

**PEPPER COMPRESSOR STATION
DOMINION TRANSMISSION, INC.**

**APPLICATION FOR TITLE V OPERATING PERMIT RENEWAL
TITLE V OPERATING PERMIT NO: R30-00100100-2010**

September 17, 2014

**DOMINION TRANSMISSION, INC.
PEPPER COMPRESSOR STATION**

TITLE V PERMIT RENEWAL APPLICATION

TABLE OF CONTENTS

Title V Permit Application Checklist For Administrative Completeness Cross Reference

Section 1: Introduction

Section 2: Renewal Title V Permit Application – General Forms

ATTACHMENTS

Attachment A: Area Map

Attachment B: Plot Plan

Attachment C: Process Flow Diagrams

Attachment D: Title V Equipment Table

Attachment E: Emission Unit Forms

Attachment G: Air Pollution Control Device Forms

**** Note — There are no Attachments F and H for this permit application.**

TITLE V PERMIT APPLICATION CHECKLIST FOR ADMINSTRATIVE COMPLETENESS

Requirement	Application
Two signed copies of the application (at least one must contain the original " <i>Certification</i> " page signed and dated in blue ink)	Enclosed – Section 2
Correct number of copies of the application on separate CDs or diskettes, (i.e. at least one disc per copy)	Enclosed – 1 CD per binder
*Table of Contents (needs to be included but not for administrative completeness)	Table of Contents
Facility Information	Section 1/Section 2
Description of process and products, including NAICS and SIC codes, and including alternative operating scenarios	Section 1 / Section 2: TV Renewal Application Form Section #14
Area map showing plant location	Attachment A
Plot plan showing buildings and process areas	Attachment B
Process flow diagram(s), showing all emission units, control equipment, emission points, and their relationships	Attachment C
Identification of all applicable requirements with a description of the compliance status, the methods used for demonstrating compliance, and a Schedule of Compliance Form (ATTACHMENT F) for all requirements for which the source is not in compliance	Not Applicable
Listing of all active permits and consent orders (if applicable)	Section 2: TV Renewal Application Form Section #21
Facility-wide emissions summary	Section 2: TV Renewal Application Form Section #23
Identification of Insignificant Activities	Section 2: TV Renewal Application Form Section #24
ATTACHMENT D – Title V Equipment Table completed for all emission units at the facility except those designated as insignificant activities	Attachment D
ATTACHMENT E – Emission Unit Form completed for each emission unit listed in the Title V Equipment Table (ATTACHMENT D) and a Schedule of Compliance Form	Attachment E

(ATTACHMENT F) for all requirements for which the emission unit is not in compliance	
ATTACHMENT G – Air Pollution Control Device Form completed for each control device listed in the Title V Equipment Table (ATTACHMENT D)	Attachment G
ATTACHMENT H – Compliance Assurance Monitoring (CAM) Plan Form completed for each control device for which the “Is the device subject to CAM?” question is answered “Yes” on the Air Pollution Control Device Form (ATTACHMENT G)	Not Applicable
General Application Forms signed by a Responsible Official	Enclosed – Section 2
Confidential Information submitted in accordance with 45CSR31	Not Applicable

SECTION 1
Introduction

Introduction

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

Pepper Station is a major source of air emissions for nitrogen oxide (NO_x) 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.

Pepper Station was originally issued a Title V Operating Permit (Permit No: R30-0010100-1996) in 1997 for a period of 5 years, with an expiration date of May 15, 2002. Subsequent Title V Operating Permits were issued in 2005 and 2010. The current Title V Operating Permit was issued on April 20, 2010, with an expiration date of April 20, 2015.

Process Description

Pepper Station began operation in 1977. The main process at Pepper Station is the compression of natural gas. The following equipment is present at the facility:

- Two 600-HP Ajax DPC-600 Reciprocating Engines/Integral Compressors
 - o Emission Point ID/Emission Unit ID: EN01/EN01, EN02/EN02
- One 1,775-HP Caterpillar G3606LE Compressor Engine
 - o Emission Point ID/Emission Unit ID: EN03/EN03
- One 530-HP Cummins Generator Set KTA19G
 - o Emission Point ID/Emission Unit ID:EN05/EN05
- One Glycol Dehydration Unit Still
 - o Emission Point ID/Emission Unit ID:RSV1/F1
- One Dehydration Unit Flare (Control Device)
 - o Emission Point ID/Emission Unit ID: F1/F1
- One Glycol Dehydration Reboiler
 - o Emission Point ID/Emission Unit ID:RBV1/RBV1
- One 4,200-gallon aboveground storage tank containing produced fluids (drip gas)
 - o Emission Point ID/Emission Unit ID: TK01/TK01
- One 4,200-gallon aboveground storage tank containing new engine oil
 - o Emission Point ID/Emission Unit ID:TK02/TK02
- One 2,000-gallon aboveground storage tank containing ethylene glycol
 - o Emission Point ID/Emission Unit ID:TK03/TK03
- One 230-gallon aboveground storage tank containing waste water

- Emission Point ID/Emission Unit ID:TK04/TK04
- One 4,000-gallon aboveground storage tank containing produced fluids (drip gas)
 - Emission Point ID/Emission Unit ID:TK05/TK05
- One 400-gallon aboveground storage tank containing TEG
 - Emission Point ID/Emission Unit ID:TK06/TK06
- One 4,200-gallon aboveground storage tank containing used oil
 - Emission Point ID/Emission Unit ID:TK07/TK07
- One 4,740gallon aboveground storage tank containing motor oil
 - Emission Point ID/Emission Unit ID:TK08/TK08
- One 1,726-gallon aboveground storage tank containing ethylene glycol
 - Emission Point ID/Emission Unit ID:TK09/TK09

SECTION 2

Renewal Title V Permit Application – General Forms



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475

www.dep.wv.gov/daq

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

Form with 10 sections: 1. Name of Applicant (Dominion Transmission, Inc.), 2. Facility Name (Pepper Compressor Station), 3. DAQ Plant ID No. (001-00100), 4. Federal Employer ID No. (550629203), 5. Permit Application Type (Renewal), 6. Type of Business Entity (Corporation), 7. Is the Applicant the: (Both), 8. Number of onsite employees (15), 9. Governmental Code (Privately owned and operated; 0), 10. Business Confidentiality Claims (No).

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: Brushy Fork Rd.	City: Pepper	County: Barbour
UTM Easting: 574.20 km	UTM Northing: 4337.79 km	Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
Directions: Travel 2.5 miles on Stewarts Run Road off Rt. 57, turn left on Brushy Fork Road. Travel 1 mile and the station will be on the right.		
Portable Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is facility located within a nonattainment area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, for what air pollutants?	
Is facility located within 50 miles of another state? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, name the affected state(s). Pennsylvania Virginia	
Is facility located within 100 km of a Class I Area ¹ ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, do emissions impact a Class I Area ¹ ? <input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, name the area(s). Dolly Sods Wilderness Area Otter Creek Wilderness Area	
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: Brian Sheppard		Title: Vice President, Pipeline Operations
Street or P.O. Box: 445 West Main Street		
City: Clarksburg	State: WV	Zip: 26301
Telephone Number: (304) 627-3733	Fax Number: (303) 627-3323	
E-mail address: Brian.C.Sheppard@dom.com		
Environmental Contact: Meghann Quinn		Title: Env. Specialist, II
Street or P.O. Box: 5000 Dominion Boulevard		
City: Glen Allen	State: VA	Zip: 23060
Telephone Number: (804) 273-2843	Fax Number: () -	
E-mail address: Meghann.J.Quinn@dom.com		
Application Preparer: Meghann Quinn		Title: Env. Specialist, II
Company: Dominion Resource Services		
Street or P.O. Box: 5000 Dominion Boulevard		
City: Glen Allen	State: VA	Zip: 23060
Telephone Number: (804) 273-2843	Fax Number: () -	
E-mail address: Meghann.J.Quinn@dom.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.

Pepper Compressor Station is a natural gas compressor station. Engines EN01 and EN02 compress wet production natural gas flowing through a pipeline for transportation. Engine EN03 and the glycol dehydration unit compress and dehydration wet transmission natural gas flowing through a pipeline for transportation.

