

Engineer	Jerry Williams, P.E.
Email Address	jerry.williams@wv.gov
Company Name	Columbia Gas Transmission, LLC
Company ID	099-00014
Facility Name	Kenova Compressor Station
Permit Number	R13-2251E
County	Wayne
Newspaper	<i>The Herald Dispatch</i> 526-4000
Company Email and "Attention To:"	Leland Johnston lelandjohnston@cpg.com
Environmental Contact Email Address	Kelly Taylor kellytaylor@nisource.com
Regional Office (if applicable)	NA
New or Modified Source?	modified
Construction, Modification, or Relocation?	modification
Type of Facility	natural gas compressor station
"Located" or "To Be Located"?	located
Place where I can find electronic versions of your notice, engineering evaluation, and draft permit	Q:\AIR_QUALITY\J_Will\2251E

Publish Tues Sept 1 2015

~~30~~ 30 days Thurs Oct 1 2015

Email conf ad will publish 8/27

\$81.90

INTERNAL PERMITTING DOCUMENT TRACKING MANIFEST

Company Name Columbia Gas Transmission, LLC

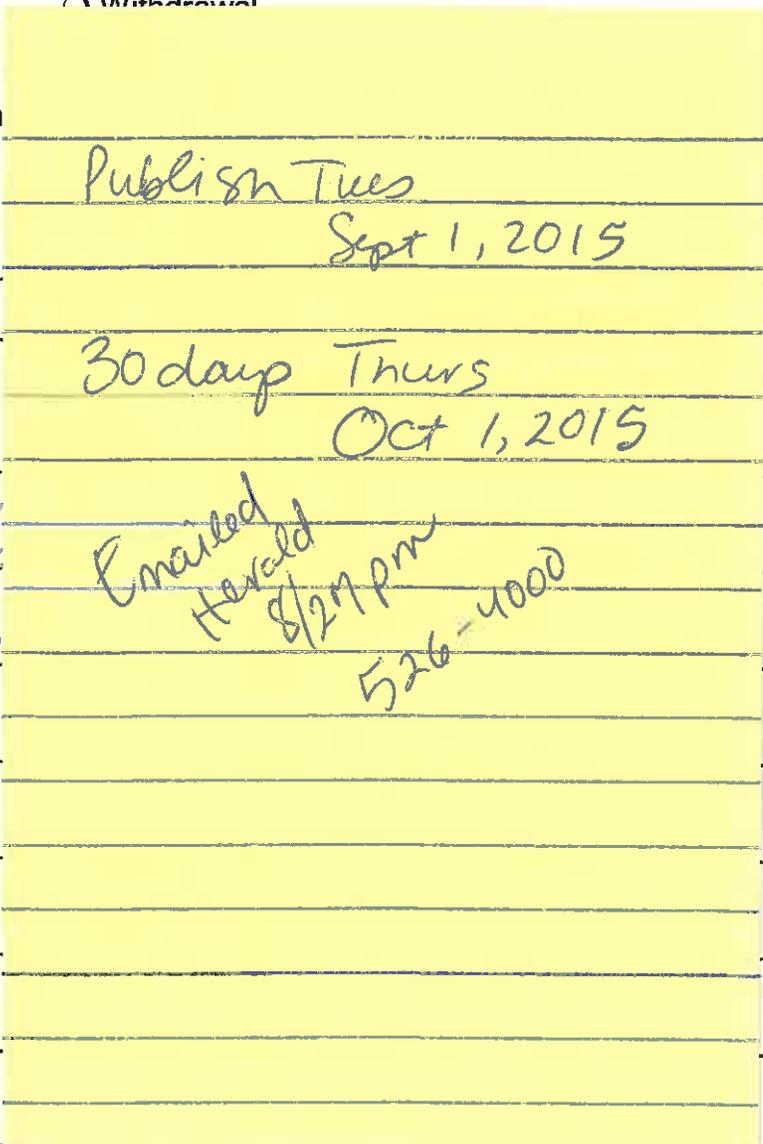
Permitting Action Number R13-2251E Total Days 52 DAQ Days 2

Permitting Action:

- Permit Determination
- General Permit
- Administrative Update
- Temporary
- Relocation
- Construction
- Modification
- PSD (Rule 14)
- NNSR (Rule 19)

Documents Attached:

- Engineering Evaluation/Memo
- Draft Permit
- Notice
- Denial
- Final Permit/General Permit Registration
- Completed Database Sheet
- Withdrawal



Date	From	
8/21/2015	Jerry 	Bev
8/27	Bev 	
8/27	Jerry	SWD

NOTE: Retain a copy of this manifest for your records when transmitting your document(s).



Permit / Application Information Sheet
Division of Environmental Protection
West Virginia Office of Air Quality

Company:	Columbia Gas Transmission, LLC	Facility:	Kenova
Region:	3	Plant ID:	099-00014
Engineer:	Williams, Jerry	Application #:	13-2251E
Physical Address:	2000 Big Sandy River Rd. Kenova WV 25530	Category:	Gas Comp
County:	Wayne	SIC: [4922] ELECTRIC, GAS AND SANITARY SERVICES - NATURAL GAS TRANSMISSION NAICS: [486210] Pipeline Transportation of Natural Gas SIC: [4925] ELECTRIC, GAS AND SANITARY SERVICES - GAS PRODUCTION/DISTRIBUTION NAICS: [221210] Natural Gas Distribution	
Other Parties:	OPER_MGR - Johnston, Leland 304-722-8628		

Information Needed for Database and AIRS
 1. Need valid physical West Virginia address with zip

Regulated Pollutants

Summary from this Permit 13-2251E		
Air Programs	Applicable Regulations	
Fee Program	Fee	Application Type
	\$1,000.00	MODIFICATION

Notes from Database

Activity Dates
 APPLICATION RECEIVED 06/30/2015
 ASSIGNED DATE 07/06/2015
 APPLICATION FEE PAID 07/06/2015

Company ID: 099-00014
 Company: Columbia Gas Transmission, LLC
 Printed: 07/06/2015
 Engineer: Williams, Jerry

