

West Virginia Department of Environmental Protection
Division of Air Quality

Joe Manchin III
Governor

Stephanie R. Timmermeyer
Cabinet Secretary

General Permit Registration



Pursuant to
Title V
of the Clean Air Act

Columbia Gas Transmission Corporation
Majorsville Compressor Station
R30-NGGP-2007-05100025
Effective Date: November 1, 2007

John A. Benedict
Director

Date Signed: October 17, 2007

Registration Number: **R30-NGGP-2007-05100025**
Permittee: **Columbia Gas Transmission Corporation**
Facility Name: **Majorsville Compressor Station**
Mailing Address: 1700 MacCorkle Avenue, SE
Charleston, WV 25314
Permit Contact: Kasey Gabbard, NiSource EH&S
Phone: (304) 357-2079 Fax: (304) 357-2770

This Registration is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 – Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this Registration and of Permit Number R30-NGGP-2007.

Facility Location:	Dallas, Marshall County, West Virginia
Physical Address:	State Route 15, Calis Majorsville Road, Dallas, WV 26036
Mailing Address:	70 Majorsville Road, West Finley, PA 15377
Telephone Number:	(724) 428-3504
Type of Business Entity:	Corporation
Facility ID #:	051-00025
Facility Description:	Natural Gas Transmission Facility
SIC Codes:	4922
UTM Coordinates:	540.9 km Easting • 4,423.6 km Northing • Zone 17

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

Issuance of this Title V Operating Permit Registration does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description (Make, Model, Serial No.)	Year Installed	Design Capacity	Control Device	Applicable Natural Gas General Permit (R30-NGGP-2007) Sections
Facility-wide						Section 2.0, Sections 3.1.1 to 3.1.8, 3.1.12 to 3.1.15, 3.2, 3.3, 3.4, 3.5 & 3.7.
BLR4*	BL4	Heating System Boiler Peerless Model # 211A-15-N	1994	2.94 MMBtu/hr	N/A	Section 4.0
BLR5*	BL5	TEG Dehydrator Reboiler; NATCO Model # 5GR-200-KR	2005	0.20 MMBtu/hr	N/A	R13-1523F Section 4.0
HTR3*	H3	Indirect-Fired Line Heater; Total Energy Resources, Inc. (TERI)	2005	3.0 MMBtu/hr	N/A	Section 4.0
14201*	E01	Reciprocating Engine/Integral Compressor; Ingersoll-Rand 412KVG1; 4-cycle, lean burn	1957	1320 HP	N/A	None
14202*	E02	Reciprocating Engine/Integral Compressor; Ingersoll-Rand 412KVG1; 4-cycle, lean burn	1957	1320 HP	N/A	None
14203*	E03	Reciprocating Engine/Integral Compressor; Ingersoll-Rand 412KVG1; 4-cycle, lean burn	1957	1320 HP	N/A	None
14204*	E04	Reciprocating Engine/Integral Compressor; Ingersoll-Rand 412KVG1; 4-cycle, lean burn	1957	1320 HP	N/A	None
14206*	E06	Reciprocating Engine/Integral Compressor; Ajax DPC-360; 2-cycle, lean burn	1997	360 HP	N/A	R13-2173A Sections 6.2.2, 6.2.3, 6.3.1, 6.4.1
142G1*	G1	Reciprocating Engine/Generator; LeRoi F-1500; 4-cycle, rich burn	1957	130 HP	N/A	None
142G2*	G2	Reciprocating Engine/Generator; LeRoi F-1500; 4-cycle, rich burn	1957	130 HP	N/A	None
TEGDEHY1*	FL1	TEG Dehydrator; NATCO; Bubble Cap (12-tray equivalent), Serial # T-1A53401-01	2005	7 MMscf/day	FL1	R13-1523F Sections 12.1.1, 12.1.7(a), 12.2, 12.3, 12.4.1 to 12.4.7, 12.5

Emission Unit ID	Emission Point ID	Emission Unit Description (Make, Model, Serial No.)	Year Installed	Design Capacity	Control Device	Applicable Natural Gas General Permit (R30-NGGP-2007) Sections
FLLP1*	FL1	Dehydration Flare; Kaldair Model 1-4-HP-A5;	1993	2.04 MMBtu/hr	N/A	R13-1523F Sections 12.1.2 to 12.1.6

* All combustion equipment is fueled by pipeline quality natural gas only.