A

- 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.	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input checked="" type="checkbox"/> NESHAP (45CSR34)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS	<input type="checkbox"/> Section 112(d) MACT standards
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input checked="" type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64)
<input type="checkbox"/> CAIR NO _x Annual Trading Program (45CSR39)	<input type="checkbox"/> CAIR NO _x Ozone Season Trading Program (45CSR40)
<input type="checkbox"/> CAIR SO ₂ Trading Program (45CSR41)	

19. Non Applicability Determinations
<p>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.</p> <p>45 CSR 2 – <i>To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.</i> The Ajax CPD-600 Reciprocating Engines/Integral Compressors (Emission Points EN01 and EN02) are exempted from sections 4, 5, 6, 8, and 9 since they have a design heat input below 10 million BTU/hr. Section three lists opacity requirements. Since these engines burn natural gas, visible emissions will be minimal making opacity conditions in the permit unnecessary.</p> <p>45 CSR 10—<i>To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.</i> The director has determined that 45 CSR 10 does not apply to engines; the engines do not meet the definition of a fuel burning unit in 45 CSR §10-2.8 or a manufacturing process in 45 CSR §2-2.11. Additionally, the Ajax CPD-600 Reciprocating Engines/Integral Compressors (Emission Points EN01 and EN02) would be exempted from sections 3 and 6-8 since they have a design heat input below 10 million BTU/hr.</p>
<input type="checkbox"/> Permit Shield

19. Non Applicability Determinations (Continued) - Attach additional pages as necessary.

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.

40 CFR 60, Subpart K—*Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.* TK01 and TK02 were constructed in 1977. However, this subpart does not apply per 40 C.F.R.60 § 110(a) because these tanks have a capacity below 40000 gallons.

40 CFR 60, Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.* Although TK03 – TK09 were installed after 1984, none are equal to or greater than 75 cubic meters (19,813 gals). Therefore, this Subpart does not apply.

40 CFR 60, Subpart OOOO – *Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution.* This facility has no equipment with applicable requirements under Subpart OOOO. This subpart applies to equipment installed after August 23, 2011. The compressor associated with EN03 has no requirements under Subpart OOOO because the unit services transmission natural gas. TK06 – TK09 have no requirements under Subpart 40 because none have the potential for VOC of 6 tons per year or more.

40 CFR 63, Subpart HHH—*National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities.* This facility is exempt per 40 C.F.R. 63 § 1270(a) since this facility is not a major HAP source.

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 61.145(b) / 45 CSR 34 – Asbestos inspection and removal (TV 3.1.3)

45 CSR 11-5.2 – Standby plans for reducing emissions (TV 3.1.5)

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

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 17-3.1 – No fugitive particulate matter beyond the property boundary (TV 3.1.9)

WV Code 22-5-4(a)(15) and 45 CSR 13 – Stack Testing Requirements (TV 3.3.1)

45 CSR 13 / 45 CSR 30 – Record keeping and Reporting (TV 3.4 and 3.5)

State Enforceable Only:

45 CSR 4-3.1 – Odor control (TV 3.1.4)

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 6-3.1 – The permittee shall prohibit open burning not meeting an exemption listed in 45 CSR 6-3.2 (TV 3.1.1)

45 CSR 6-3.2 – The permittee shall prohibit open burning not meeting an exemption listed in 45 CSR 6-3.2 (TV 3.1.2)

40 CFR Part 61.145(b) / 45 CSR 34 – Prior to demolition/construction, buildings will be inspected for asbestos (TV 3.1.3)

45 CSR 11-5.2 – Upon request by the Secretary, the permittee shall prepare a standby plan (TV 3.1.5)

40 CFR Part 82 Subpart F – The permittee will prohibit maintenance, service, or repair of appliances containing Ozone depleting substances (TV 3.1.7)

40 CFR Part 68 – Should the permittee become subject to 40 CFR Part 68, a Risk Management Plan shall be submitted (TV 3.1.8)

WV Code 22-5-4(a)(15) and 45 CSR 13 – Stack Testing shall be conducted as required and when requested (TV 3.3.1)

45 CSR 30-5.1.c.2.A, 45 CSR 13 – The permittee shall keep records of monitoring (TV 3.4.1, R13-2866 4.3.1)

45 CSR 30-5.1.c.2.B – The permittee shall keep records of monitoring and supporting information for at least 5 years (TV 3.4.2)

45 CSR 30-4.4 and 5.1.c.3.D – Any application form shall contain a certification by the responsible official that states that the statements and information in the document are true (TV 3.5.1)

45 CSR 30-5.1.c.3.E – The permittee may request confidential treatment for the submission of reporting (TV 3.5.2)

45 CSR 30-8 – The permittee shall submit a certified emissions statement annually (TV 3.5.4)

45 CSR 30-5.3.e – The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ (TV 3.5.5)

45 CSR 30-5.1.c.3.A – The permittee shall submit reports of any required monitoring on or before the required dates (TV 3.5.6)

State Enforceable Only:

45 CSR 30-5.1.c – The permittee shall keep records of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken (TV 3.4.3)

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

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

20. Facility-Wide Applicable Requirements (Continued) - Attach additional pages as necessary.

List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.

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.)

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

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

22. Inactive Permits/Obsolete Permit Conditions

Permit Number	Date of Issuance	Permit Condition Number
	MM/DD/YYYY	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	
	/ /	

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	47.26
Nitrogen Oxides (NO _x)	190.23
Lead (Pb)	
Particulate Matter (PM _{2.5}) ¹	1.67*
Particulate Matter (PM ₁₀) ¹	1.67*
Total Particulate Matter (TSP)	2.69*
Sulfur Dioxide (SO ₂)	0.06
Volatile Organic Compounds (VOC)	84.58**
Hazardous Air Pollutants ²	Potential Emissions
Formaldehyde	8.18
Acrolein	0.28
Acetaldehyde	0.57
Benzene	0.09
Ethylbenzene	0.02
n-Hexane	0.23
Toluene	0.48
Xylene	0.87
Regulated Pollutants other than Criteria and HAP	Potential Emissions
Greenhouse Gases (GHGs)	Potential Emissions
Carbon Dioxide (CO ₂)	13,923
Nitrous Oxide (N ₂ O)	0.03
Methane (CH ₄)	0.24
Hydrofluorocarbons (HFCs)	
Perfluorocarbons (PFCs)	
Sulfur hexafluoride (SF ₆)	

CO ₂ equivalent (CO ₂ e)	13,931
<p>¹PM_{2.5} and PM₁₀ are components of TSP.</p> <p>²For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.</p> <p>*The PTE for PM2.5, PM10, and TSP increased because updated emission factors were used for EN01 and EN02.</p> <p>**The PTE for VOC emissions has increased due to tank emissions.</p>	

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)	
<input checked="" type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input type="checkbox"/>	2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	4. Bathroom/toilet vent emissions.
<input checked="" type="checkbox"/>	5. Batteries and battery charging stations, except at battery manufacturing plants.
<input type="checkbox"/>	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.
<input type="checkbox"/>	7. Blacksmith forges.
<input type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input type="checkbox"/>	10. CO ₂ lasers, used only on metals and other materials which do not emit HAP in the process.
<input type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input checked="" type="checkbox"/>	12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
<input checked="" type="checkbox"/>	13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
<input type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input type="checkbox"/>	15. Drop hammers or hydraulic presses for forging or metalworking.
<input type="checkbox"/>	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.
<input type="checkbox"/>	17. Emergency (backup) electrical generators at residential locations.
<input type="checkbox"/>	18. Emergency road flares.
<input type="checkbox"/>	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)	
<input type="checkbox"/>	<p>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.</p> <p>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:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<input type="checkbox"/>	21. Environmental chambers not using hazardous air pollutant (HAP) gases.
<input checked="" type="checkbox"/>	22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
<input type="checkbox"/>	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.
<input type="checkbox"/>	24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
<input type="checkbox"/>	25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
<input type="checkbox"/>	26. Fire suppression systems.
<input checked="" type="checkbox"/>	27. Firefighting equipment and the equipment used to train firefighters.
<input type="checkbox"/>	28. Flares used solely to indicate danger to the public.
<input checked="" type="checkbox"/>	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.
<input type="checkbox"/>	30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
<input checked="" type="checkbox"/>	31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
<input type="checkbox"/>	32. Humidity chambers.
<input type="checkbox"/>	33. Hydraulic and hydrostatic testing equipment.
<input type="checkbox"/>	34. Indoor or outdoor kerosene heaters.
<input checked="" type="checkbox"/>	35. Internal combustion engines used for landscaping purposes.
<input type="checkbox"/>	36. Laser trimmers using dust collection to prevent fugitive emissions.
<input type="checkbox"/>	37. Laundry activities, except for dry-cleaning and steam boilers.
<input type="checkbox"/>	38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
<input type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input type="checkbox"/>	40. Ozone generators.
<input checked="" type="checkbox"/>	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.)
<input checked="" type="checkbox"/>	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.
<input type="checkbox"/>	43. Process water filtration systems and demineralizers.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
<input type="checkbox"/>	46. Routing calibration and maintenance of laboratory equipment or other analytical instruments.
<input type="checkbox"/>	47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
<input type="checkbox"/>	48. Shock chambers.
<input type="checkbox"/>	49. Solar simulators.
<input checked="" type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input type="checkbox"/>	51. Steam cleaning operations.
<input type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input type="checkbox"/>	54. Steam vents and safety relief valves.
<input type="checkbox"/>	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.
<input type="checkbox"/>	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.
<input type="checkbox"/>	57. Such other sources or activities as the Director may determine.
<input type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input type="checkbox"/>	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 .