NON-CONFIDENTIAL

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Engineer	Jerry Williams, P.E.
Email Address	jerry.williams@wv.gov
Company Name	Columbia Gas Transmission, LLC
Company ID	099-00014
Facility Name	Kenova Compressor Station
Permit Number	R13-2251E
County	Wayne
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New or Modified Source?	modified
Construction, Modification, or Relocation?	modification
Type of Facility	natural gas compressor station
"Located" or "To Be Located"?	located
Place where I can find electronic versions of your notice, engineering evaluation, and draft permit	Q:\AIR_QUALITY\Willi\2251E

AIR QUALITY PERMIT NOTICE

Notice of Intent to Approve

On June 30, 2015, Columbia Gas Transmission LLC applied to the WV Department of Environmental Protection, Division of Air Quality (DAQ) for a permit to modify a natural gas compressor facility located at 2000 Big Sandy River Road, Kenova, Wayne County, WV at latitude 38.371184 and longitude -82.592343. A preliminary evaluation has determined that all State and Federal air quality requirements will be met by the proposed facility. The DAQ is providing notice to the public of its preliminary determination to issue the permit as R13-2251E.

The following decrease in potential emissions will be authorized by this permit action: Carbon Monoxide, 569.95 tons per year (TPY); Volatile Organic Compounds, 1.82 TPY.

Written comments or requests for a public meeting must be received by the DAQ before 5:00 p.m. on (Day of Week, Month, Day, Year). A public meeting may be held if the Director of the DAQ determines that significant public interest has been expressed, in writing, or when the Director deems it appropriate.

The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed modification will meet all state and federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

Jerry Williams, P.E.
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Telephone: 304/926-0499, ext. 1223
FAX: 304/926-0478

Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:

www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx



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

ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.: R13-2251E
Plant ID No.: 099-00014
Applicant: Columbia Gas Transmission, LLC (Columbia)
Facility Name: Kenova Compressor Station
Location: Kenova, Wayne County
NAICS Code: 486210 (Pipeline Transportation of Natural Gas)
Application Type: Modification
Received Date: June 30, 2015
Engineer Assigned: Jerry Williams, P.E.
Fee Amount: \$3,500.00
Date Received: \$1,000 (June 30, 2015), \$2500 (August 19, 2015)
Complete Date: August 19, 2015
Due Date: November 17, 2015
Applicant Ad Date: July 3, 2015
Newspaper: *The Herald Dispatch*
UTM's: Easting: 360.9 km Northing: 4,248.2km Zone: 17
Lat/Long: 38.371184, -82.592343
Description: This permit action includes the previously installed non selective catalytic reduction (NSCR) control devices on engines E05 – E08 and recognition that this facility is not a major source of HAPs in regards to 40CFR63 Subpart DDDDD due to the separate surface site exclusion. Therefore, all 40CFR63 Subpart DDDDD requirements have been removed from the permit. Additionally, the emergency generator (G3) is subject to 40CFR63 Subpart ZZZZ requirements and these have been added.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emission reductions associated with this modification application are the result of the previously installed NSCR control devices on engines E05 – E08.

The following table indicates the existing potential to emit (PTE) from the natural gas transmission facility, emissions decrease to account for the NSCR control devices installed on engines E05 – E08, and the new facility PTE in tons/year (tpy):

Pollutant	Current Transmission Facility PTE (tpy)	Emissions Decrease from NSCR (tpy)	New Facility PTE (tpy)
Carbon Monoxide	802.35	569.95	232.40
Nitrogen Oxides	1,341.62	0	1,341.62
Particulate Matter-10	18.45	0	18.45
Sulfur Dioxide	0.38	0	0.38
Volatile Organic Compounds	41.76	1.82	39.94
Greenhouse Gas (CO ₂ e)	62,527	0	62,527
Formaldehyde	9.46	0	9.46
Total HAPs	19.14	0	19.14

REGULATORY APPLICABILITY

The following rules apply to this modification:

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 is subject to a substantive requirement of an emission control rule promulgated by the Secretary (40CFR63 Subpart ZZZZ).

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

45CSR30 (Requirements for Operating Permits)

Columbia is subject to 45CSR30. The Kenova Compressor Station has the potential to emit over 100 tons per year of criteria pollutant, Columbia is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Columbia is required to pay the appropriate annual fees and submit an annual Certified Emissions Statement.

major sources, even when emission points are in a contiguous area or under common control;

- (2) Emissions from processes, operations, or equipment that are not part of the same facility, as defined in this section, shall not be aggregated; and
- (3) For facilities that are production field facilities, only HAP emissions from glycol dehydration units and storage vessels with the potential for flash emissions shall be aggregated for a major source determination. For facilities that are not production field facilities, HAP emissions from all HAP emission units shall be aggregated for a major source determination.

The Kenova Compressor Station is not a major source of HAPs in regards to 40CFR63 Subpart DDDD therefore this rule does not apply.

This facility has been incorrectly designated as a major source of HAP emissions in recent permitting actions issued by the DAQ (including their most recent Title V permit). As a result, these boiler requirements were listed in the March 25, 2014 permitting action (R13-2251D). Columbia has submitted the proper documentation which shows that this facility is not a major source of HAP emissions (specifically formaldehyde). Therefore, this language will be removed from the permit.

On July 8, 2005 Columbia submitted a permit determination detailing the MACT applicability (40CFR63 Subpart ZZZZ) surrounding this facility. A complete technical background of this determination can be found in Permit Determination PD05-097, in which the DAQ agreed with this HAP non-major determination in regards to 40FR63 Subpart ZZZZ.

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.

- 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 Kenova Compressor Station commenced construction, modification, or reconstruction before August 23, 2011. 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

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.

The first step is to determine whether or not the proposed project results in a significant emissions increase utilizing the Actual-to-Potential test. There are no emissions increases associated with this permitting action.

Final Conclusion

Because there was not an emissions increase above the PSD SER, PSD review is not required.