**45CSR13/14, Consent Order specific and Other Requirements not included in Title V
General Permit:**

1. R13-1523F

2. R13-2173A

3. Compliance with the annual emission limit set forth in R13-1523F Condition 4.1.5 for SO₂ emissions from the flare shall be determined by using an emission factor of 0.0007 lb/MMBtu, which is based on an average sulfur content of 0.25 grains S/100 scf in the fuel assist gas.

[45CSR§30-5.1.c] [FL1]

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Permit Number: R13-1523F
Permittee: Columbia Gas Transmission Corporation
Facility Name: Majorsville (Dallas)
Facility ID No.: 051-00025
Mailing Address: 1700 MacCorkle Avenue, Charleston, WV 25325-1273

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

This permit will supercede and replace Permit R13-1523E.

Facility Location: Dallas, Marshall County, West Virginia
Mailing Address: 1700 MacCorkle Avenue, Charleston, WV 25325-1273
Facility Description: Natural Gas Compressor Station
SIC Codes: 4922
UTM Coordinates: 540.0 km Easting • 4,423.0 km Northing • Zone 17
Permit Type: Administrative Update
Description of Change: The applicant has requested a Class I Administrative update to correct a typographical error in permit R13-1523E. Also, the applicant has requested to have column three of the opacity record table located in Appendix A state both the date and time of observation.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

The source is subject to 45 C.S.R. 30. The permittee has the duty to update the facility's Title V (45 C.S.R. 30) permit application to reflect the changes permitted herein.

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1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
TEGDEHY1	FL1	NATCO 12-tray Bubble Cap	2005	7 MMscf/day	FL1
BLR5	BL5	NATCO Model #5GR-200-KR Regeneration/Reboiler	2005	0.20 MMBtu/hr	N/A
FLLP1	FL1	Dehydrator Flare; Kaldair Model 1-4-HP-A5	1993	2.04 MMBtu/hr	N/A

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2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NESHAPS	National Emissions Standards for Hazardous Air Pollutants
CBI	Confidential Business Information	NO_x	Nitrogen Oxides
CEM	Continuous Emission Monitor	NSPS	New Source Performance Standards
CES	Certified Emission Statement	PM	Particulate Matter
C.F.R. or CFR	Code of Federal Regulations	PM_{2.5}	Particulate Matter less than 2.5 µm in diameter
CO	Carbon Monoxide	PM₁₀	Particulate Matter less than 10µm in diameter
C.S.R. or CSR	Codes of State Rules	Ppb	Pounds per Batch
DAQ	Division of Air Quality	Pph	Pounds per Hour
DEP	Department of Environmental Protection	Ppm	Parts per Million
dscm	Dry Standard Cubic Meter	Ppm_v or ppmv	Parts per Million by Volume
FOIA	Freedom of Information Act	PSD	Prevention of Significant Deterioration
HAP	Hazardous Air Pollutant	Psi	Pounds per Square Inch
HON	Hazardous Organic NESHAP	SIC	Standard Industrial Classification
HP	Horsepower	SIP	State Implementation Plan
lbs/hr	Pounds per Hour	SO₂	Sulfur Dioxide
LDAR	Leak Detection and Repair	TAP	Toxic Air Pollutant
M	Thousand	TPY	Tons per Year
MACT	Maximum Achievable Control Technology	TRS	Total Reduced Sulfur
MDHI	Maximum Design Heat Input	TSP	Total Suspended Particulate
MM	Million	USEPA	United States Environmental Protection Agency
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	UTM	Universal Transverse Mercator
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VEE	Visual Emissions Evaluation
NA	Not Applicable	VOC	Volatile Organic Compounds
NAAQS	National Ambient Air Quality Standards	VOL	Volatile Organic Liquids

2.3. Authority

This Construction Permit is issued in accordance with West Virginia air pollution control law W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

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- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation:*

2.4. Term and Renewal

- 2.4.1. This Permit supercedes and replaces previously issued Permit R13-1523E. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;
- 2.4.2. The Secretary shall review and may renew, reissue or revise this Construction Permit for cause.