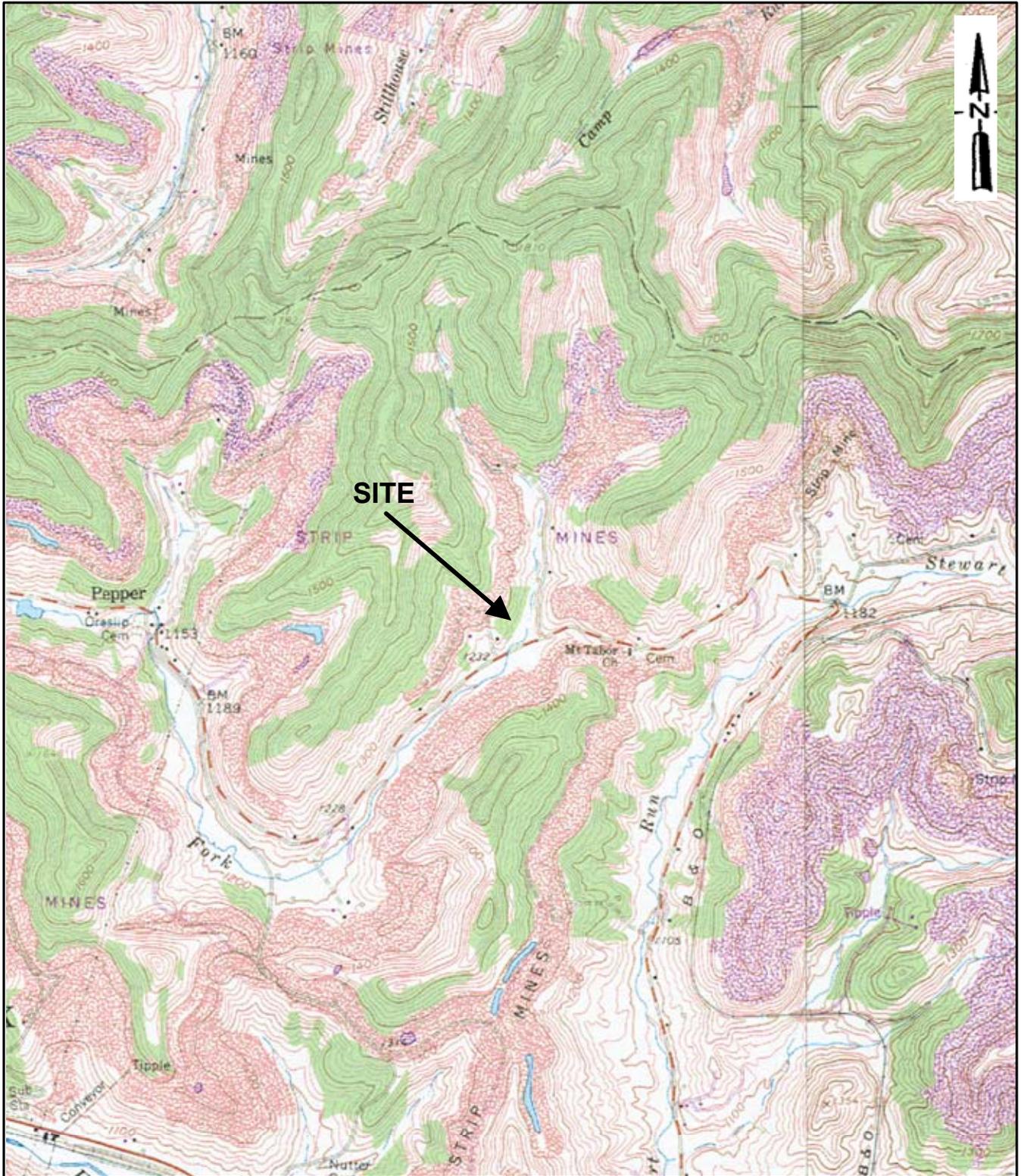
Section 6: Certification of Information

<p>28. Certification of Truth, Accuracy and Completeness and Certification of Compliance</p> <p><i>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.</i></p>	
<p>a. Certification of Truth, Accuracy and Completeness</p> <p>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.</p>	
<p>b. Compliance Certification</p> <p>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.</p>	
<p>Responsible official (type or print)</p>	
<p>Name: Brian C. Sheppard</p>	<p>Title: Vice President, Pipeline Operations</p>
<p>Responsible official's signature:</p>	
<p>Signature: <u></u> Signature Date: <u>09-22-2014</u> <small>(Must be signed and dated in blue ink)</small></p>	

<p>Note: Please check all applicable attachments included with this permit application:</p>	
<input checked="" type="checkbox"/>	ATTACHMENT A: Area Map
<input checked="" type="checkbox"/>	ATTACHMENT B: Plot Plan(s)
<input checked="" type="checkbox"/>	ATTACHMENT C: Process Flow Diagram(s)
<input checked="" type="checkbox"/>	ATTACHMENT D: Equipment Table
<input checked="" type="checkbox"/>	ATTACHMENT E: Emission Unit Form(s)
<input type="checkbox"/>	ATTACHMENT F: Schedule of Compliance Form(s)
<input checked="" type="checkbox"/>	ATTACHMENT G: Air Pollution Control Device Form(s)
<input type="checkbox"/>	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.dep.wv.gov/dag, requested by phone (304) 926-0475, and/or obtained through the mail.