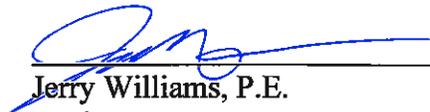
MONITORING OF OPERATIONS FOR PROPOSED MODIFICATION

Columbia will be required to perform the following monitoring and recordkeeping associated with this application:

1. Monitor and record quantity of natural gas consumed for engines E05 – E08 and emergency generator G3.
2. Monitor all applicable requirements of 40CFR63 Subpart ZZZZ.
3. Maintain records of testing conducted in accordance with the permit.
4. Maintain the corresponding records specified by the on-going monitoring requirements of and testing requirements of the permit.
5. 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.
6. Maintain records of all applicable requirements of 40CFR63 Subpart ZZZZ.
7. 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.

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 Kenova Compressor Station should be granted a 45CSR13 modification permit for their facility.



Jerry Williams, P.E.
Engineer

AUG 21, 2015

Date

West Virginia Department of Environmental Protection
Earl Ray Tomblin
Governor

Division of Air Quality

Randy C. Huffman
Cabinet Secretary

Permit to Modify



R13-2251E

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

Columbia Gas Transmission, LLC
Kenova Compressor Station
099-00014

William F. Durham
Deputy Director

Issued: Draft

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1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
02001	E01	Cooper-Bessemer GMWA-8 2SLB RICE	1959	2,000 HP	None
02002	E02	Cooper-Bessemer GMWA-8 2SLB RICE	1959	2,000 HP	None
02003	E03	Cooper-Bessemer GMWA-8 2SLB RICE	1959	2,000 HP	None
02004	E04	Cooper-Bessemer GMWA-8 2SLB RICE	1959	2,000 HP	None
02005	E05	Ingersoll-Rand 410 KVG-1 4SRB RICE	1959	1,100 HP	NSCR
02006	E06	Ingersoll-Rand 410 KVG-1 4SRB RICE	1959	1,100 HP	NSCR
02007	E07	Ingersoll-Rand 410 KVG-1 4SRB RICE	1959	1,100 HP	NSCR
02008	E08	Ingersoll-Rand 410 KVG-1 4SRB RICE	1959	1,100 HP	NSCR
HTR-1	H1	Line Heater	1963	1.5 MMBTU/hr	None
A24	FL1	Mercaptan Storage Tank	1998	1,000 gallon	Vapor Recovery
020G3	G3	Waukesha VGF-H24GL 4SLB Emergency Generator	2003	500 HP	None
BLR2	BL2	Natural Gas Fired Boiler Hurst S-4-G-150-15	2013	6.3 MMBtu/hr	None

1.1. Control Devices

Emission Unit	Pollutant	Control Device	Control Efficiency
1,100 HP Ingersoll-Rand 410 KVG-1 4SRB RICE w/NSCR (E05-E08)	Carbon Monoxide	NSCR	75 %
	Volatile Organic Compounds		30 %

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Act W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*
- 2.3.2. 45CSR14 – *Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration;*

2.4. Term and Renewal

- 2.4.1. This permit supersedes and replaces previously issued Permit R13-2251D. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2251, R13-2251A, R13-2251B, R13-2251C, R13-2251D, R13-2251E and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 10.3.]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1] *[State Enforceable Only]*
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling

information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

[45CSR§4. *State Enforceable Only.*]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street
Charleston, WV 25304-2345

If to the US EPA:

Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. Operating Fee

- 3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

- a. The date, place as defined in this permit, and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

4.1.2. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.

[45CSR§13-5.11.]

4.1.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.1.4. The permittee shall install, maintain, and operate all above-ground piping, valves, pumps, etc. that service lines in the transport of potential sources of regulated air pollutants to minimize any fugitive escape of regulated air pollutants (leak). Any above-ground piping, valves, pumps, etc. that shows signs of excess wear and that have a reasonable potential for fugitive emissions of regulated air pollutants shall be replaced.

4.1.5. The permittee shall monitor and maintain quarterly records (calendar year) for each facility component that was inspected for fugitive escape of regulated air pollutants. Each component shall operate with no detectable emissions, as determined using audio-visual-olfactory (AVO) inspections, USEPA 40CFR60 Method 21, USEPA alternative work practice to detect leaks from equipment using optical gas imaging (OGI) camera (ex. FLIR camera), or some combination thereof. AVO inspections shall include, but not limited to, defects as visible cracks, holes, or gaps in piping; loose connections; liquid leaks; or broken or missing caps or other closure devices. If permittee uses USEPA Method 21, then no detectable emissions is defined as less than 500 ppm in

5.0. Source-Specific Requirements (Engines (E05-E08), Generator (G3))

5.1. Limitations and Standards

- 5.1.1. Maximum emissions from each of the 1,100 hp natural gas fired reciprocating engines equipped with NSCR, Ingersol-Rand 410-KVG, 4SRB (E05-E08) equipped with NSCR shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
Nitrogen Oxides	28.35	112.87
Carbon Monoxide	11.93	47.50
Volatile Organic Compounds	0.27	1.06
Formaldehyde	0.09	0.36

- 5.1.2. **Maximum Yearly Operation Limitation.** The maximum yearly hours of operation for the 500 hp natural gas fired emergency generator, Waukesha VGF24GL (G3) shall not exceed 500 hours per year. Compliance with the Maximum Yearly Operation Limitation shall be determined using a twelve month rolling total. A twelve month rolling total shall mean the sum of the hours of operation at any given time during the previous twelve consecutive calendar months.

- 5.1.3. Maximum emissions from the 500 hp natural gas fired emergency generator, Waukesha VGF24GL (G3) shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
Nitrogen Oxides	1.27	0.29
Carbon Monoxide	1.57	0.36
Volatile Organic Compounds	0.91	0.21
Formaldehyde	0.28	0.06

- 5.1.4. Requirements for Use of Catalytic Reduction Devices (NSCR for E05-E08)

