OSCAR NELSON COMPRESSOR STATION
DOMINION TRANSMISSION INC.
APPLICATION FOR TITLE V OPERATING PERMIT RENEWAL
TITLE V OPERATING PERMIT NO: R30-10900018-2006

Dominion Transmission, Inc.
Oscar Nelson Compressor Station
Marianna, WV

Prepared for:

Dominion Transmission, Inc.
445 West Main Street
Clarksburg, WV 26301

Prepared by:

AMEC Earth & Environmental
2200 Gateway Centre Blvd, Suite 205
Morrisville, NC 27560

AUGUST 2010

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Beth Espitia
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1.0 INTRODUCTION

Oscar Nelson Station is a natural gas compressor station used to compress gas for Dominion Transmission, Inc.'s pipeline system in West Virginia. Oscar Nelson Station is located in Marianna, West Virginia.

Oscar Nelson Station has the potential to emit in excess of 1500 tons per year of nitrogen oxides (NOx) and 100 tons per year each of carbon monoxide (CO) and volatile organic compounds (VOCs). The Station is classified as a major stationary source under the West Virginia Department of Environmental Protection (WVDEP) Regulation (45 CSR Part 30) and is subject to the Title V Operating Permit provisions of Part 30.

The Title V Operating Permit Renewal 1 (Permit No: R30-10900018-2006) was issued on May 24, 2006, with an expiration date of May 24, 2011. The Title V Operating Permit is for the operation of six (6) 880 HP natural gas fired reciprocating engines (EN01, EN02, EN03, EN04, EN05, and EN06), one (1) auxiliary generator (AUX01), one (1) glycol dehydrator system (DEHY01), one (1) dehydration unit reboiler (REB1), one (1) low pressure dehydration unit still flare (F1), one (1) 583-gallon aboveground storage tank (TK01), one (1) 10,000-gallon aboveground storage tank (TK02), one (1) 1,000-gallon aboveground storage tank (TK03), one (1) 1,260-gallon aboveground storage tank (TK04), one (1) 2,100-gallon aboveground storage tank (TK07), and one (1) 2,700-gallon aboveground storage tank (TK08).

On October 16, 2006, Dominion Transmission, Inc. (Dominion) was issued a Title V minor modification permit to the existing Title V Operating Permit (Permit No: R30-10900018-2006). The minor modification incorporated changes from Permit R13-2626C, which allowed the facility to install and operate a new glycol dehydration unit and flare.

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2.0 PROCESS DESCRIPTION

Oscar Nelson Station began operation in 1947. The main process occurring at Oscar Nelson Station is the compression and transmission of natural gas. The following emission units are present at the facility.

Six (6) 880-hp Cooper GMV-8TF Reciprocating Engines/Integral Compressors

- Emission points EN01 and EN02
- Emission unit EN01 and EN02
- Emission points EN03 and EN03
- Emission unit EN04 and EN04
- Emission points EN05 and EN05
- Emission unit EN06 and EN06

Auxiliary Generator; 350-hp Waukesha F1905

- Emission point AUX01
- Emission unit AUX01

Glycol Dehydration System; 54.0 MMSCF wet gas/day

- Emission point 1E
- Emission unit DEHY1

Dehydration Unit Reboiler; 750,000 BTU/hr

- Emission point 2E
- Emission unit REB1

Dehydration Unit Low Pressure Flare; 1,100,000 BTU/hr

- Emission point 1E
- Emission unit F1

One (1) 583-gallon horizontal, above ground tank containing triethylene glycol (TK01)

- Emission point TK01
- Emission unit TK01

One (1) 10,000-gallon horizontal, above ground tank containing engine oil (TK02)

- Emission point TK02
- Emission unit TK02

One (1) 1,000-gallon horizontal, above ground tank containing used oil (TK03)

- Emission point TK03
- Emission unit TK03

One (1) 1,260-gallon vertical, above ground tank containing produced fluids (TK04)

- Emission point TK04
- Emission unit TK04

One (1) 2,100-gallon vertical, above ground tank containing ethylene glycol (TK07)

- Emission point TK07
- Emission unit TK07

One (1) 2,700-gallon vertical, above ground tank containing produced fluids (TK08)

- Emission point TK08
- Emission unit TK08

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3.0 POTENTIAL TO EMIT

Oscar Nelson Station is a major source of nitrogen oxides under 45 CSR 30 of the West Virginia Code of State Regulations. Oscar Nelson Station is currently operating at the following potential emission rates:

Process Control Equipment	Potential Emissions, Tons Per Year (TPY)		
	Carbon Monoxide	Nitrogen Oxides	Volatile Organic Compounds
Current Potential-to-Emit	197.6	1566.1	127.3
Fugitive Emissions	--	--	7.86
Engines (EN01 - EN06)	152.96	1514.26	117.27
Auxiliary Generator	43.60	50.70	0.71
Reboiler	0.27	0.32	0.02
Dehydration System	0.81	0.78	1.41

The Dehydration Unit Still Column and Flare emissions are combined as per the 2006 R13-2626 Permit. The Flare is being permitted as a control device to limit the PTE of HAPs from the facility. The facility is not a major source of HAPs.

Onsite storage tanks are not regulated as a potential source for VOC emissions.

4.0 PROPOSED MODIFICATIONS

Dominion does not propose any new modifications under this application.

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APPENDIX A

AIR PERMIT APPLICATION FORMS

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WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475
www.wvdep.org/daq

TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

1. **Name of Applicant (As registered with the WV Secretary of State's Office):** Dominion Transmission, Inc.	2. **Facility Name or Location:** Oscar Nelson Station
3. **DAQ Plant ID No.:** 1 0 9 — 0 0 0 1 8	4. **Federal Employer ID No. (FEIN):** 5 5 0 6 2 9 2 0 3

5. **Permit Application Type:**

☐ Initial Permit — When did operations commence? 1947
☒ Permit Renewal — What is the expiration date of the existing permit? 05/24/2011
☐ Update to Initial Permit Application

6. Type of Business Entity:

☒ Corporation ☐ Governmental Agency
☐ Partnership ☐ Limited Partnership

8. Number of onsite employees: 14

7. Is the Applicant the:

☐ Owner ☐ Operator ☒ Both

If the Applicant is not both the owner and operator, please provide the name and address of the other party.

9. Governmental Code:

☒ Privately owned and operated; 0
☐ Federally owned and operated; 1
☐ State government owned and operated; 2
☐ County government owned and operated; 3
☐ Municipality government owned and operated; 4
☐ District government owned and operated; 5

10. Business Confidentiality Claims

Does this application include confidential information (per 45CSR31)? ☐ Yes ☒ No

If yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's *"PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY"* guidance.

11. Mailing Address		
Street or P.O. Box: 445 West Main Street		
City: Clarksburg	**State:** WV	**Zip:** 26301
Telephone Number: (304) 627-3225	**Fax Number:** (304) 627-3222	

12. Facility Location		
Street:	**City:** Marianna	**County:** Wyoming County
UTM Easting: 445.76 km	**UTM Northing:** 4161.72 km	**Zone:** ☒ 17 or ☐ 18
Directions: Take Interstate 77 south to the Mabscott/Macarthur exit. Turn South on State Route 16 and travel approximately 13.3 miles to Maben in Wyoming County. Turn right onto State Route 97 West and go 19.9 miles to Marianna. Turn left at Phillips Coal Road off of Route 97 (just before Turkey Creek Road). Go across the bridge crossing the Guyandotte River. Turn right at the end of the bridge and go 0.5 miles to the station.		
Portable Source? ☐ Yes ☒ No		
Is facility located within a nonattainment area? ☐ Yes ☒ No		**If yes, for what air pollutants?**
Is facility located within 50 miles of another state? ☒ Yes ☐ No		**If yes, name the affected state(s).** Virginia
Is facility located within 100 km of a Class I Area[1]? ☐ Yes ☒ No **If no, do emissions impact a Class I Area[1]?** ☐ Yes ☒ No		**If yes, name the area(s).**

[1] *Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.*

13. Contact Information		
Responsible Official: Jeffrey L. Barger		**Title:** Vice President, Pipeline Operations
Street or P.O. Box: 445 West Main Street		
City: Clarksburg	**State:** WV	**Zip:** 26301
Telephone Number: (304) 627-3910	**Fax Number:** (304) 627-3323	
E-mail address: Jeffry.L.Barger@dom.com		
Environmental Contact: Richard B. Gangle		**Title:** Environmental Specialist III
Street or P.O. Box: 445 West Main Street		
City: Clarksburg	**State:** WV	**Zip:** 26301
Telephone Number: (304) 627-3325	**Fax Number:** (304) 627-3222	
E-mail address: Richard.B.Gangle@dom.com		
Application Preparer: Beth D. Espitia		**Title:** Environmental Engineer
Company: AMEC Earth & Environmental, Inc.		
Street or P.O. Box: 2200 Gateway Centre Blvd, Suite 205		
City: Morrisville	**State:** NC	**Zip:** 27560
Telephone Number: (919) 447-2750	**Fax Number:** (919) 447-2751	
E-mail address: beth.espitia@amec.com		

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Natural Gas Compressor Station	N/A	48612	4922

Provide a general description of operations.