ATTACHMENT A
Area Map



0 2000 4000



APPROXIMATE SCALE IN FEET

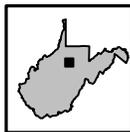
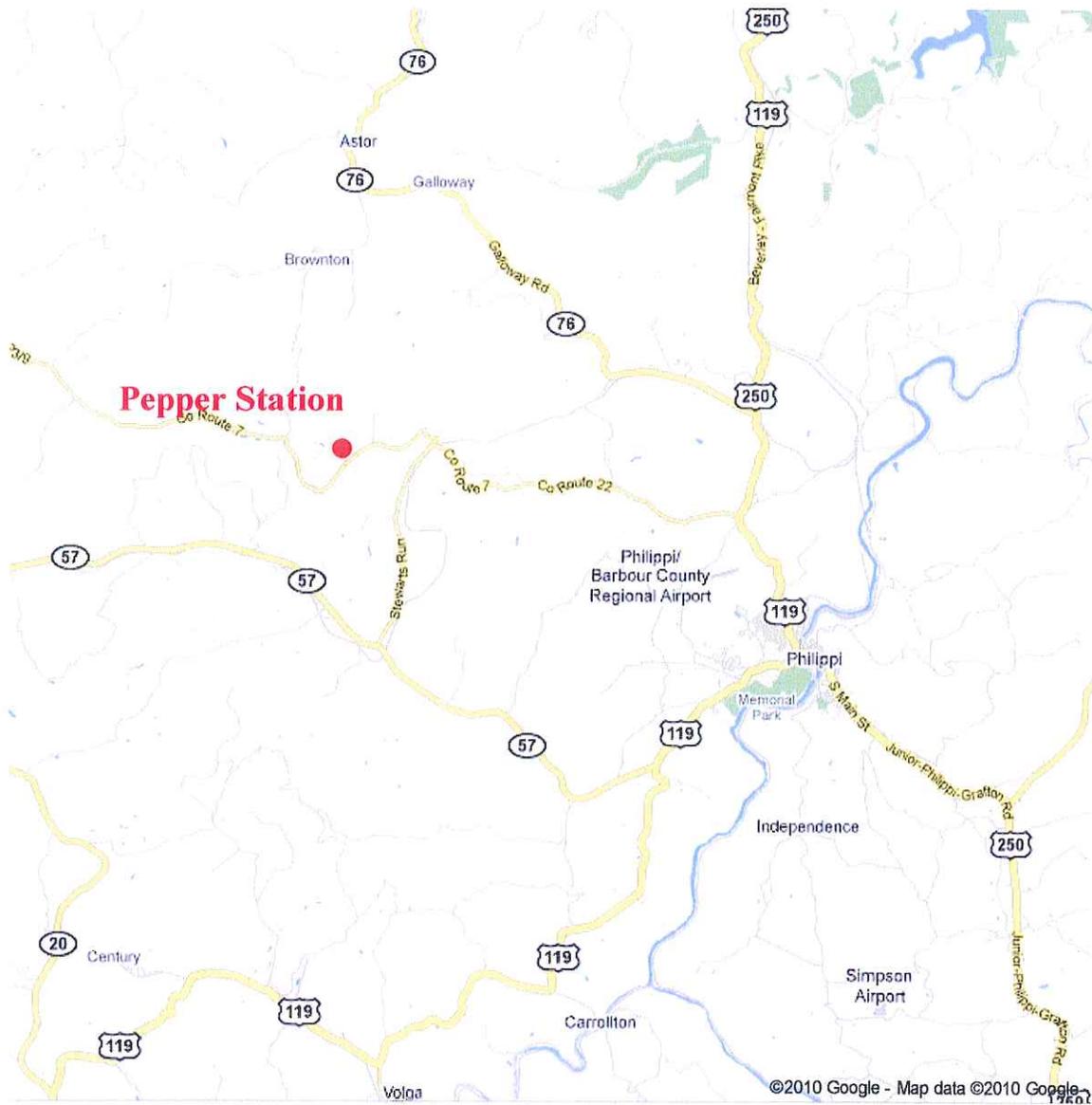


FIGURE 1
SITE LOCATION MAP
PEPPER COMPRESSOR STATION
BARBOUR COUNTY, WEST VIRGINIA

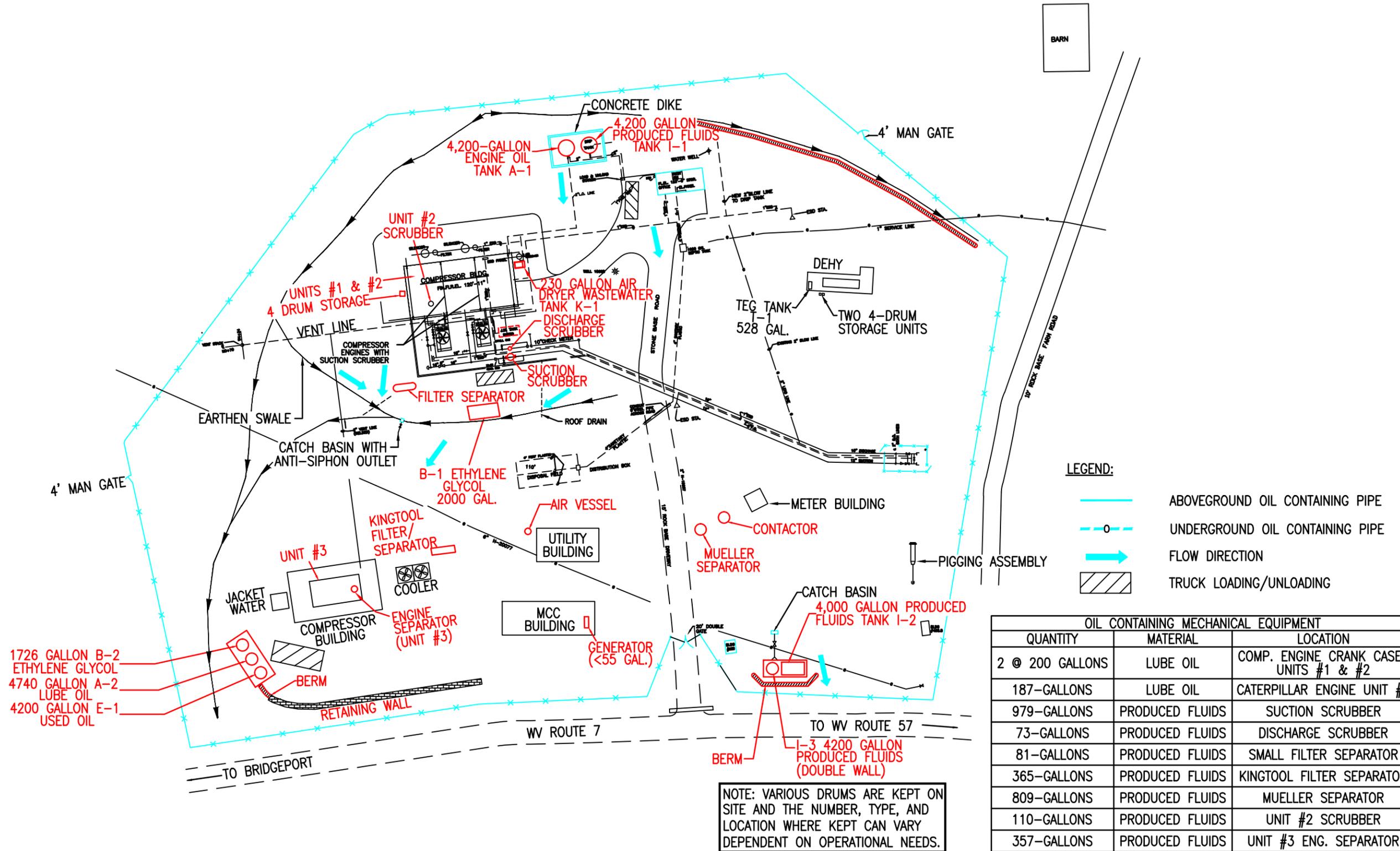
BASE MAP SOURCE: Browton, WV (1961, Photorevised 1976) 7.5 Minute Series Topographic Map.





ATTACHMENT B

Plot Plan



LEGEND:

- ABOVEGROUND OIL CONTAINING PIPE
- o- UNDERGROUND OIL CONTAINING PIPE
- FLOW DIRECTION
- TRUCK LOADING/UNLOADING

1726 GALLON B-2
ETHYLENE GLYCOL
4740 GALLON A-2
LUBE OIL
4200 GALLON E-1
USED OIL

OIL CONTAINING MECHANICAL EQUIPMENT		
QUANTITY	MATERIAL	LOCATION
2 @ 200 GALLONS	LUBE OIL	COMP. ENGINE CRANK CASES UNITS #1 & #2
187-GALLONS	LUBE OIL	CATERPILLAR ENGINE UNIT #3
979-GALLONS	PRODUCED FLUIDS	SUCTION SCRUBBER
73-GALLONS	PRODUCED FLUIDS	DISCHARGE SCRUBBER
81-GALLONS	PRODUCED FLUIDS	SMALL FILTER SEPARATOR
365-GALLONS	PRODUCED FLUIDS	KINGTOOL FILTER SEPARATOR
809-GALLONS	PRODUCED FLUIDS	MUELLER SEPARATOR
110-GALLONS	PRODUCED FLUIDS	UNIT #2 SCRUBBER
357-GALLONS	PRODUCED FLUIDS	UNIT #3 ENG. SEPARATOR

NOTE: VARIOUS DRUMS ARE KEPT ON SITE AND THE NUMBER, TYPE, AND LOCATION WHERE KEPT CAN VARY DEPENDENT ON OPERATIONAL NEEDS.