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-1523E, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and -10.3.]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

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

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Permit Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-4.]

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2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-5.4.]

2.10 Major Permit Modification

The permittee may request a major modification to this permit as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
[45CSR§14-6. or 45CSR§19-12.]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.

2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a

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request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5 The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.
- 2.13. Need to Halt or Reduce Activity Not a Defense**
It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.
- 2.14. Suspension of Activities**
In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.
- 2.15. Property Rights**
This permit does not convey any property rights of any sort or any exclusive privilege.
- 2.16. Severability**
The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.
- 2.17. Transferability**
This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1.]
- 2.18. Notification Requirements**
- 2.18.1. The permittee shall notify the Secretary, in writing, within fifteen (15) calendar days of the commencement of the construction, modification, or relocation activities authorized by this permit.
- 2.18.2. The permittee shall notify the Secretary, in writing, at least fifteen (15) calendar days prior to the actual startup of the operations authorized under this permit.
- 2.19. Credible Evidence**
Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

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3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§15]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1] *[State Enforceable Only]*
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2.]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

3.2. Monitoring Requirements

N/A

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:
- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit will be revised in accordance with 45CSR§30-6.4. or 45CSR§30-6.5 as applicable.
 - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit will be revised in accordance with 45CSR§30-6.4. or 45CSR§30-6.5 as applicable.
 - c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

[WV Code § 22-5-4(a)(15)]

3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or

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record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received. Such record shall contain an assessment of the validity of the complaints as well as any corrective actions taken.
[State Enforceable Only]

3.5. Reporting Requirements

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

If to the DAQ:
Director
WVDEP
Division of Air Quality
601 57th Street
Charleston, WV 25304-2345

If to the US EPA:
Associate Director
Office of Enforcement and Permits Review
(3AP12)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. Operating Fee

- 3.5.4.1. In accordance with 45CSR30 - Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative
- 3.5.5. **Emissions inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

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4.0. Source-Specific Requirements

4.1. Limitations and Standards

- 4.1.1. The maximum processing/drying rate of natural gas through the new triethylene glycol (TEG) dehydrator (Equip. ID No. TEGDEHY1; Emission Point ID No. FL1) shall not exceed 7 MM scf/day and 61,320 MM scf/yr based on 8,760 hr/yr of operation. The annual natural gas processing rate shall be calculated using a rolling total for any continuous span of 12 months.
- 4.1.2. Vent gas from the new TEG dehydrator/regenerator shall be routed to and controlled by the existing dehydrator flare (Equip. ID No. FLLP1; Emission Point ID No. FL1).
- 4.1.3. The dehydrator flare (FLLP1) shall be operated at all times when emissions may be vented to it.
- 4.1.4. The dehydrator flare (FLLP1) shall be maintained and operated so as to reduce VOC and HAP emissions by 95.0 percent or more, by weight.
- 4.1.5. Emissions to the atmosphere from the existing flare (FLLP1) shall not exceed the maximum hourly and annual rates specified below:

Pollutant	Maximum Emission Rate	
	(lb/hr)	(ton/yr) ⁽¹⁾
Carbon Monoxide (CO)	0.75	3.31
Nitrogen Oxide (NO _x)	0.14	0.61
Particulate Matter less than 10 micron (PM ₁₀)	0.01	0.04
Sulfur Dioxide (SO ₂)	0.12	0.01
Volatile Organic Compounds (VOC)	0.088	0.385

Pollutant	Maximum Emission Rate		
	(lb/hr)	(ton/yr) ⁽¹⁾	
Hazardous Air Pollutants (HAPs)	Benzene	0.015	0.065
	Toluene	0.013	0.055
	Ethylbenzene	0.005	0.02
	Xylene	0.009	0.04
	Hexane	0.0008	0.005
	Total	0.0428	0.185

(1) Based on 8,760 hr/yr of operation.