The Oscar Nelson Station is a compressor facility that services a natural gas pipeline system. The purpose of the facility is to recompress natural gas flowing through a pipeline for transportation. The reciprocating engines (EN01 - EN06) at the facility receive natural gas from a valve on a pipeline and compress it to enable further transportation in the pipeline.

15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to "Plot Plan - Guidelines."

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

Section 2: Applicable Requirements

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
☐ SIP	☐ FIP
☒ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR15)	☐ Nonattainment NSR (45CSR19)
☐ Section 111 NSPS	☐ Section 112(d) MACT standards
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☒ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☐ Compliance Assurance Monitoring (40CFR64)
☐ NO_x Budget Trading Program Non-EGUs (45CSR1)	☐ NO_x Budget Trading Program EGUs (45CSR26)

19. Non Applicability Determinations
List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies. 45 CSR 10 – Compressor engines (001-01 and 001-02) have been excluded from the applicability of SO2 and H2S limits. WVDAQ determined that 45 CSR 10 is not applicable to compressor engines.
☐ Permit Shield

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*).

45 CSR 6-3.1 – Open Burning prohibited (TV 3.1.1)

45 CSR 6-3.2 – Open Burning exemption (TV 3.1.2)

40 CFR Part 61 – Asbestos inspection and removal (TV 3.1.3)

45 CSR 15 – Asbestos inspection and removal (TV 3.1.3)

45 CSR 11-5.2 – Standby plans for emergency episodes (TV 3.1.5)

40 CFR Part 82 Subpart F – Ozone depleting substances (TV 3.1.7)

40 CFR Part 68 – Risk Management Plan (TV 3.1.8)

45 CSR 17 – Fugitive Particulate Matter (TV 3.1.11)

45 CSR 13 – Minor Source of Hazardous Air Pollutants (HAP) (TV 3.1.12, R13-2626C, 4.1.3)

45 CSR 30-5.1(c) - Annual Sulfur analysis of Inlet Gas Stream (TV 3.2.1, 3.2.4)

45 CSR 30-5.1 (c) – Visible Emission checks (TV 3.2.2, F1)

45 CSR 30-5.1(c) - Annual H2S analysis of Inlet Gas Stream (TV 3.2.3, 3.2.5)

State Only:

45 CSR 4 – No Objectionable odors (TV 3.1.4)

WV Code 22-5-4 (a) (14) – The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements (TV 3.1.6)

☐ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing/recordkeeping/ reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45 CSR 30-5.1.c.2.A – Monitoring Information (TV 3.4.1, R13-2626C, 4.2.1)

45 CSR 30-5.1.c.2.B – Retention of Records (TV 3.4.2)

45 CSR 13 – Record of Maintenance of Air Pollution Control Equipment (TV 3.4.4)

45 CSR 13 – Record of Malfunctions of Air Pollution Control Equipment (TV 3.4.5, R13-2626C, 4.2.3)

45 CSR 13 – Minor Source of Hazardous Air Pollutants (HAP) (TV 3.1.12, R13-2626C, 4.2.4))

45 CSR 30-5.1.c – Visible Emission checks (TV 3.2.2) – F1

45 CSR 30 – The permittee shall certify and submit monitoring reports, compliance reports, and emissions statements as specified (TV 3.5)

State only:

WV Code 22-5-4(a)(15) – Stack Testing (TV 3.3.1)

45 CSR 30-5.1.c – The permittee shall maintain records of all odor complaints.

Are you in compliance with all facility-wide applicable requirements? ☒ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

21. Active Permits/Consent Orders		
Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit *(if any)*
R13-2626C	07/19/2006	Since the issuance of the permit renewal for this facility, WVDEP has determined that 45CSR10 is not applicable to engines.

22. Inactive Permits/Obsolete Permit Conditions		
Permit Number	Date of Issuance	Permit Condition Number
N/A	/ /	

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	197.6
Nitrogen Oxides (NO_X)	1566.1
Lead (Pb)	N/A
Particulate Matter ($PM_{2.5}$)[1]	0.05
Particulate Matter (PM_{10})[1]	2.08
Total Particulate Matter (TSP)	2.08
Sulfur Dioxide (SO_2)	0.13
Volatile Organic Compounds (VOC)	127.3
Hazardous Air Pollutants[2]	Potential Emissions
Formaldehyde	7.47
Benzene	0.48
Toluene	0.42
Ethylbenzene	0.31
Hexane	0.11
Xylene	0.29
Acrolein	0.09
Acetaldehyde	0.14
Regulated Pollutants other than Criteria and HAP	Potential Emissions

[1] $PM_{2.5}$ and PM_{10} are components of TSP.
[2] For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

Section 4: Insignificant Activities

		24. Insignificant Activities (Check all that apply)
☒	1.	Air compressors and pneumatically operated equipment, including hand tools.
☐	2.	Air contaminant detectors or recorders, combustion controllers or shutoffs.
☐	3.	Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
☒	4.	Bathroom/toilet vent emissions.
☐	5.	Batteries and battery charging stations, except at battery manufacturing plants.
☐	6.	Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
☐	7.	Blacksmith forges.
☒	8.	Boiler water treatment operations, not including cooling towers.
☐	9.	Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
☐	10.	CO_2 lasers, used only on metals and other materials which do not emit HAP in the process.
☐	11.	Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
☒	12.	Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
☒	13.	Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
☐	14.	Demineralized water tanks and demineralizer vents.
☐	15.	Drop hammers or hydraulic presses for forging or metalworking.
☐	16.	Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
☐	17.	Emergency (backup) electrical generators at residential locations.
☐	18.	Emergency road flares.
☐	19.	Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO_x, SO_2, VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units. Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis: _____ _____ _____ _____ _____ _____ _____ _____ _____

24. Insignificant Activities (Check all that apply)		
☐	20.	Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27. Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis: _____ _____ _____ _____ _____
☐	21.	Environmental chambers not using hazardous air pollutant (HAP) gases.
☐	22.	Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
☐	23.	Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
☐	24.	Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
☐	25.	Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
☐	26.	Fire suppression systems.
☐	27.	Firefighting equipment and the equipment used to train firefighters.
☐	28.	Flares used solely to indicate danger to the public.
☒	29.	Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
☐	30.	Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
☒	31.	Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
☐	32.	Humidity chambers.
☐	33.	Hydraulic and hydrostatic testing equipment.
☐	34.	Indoor or outdoor kerosene heaters.
☒	35.	Internal combustion engines used for landscaping purposes.
☐	36.	Laser trimmers using dust collection to prevent fugitive emissions.
☐	37.	Laundry activities, except for dry-cleaning and steam boilers.
☐	38.	Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
☐	39.	Oxygen scavenging (de-aeration) of water.
☐	40.	Ozone generators.
☒	41.	Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant

24. Insignificant Activities (Check all that apply)		
		owners/operators must still get a permit if otherwise requested.)
☐	42.	Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
☐	43.	Process water filtration systems and demineralizers.
☒	44.	Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
☐	45.	Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
☐	46.	Routing calibration and maintenance of laboratory equipment or other analytical instruments.
☐	47.	Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
☐	48.	Shock chambers.
☐	49.	Solar simulators.
☐	50.	Space heaters operating by direct heat transfer.
☐	51.	Steam cleaning operations.
☐	52.	Steam leaks.
☐	53.	Steam sterilizers.
☐	54.	Steam vents and safety relief valves.
☐	55.	Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
☐	56.	Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
☐	57.	Such other sources or activities as the Director may determine.
☐	58.	Tobacco smoking rooms and areas.
☐	59.	Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

25. Equipment Table
Fill out the **Title V Equipment Table** and provide it as **ATTACHMENT D**.
26. Emission Units
For each emission unit listed in the **Title V Equipment Table**, fill out and provide an **Emission Unit Form** as **ATTACHMENT E**.
For each emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**.
27. Control Devices
For each control device listed in the **Title V Equipment Table**, fill out and provide an **Air Pollution Control Device Form** as **ATTACHMENT G**.
For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H**.