SYM.	DATE	BY	REVISION DESCRIPTION	PRJ/TSK	APP.	SCALE	DATE
						1"=60'	
						DRAWN	DJF
						CHECKED	
						APP. FOR BID	
						APP. FOR CONST.	
						TOWN: PEPPER	COUNTY: BARBOUR
3	07/03/14	TBB	REVISED PER TIM JACKSON MARKUPS				
2	04/02/13	TBB	REVISED PER TIM JACKSON MARKUPS				
1	01/30/13	TBB	TRANSFERRED TO DOMINION BORDER & ADDED MARKUPS PER TIM JACKSON				

Dominion Transmission, Inc.
445 West Main St. Clarksburg, West Virginia 26301 / Phone: (304) 623-8000

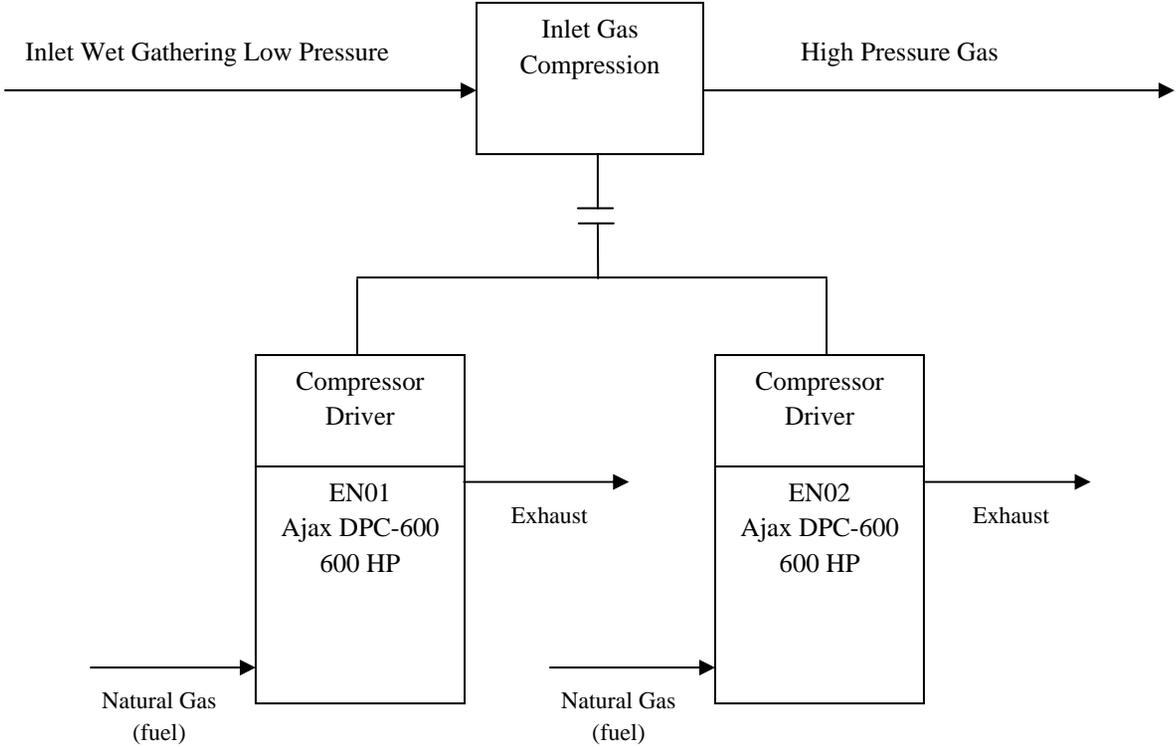
FOR: **PEPPER COMPRESSOR STATION**

TITLE: **ENVIRONMENTAL EMERGENCY SITE PLAN**

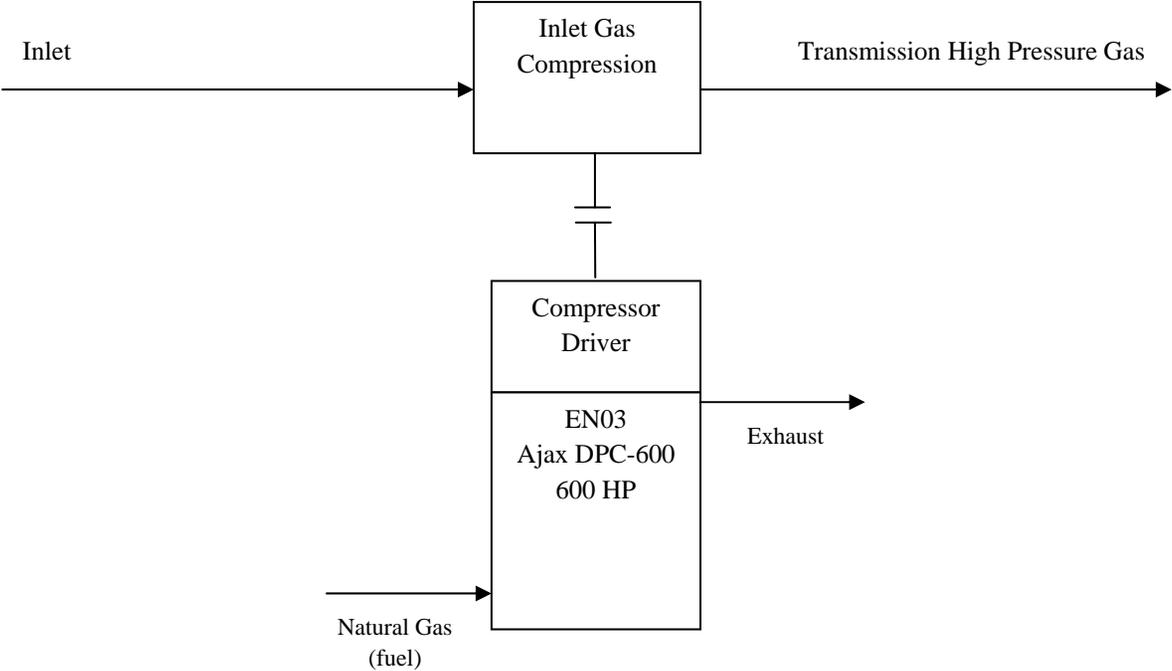
DIR:	GROUP:	DWG. NO.	REV.
FILE:	PRJ/TSK:	PD	X1397
			3

ATTACHMENT C
Process Flow Diagram

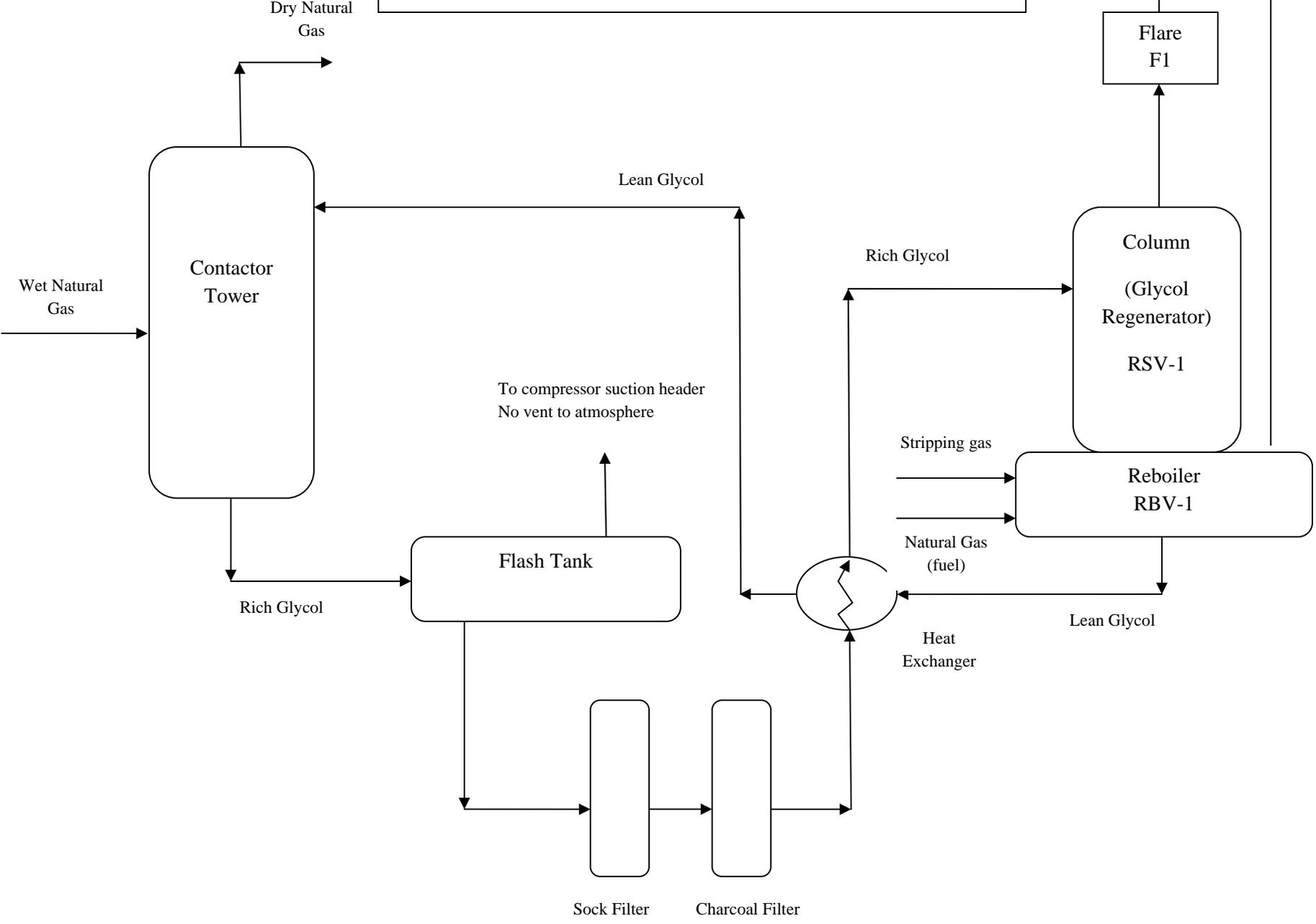
Pepper Compressor Station
Figure 1 – Process Flow Diagram
Compressor Engines



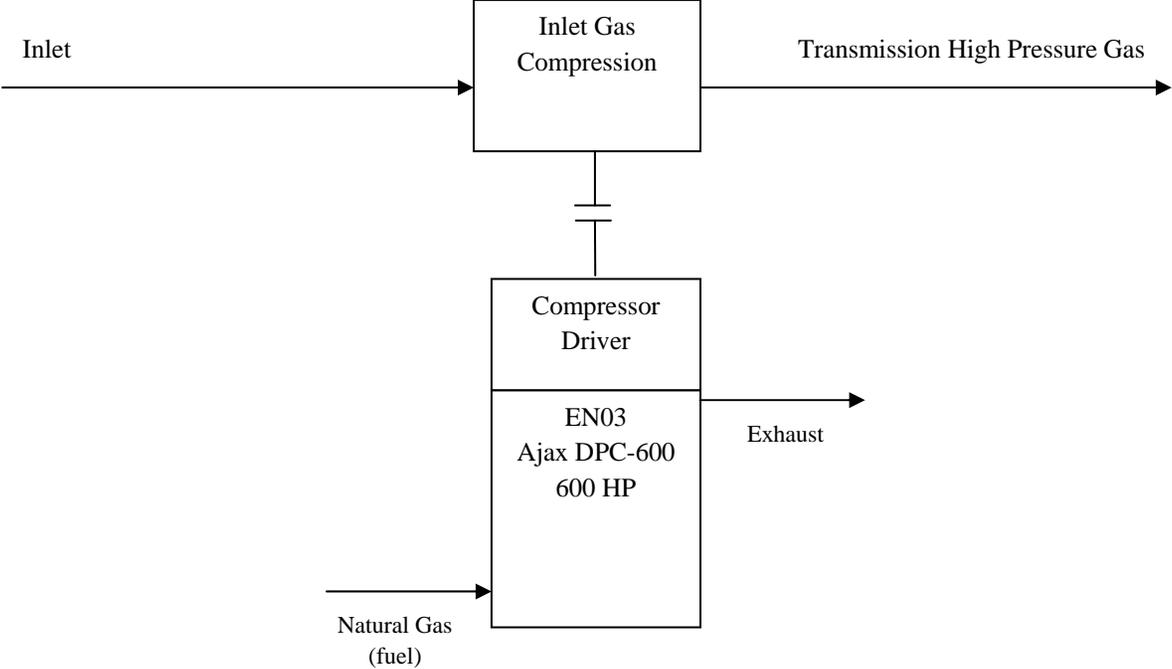
Pepper Compressor Station
Figure 2 – Process Flow Diagram
Compressor Engines



Pepper Compressor Station
Figure 3 – Process Flow Diagram
Dehydration System



Pepper Compressor Station
Figure 2 – Process Flow Diagram
Compressor Engines



ATTACHMENT D
Title V Equipment Table

ATTACHMENT D - Title V Equipment Table
(includes all emission units at the facility except those designated as
insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
EN01*	N/A	EN01	Reciprocating Engine/Integral Compressor; Ajax DPC-600	600 HP	1977
EN02*	N/A	EN02	Reciprocating Engine/Integral Compressor; Ajax DPC-600	600 HP	1977
EN03*	CC1	EN03	Caterpillar G3606LE Compressor	1775 HP	2011
EN05*	N/A	EN05	Cummins Generator Set; KTA19G	530 HP	2012
RSV1	F1	F1	Glycol Dehydrator Regenerator	30 mmscf/day	2011
RBV1	N/A	RBV1	Glycol Dehydrator Reboiler Vent	1 mmBtu/hr	2011
TK01	N/A	TK01	Tank containing Drip Gas	4200 gallon	1977
TK02	N/A	TK02	Tank containing New Engine Oil	4200 gallon	1977
TK03	N/A	TK03	Tank containing Ethylene Glycol	2000 gallon	1992
TK04	N/A	TK04	Tank containing Waste Water	230 gallon	1985
TK05	N/A	TK05	Tank containing Drip Gas	4000 gallon	2005
TK06**	N/A	TK06	Tank containing TEG	400 gallon	2012