- 4.1.7. The dehydrator flare shall be operated in accordance with 40 CFR 60.18 "General Control Device Requirements" paragraphs (c) through (f).
- 4.1.8. The new 0.20 MM Btu/hr TEG Dehydrator Reboiler (Equip. ID No. BLR5; Emission Point ID No. BL5) shall not consume more than 200 ft³/hr and 1.76 MM ft³/yr of natural gas based on 1,000 Btu/ft³ of natural gas and 8,760 hr/yr of operation.
- 4.1.9. The new TEG Dehydrator Reboiler shall be maintained and operated so as not to exceed the maximum hourly and annual emission rates specified below:

Pollutant	Maximum Emission Rates	
	(lb/hr)	(lb/yr) ⁽¹⁾
Carbon Monoxide (CO)	0.02	144
Nitrogen Oxide (NO _x)	0.02	172
Particulate Matter less than 10 micron (PM ₁₀)	0.001	13
Sulfur Dioxide (SO ₂)	0.0001	1
Volatile Organic Compounds (VOC)	0.001	9

(1) Based on burning natural gas 8,760 hr/yr.

- 4.1.10. The pertinent sections of 45CSR2 applicable to this facility include, but are not limited to, the following:
 - §45-2.3.1.
No person shall cause, suffer, allow, or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average.
 - §45-2.3.2.
Compliance with the visible emission requirements of subsection 3.1 shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 or by using measurements from continuous opacity monitoring systems approved by the Director. The Director may require the installation, calibration, maintenance and operation of continuous opacity monitoring systems and may establish policies for the evaluation of continuous opacity monitoring results and the determination of compliance with the visible emission requirements of subsection 3.1. Continuous opacity monitors shall not be required on fuel burning units which employ wet scrubbing systems for emission control.
- 4.1.11. The pertinent section of 45CSR4 applicable to this facility include, but are not limited to, the following:
 - §45-4.3.1.
No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.

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4.1.12. The pertinent sections of 45CSR6 applicable to this facility include, but are not limited to, the following:

§45-6.4.3.

Emission of Visible Particulate Matter --No person shall cause, suffer, allow or permit emission of smoke into the atmosphere from any incinerator which is twenty (20%) percent opacity or greater.

§45-6.4.4.

The provisions of subsection 4.3 shall not apply to smoke which is less than forty (40%) percent opacity, for a period or periods aggregating no more than eight (8) minutes per start-up, or six (6) minutes in any sixty (60)-minute period for stoking operations.

§45-6.4.6.

Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

§45-6.7.1.

At such reasonable times as the Director may designate, the operator of any incinerator shall be required to conduct or have conducted stack tests to determine the particulate matter loading, by using 40 CFR Part 60, Appendix A, Method 5 or other equivalent EPA approved method approved by the Director, in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or the Director's authorized representative, may at the Director's option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices.

4.1.13. The pertinent sections of 45CSR10 applicable to this facility include, but are not limited to the following:

§45-10.4.1.

No person shall cause, suffer, allow or permit the emission into the open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 parts per million by volume from existing source operations, except as provided in subdivisions 4.1.a through 4.1.e.

§45-10-4.2.

Compliance with the allowable sulfur dioxide concentration limitations from manufacturing process operation(s) set forth in this rule shall be based on a block three (3) hour averaging time.

§45-10.5.1.

No person shall cause, suffer, allow or permit the combustion of any refinery process gas stream or any other process gas stream that contains hydrogen sulfide in a concentration greater than 50 grains per 100 cubic feet of gas. . . .