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

*Note: This Certification must be signed by a responsible official. The **original**, signed in **blue ink**, must be submitted with the application. Applications without an **original** signed certification will be considered as incomplete.*

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: Jeffrey L. Barber	Title: Vice President, Pipeline Operations

Responsible official's signature:

Signature: _____ Signature Date: _____

(Must be signed and dated in blue ink)

Note: Please check all applicable attachments included with this permit application:

☒	ATTACHMENT A: Area Map
☒	ATTACHMENT B: Plot Plan(s)
☒	ATTACHMENT C: Process Flow Diagram(s)
☒	ATTACHMENT D: Equipment Table
☒	ATTACHMENT E: Emission Unit Form(s)
☐	ATTACHMENT F: Schedule of Compliance Form(s)
☒	ATTACHMENT G: Air Pollution Control Device Form(s)
☐	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

All of the required forms and additional information can be found and downloaded from, the DEP website at www.wvdep.org/daq, requested by phone (304) 926-0475, and/or obtained through the mail.

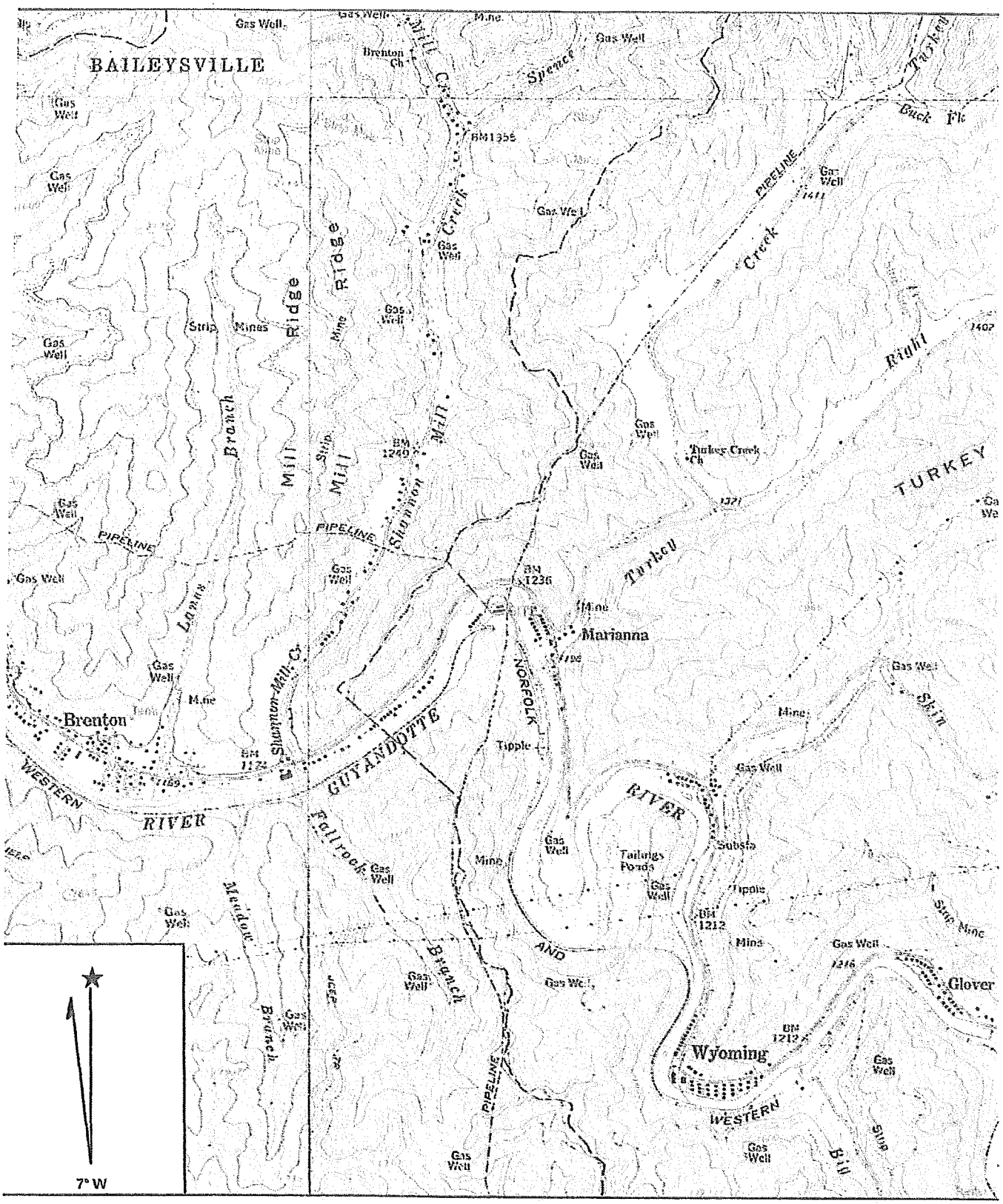
APPENDIX B

PLOT PLANS

AMEC Earth & Environmental, Inc.
2200 Gateway Centre Boulevard, Suite 205
Morrisville, NC 27560

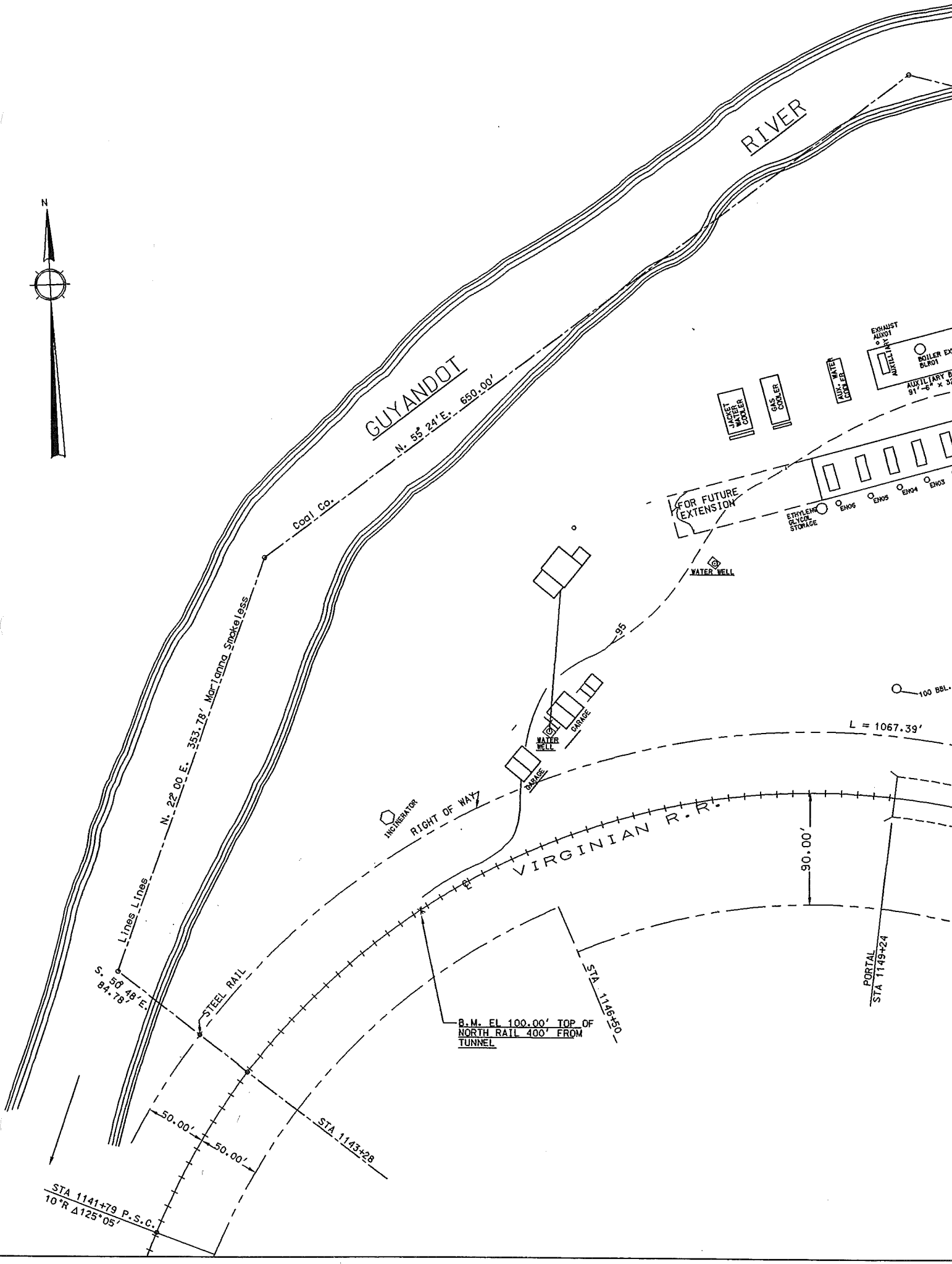
www.amec.com

Tel – (919) 447-2750
Fax – (919) 447-2751



Name: PINEVILLE
Date: 1/7/2002
Scale: 1 inch equals 2000 feet

Location: 037° 36' 10.2" N 081° 36' 52.1" W
Caption: OSCAR NELSON STATION
SITE LOCATION
DOMINION TRANSMISSION CORP.