- a. Rich-burn natural gas compressor engines (E05-E08) equipped with non-selective catalytic reduction (NSCR) air pollution control device shall be fitted with a closed-loop, automatic air/fuel ratio controller to ensure emissions of regulated pollutants do not exceed the potential to emit for any engine/NSCR combination under varying load. The closed-loop, automatic air/fuel ratio controller shall control a fuel metering valve to deliver additional fuel when required to ensure a fuel-rich mixture and a resultant exhaust oxygen content of less than or equal to 0.5%. The automatic air/fuel ratio controller shall also incorporate dual-point exhaust gas temperature and oxygen sensors which provide temperature and exhaust oxygen content differential feedback. Such controls shall ensure proper and efficient operation of the engine and NSCR air pollution control device;
- b. The automatic air/fuel ratio controller or closed-loop automatic feedback controller shall provide a warning or indication to the operator and/or be interlocked with the engine ignition system to cease engine operation in case of a masking, poisoning or overrich air/fuel ratio situation which results in performance degradation or failure of the catalyst element; and

6.0. Source-Specific Requirements (40CFR63 Subpart ZZZZ Requirements, Reciprocating Compressor Engines (E05-E08, G3))

6.1. Limitations and Standards

- 6.1.1. The permittee must comply with the applicable operating limitations in this section no later than October 19, 2013.
[40 C.F.R. § 63.6595(a)(1)] (E05-E08, G3)
- 6.1.2. If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this subpart and the operating limitations in Table 2b to this subpart that apply to you.
[40 C.F.R. § 63.6603(a)] (E05-E08, G3)
- 6.1.3. An existing non-emergency SI 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at area sources of HAP must meet the definition of remote stationary RICE in §63.6675 on the initial compliance date for the engine, October 19, 2013, in order to be considered a remote stationary RICE under this subpart. Owners and operators of existing non-emergency SI 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at area sources of HAP that meet the definition of remote stationary RICE in §63.6675 of this subpart as of October 19, 2013 must evaluate the status of their stationary RICE every 12 months. Owners and operators must keep records of the initial and annual evaluation of the status of the engine. If the evaluation indicates that the stationary RICE no longer meets the definition of remote stationary RICE in §63.6675 of this subpart, the owner or operator must comply with all of the requirements for existing non-emergency SI 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at area sources of HAP that are not remote stationary RICE within 1 year of the evaluation.
[40 C.F.R. § 63.6603(f)] (E05-E08)

6.2. Monitoring, Installation, Collection, Operation, and Maintenance Requirements

- 6.2.1. If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:
- (3) An existing emergency or black start stationary RICE located at an area source of HAP emissions (G3)
 - (9) An existing, non-emergency, non-black start 4SLB stationary RICE with a site rating greater than 500 HP located at an area source of HAP emissions that is operated 24 hours or less per calendar year (E05, E08)
[40 C.F.R. § 63.6625(e)] (E05-E08, G3)
- 6.2.2. If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.
[40 C.F.R. § 63.6625(f)] (G3)
- 6.2.3. If you operate a new, reconstructed, or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the

- (5) You must measure O₂ using one of the O₂ measurement methods specified in Table 4 of this subpart. Measurements to determine O₂ concentration must be made at the same time as the measurements for CO or THC concentration.
- (6) If you are demonstrating compliance with the CO or THC percent reduction requirement, you must measure CO or THC emissions and O₂ emissions simultaneously at the inlet and outlet of the control device.
[40 C.F.R. § 63.6630(e)] (E05-E08)

6.4. Continuous Compliance

- 6.4.1. You must be in compliance with the emission limitations, operating limitations, and other requirements in this subpart that apply to you at all times.
[40 C.F.R. § 63.6605(a)] (E05-E08 G3)
- 6.4.2. At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
[40 C.F.R. § 63.6605(b)] (E05-E08, G3)
- 6.4.3. If you must comply with emission and operating limitations, you must monitor and collect data according to this section.
[40 C.F.R. § 63.6635(a)] (E05-E08)
- 6.4.4. Except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, you must monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
[40 C.F.R. § 63.6635(b)] (E05-E08)
- 6.4.5. You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. You must, however, use all the valid data collected during all other periods.
[40 C.F.R. § 63.6635(c)] (E05-E08)
- 6.4.6. You must demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.
[40 C.F.R. § 63.6640(a)] (E05-E08, G3)
- 6.4.7. You must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.
[40 C.F.R. § 63.6640(b)] (E05-E08)

brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart, except for the initial notification requirements: a new or reconstructed stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new or reconstructed emergency stationary RICE, or a new or reconstructed limited use stationary RICE.

[40 C.F.R. § 63.6640(e)] (E05-E08, G3)

- 6.4.11. If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in nonemergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

[40 C.F.R. § 63.6640(f)] (G3)

6.5. Notification Requirements

- 6.5.1. You must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to you by the dates specified if you own or operate any of the following;

(2) An existing stationary RICE located at an area source of HAP emissions.

[40 C.F.R. § 63.6645(a)] (E05-E08)

- 6.5.2. If you are required to conduct a performance test or other initial compliance demonstration as specified in Tables 4 and 5 to this subpart, you must submit a Notification of Compliance Status according to §63.9(h)(2)(ii).

(1) For each initial compliance demonstration required in Table 5 to this subpart that does not include a performance test, you must submit the Notification of Compliance Status before the close of business on the 30th day following the completion of the initial compliance demonstration.

(2) For each initial compliance demonstration required in Table 5 to this subpart that includes a performance test conducted according to the requirements in Table 3 to this subpart, you must submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th day following the completion of the performance test according to §63.10(d)(2).

[40 C.F.R. § 63.6645(h)] (E05-E08)

6.6. Recordkeeping Requirements

- 6.6.1. If you must comply with the emission and operating limitations, you must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv).

(2) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.

(3) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii).

- (4) For semiannual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 - (5) For each stationary RICE that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), you may submit the first and subsequent Compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (b)(4) of this section.
 - (6) For annual Compliance reports, the first Compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.6595 and ending on December 31.
 - (7) For annual Compliance reports, the first Compliance report must be postmarked or delivered no later than January 31 following the end of the first calendar year after the compliance date that is specified for your affected source in §63.6595.
 - (8) For annual Compliance reports, each subsequent Compliance report must cover the annual reporting period from January 1 through December 31.
 - (9) For annual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than January 31.
[40 C.F.R. § 63.6650(b)] (E05-E08)
- 6.7.3. The Compliance report must contain the information in paragraphs (c)(1) through (6) of this section.
- (1) Company name and address.
 - (2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - (3) Date of report and beginning and ending dates of the reporting period.
 - (4) If you had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction.
 - (5) If there are no deviations from any emission or operating limitations that apply to you, a statement that there were no deviations from the emission or operating limitations during the reporting period.
 - (6) If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.
[40 C.F.R. § 63.6650(c)] (E05-E08)
- 6.7.4. For each deviation from an emission or operating limitation that occurs for a stationary RICE where you are not using a CMS to comply with the emission or operating limitations in this subpart, the Compliance report must contain the information in paragraphs (c)(1) through (4) of this section and the information in paragraphs (d)(1) and (2) of this section.