TK07**	N/A	TK07	Tank containing Used Oil	4200 gallon	2012
TK08**	N/A	TK08	Tank containing Motor Oil	4740 gallon	2012
TK09**	N/A	TK09	Tank containing Ethylene Glycol	1726 gallon	2012

Control Devices

F1		F1	Ground Level Flare	6 mmBtu/hr	2011
CC1		EN03	Catalyst on EN03	NA	2011

* Equipment burns or combusts pipeline quality natural gas only.

**See Section 2, Renewal Title V Permit Application – General Forms #19 for additional information. There are no applicable regulations to these tanks.

¹For 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.

ATTACHMENT E
Emission Unit Forms

ATTACHMENT E - Emission Unit Form

Emission Unit Description

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

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

Ajax 600 hp Natural gas fired reciprocating internal combustion engine/integral compressor.

Manufacturer: Ajax	Model number: DPC-600	Serial number:
------------------------------	---------------------------------	-----------------------

Construction date:	Installation date: 1977	Modification date(s):
---------------------------	-----------------------------------	------------------------------

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

8,000 btu/hp-hrs

Maximum Hourly Throughput: 0.0048 MMscf/hr	Maximum Annual Throughput:	Maximum Operating Schedule: 8760
--	-----------------------------------	--

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating: 600 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.

Natural Gas

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

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	4.1	18.0
Nitrogen Oxides (NO _x)	20.5	90.0
Lead (Pb)	N/A	N/A
Particulate Matter (PM _{2.5})	0.19	0.83
Particulate Matter (PM ₁₀)	0.19	0.83
Total Particulate Matter (TSP)	0.24	1.04
Sulfur Dioxide (SO ₂)	0.003	0.01
Volatile Organic Compounds (VOC)	3.8	16.8
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.12	0.63
Acrolein	0.0024	0.13
Acetaldehyde	0.0036	0.13
Benzene	0.0087	0.03
Ethylbenzene	0.0011	<0.01
Toluene	0.0021	0.02
Xylene	0.0033	0.005
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.).