§45-10-5.4.

Compliance with the allowable hydrogen sulfide concentration limitations for combustion sources set forth in this rule shall be based on a block three (3) hour averaging time.

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§45-10-9.1.

Due to unavoidable malfunctions of equipment or inadvertent fuel shortages, emissions exceeding those provided for in this rule may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the equipment malfunction or fuel shortage. In cases of major equipment failure or extended shortages of conforming fuels, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.

- 4.1.14. *Operation and Maintenance of Air Pollution Control Equipment.* The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11.]

4.2. Monitoring Requirements

- 4.2.1 For the purpose of determining compliance with the opacity limits of 45CSR2 and 45CSR6, the permittee shall conduct visible emission checks and / or opacity monitoring and recordkeeping for all emission sources subject to an opacity limit.
- a. The visible emission check shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.
 - b. Visible emission checks shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed at each source (stack, transfer point, fugitive emission source, etc.) for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.
 - c. If visible emissions are present at a source(s) for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that source(s) using the procedures and requirements of 45CSR§7A as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A 45CSR§7A observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

4.3. Testing Requirements

Reserved

4.4. Recordkeeping Requirements

- 4.4.1. *Record of Monitoring.* The permittee shall keep records of monitoring information that include the following:
- The date, place as defined in this permit and time of sampling or measurements.
 - The date(s) analyses were performed.
 - The company or entity that performed the analyses.
 - The analytical techniques or methods used.
 - The results of the analyses.
 - The operating conditions existing at the time of sampling or measurement.
- 4.4.2. *Record of Maintenance of Air Pollution Control Equipment.* For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
- 4.4.3. *Record of Malfunctions of Air Pollution Control Equipment.* For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- The equipment involved.
 - Steps taken to minimize emissions during the event.
 - The duration of the event.
 - The estimated increase in emissions during the event.
- For each such case associated with an equipment malfunction, the additional information shall also be recorded:
- The cause of the malfunction.
 - Steps taken to correct the malfunction.
 - Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.
- 4.4.4. For the purpose of determining compliance with the emission limitations set forth in Source-Specific Requirements 4.1.5. and 4.1.9. of this permit, the permittee shall maintain records of:
- Operating times for the new dehydrator unit, flare, and flare pilot flame monitoring equipment.
 - The station's dry natural gas production rate. This information is to be collected on a daily, monthly, and a 12-month rolling total bases.
 - The glycol flow/pump rate to the contact tower. This information shall be measured and recorded at least once a month.

- d. All maintenance work performed on the dehydration unit, and flare.
- e. All periods of time during which the flare's pilot flame was lost.

The above records shall be maintained on-site for a period of five (5) years. Certified copies of these records shall be made available to the Director or his duly authorized representative upon request.

- 4.4.5. For the purpose of determining compliance with the emission limitations established in Source-Specific Requirements 4.1.5., any and all malfunctions of the existing flare (FLLP1) which result in increased emissions shall be documented in writing. The following information shall be recorded for each malfunction:
 - a. cause of the malfunction
 - b. steps taken to correct the malfunction
 - c. steps taken to minimize emissions during the malfunction
 - d. duration of the malfunction
 - e. estimated increase in emissions during the malfunction
 - f. steps taken to prevent recurrence of the malfunction

The above records shall be maintained on-site for a period of five (5) years following each malfunction. Certified copies of the records shall be made available to the Director or a duly authorized representative of the Director upon request.

- 4.4.6. The permittee shall maintain records of all monitoring data required by Section 4.2.1. documenting the date and time of each visible emission check, the emission point or equipment / source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6-10 mph NE wind) during the visual emission check(s). An example form is supplied as Appendix A. Should a visible emission observation be required to be performed per the requirements specified in 45SR§7A, the data records of each observation shall be maintained per the requirements of 45CSR§7A. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (O/S) or equivalent.