[40 C.F.R. § 63.6650(f)] (E05-E08)

- 6.7.7. If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.
[40 C.F.R. § 63.6650(footnote 2 of Table 2d)] (G3)

7.0. Source-Specific Requirements (Mercaptan Storage Tank (A24))

7.1. Limitations and Standards

- 7.1.1. The permittee shall operate a vapor recovery system at all times when conducting filling operations of Tank A24 to control the release compounds known to cause objectionable odors.
[45 CSR §4-3.1]

8.0. Source-Specific Requirements (Boiler (BL2))

8.1. Limitations and Standards

- 8.1.1. The maximum design heat input of boiler BL2 shall be 6.3 MMBTU/hr.
- 8.1.2. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average **[45CSR§2-3.1.]**

8.2. Monitoring Requirements

- 8.2.1. At such reasonable times as the Secretary may designate, the permittee shall conduct Method 9 emission observations for the purpose of demonstrating compliance with section 8.1.2. Method 9 shall be conducted in accordance with 40 CFR 60 Appendix A.

8.3. Testing Requirements

- 8.3.1. Upon request by the Secretary, compliance with the visible emission requirements of section 8.1.2 shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 or by using measurements from continuous opacity monitoring systems approved by the Secretary. The Secretary may require the installation, calibration, maintenance and operation of continuous opacity monitoring systems and may establish policies for the evaluation of continuous opacity monitoring results and the determination of compliance with the visible emission requirements of section 8.1.2. Continuous opacity monitors shall not be required on fuel burning units which employ wet scrubbing systems for emission control.
[45CSR§2-3.2.]

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹

(please use blue ink)

Responsible Official or Authorized Representative

Date

Name & Title

(please print or type)

Name

Title

Telephone No. _____

Fax No. _____

¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either
 - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.



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

August 20, 2015

Columbia Gas Transmission, LLC
Leland Johnston
1700 MacCorkle Avenue SE
Charleston, WV 25314

RE: Application Status: Complete
Columbia Gas Transmission, LLC
Kenova Compressor Station
Permit Application R13-2251E
Plant ID No. 099-00014

Dear Mr. Johnston:

Your application for a modification permit for a natural gas compressor station was received by this Division on June 30, 2015 and assigned to the writer for review. Upon review of said application, it was determined that the application was incomplete as submitted and additional information was requested. The requested information was received on August 19, 2015, therefore, the statutory review period commenced on August 19, 2015.

Since this application involves unique or technically complex issues, the agency believes it may require the full 90-day time period to make a final permit determination.

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact me at (304) 926-0499 ext. 1223.

099-00014
R13-2251E
Company Columbia Gas
Facility Kenova Initials JW

Sincerely,

Jerry Williams, P.E.
Engineer

NON-CONFIDENTIAL

c: Kelly Taylor

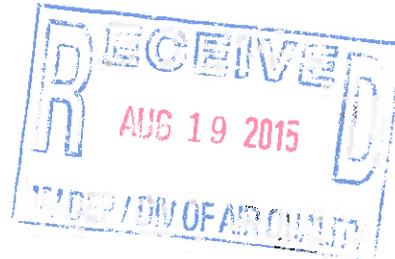


Kelly D. Taylor
Environmental Policy & Permitting
Environmental Safety & Sustainability Coordinator
1700 MacCorkle Avenue SE
Charleston, West Virginia 25314
Phone: 304-357-2047
Fax: 304-357-2770
kellytaylor@cpg.com

August 18, 2015

Mr. Jerry Williams, Engineer
WVDEP - Division of Air Quality
601 57th Street SE
Charleston, West Virginia 25304

*Jerry,
I've forwarded CK
to AR -- updated
AirTrax w/ additional
payment info. S*



RE: Permit Application R13-2251E (Revision to Title V)
Columbia Gas Transmission, LLC
Kenova Compressor Station (Facility ID # 099-00014)

Dear Mr. Williams,

Pursuant to your July 28, 2015 letter; please find the attached application check fee in the amount of \$2500.00.

This should complete the application package submitted on June 30, 2015.

Should you have any questions or need additional information, please feel free to contact me at (304) 357-2047 or via email at kellytaylor@cpg.com.

Sincerely,

Kelly D. Taylor
Kelly D. Taylor
Environmental Safety & Sustainability Coordinator

ID # 099-00014
Reg R13-2251E
Company COLUMBIA GAS
KENOVA Initials dw

Attachments

NON-CONFIDENTIAL



west virginia department of environmental protection

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

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

July 28, 2015

Columbia Gas Transmission, LLC
Leland Johnston
1700 MacCorkle Avenue SE
Charleston, WV 25314

RE: Application Status: Incomplete
Columbia Gas Transmission, LLC
Kenova Compressor Station
Permit Application R13-2251E
Plant ID No. 099-00014

Dear Mr. Johnston:

Your application for a modification permit for a natural gas compressor station was received by this Division on June 30, 2015 and assigned to the writer for review. Upon initial review of said application, it has been determined that the application as submitted is incomplete based on the following items:

1. Please provide an explanation behind not submitting a \$2500 NESHAP fee with the permit application.

Please address the above deficiencies in writing within fifteen (15) days of the receipt of this letter. Application review will not commence until the application has been deemed to be technically complete. Failure to respond to this request in a timely manner may result in the denial of the application. Should you have any questions, please contact me at (304) 926-0499 ext. 1223.