NO_x, CO, and VOC emission rates were based on emission factors provided by the manufacturer.
PM emission factors and the SO₂ emission factors were updated to use AP-42 Table 3.2-1. This resulted in an increase in PM_{2.5}, PM₁₀, and TSP emissions.
HAP emission factors were obtained from GRI's HAPCalc v 1.0 (July 1994), except for Ethylbenzene and Xylene which were obtained from US EPA's AP-42 (July 1993).

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.

40 CFR Part 63, Subpart ZZZZ §63.6603(a), Table 2d (Item 6), and §63.6595(a)(1): Every 4,320 hours of operation or annually, whichever comes first change oil and filter and inspect spark plugs, hoses, and belts (replace as necessary). (TV 4.1.10)

40 CFR Part 63, Subpart ZZZZ §63.6625(e)(5), §63.6630(a) and Table 6 (Item 9): Operate and maintain the stationary RICE, and any after-treatment control device, 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. (TV 4.1.11(e))

40 CFR Part 63, Subpart ZZZZ §63.6625(h): The engine must be in compliance with NESHAP emission limits (if applicable) or NESHAP work practice standards within 30 minutes of startup. (TV 4.1.11(h))

40 CFR Part 63, Subpart ZZZZ §63.6625(j): The permittee may implement an oil analysis program to extend the specified oil change requirement (TV 4.1.11(j))

40 CFR Part 63, Subpart ZZZZ §63.6605: At all times 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. (General duty to comply clause). (TV 4.1.12)

40 CFR Part 63, Subpart ZZZZ §§63.6640(b): The permittee must report each instance in which they did not meet operating limitations. (TV 4.1.13)

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.)

40 CFR Part 63, Subpart ZZZZ §§63.6655(a): The permittee must maintain records of the following:
a. The occurrence and duration of each malfunction of the unit and air pollution control equipment.
b. All required maintenance performed on the engine and air pollution control equipment to demonstrate that you operated and maintained them in accordance with your maintenance plan including the required work practice requirements.
c. Actions taken during periods of malfunction to minimize emissions including corrective actions to restore malfunctioning process and air pollution control equipment. (TV 4.4.4)

Are you in compliance with all applicable requirements for this emission unit? 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: EN02	Emission unit name: EN02	List any control devices associated with this emission unit: N/A
---	------------------------------------	--

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

Ajax 600 hp Natural gas fired reciprocating internal combustion engine/integral compressor.

Manufacturer: Ajax	Model number: DPC-600	Serial number:
------------------------------	---------------------------------	-----------------------

Construction date:	Installation date: 1977	Modification date(s):
---------------------------	-----------------------------------	------------------------------

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

8,000 btu/hp-hrs

Maximum Hourly Throughput: 0.0048 MMscf/hr	Maximum Annual Throughput:	Maximum Operating Schedule: 8760
--	-----------------------------------	--

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating: 600 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.

Natural Gas

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

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	4.1	18.0
Nitrogen Oxides (NO _x)	20.5	90.0
Lead (Pb)	N/A	N/A
Particulate Matter (PM _{2.5})	0.19	0.83
Particulate Matter (PM ₁₀)	0.19	0.83
Total Particulate Matter (TSP)	0.24	1.04
Sulfur Dioxide (SO ₂)	0.003	0.01
Volatile Organic Compounds (VOC)	3.8	16.8
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.12	0.63
Acrolein	0.0024	0.13
Acetaldehyde	0.0036	0.13
Benzene	0.0087	0.03
Ethylbenzene	0.0011	<0.01
Toluene	0.0021	0.02
Xylene	0.0033	0.005
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.).

NO_x, CO, and VOC emission rates were based on emission factors provided by the manufacturer.
PM emission factors and the SO₂ emission factors were updated to use AP-42 Table 3.2-1. This resulted in an increase in PM_{2.5}, PM₁₀, and TSP emissions.
HAP emission factors were obtained from GRI's HAPCalc v 1.0 (July 1994), except for Ethylbenzene and Xylene which were obtained from US EPA's AP-42 (July 1993).

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.

40 CFR Part 63, Subpart ZZZZ §63.6603(a), Table 2d (Item 6), and §63.6595(a)(1): Every 4,320 hours of operation or annually, whichever comes first change oil and filter and inspect spark plugs, hoses, and belts (replace as necessary). (TV 4.1.10)

40 CFR Part 63, Subpart ZZZZ §63.6625(e)(5), §63.6630(a) and Table 6 (Item 9): Operate and maintain the stationary RICE, and any after-treatment control device, 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. (TV 4.1.11(e))

40 CFR Part 63, Subpart ZZZZ §63.6625(h): The engine must be in compliance with NESHAP emission limits (if applicable) or NESHAP work practice standards within 30 minutes of startup. (TV 4.1.11(h))

40 CFR Part 63, Subpart ZZZZ §63.6625(j): The permittee may implement an oil analysis program to extend the specified oil change requirement (TV 4.1.11(j))

40 CFR Part 63, Subpart ZZZZ §63.6605: At all times 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. (General duty to comply clause). (TV 4.1.12)

40 CFR Part 63, Subpart ZZZZ §§63.6640(b): The permittee must report each instance in which they did not meet operating limitations. (TV 4.1.13)

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.)

40 CFR Part 63, Subpart ZZZZ §§63.6655(a): The permittee must maintain records of the following:
a. The occurrence and duration of each malfunction of the unit and air pollution control equipment.
b. All required maintenance performed on the engine and air pollution control equipment to demonstrate that you operated and maintained them in accordance with your maintenance plan including the required work practice requirements.
c. Actions taken during periods of malfunction to minimize emissions including corrective actions to restore malfunctioning process and air pollution control equipment. (TV 4.4.4)

Are you in compliance with all applicable requirements for this emission unit? 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: EN03	Emission unit name: EN03	List any control devices associated with this emission unit: CC1
---	------------------------------------	--

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

Natural gas fired reciprocating internal combustion engine.

Manufacturer: Caterpillar	Model number: G3606LE	Serial number:
-------------------------------------	---------------------------------	-----------------------

Construction date:	Installation date: 2011	Modification date(s):
---------------------------	-----------------------------------	------------------------------

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
1775 HP

Maximum Hourly Throughput: ~12,780 cf/hr	Maximum Annual Throughput:	Maximum Operating Schedule: 8760
--	-----------------------------------	--

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating: 1775 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

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)	2.15	9.43
Nitrogen Oxides (NO _x)	1.96	8.57
Lead (Pb)		
Particulate Matter (PM _{2.5})	0.001	0.005
Particulate Matter (PM ₁₀)	0.001	0.005
Total Particulate Matter (TSP)	0.13	0.59
Sulfur Dioxide (SO ₂)	0.008	0.035
Volatile Organic Compounds (VOC)	0.86	3.77
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	1.57	6.87
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.).

NO_x, CO, VOC, and Formaldehyde emission factors are from the Manufacturer.
SO₂, PM₁₀, and PM_{2.5} emission factors are 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.

40 CFR Part 60, Subpart JJJJ 60.4233(e) and Table 1: Emission limits for NOx of 1.0 g/HP-hr or 82 ppmvd at 15% O2, CO of 2.0 g/HP-hr or 270 ppmvd at 15% O2, and VOC of 1.0 g/HP-hr or 60 ppmvd at 15% O2. (TV 4.1.14)

40 CFR Part 63, Subpart ZZZZ 63.6590(c): Meet requirements of Subpart ZZZZ by meeting the requirements in 40 CFR Part 60, Subpart JJJJ. No further requirements in Subpart ZZZZ apply.

R13-2866A limits the amount of fuel to 12,780 cf/hr. Note that this is the maximum design capacity of the unit.

____ 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.)

40 CFR Part 60, Subpart JJJJ 60.4243(b)(2)(ii), 60.4244, 60.4245(a), and 60.4245(d):

Keep a maintenance plan and records of conducted maintenance.

Maintain and operate, to the extent practicable, the engine in a manner consistent with good air pollution control practices for minimizing emissions.