4.5. Reporting Requirements

- 4.5.1. Any violation(s) of the allowable visible emission requirement for any emission source discovered during observation using 45CSR§7A must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.

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CERTIFICATION OF DATA ACCURACY

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

Signature¹ _____
(please use blue ink) Responsible Official or Authorized Representative Date

Name & Title _____
(please print or type) Name Title

Telephone No. _____ Fax No. _____

- ¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:
- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
 - b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
 - c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
 - d. The designated representative delegated with such authority and approved in advance by the Director.

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Division of Air Quality
7012 MacCorkle Avenue, South East
Charleston, WV 25304-2943
Telephone Number: (304) 926-3727
Fax Number: (304) 926-3739

West Virginia Department of Environmental Protection

Bob Wise
Governor

Michael O. Callaghan
Secretary

**PERMIT TO MODIFY
A NATURAL GAS PROCESSING FACILITY**

IN ACCORDANCE WITH THE WEST VIRGINIA AIR POLLUTION CONTROL LAW (W. Va. Code §§22-5-1 et seq.), AND REGULATIONS PROMULGATED THEREUNDER, THE FOLLOWING PERMITTEE IS AUTHORIZED TO CONSTRUCT, SUBJECT TO THE TERMS AND CONDITIONS OF THIS PERMIT, THE SOURCE DESCRIBED BELOW.

This permit will supersede and replace Permit R13-2173.

Name of Permittee: Columbia Gas Transmission Corporation
Name of Facility: Majorsville Compressor Station
Permit No.: R13-2173A
Plant ID No.: 05100025
Effective Date of Permit: October 30, 2001
Permit Writer: Toby Scholl
Facility Mailing Address: 1700 MacCorkle Ave. SE
Charleston, WV 25325-1273
County: Marshall
Nearest City or Town: Dallas
UTM Coordinates: Easting: 540.0 km Northing: 4423.0 km Zone: 17
Directions to Exact Location: Traveling Pennsylvania State Route 21 west from Waynesburg, turn onto Legislative Route 62007 at Graysville and proceed to W. Finley. Turn left onto Township Route 316 and go approximately 4.6 miles to the station.
Type of Facility or Modification: Administrative update for the purpose of correcting and updating permit conditions associated with 45CSR10 (as they pertain to compressor engines), to reflect the state's new administrative rule changes for the purpose of completing a Title V Permit Modification.

THIS FACILITY HAS BEEN DEEMED TO BE A TITLE V SOURCE. THE PERMITTED FACILITY'S TITLE V (45CSR30) PERMIT R30-05100025-1996, MUST BE REVISED BEFORE COMMENCING OPERATION OF THE ACTIVITY AUTHORIZED BY THIS PERMIT.

NON CONFIDENTIAL

"To use all available resources to protect and restore West Virginia's environment in concert with the needs of present and future generations."



IN ACCORDANCE WITH THE PERMIT APPLICATION AND ITS AMENDMENTS, THIS PERMIT IS LIMITED AS FOLLOWS:

A. SPECIFIC REQUIREMENTS

1. Emissions from the Ajax DPC-360 compressor engine to the atmosphere shall be limited to the following:

Emission Point ID	Source ID	Control Device	Pollutant	Allowable Emissions (lbs/hr)	Allowable Emissions (TPY)
E06	14206	None	CO	0.9	3.5
			NO _x	4.4	17.4
			PM ₁₀	0.1	0.5
			SO ₂	0.2	0.01
			VOC	1.4	5.6

2. The Ajax DPC-360 compressor engine, designated as 14206, shall consume no more than 4,250 cubic feet of natural gas per hour or 37,230,000 cubic feet of natural gas per year.