ID # 099-00014
Reg R13-2251E
Company COLUMBIA GAS
Facility Kenova Initials dw

Sincerely,

Jerry Williams, P.E.
Engineer

c: Kelly Taylor

NON-CONFIDENTIAL

Williams, Jerry

From: Ehrhardt, Jennifer <Jennifer.Ehrhardt@aecom.com>
Sent: Friday, July 17, 2015 9:40 AM
To: Williams, Jerry
Cc: kellytaylor@cpq.com
Subject: RE: Kenova Compressor Station
Attachments: AGES(GeorgeTimko) - Emissions Guarantee(16-1345-R5 Kenova) - Oct. 14, 2010.pdf

Jerry,

Attached is the emissions guarantee for the NSCRs at Kenova.

Yes, Columbia would like the updated NESHAP ZZZZ requirements included in the permit to help ensure continuous compliance with all regulatory requirements. Thanks!

Jennifer Ehrhardt
Air Quality Engineer II
AECOM Environment
D 215-315-4319
Jennifer.Ehrhardt@aecom.com

AECOM
125 Rock Road
Horsham, PA 19044
T 215-315-4150 F 215-315-4151
www.aecom.com

From: Williams, Jerry [<mailto:Jerry.Williams@wv.gov>]
Sent: Thursday, July 16, 2015 7:16 AM
To: Ehrhardt, Jennifer
Cc: kellytaylor@cpq.com
Subject: RE: Kenova Compressor Station

Jennifer,

Thanks for the response. The application is very misleading in that there is no mention of the NSCR or 5D issue in the cover letter or modification description. Please submit a manufacturer's data sheet for the NSCR units to substantiate the emissions control reduction claimed in the permit application.

Is your goal to have the regulatory requirements for 40CFR63 Subpart ZZZZ and any associated engine and NSCR requirements added to your permit?

Thanks,
Jerry

Jerry Williams, P.E.
Engineer
WVDEP – Division of Air Quality

ID # 099-00014
Reg R13-2251E
Company COLUMBIA GAS
Facility KENOVA Initials JW

From: kellytaylor@cpg.com [mailto:kellytaylor@cpg.com]

Sent: Friday, July 10, 2015 2:55 PM

To: Williams, Jerry; Ehrhardt, Jennifer

Subject: Re: Kenova Compressor Station

Jennifer,

My visit to Loudoun took longer than expected. can you contact Jerry Williams regarding questions he has on the Kenova modification?

Kelly Taylor
Columbia Pipeline Group
Environmental
Kellytaylor@cpg.com

On Jul 9, 2015, at 7:11 AM, Williams, Jerry <Jerry.Williams@wv.gov> wrote:

Kelly,

Yes. That is fine.

Thanks,
Jerry

From: kellytaylor@cpg.com [mailto:kellytaylor@cpg.com]

Sent: Thursday, July 09, 2015 7:10 AM

To: Williams, Jerry

Subject: Re: Kenova Compressor Station

Sorry Jerry, I forgot to change my mail message. I'm up in Virginia doing a station audit. Can I call you tomorrow? Your office should be receiving the affidavit of publication soon if you haven't already.

Kelly Taylor
Columbia Pipeline Group
Environmental
Kellytaylor@cpg.com

On Jul 9, 2015, at 7:07 AM, Williams, Jerry <Jerry.Williams@wv.gov> wrote:

Kelly,

I left you a phone message on Tuesday July 7 to discuss the Kenova Compressor Station R13 application. Please call me when you get a chance.

Thanks,
Jerry

Jerry Williams, P.E.
Engineer
WVDEP – Division of Air Quality
601 57th Street, SE



DCL International Inc.

Mailing address: P.O. Box 90, Concord, Ontario, Canada, L4K 1B2
Toll free: 1-800-872-1968 Phone: 905-660-6450 Fax: 905-660-6435 E-mail: info@dcl-inc.com

To	George Timko
	AGES
Date	October 14, 2010

Telephone	
Facsimile	
Email	
No of Pages	1

RE: EMISSIONS GUARANTEE FOR COLUMBIA GAS – KENOVA STATION

George,

We hereby guarantee that our QUICK-LID™ Model DC76-16 catalytic converter described below:

Catalyst model	DC76
Catalyst coating	3-way
Outside Diameter of catalyst substrate	34.2"
No. of catalyst substrates	1
Cell Density	300 cpsi

and sized for the following engine:

Engine model	IR KVG 410
Power	1100 hp @ 330 rpm
Fuel	Pipeline Quality Natural Gas

will perform as follows:

Emissions	% Reduction
Formaldehyde (CH ₂ O)	90
Nitrogen Oxides (NO _x)	90
Carbon Monoxide (CO)	85
Volatile Organic Compounds (VOCs)	65

for a period of 1 year or 8000 hours, whichever comes first, subject to all terms and conditions contained in the attached warranty document being respected and met.

Best regards,
DCL International, Inc.

Tawnya VanGroningen
Account Manager
North American Industrial Catalyst Division

Quote#16-1345-R5

Williams, Jerry

From: Williams, Jerry
Sent: Thursday, July 16, 2015 7:16 AM
To: 'Ehrhardt, Jennifer'
Cc: kellytaylor@cpq.com
Subject: RE: Kenova Compressor Station

Jennifer,

Thanks for the response. The application is very misleading in that there is no mention of the NSCR or 5D issue in the cover letter or modification description. Please submit a manufacturer's data sheet for the NSCR units to substantiate the emissions control reduction claimed in the permit application.

Is your goal to have the regulatory requirements for 40CFR63 Subpart ZZZZ and any associated engine and NSCR requirements added to your permit?

Thanks,
Jerry

Jerry Williams, P.E.
Engineer
WVDEP – Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
(304) 926-0499 ext. 1223
jerry.williams@wv.gov



Please consider the environment before printing this email.

NON-CONFIDENTIAL

From: Ehrhardt, Jennifer [<mailto:Jennifer.Ehrhardt@aecm.com>]
Sent: Wednesday, July 15, 2015 3:21 PM
To: Williams, Jerry
Cc: kellytaylor@cpq.com
Subject: RE: Kenova Compressor Station

Jerry,

ID # 099-00014
Reg R13-2251E
Company COLUMBIA GAS
Facility KENOVA Initials JW

Since we've had some trouble connecting via telephone, I will try to answer the questions you posed to Kelly Taylor. She communicated the following questions to me, which I have answered below.