RIVER
GUYANDOT
N. 55° 24' E. 650.00'
Coal Co.
N. 22° 00 E. 353.78' Marianna Smokeless
Lines Lines
S. 50° 48' E. 84.78'
STEEL RAIL
STA 1141+79 P.S.C.
10°R Δ125°05'
50.00'
50.00'
STA 1143+28
B.M. EL 100.00' TOP OF NORTH RAIL 400' FROM TUNNEL
STA 1146+50
PORTAL STA 1149+24
90.00'
VIRGINIAN R.R.
L = 1067.39'
RIGHT OF WAY
INCINERATOR
WATER WELL
GARAGE
WATER WELL
GARAGE
95
FOR FUTURE EXTENSION
ETHYLENE GLYCOL STORAGE
EH06
EH05
EH04
EH03
JACKET WATER COOLER
GAS COOLER
AUX. WATER COOLER
EXHAUST AUX01
AUXILIARY
BOILER EX
BLR01
AUXILIARY B
100 BBL.
N

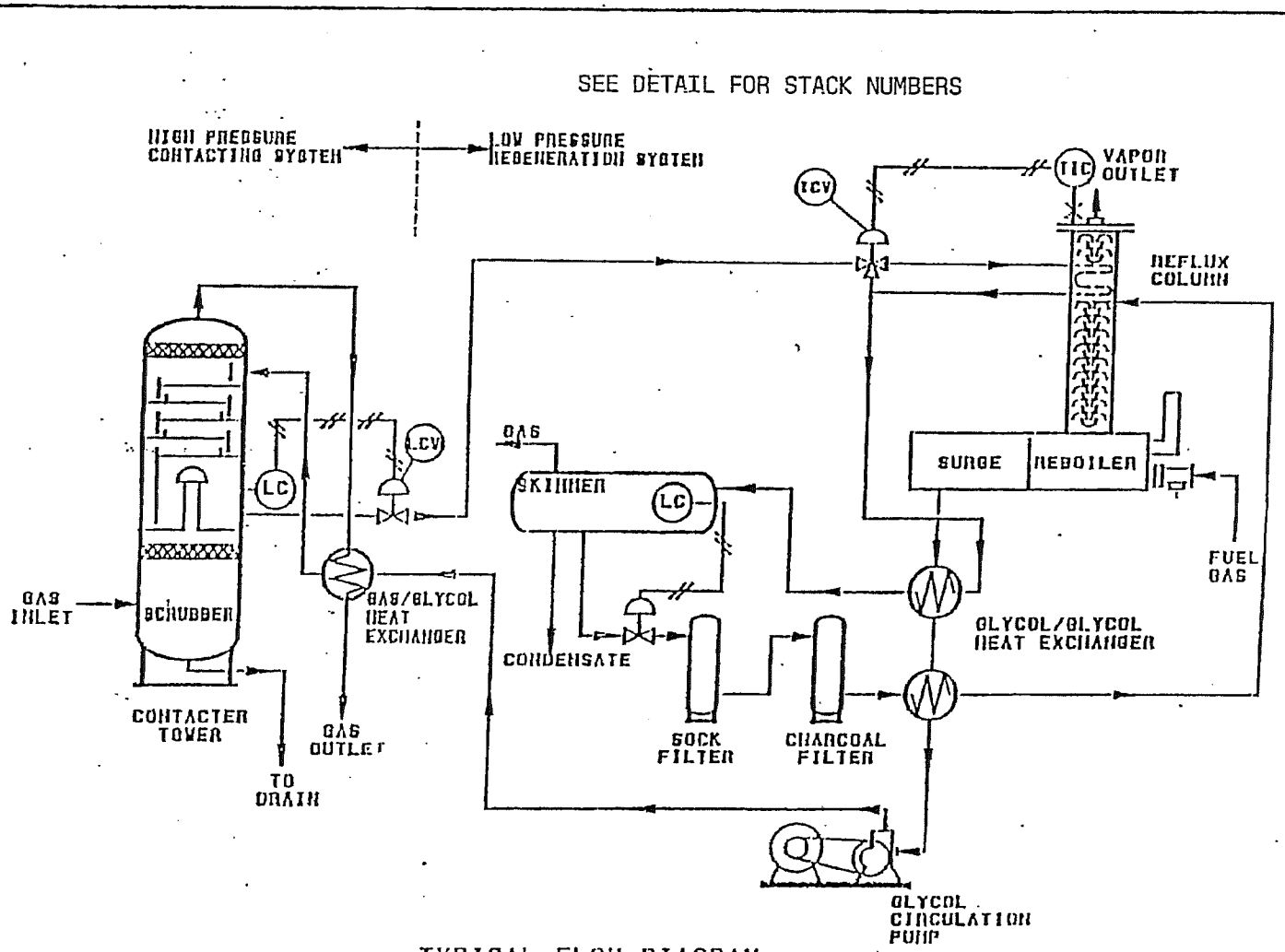
APPENDIX C

PROCESS FLOW DIAGRAMS

AMEC Earth & Environmental, Inc.
2200 Gateway Centre Boulevard, Suite 205
Morrisville, NC 27560