Conduct an initial performance test and subsequent performance testing every 8,760 hours or 3 years, whichever comes first. (TV 4.3, 4.4.5)

Are you in compliance with all applicable requirements for this emission unit? 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: EN05	Emission unit name: EN05	List any control devices associated with this emission unit: N/A
---	------------------------------------	--

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

Emergency auxiliary generator.

Manufacturer: Cummins	Model number: KTA19G	Serial number:
---------------------------------	--------------------------------	-----------------------

Construction date:	Installation date: 2012	Modification date(s):
---------------------------	-----------------------------------	------------------------------

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
530 HP

Maximum Hourly Throughput: ~4,615 cf/hr	Maximum Annual Throughput:	Maximum Operating Schedule: 500
---	-----------------------------------	---

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating: 1775 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

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)	4.67	1.17
Nitrogen Oxides (NO _x)	2.34	0.58
Lead (Pb)		
Particulate Matter (PM _{2.5})	<0.01	<0.01
Particulate Matter (PM ₁₀)	<0.01	<0.01
Total Particulate Matter (TSP)	0.05	0.01
Sulfur Dioxide (SO ₂)	<0.01	<0.01
Volatile Organic Compounds (VOC)	1.17	0.29
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>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.).</p> <p>NO_x, CO, and VOC emission factors are from the Manufacturer. SO₂ and Particulate Matter emission factors are from AP-42.</p>		

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.

40 CFR Part 60, Subpart JJJJ, 60.4233 and Table 1: Emission limits for NO_x of 2.0 g/HP-hr or 160 ppmvd at 15% O₂, CO of 4.0 g/HP-hr or 540 ppmvd at 15% O₂, and VOC of 1.0 g/HP-hr or 86 ppmvd at 15% O₂. (TV 4.1.14)

40 CFR Part 60, Subpart JJJJ, 60.4243(d):

- a. There is no time limit on the use of emergency stationary RICE in emergency situations.
- b. Emergency RICE may be operated for maintenance checks and readiness testing as required by government, manufacturer, vendor, insurance, regional transmission or equivalent balancing authority and transmission operator, and emergency demand response in Energy Emergency alert Level 2, etc. for maximum of 100 hours per calendar year.
- c. Emergency stationary RICE may operate up to 50 hours per year in non-emergency situations (those 50 hours are counted towards the 100 hours per year provided for maintenance and testing and emergency demand response.) (TV 4.1.18)

40 CFR Part 60, Subpart JJJJ, 60.4237(a): Must install and maintain a non-resettable hour meter. (TV 4.1.15)

40 CFR Part 63, Subpart ZZZZ, 63.6590(c): Meet requirements of Subpart ZZZZ by meeting the requirements in 40 CFR Part 60, Subpart JJJJ. No further requirements in Subpart ZZZZ apply.

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.)

40 CFR Part 60, Subpart JJJJ, 60.4245(a and b):

Keep records of the following:

- a. Maintenance conducted on engine
- b. Manufacturer documentation of engine certification
- c. Operating hours (TV 4.4.6, 4.4.7, 4.4.8)

Are you in compliance with all applicable requirements for this emission unit? 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: RBV1	Emission unit name: RBV1	List any control devices associated with this emission unit: N/A
---	------------------------------------	--

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

Glycol dehydration system reboiler.

Manufacturer: Engineering Technology Incorporated	Model number:	Serial number:
---	----------------------	-----------------------

Construction date:	Installation date: 2011	Modification date(s):
---------------------------	-----------------------------------	------------------------------

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
1 mmBtu/hr

Maximum Hourly Throughput: ~0.994 x 10 ⁶ BTU/hr	Maximum Annual Throughput:	Maximum Operating Schedule: 8760
--	-----------------------------------	--

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating: ~0.994 x 10 ⁶ 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.

Pipeline Quality Natural Gas

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

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.151	0.66
Nitrogen Oxides (NO _x)	0.247	1.08
Lead (Pb)	Negligible	Negligible
Particulate Matter (PM _{2.5})	<0.01	0.01
Particulate Matter (PM ₁₀)	<0.01	0.01
Total Particulate Matter (TSP)	0.01	0.05
Sulfur Dioxide (SO ₂)	<0.01	<0.01
Volatile Organic Compounds (VOC)	0.116	0.51
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.).

All emission factors are 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.

40 CSR 2-3.1 – Emission of Visible Particulate Matter must be less than 10% opacity on a six minute block average.

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.)

TV 2.1.7: Proper operation and fuel type will prevent visible particulate matter from exceeding the 10% opacity on six minute block average limit. Emergency situations which cause an exceedance of this limit will be reported.

Are you in compliance with all applicable requirements for this emission unit? 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: RSV1	Emission unit name: F1	List any control devices associated with this emission unit: F1
---	----------------------------------	---

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

Glycol dehydration regenerator still.

Manufacturer:	Model number:	Serial number:
----------------------	----------------------	-----------------------

Construction date:	Installation date: 2011	Modification date(s):
---------------------------	-----------------------------------	------------------------------

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
~30 mmscfd

Maximum Hourly Throughput:	Maximum Annual Throughput: ~10,950 mmscfyr	Maximum Operating Schedule: 8760
-----------------------------------	--	--

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Fuel is combusted in the flare.	If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
---	---

Maximum design heat input and/or maximum horsepower rating: Flare has a max capacity of 9381 scf/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.

Pipeline Quality Natural Gas for supplemental fuel and pilots used to combust the waste gas.

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)	1.39	6.11
Nitrogen Oxides (NO _x)	0.26	1.12
Lead (Pb)		
Particulate Matter (PM _{2.5})	<0.01	<0.01
Particulate Matter (PM ₁₀)	<0.01	<0.01
Total Particulate Matter (TSP)	<0.01	<0.01
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)	1.28	5.63
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Hexane	0.03	0.15
Toluene	0.095	0.42
Xylene	0.193	0.85
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>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.).</p> <p>NO_x and CO emission factors are from the flare Manufacturer. VOC and HAP emission factors are from GLYCalc.</p>		

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 6-4.3, 6-4.4: Flare must not cause smoke with opacity of 20% or greater, with the exception of smoke less than 40% opacity for less than 8 minutes during startup. (TV 4.1.4, 4.1.5)

45 CSR 6-4.5: Flare must not release particles of unburned or partially burned refuse or ash. (TV 4.1.6)

45 CSR 6-4.6: Flare must not omit any objectionable odors. (TV 4.1.7)

45 CSR 13-5.11: Flare must be maintained and operated in a manner consistent with safety and good air pollution control practices. (TV 4.1.9)

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.)

TV 4.2.2: Conduct monthly visual emission checks.

TV 3.4.3: Maintain a record of odor complaints and responsive actions taken.

TV 4.4.1: Maintain records of inspections and maintenance.

TV 4.4.2: Maintain records of malfunctions.

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

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

ATTACHMENT G
Air Pollution Control Device Forms

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: CC1	List all emission units associated with this control device. EN03
---	---

Manufacturer: Vanec	Model number:	Installation date: 2011
-------------------------------	----------------------	-----------------------------------

Type of Air Pollution Control Device:

<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input checked="" type="checkbox"/> Other (describe) <u>Catalytic Oxidation and Reduction</u>
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input type="checkbox"/> 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
CO	Assumed 100%	80% (2.75 gr/bhp-hr pre-catalyst, 0.55 gr/bhp-hr post-catalyst)

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

NA

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

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.** The potential pre-control emissions of applicable pollutants does not exceed 100% of the major source threshold.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: F1	List all emission units associated with this control device. RSV1
--	---

Manufacturer: Engineering Technology Incorporated	Model number:	Installation date: 2011
---	----------------------	-----------------------------------

Type of Air Pollution Control Device:

<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input checked="" type="checkbox"/> Flare	<input type="checkbox"/> Other (describe) _____
<input type="checkbox"/> Wet Plate Electrostatic Precipitator		<input type="checkbox"/> 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%
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.).

Capacity of flare: 9381 scf/hr

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

If Yes, Complete ATTACHMENT H

If No, Provide justification. The potential pre-control emissions of applicable pollutants from RSV1 does not exceed 100% of the major source threshold amount. 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.

The system is equipped with a thermocouple which prevents the dehydration system from operating if the flare pilot lights are not on.