1. If there are no changes to the units why is there a decrease in emissions in the public notice?

From: kellytaylor@cpq.com [mailto:kellytaylor@cpq.com]

Sent: Thursday, July 09, 2015 7:10 AM

To: Williams, Jerry

Subject: Re: Kenova Compressor Station

Sorry Jerry, I forgot to change my mail message. I'm up in Virginia doing a station audit. Can I call you tomorrow? Your office should be receiving the affidavit of publication soon if you haven't already.

Kelly Taylor
Columbia Pipeline Group
Environmental
kellytaylor@cpq.com

On Jul 9, 2015, at 7:07 AM, Williams, Jerry <Jerry.Williams@wv.gov> wrote:

Kelly,

I left you a phone message on Tuesday July 7 to discuss the Kenova Compressor Station R13 application. Please call me when you get a chance.

Thanks,
Jerry

Jerry Williams, P.E.
Engineer
WVDEP – Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
(304) 926-0499 ext. 1223
jerry.williams@wv.gov

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 Please consider the environment before printing this email.

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This e-mail and any attachments contain AECOM confidential information that may be proprietary or privileged. If you receive this message in error or are not the intended recipient, you should not retain, distribute, disclose or use any of this information and you should destroy the e-mail and any attachments or copies.

Williams, Jerry

From: Ehrhardt, Jennifer <Jennifer.Ehrhardt@aecom.com>
Sent: Wednesday, July 15, 2015 3:21 PM
To: Williams, Jerry
Cc: kellytaylor@cpq.com
Subject: RE: Kenova Compressor Station

Jerry,

Since we've had some trouble connecting via telephone, I will try to answer the questions you posed to Kelly Taylor. She communicated the following questions to me, which I have answered below.

1. If there are no changes to the units why is there a decrease in emissions in the public notice?
 - a. Based on the updated Subpart ZZZZ requirements, engines E05-E08 require NSCR. The decrease in emissions is based on the previously-installed NSCR being included in the permit for these units. Attachment M in the application provides details on the NSCR devices.
2. What needs to be changed in the R13 permit?
 - a. Although the engines are the main units affected by the area HAP source designation, the modification also affects the boiler. The R13 permit for Kenova currently includes Subpart DDDDD requirements for boiler BL2. Because the Station is a minor source (and should have always been categorized as a minor source), Subpart DDDDD does not apply to this boiler. These requirements should be removed from the R13 permit. Additionally, the emergency generator listed in the R13 permit is subject to Subpart ZZZZ as specified in Attachment D-1 page D-5 of the permit application.

If you have any further questions, please let me know.

Jennifer Ehrhardt
Air Quality Engineer II
AECOM Environment
D 215-315-4319
Jennifer.Ehrhardt@aecom.com

AECOM
125 Rock Road
Horsham, PA 19044
T 215-315-4150 F 215-315-4151
www.aecom.com

NON-CONFIDENTIAL

From: kellytaylor@cpq.com [mailto:kellytaylor@cpq.com]
Sent: Friday, July 10, 2015 2:55 PM
To: Williams, Jerry; Ehrhardt, Jennifer
Subject: Re: Kenova Compressor Station

Jennifer,

My visit to Loudoun took longer than expected. can you contact Jerry Williams regarding questions he has on the Kenova modification?

ID # 099-0018
log R13-2251E
Company COLUMBIA GAS
Utility KENOVA Initials JL

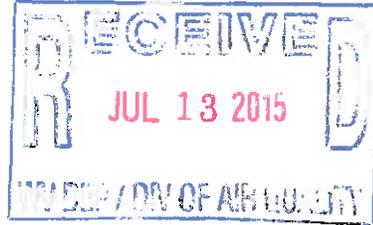


AECOM
125 Rock Road
Horsham, PA 19044

215.315.4150 tel
215.315.4151 fax

Jenny
13-2251E

July 8, 2015



Mr. William F. Durham, Director
West Virginia DEP – Division of Air Quality
601 57th Street SE
Charleston, WV 25304

**RE: Minor Modification Application (Revision to Title V)
Columbia Gas Transmission, LLC
Kenova Compressor Station (Facility ID#099-00014)**

Dear Mr. Durham:

On behalf of Columbia Gas Transmission, LLC, AECOM hereby submits the Affidavit of Publication for Attachment P of the permit application submitted on June 30, 2015 for the Kenova Compressor Station, located in Wayne County, West Virginia. The legal advertisement was published on July 3, 2015.

Should you have any questions regarding this application, please contact Kelly Taylor of the Columbia Pipeline Group at 304-357-2047 or via email at kellytaylor@cpg.com.

Sincerely,

Jennifer Ehrhardt
Air Quality Engineer II
jennifer.ehrhardt@aecom.com

NON-CONFIDENTIAL

099-00014
13-2251E
Company Columbia Gas
Initials JE

AFFIDAVIT OF PUBLICATION

AIR QUALITY PERMIT NOTICE
Notice of Application

Notice is given that Columbia Gas Transmission LLC has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Permit Modification for its existing natural gas compression station located on Route 1, Kenova, in Wayne County, West Virginia. The latitude and longitude coordinates are: 38° 22' 15.34" N and 82° 35' 32.07" W.

There will be a reduction in carbon monoxide (CO) and volatile organic compound (VOC) emissions due to this modification; potential to discharge the following Regulated Air Pollutants will be: CO at 232.4 tons per year, Nitrogen Oxides at 1,341.6 tons per year, PM10 and PM2.5 at 18.5 tons per year, Sulfur Dioxide at 0.38 tons per year, VOC at 39.9 tons per year, Carbon Dioxide Equivalents (CO2e) at 62,527 tons per year, and Formaldehyde at 9.5 tons per year.

Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours.

Dated this the 30th day of June, 2015.