www.amec.com

Tel – (919) 447-2750
Fax – (919) 447-2751



TYPICAL FLOW DIAGRAM

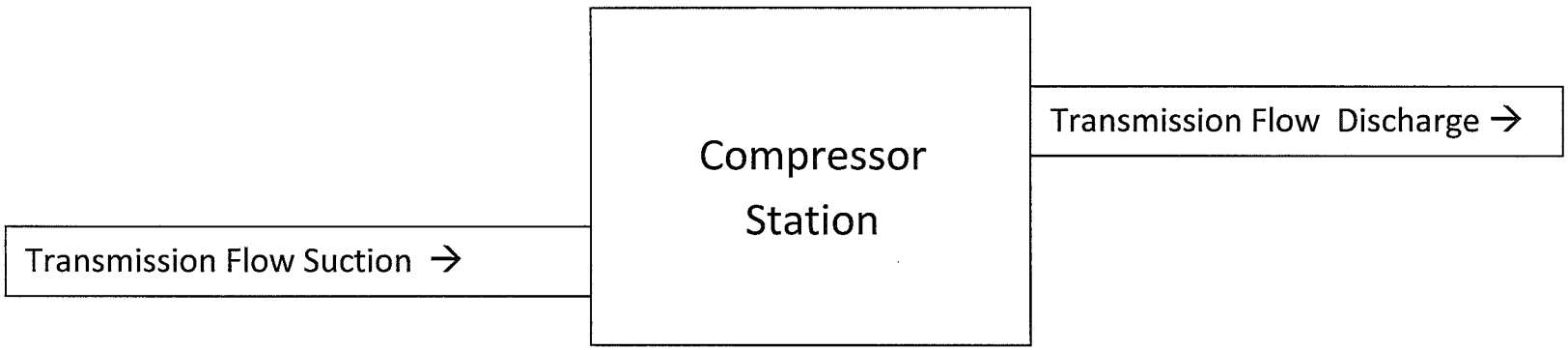
GLYCOL DEHYDRATION UNIT

NATCO

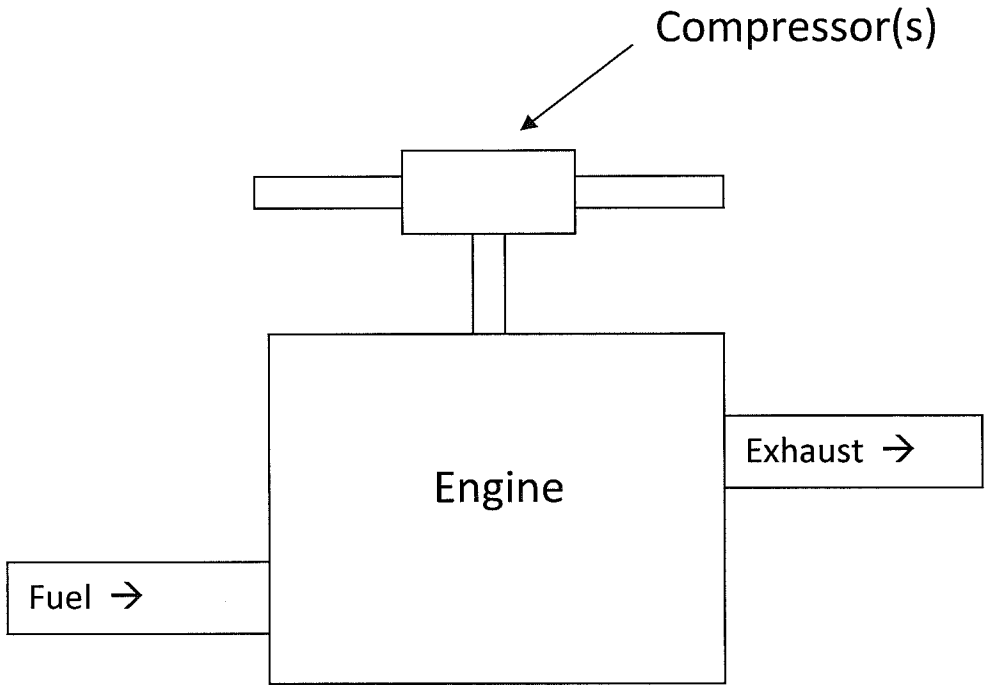
Natural Gas Compression Station Process Flow Diagram
Oscar Nelson Station

Fugitive sources are described in application.

Fugitive sources are for the entire facility.

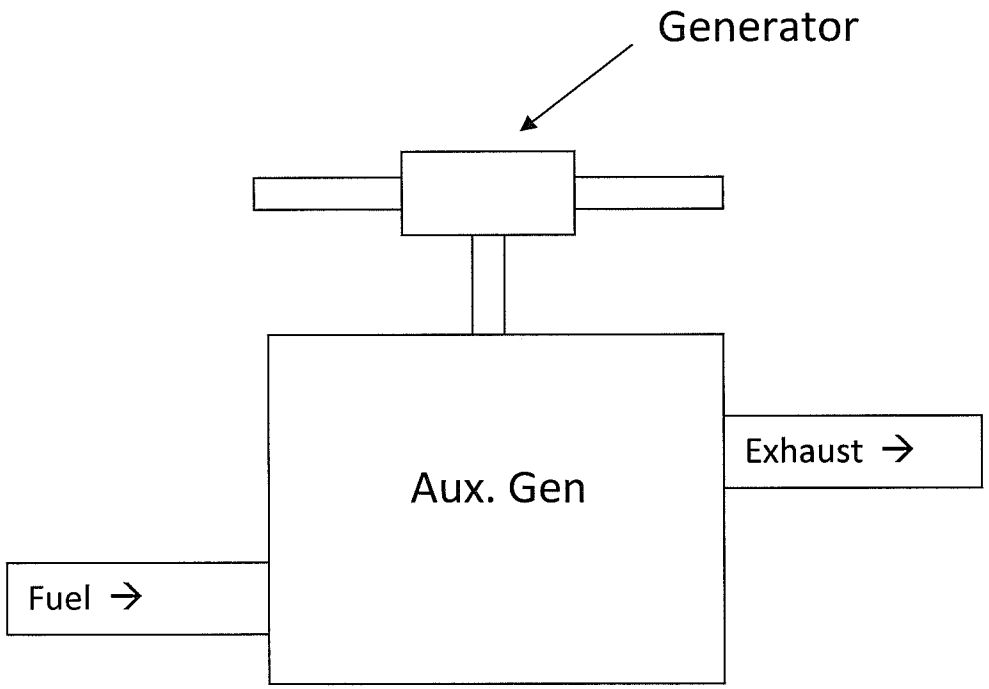


Natural Gas Compression Station Process Flow Diagram – Engine



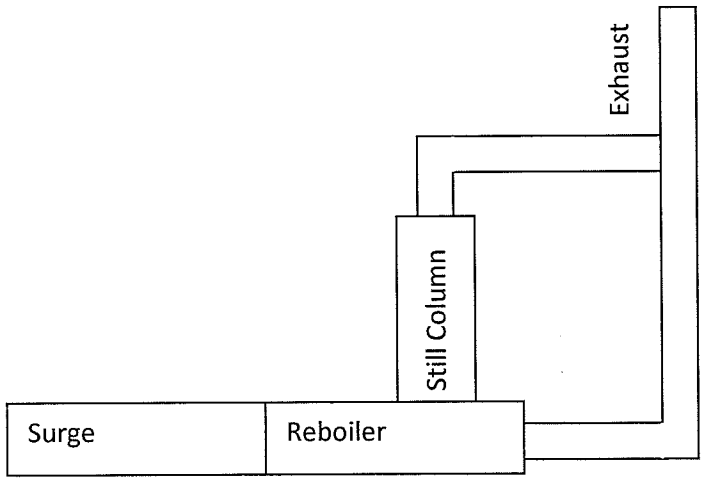
Oscar Nelson Station
Stack ID Number:
EN01, EN02, EN03, EN04,
EN05, EN06

Natural Gas Compression Station Process Flow Diagram – Auxiliary Generator



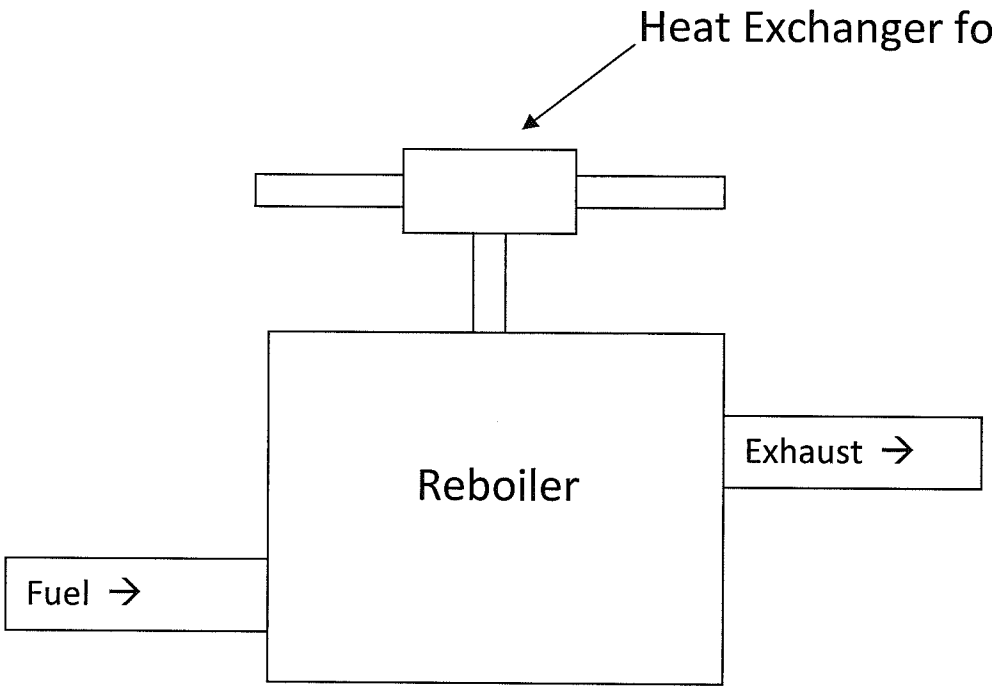
Oscar Nelson Station
Stack ID Number: AUX01