B. OTHER REQUIREMENTS

1. In accordance with 45CSR30 - "Operating Permit Program", enclosed with this permit is a Certified Emissions Statement (CES) Invoice, from the date of initial startup through the following June 30. Said invoice and the appropriate fee shall be submitted to this office no later than 30 days prior to the date of initial startup. For any startup date other than July 1, the permittee shall pay a fee or prorated fee in accordance with the Section 4.5 of 45CSR22. A copy of this schedule may be found attached to the Certified Emissions Statement (CES) Invoice.
2. The pertinent sections of 45CSR10 applicable to this facility include, but are not limited to, the following:

§45-10-5.1.

No person shall cause, suffer, allow or permit the combustion of any refinery process gas stream or any other process gas stream that contains hydrogen sulfide in a concentration greater than 50 grains per 100 cubic feet of gas...

§45-10-5.4.

Compliance with the allowable hydrogen sulfide concentration limitations for combustion sources set forth in this rule shall be based on a block three (3) hour

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averaging time.

3. The pertinent sections of 45CSR13 applicable to this facility include, but are not limited to, the following:

§45-13-6.1

At the time a stationary source is alleged to be in compliance with an applicable emission standard and at reasonable times to be determined by the Director thereafter, appropriate tests consisting of visual determinations or conventional in-stack measurements or such other tests the Director may specify shall be conducted to determine compliance.

§45-13-10.2

The Director may suspend or revoke a permit if, after six (6) months from the date of issuance, the holder of the permit cannot provide the Director, at the Director's request, with written proof of a good faith effort that construction, modification, or relocation, if applicable, has commenced. Such proof shall be provided not later than thirty (30) days after the Director's request. If construction or modification of a stationary source is discontinued for a period of eighteen (18) months or longer, the Director may suspend or revoke the permit.

§45-13-10.3

The Director may suspend or revoke a permit if the plans and specifications upon which the approval was based or the conditions established in the permit are not adhered to. Upon notice of the Director's intent to suspend, modify or revoke a permit, the permit holder may request a conference with the Director in accordance with the provisions of W.Va Code § 22-5-5 to show cause why the permit should not be suspended, modified or revoked.

C. GENERAL REQUIREMENTS

1. In accordance with 45CSR30 - "Operating Permit Program", the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first filing a Certified Emissions Statement (CES) and paying the appropriate fee. Such Certified Emissions Statement (CES) shall be filed and the appropriate fee paid annually. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Director or his/her duly authorized representative.
2. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

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3. The permitted facility shall be constructed and operated in accordance with information filed in Permit Application R13-2173 and any amendments thereto. The Director may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to.
4. At such reasonable time(s) as the Director may designate, the permittee shall conduct or have conducted test(s) to determine compliance with the emission limitations established in the permit application and/or applicable regulations. Test(s) shall be conducted in such a manner as the Director may specify or approve and shall be filed in a manner acceptable to the Director. The Director, or his/her duly authorized representative, may at his option witness or conduct such test. Should the Director exercise his option to conduct such test(s), the permittee shall provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment, and the required safety equipment such as scaffolding, railings, and ladders to comply with generally accepted good safety practices. For any tests to be conducted by the permittee, a test protocol shall be submitted to the DAQ by the permittee at least thirty (30) days prior to the test and shall be approved by the Director. The Director shall be notified at least fifteen (15) days in advance of the actual dates and times during which the test will be conducted.
5. In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations, either in whole or in part, authorized by this permit, the permittee shall notify the Director, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.
6. The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.
7. The permittee shall notify the Director, in writing, within fifteen (15) calendar days of the commencement of the construction, modification, or relocation activities authorized under this permit.
8. The permittee shall notify the Director, in writing, at least fifteen (15) calendar days prior to actual startup of the operations authorized under this permit.
9. This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13.
10. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7.
11. On or before July 1st of each calendar year, the permittee herein shall prepare and submit an emission inventory for the previous calendar year, addressing the

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emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Director may, based upon the type and quantity of the pollutants emitted, establish a submittal frequency other than on an annual basis.

ISSUED BY: _____


JOHN A. BENEDICT, DEPUTY DIRECTOR
WV DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY

DATE SIGNED: _____

October 30, 2001

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