By: Columbia Gas Transmission LLC
Leland Johnston
Manager of Operations
485 Industrial Road
St. Albans, WV
25177-1831

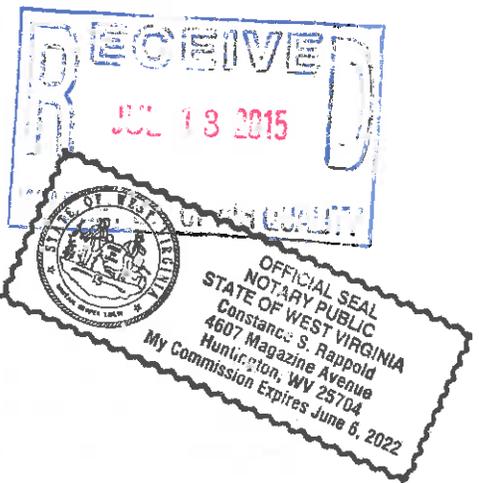
LH-33706
7-3; 2015

Linda Loopy being duly sworn, depose and say that I am Legal Clerk for Herald-Dispatch, HD Media Co., LLC, who publishes at Huntington, Cabell County, West Virginia, the newspaper The Herald-Dispatch, an Independent newspaper, the morning seven days a week, Monday through Sunday including New Year's Day, Memorial Day, the Fourth of July, Day, Thanksgiving and Christmas; that I have been duly authorized by the Board of Directors of the corporation and the newspaper mentioned herein; that the legal advertisement attached in the margin of this affidavit and made a part herof and bearing number 33706 was duly published in The Herald-Dispatch once a week for 1 successive weeks, commencing with its issue of 07/03/2015 and ending with the issue of 07/03/2015, that said legal advertisement was published on the following dates: 07/03/2015 that the cost of publishing said annexed advertisement as aforesaid was \$57.40; that such newspaper in which such legal advertisement was published has been and is published regularly, at least as frequently as once a week for at least fifty weeks during the calendar year as prescribed by its mailing permit and has been so published in the municipality of Huntington, Cabell County, West Virginia, for at least one year immediately preceding the date on which the legal advertisement set forth herein was delivered to such newspaper for publication; that such newspaper is a newspaper of "general circulation" as defined in article 3, chapter 59, of the West Virginia Code within the publication area or areas of the municipality of Huntington, Cabell, Putnam and Wayne Counties, West Virginia, and that such newspaper is circulated to the general public at a definite price or consideration; that such newspaper on each date published consists of not less than 4 pages without a cover; and that it is a newspaper to which the general public resorts for passing news of a political, religious, commercial and social nature, and for current happenings, announcements, miscellaneous reading matter, advertisements and other notices.

I, Linda Loopy, am, subscribed and sworn to before me in my said county this day: 07/03/2015

commission expires June 6, 2022
Constance S. Rappold
Notary Public
Cabell County, West Virginia

Linda Loopy



Williams, Jerry

From: Null, Gregory L
Sent: Tuesday, July 07, 2015 10:33 AM
To: Williams, Jerry
Subject: Columbia Gas Transmission LLC Kenova/Permit Applicaiton Fee

This is the receipt for payment received from:

Columbia Gas Transmission LLC, check# 0351138609, dated 6/10/15, \$1,000
Columbia Gas Transmission LLC Kenova, R13-2251E, id no 099-00014

OASIS Deposit CR 1600001881 July 7, 2015

ID # 099-00014
Reg R13-2251E
Company COLUMBIA GAS
Facility Kenova Initials lw

Williams, Jerry

From: Adkins, Sandra K
Sent: Monday, July 06, 2015 3:05 PM
To: lelandjohnston@cpg.com
Cc: Williams, Jerry; McKeone, Beverly D
Subject: WV DAQ Permit Application Status for Columbia Gas Transmission LLC; Kenova

**RE: Application Status
Columbia Gas Transmission, LLC
Kenova Facility
Plant ID No. 099-00014
Application No. R13-2251E**

Mr. Johnston,

Your application for a modification permit for the Kenova facility was received by this Division on June 30, 2015, and was assigned to Jerry Williams. The following item was not included in the initial application submittal:

Original affidavit for Class I legal advertisement not submitted.

This item is necessary for the assigned permit writer to continue the 30-day completeness review.

Within 30 days, you should receive a letter from Jerry Williams stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

Should you have any questions, please contact the assigned engineer, Jerry Williams, at 304-926-0499, extension 1223.

ID # 099-00014
Reg R13-2251E
Company COLUMBIA GAS
Facility KENOVA Initials dw

*Title
Attachment 5*

*099-00014 Modification
R13-2251E Jerry*

45CSR13 Administrative Update, Construction, Modification, Relocation, Temporary Permit or General Permit Registration Incomplete Application

A complete application is demonstrated when all of the information required below is properly prepared, completed and attached. The items listed below are required information which must be submitted with a 45CSR13 permit application. Any submittal will be considered incomplete if the required information is not included. The applicant must submit a complete application in order to receive a 45CSR13 permit.

Class I legal advertisement not published in a newspaper certified to accept legal advertisements and original affidavit submitted.

- Application fee AND/OR additional application fees not included:
 - \$250 Class I General Permit
 - \$300 Class II Administrative Update
 - \$1,000 Construction, Modification, Relocation or Temporary Permit
 - \$500 Class II General Permit
 - \$1,000 NSPS
 - \$2,500 NESHAP
 - \$2,500 45CSR27 Pollutant
 - \$5,000 Major Modification
 - \$10,000 Major Construction
- Original and two (2) copies of the application not submitted.
- File organization – application pages are not numbered or in correct order, application is not bound in some way, etc.
- Confidential Business Information is not properly identified.
- General application forms not completed and signed by a responsible official.
- Authority of Corporation form not included – required if application is signed by someone other than a responsible official.
- Applicant is not registered with the West Virginia Secretary of State's Office.
- Copy of current Business Registration Certificate not included.
- Process description, including equipment and emission point identification numbers, not submitted.
- Process flow diagram, including equipment and emission point identification numbers, not submitted.
- Plot plan, including equipment and emission point identification numbers, not submitted.
- Applicable technical forms not completed and submitted:
 - Emission Point Data Summary Sheets
 - Air Pollution Control Device Sheets
 - Emission Unit Data Sheets
 - Equipment List Form
- Emission calculations not included – emission factors, references, source identification numbers, etc.
- Electronic submittal diskette not included.