Natural Gas Compression Station Process Flow Diagram – Glycol Dehy



Oscar Nelson Station
Stack ID Number: DEHY1

Natural Gas Compression Station Process Flow Diagram - Reboiler



Oscar Nelson Station
Stack ID Number: REB01

APPENDIX D

EQUIPMENT TABLE

AMEC Earth & Environmental, Inc.
2200 Gateway Centre Boulevard, Suite 205
Morrisville, NC 27560

www.amec.com

Tel – (919) 447-2750
Fax – (919) 447-2751

ATTACHMENT D - Emission Units Table

(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Unit ID[1]	Emission Point ID[1]	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device[1]
EN01*	EN01	Reciprocating Engine/Integral Compressor; Cooper GMV-8TF; 2 cycle Rich burn	1947	880 HP	N/A
EN02*	EN02	Reciprocating Engine/Integral Compressor; Cooper GMV-8TF; 2 cycle Rich burn	1947	880 HP	N/A
EN03*	EN03	Reciprocating Engine/Integral Compressor; Cooper GMV-8TF; 2 cycle Rich burn	1947	880 HP	N/A
EN04*	EN04	Reciprocating Engine/Integral Compressor; Cooper GMV-8TF; 2 cycle Rich burn	1947	880 HP	N/A
EN05*	EN05	Reciprocating Engine/Integral Compressor; Cooper GMV-8TF; 2 cycle Rich burn	1947	880 HP	N/A
EN06*	EN06	Reciprocating Engine/Integral Compressor; Cooper GMV-8TF; 2 cycle Rich burn	1947	880 HP	N/A
AUX01*	AUX01	Auxiliary Generator; Waukesha F1905	1988	350 HP	N/A
DEHY1*	1E	Glycol Dehydration System	2005	54.0 MMSCF wet gas/day	Low Pressure Flare, 1C
REB1*	2E	Reboiler 1	2005	750,000 BTU/hr	N/A
F1	1E	Low Pressure Flare	2005	1,100,000 BTU/hr	N/A
TK01	TK01	Horizontal, above ground tank containing triethylene glycol	1947	583 gallon	N/A
TK02	TK02	Horizontal, above ground tank containing engine oil	2004	10,000 gallon	N/A
TK03	TK03	Horizontal, above ground tank containing used oil	2004	1,000 gallon	N/A
TK04	TK04	Vertical, above ground tank containing produced fluids	2005	1260 gallon	N/A
TK07	TK07	Vertical, above ground tank containing ethylene glycol	N/A	2,100 gallon	N/A

TK08	TK08	Vertical, above ground tank containing produced fluids	1947	2,700 gallon	N/A

* Equipment burns or combusts pipeline quality natural gas only.

[1]For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

APPENDIX E

EMISSION UNIT FORMS

AMEC Earth & Environmental, Inc.
2200 Gateway Centre Boulevard, Suite 205
Morrisville, NC 27560

www.amec.com

Tel – (919) 447-2750
Fax – (919) 447-2751

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
EN01	EN01	N/A

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Cooper 660-hp Natural Gas Fired Reciprocating Engine/Integral Compressor.

Manufacturer:	**Model number:**	**Serial number:**
Cooper	GMV-8TF	
Construction date:	**Installation date:**	**Modification date(s):**
	1947	N/A

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
8,400 Btu/HP-hrs

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
0.0074 MMscf/hr		8760 hrs/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? _X_Yes ___ No	**If yes, is it?** ___ Indirect Fired _X_Direct Fired
Maximum design heat input and/or maximum horsepower rating: 880 HP	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Pipeline Quality Natural Gas – 0.0074 MMscf/hr, 8,400 Btu/HP-hrs

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	< 20 gr/100 ft^3	N/A	1,000 BTU/ft^3

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	5.82	25.49
Nitrogen Oxides (NO_X)	57.62	252.38
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}$)	<0.01	<0.01
Particulate Matter (PM_{10})	0.07	0.32
Total Particulate Matter (TSP)	0.07	0.32
Sulfur Dioxide (SO_2)	<0.01	0.02
Volatile Organic Compounds (VOC)	4.46	19.54
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.28	1.20
Benzene	0.01	0.06
Toluene	0.01	0.03
Ethylbenzene	<0.01	<0.01
n-Hexane	<0.01	0.01
Xylene	<0.01	0.01
Acrolein	<0.01	0.02
Acetaldehyde	0.01	0.02
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

CO, NOx, VOC and HAPs Emission Rates based on annual emission statement submittals to WVDEP. PM10, PM2.5, and SO2 Emission Factors were obtained from USEPA's AIRS Report (March 1990). HAP Emission Rates based on AP-42 (Formaldehyde Emission Rate based on an emission test report conducted in 2006 in accordance with EPA Method 320).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

____ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
EN02	EN02	N/A

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Cooper 660-hp Natural Gas Fired Reciprocating Engine/Integral Compressor.

Manufacturer:	**Model number:**	**Serial number:**
Cooper	GMV-8TF	
Construction date:	**Installation date:**	**Modification date(s):**
	1947	N/A

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
8,400 Btu/HP-hrs

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
0.0074 MMscf/hr		8760 hrs/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? _X_ Yes ___ No	**If yes, is it?** ___ Indirect Fired _X_ Direct Fired
Maximum design heat input and/or maximum horsepower rating: 880 HP	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Pipeline Quality Natural Gas – 0.0074 MMscf/hr, 8,400 Btu/HP-hrs

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	< 20 gr/100 ft^3	N/A	1,000 BTU/ft^3

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	5.82	25.49
Nitrogen Oxides (NO_X)	57.62	252.38
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}$)	<0.01	<0.01
Particulate Matter (PM_{10})	0.07	0.32
Total Particulate Matter (TSP)	0.07	0.32
Sulfur Dioxide (SO_2)	<0.01	0.02
Volatile Organic Compounds (VOC)	4.46	19.54
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.28	1.20
Benzene	0.01	0.06
Toluene	0.01	0.03
Ethylbenzene	<0.01	<0.01
n-Hexane	<0.01	0.01
Xylene	<0.01	0.01
Acrolein	<0.01	0.02
Acetaldehyde	0.01	0.02
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

CO, NOx, VOC and HAPs Emission Rates based on annual emission statement submittals to WVDEP. PM10, PM2.5, and SO2 Emission Factors were obtained from USEPA's AIRS Report (March 1990). HAP Emission Rates based on AP-42 (Formaldehyde Emission Rate based on an emission test report conducted in 2006 in accordance with EPA Method 320).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

____ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
EN03	EN03	N/A

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Cooper 660-hp Natural Gas Fired Reciprocating Engine/Integral Compressor.

Manufacturer:	**Model number:**	**Serial number:**
Cooper	GMV-8TF	
Construction date:	**Installation date:**	**Modification date(s):**
	1947	N/A

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
8,400 Btu/HP-hrs

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
0.0074 MMscf/hr		8760 hrs/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? _X_Yes ___ No	**If yes, is it?** ___ Indirect Fired _X_Direct Fired
Maximum design heat input and/or maximum horsepower rating: 880 HP	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Pipeline Quality Natural Gas – 0.0074 MMscf/hr, 8,400 Btu/HP-hrs

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	< 20 gr/100 ft^3	N/A	1,000 BTU/ft^3

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	5.82	25.49
Nitrogen Oxides (NO_X)	57.62	252.38
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}$)	<0.01	<0.01
Particulate Matter (PM_{10})	0.07	0.32
Total Particulate Matter (TSP)	0.07	0.32
Sulfur Dioxide (SO_2)	<0.01	0.02
Volatile Organic Compounds (VOC)	4.46	19.54
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.28	1.20
Benzene	0.01	0.06
Toluene	0.01	0.03
Ethylbenzene	<0.01	<0.01
n-Hexane	<0.01	0.01
Xylene	<0.01	0.01
Acrolein	<0.01	0.02
Acetaldehyde	0.01	0.02
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

CO, NOx, VOC and HAPs Emission Rates based on annual emission statement submittals to WVDEP. PM10, PM2.5, and SO2 Emission Factors were obtained from USEPA's AIRS Report (March 1990). HAP Emission Rates based on AP-42 (Formaldehyde Emission Rate based on an emission test report conducted in 2006 in accordance with EPA Method 320).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

____ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
EN04	EN04	N/A

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Cooper 660-hp Natural Gas Fired Reciprocating Engine/Integral Compressor.

Manufacturer:	**Model number:**	**Serial number:**
Cooper	GMV-8TF	
Construction date:	**Installation date:**	**Modification date(s):**
	1947	N/A

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
8,400 Btu/HP-hrs

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
0.0074 MMscf/hr		8760 hrs/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? _X_Yes ___ No	**If yes, is it?** ___ Indirect Fired _X_Direct Fired
Maximum design heat input and/or maximum horsepower rating: 880 HP	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Pipeline Quality Natural Gas – 0.0074 MMscf/hr, 8,400 Btu/HP-hrs

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	< 20 gr/100 ft^3	N/A	1,000 BTU/ft^3

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	5.82	25.49
Nitrogen Oxides (NO_X)	57.62	252.38
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}$)	<0.01	<0.01
Particulate Matter (PM_{10})	0.07	0.32
Total Particulate Matter (TSP)	0.07	0.32
Sulfur Dioxide (SO_2)	<0.01	0.02
Volatile Organic Compounds (VOC)	4.46	19.54
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.28	1.20
Benzene	0.01	0.06
Toluene	0.01	0.03
Ethylbenzene	<0.01	<0.01
n-Hexane	<0.01	0.01
Xylene	<0.01	0.01
Acrolein	<0.01	0.02
Acetaldehyde	0.01	0.02
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

CO, NOx, VOC and HAPs Emission Rates based on annual emission statement submittals to WVDEP. PM10, PM2.5, and SO2 Emission Factors were obtained from USEPA's AIRS Report (March 1990). HAP Emission Rates based on AP-42 (Formaldehyde Emission Rate based on an emission test report conducted in 2006 in accordance with EPA Method 320).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

____ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
EN05	EN05	N/A

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Cooper 660-hp Natural Gas Fired Reciprocating Engine/Integral Compressor.

Manufacturer:	**Model number:**	**Serial number:**
Cooper	GMV-8TF	
Construction date:	**Installation date:**	**Modification date(s):**
	1947	N/A

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
8,400 Btu/HP-hrs

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
0.0074 MMscf/hr		8760 hrs/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? _X_Yes ___ No	**If yes, is it?** ___ Indirect Fired _X_Direct Fired
Maximum design heat input and/or maximum horsepower rating: 880 HP	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Pipeline Quality Natural Gas – 0.0074 MMscf/hr, 8,400 Btu/HP-hrs

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	< 20 gr/100 ft^3	N/A	1,000 BTU/ft^3

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	5.82	25.49
Nitrogen Oxides (NO_X)	57.62	252.38
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}$)	<0.01	<0.01
Particulate Matter (PM_{10})	0.07	0.32
Total Particulate Matter (TSP)	0.07	0.32
Sulfur Dioxide (SO_2)	<0.01	0.02
Volatile Organic Compounds (VOC)	4.46	19.54
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.28	1.20
Benzene	0.01	0.06
Toluene	0.01	0.03
Ethylbenzene	<0.01	<0.01
n-Hexane	<0.01	0.01
Xylene	<0.01	0.01
Acrolein	<0.01	0.02
Acetaldehyde	0.01	0.02
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

CO, NOx, VOC and HAPs Emission Rates based on annual emission statement submittals to WVDEP. PM10, PM2.5, and SO2 Emission Factors were obtained from USEPA's AIRS Report (March 1990). HAP Emission Rates based on AP-42 (Formaldehyde Emission Rate based on an emission test report conducted in 2006 in accordance with EPA Method 320).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

____ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F.**

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
EN06	EN06	N/A

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Cooper 660-hp Natural Gas Fired Reciprocating Engine/Integral Compressor.

Manufacturer:	**Model number:**	**Serial number:**
Cooper	GMV-8TF	

Construction date:	**Installation date:**	**Modification date(s):**
	1947	N/A

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
8,400 Btu/HP-hrs

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
0.0074 MMscf/hr		8760 hrs/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? _X_Yes ___ No	**If yes, is it?** ___ Indirect Fired _X_Direct Fired
Maximum design heat input and/or maximum horsepower rating: 880 HP	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Pipeline Quality Natural Gas – 0.0074 MMscf/hr, 8,400 Btu/HP-hrs

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	< 20 gr/100 ft^3	N/A	1,000 BTU/ft^3

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	5.82	25.49
Nitrogen Oxides (NO_X)	57.62	252.38
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}$)	<0.01	<0.01
Particulate Matter (PM_{10})	0.07	0.32
Total Particulate Matter (TSP)	0.07	0.32
Sulfur Dioxide (SO_2)	<0.01	0.02
Volatile Organic Compounds (VOC)	4.46	19.54
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.28	1.20
Benzene	0.01	0.06
Toluene	0.01	0.03
Ethylbenzene	<0.01	<0.01
n-Hexane	<0.01	0.01
Xylene	<0.01	0.01
Acrolein	<0.01	0.02
Acetaldehyde	0.01	0.02
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

CO, NOx, VOC and HAPs Emission Rates based on annual emission statement submittals to WVDEP. PM10, PM2.5, and SO2 Emission Factors were obtained from USEPA's AIRS Report (March 1990). HAP Emission Rates based on AP-42 (Formaldehyde Emission Rate based on an emission test report conducted in 2006 in accordance with EPA Method 320).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

____ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F.**

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
AUX01	AUX01	N/A

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Cooper 660-hp Natural Gas Fired Reciprocating Engine/Integral Compressor.

Manufacturer:	**Model number:**	**Serial number:**
Waukesha	F1905	
Construction date:	**Installation date:**	**Modification date(s):**
	1988	N/A

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
7,500 Btu/HP-hrs

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
0.0026 MMscf/hr		8760 hrs/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? _X_Yes ___ No	**If yes, is it?** ___ Indirect Fired _X_Direct Fired
Maximum design heat input and/or maximum horsepower rating: 350 HP	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Pipeline Quality Natural Gas – 0.0026 MMscf/hr, 7,500 Btu/HP-hrs

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	< 20 gr/100 ft^3	N/A	1,000 BTU/ft^3

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	9.95	43.60
Nitrogen Oxides (NO_X)	11.57	50.70
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}$)	<0.01	<0.01
Particulate Matter (PM_{10})	0.03	0.11
Total Particulate Matter (TSP)	0.03	0.11
Sulfur Dioxide (SO_2)	<0.01	0.01
Volatile Organic Compounds (VOC)	0.16	0.71
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.05	0.24
Acrolein	<0.01	<0.01
Acetaldehyde	<0.01	<0.01
Benzene	<0.01	0.02
Ethylbenzene	<0.01	<0.01
Toluene	<0.01	0.01
Xylene	<0.01	<0.01
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

NOx, CO and VOC emission rates based on manufacturer's information.
PM and SO2 emission rates were obtained from USEPA's AIRS Report (March 1990).
HAP emission factors were obtained from AP-42.

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
____ Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
DEHY1	1E	Low Pressure Flare, 1C

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Glycol Dehydration System

Manufacturer:	**Model number:**	**Serial number:**

Construction date:	**Installation date:**	**Modification date(s):**
	2005	N/A

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
54.0 MMSCF wet gas/day

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
54.0 MMSCF wet gas/day		8760 hrs/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** __ Indirect Fired __Direct Fired
Maximum design heat input and/or maximum horsepower rating: N/A	**Type and Btu/hr rating of burners: unknown**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
N/A

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.19	0.81
Nitrogen Oxides (NO_X)	0.18	0.78
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)	0.33	1.41
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Hexane	<0.01	0.02
Benzene	0.02	0.07
Toluene	0.05	0.23
Ethylbenzene	0.04	0.19
Xylene	0.05	0.24
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Emission Rates based on emission required permitted maximums.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

45 CSR 10-4.1 – SO2 emissions shall not exceed 2,000 ppm by volume (TV 3.1.9, R13-2626C, 4.1.2).
45 CSR 10-5.1 – H2S emissions shall not exceed 50 gr/100 cu ft (TV 3.1.10).
45 CSR 30-5.1(c) – Annual analysis of Inlet Gas for Total Sulfur (TV 3.2.1).
45 CSR 30.5.1(c) - Monthly visual emissions check of each emission point (TV 3.2.2).
45 CSR 30-5.1(c) – Annual analysis of Inlet Gas for H2S (TV 3.2.3).
45 CSR 2-3.1 – Opacity limit of less than ten (10) percent (TV 4.1.1, R13-2626C, 5.1.1)
45 CSR 2-3.2 – Compliance with visible emission requirement shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 or by using a COMS if directed by Director (TV 4.1.2, R13-2626C, 5.1.2)

____ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45 CSR 30-5.1(c) - TV 3.1.9 shall be complied with by annual sampling of inlet natural gas stream (TV 3.2.4)
45 CSR 30-5.1(c) - TV 3.1.10 shall be complied with by annual sampling of inlet natural gas stream (TV 3.2.5).
45 CSR 30-5.1(c) - TV 3.2.1 shall be complied with by annual sampling of inlet natural gas stream.
45 CSR 30-5.1(c) - TV 3.2.2 shall be complied with by monthly visual emissions checks of each emission point.
45 CSR 30-5.1(c) - TV 3.2.3 shall be complied with by annual sampling of inlet natural gas stream.
45 CSR 2-3.1 - TV 4.1.1 shall be complied with by performing opacity readings upon request from Department (45 CSR 13, R13-2626C, 5.1.1).
45 CSR 2-3.2 – Compliance with visible emission requirement shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 or by using a COMS if directed by Director (TV 4.1.2, R13-2626C, 5.1.2)

Are you in compliance with all applicable requirements for this emission unit? _X_ Yes ___ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
REB1	2E	N/A

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Dehydration unit reboiler

Manufacturer:	**Model number:**	**Serial number:**
ETI		
Construction date:	**Installation date:**	**Modification date(s):**
	2005	N/A

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
750,000 BTU/hr

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
750,000 BTU/hr		8760 hrs/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? _X_Yes ___ No	**If yes, is it?** ___ Indirect Fired _X_Direct Fired
Maximum design heat input and/or maximum horsepower rating: 750,000 BTU/hr	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Natural Gas – 750,000 BTU/hr

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	< 20 gr/100 ft^3	N/A	

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.06	0.27
Nitrogen Oxides (NO_X)	0.07	0.32
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}$)	0.01	0.02
Particulate Matter (PM_{10})	0.01	0.02
Total Particulate Matter (TSP)	0.01	0.02
Sulfur Dioxide (SO_2)	<0.01	<0.01
Volatile Organic Compounds (VOC)	<0.01	0.02
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

NOx and CO Emission Factors were obtained from Table 1.4-1 of AP-42 (7/98).
VOC, PM, SO2, and PM2.5 Emission Factors were obtained from Table 1.4-2 of AP-42 (7/98).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

45 CSR 10-4.1 – SO2 emissions shall not exceed 2,000 ppm by volume (TV 3.1.9, R13-2626C, 4.1.2).
45 CSR 10-5.1 – H2S emissions shall not exceed 50 gr/100 cu ft (TV 3.1.10).
45 CSR 30-5.1(c) – Annual analysis of Inlet Gas for Total Sulfur (TV 3.2.1).
45 CSR 30.5.1(c) - Monthly visual emissions checks of each emission point (TV 3.2.2).
45 CSR 30-5.1(c) – Annual analysis of Inlet Gas for H2S (TV 3.2.3).
45 CSR 2-3.1 – Opacity limit of less than ten (10) percent (TV 4.1.1, R13-2626C, 5.1.1)
45 CSR 13 – Fuel consumption limited to 735 cft/hr and 6.44 mmcf/yr of natural gas (TV 4.1.3, R13-2626B, 5.1.3).
45 CSR 2-3.2 – Compliance with visible emission requirement shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 or by using a COMS if directed by Director (TV 4.1.2, R13-2626C, 5.1.2)

____ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45 CSR 30-5.1(c) - TV 3.1.9 shall be complied with by annual sampling of inlet natural gas stream (TV 3.2.4).
45 CSR 30-5.1(c) - TV 3.1.10 shall be complied with by annual sampling of inlet natural gas stream (TV 3.2.5).
45 CSR 30-5.1(c) - TV 3.2.1 shall be complied with by annual sampling of inlet natural gas stream.
45 CSR 30-5.1(c) - TV 3.2.2 shall be complied with by monthly visual emissions checks of each emission point.
45 CSR 30-5.1(c) - TV 3.2.3 shall be complied with by annual sampling of inlet natural gas stream.
TV 4.1.1 shall be complied with by performing opacity readings upon request from Department (45 CSR 13, R13-2626C, 5.1.1).
TV 4.1.3 shall be complied with by maintaining fuel records and the hours of operation of the reboiler (45 CSR 13, R13-2626C, 5.1.3).
45 CSR 2-3.2 – Compliance with visible emission requirement shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 or by using a COMS if directed by Director (TV 4.1.2, R13-2626C, 5.1.2)

Are you in compliance with all applicable requirements for this emission unit? _X_ Yes ___ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: F1	**List all emission units associated with this control device.** DEHY1, REB1	
Manufacturer:	**Model number:**	**Installation date:** 2005

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter ___ Venturi Scrubber ___ Multiclone

___ Carbon Bed Adsorber ___ Packed Tower Scrubber ___ Single Cyclone

___ Carbon Drum(s) ___ Other Wet Scrubber ___ Cyclone Bank

___ Catalytic Incinerator ___ Condenser ___ Settling Chamber

___ Thermal Incinerator _X_ Flare ___ Other (describe) _____

___ Wet Plate Electrostatic Precipitator ___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
VOC		98%
Benzene		98%
Ethylbenzene		98%
n-Hexane		98%
Toluene		98%
Xylene		98%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).
1,1000,000 BTU/hr

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.** The Permittee is conducting reasonable assurance compliance monitoring to maintain minor source classification in accordance with the requirements of 40 CFR 63, Subpart HH.

Describe the parameters monitored and/or methods used to indicate performance of this control device.
Visual emission checks shall be conducted monthly. If visible emissions are observed, compliance shall be determined by conducting tests in accordance with Method 9 of 40 CFR 60, Appendix A (TV 3.2.2, 45 CSR 30-5.1c; TV 5.2.2, 45 CSR 13, R13-2626C, 6.2.2).
Emission of Visible Particulate Matter cannot exceed 20% opacity (TV 5.1.1, 45 CSR 6-4.3 and 45 CSR 13, R13-2626C, 6.1.1).
The flare (F1) must be operated within operational design limits and with routine maintenance (TV 5.1.2, 45 CSR 13, R13-2626C, 6.1.2).

The flare (F1) will be operated at all times when the glycol dehydration unit is operational (TV 5.1.3, 45 CSR 13, R13-2626C, 6.1.3).

Particulate matter cannot exceed determined quantity (TV 5.1.4, 45 CSR 6-4.1, 45CSR13, R13-2626C, 6.1.4).

Emissions of particles or unburned or partially burned refuse or ash, large enough to be individually distinguished in the open air, is prohibited (TV 5.1.5, 45 CSR 6-4.5, 45 CSR 13, R13-2626C, 6.1.5).

Flare will be designed, operated, and maintained to prevent emissions of objectionable odors (TV 5.1.6, 45 CSR 6-4.6, 45 CSR 13, R13-2626C, 6.1.6).

A wet natural gas throughput of 54.0 mmscf/day to the glycol dehydration unit/still column (DEHY1) shall not be exceeded (TV 5.1.7, 45 CSR 13, R16-2626C, 6.1.7).

Emissions from the Flare, F1, shall not exceed set limits (TV 5.1.8, 45 CSR 13, R13-2626C, 6.1.7).

The flame will be monitored by a thermocouple connected to the control room (TV 5.2.1, 45 CSR 13, R13-2626C, 6.2.1).

The permittee shall conduct visible emission checks and/or opacity monitoring for the flare (TV 5.2.2, 45 CSR, R13-2626C, 6.2.2).

The throughput of wet natural gas feed to the dehydration system (DEHY1) shall be monitored on a daily basis (TV 5.2.3, 45 CSR 13, R13-2626C, 6.2.3).

Glycol dehydration unit parameters shall be monitored while conducting wet gas testing (TV 5.2.4, 45 CSR 13, R13-2626C, 6.2.4).

Potential HAP emissions shall not exceed 10 TPY of any single HAP or 25 TPY of any combination of HAPs (TV 5.3.1, 45 CSR 13, R13-2626C, 6.3.1)

Record of the wet natural gas throughput through the glycol dehydration system shall be maintained (TV 5.4.1, 45 CSR 13, R13-2626C, 6.4.1)

Record of the times and duration of all periods during which the pilot flame was absent shall be maintained (TV 5.4.2, 45 CSR 13, R13-2626C, 6.4.2)

A record of flare design shall be maintained (TV 5.4.3, 45 CSR 13, R13-2626C, 6.4.3).

Records of initial heat content determinations, flow rate measurements, exit velocity determinations and wet gas analysis (if required) will be maintained for compliance determinations as required (TV 5.4.4, 45 CSR 13, R13-2626C, 6.4.4).

APPENDIX F

P.E. CERTIFICATION

AMEC Earth & Environmental, Inc.
2200 Gateway Centre Boulevard, Suite 205
Morrisville, NC 27560

www.amec.com

Tel – (919) 447-2750
Fax – (919) 447-2751

amec

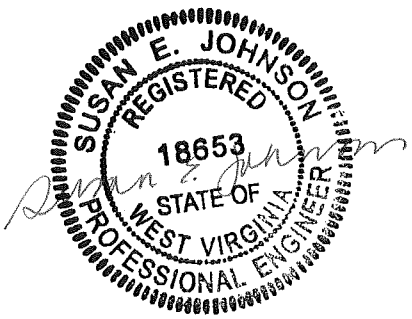
P.E. Certification

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments as they pertain to the practice of engineering. This is defined as the performance of a professional service such as consultation, investigation, evaluation, planning, design or supervision of construction or operation in connection with any utilities, structures, buildings, machines, equipment, processes, works, or projects wherein the safeguarding of life, health and property is concerned, when such service or work requires the application of engineering principals and data. Based on my inquiry of those individuals with primary responsibility for obtaining such information, I certify that the statements and information are to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name of P.E. Susan E. Johnson

Signature of P.E. Susan E. Johnson

Date 8 / 27 / 2010

WV License No. 18653

Phone (919) 447-2750