West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on July 10, 2012.

Permit Number: **R30-03900051-2012**
Application Received: **July 12, 2012**
Plant Identification Number: **03-54-03900051**
Permittee: **Dominion Transmission, Inc.**
Facility Name: **Cornwell Station**
Mailing Address: **445 West Main Street, Clarksburg, WV 26301**

Permit Action Number: *SM01* Revised: *April 2, 2013*

Physical Location:	Clendenin, Kanawha County, West Virginia
UTM Coordinates:	476.19 km Easting • 4259.58 km Northing • Zone 17
Directions:	From I-79, take exit 19 to WV State Route 4, then take Route 4 north to Clendenin, cross Elk River on Queen Shoals Road (Route 1). Turn left onto River Haven Road (Route 1/6) and proceed 2.5 miles to station.

Facility Description

Cornwell Station is a natural gas transmission and production station covered by SIC Code 4922. The natural gas is compressed by 13 integral compressors powered by the natural gas-fired reciprocating engines. The station also has one (1) 23 mmscf/day glycol dehydration unit with flare and a 0.62 mmBtu/hr boiler. The dehydration system and engines EN07, EN08, and EN09 are on a production line.

This permit modification is for the proposed construction and operation of a new flare for the dehydration unit still. The proposed new flare will permanently replace the existing flare, Unit ID 0001.

Emissions Summary

As a result of this modification, there will be a decrease in CO, PM, and SO_2 emissions and an increase of the following emissions: NO_x - 1.36 tpy, VOCs - 12.9 tpy, and Total HAPs - 1.55 tpy. The change in potential emissions of the existing dehy unit are the result of an updated gas analysis and subsequent GLYCalc model.

Regulated Pollutant	Existing Dehydration Unit and Flare 0001		Existing Dehydration Unit and New Flare F1		Change in Emissions as a result of this project	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
CO	0.82	3.57	0.03	0.13	-0.79	-3.44
NO_x	0.15	0.66	0.46	2.02	0.31	1.36
PM_{10}	0.02	0.07	0.02	0.06	0	-0.01
SO_2	0.12	0.49	0.01	0.02	-0.11	-0.47
VOC	0.70	3.06	3.65	15.96	2.95	12.9
Total HAPs	0.25	1.08	0.60	2.63	0.35	1.55

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 514 tpy of CO, 3301 tpy of NO_x, 433 tpy of VOCs, and 33 tpy of Formaldehyde. Due to this facility's potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Dominion Transmission, Inc.'s Cornwell Station is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open Burning Prohibited
	45CSR13	Construction Permits
	45CSR30	Operating permit requirement
	40 CFR Part 63, subpart HH	Oil & Natural Gas Production MACT

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit *(if any)*
R13-2346C	November 16, 2012	

Conditions from this facility's Rule 13 permits governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s).

Determinations and Justifications

This is a significant modification to the renewal permit issued on July 10, 2012 and incorporates the changes from Permit R13-2346C. Changes to the most recent version of the Title V Permit consist of the following:

1. The Equipment Table was revised to remove the old Dehydrator flare (DEHY01) and add the new Dehydration Unit Flare (F1). In addition, the Dehydration Unit Still was renamed from DEHY01B to DEHY01.

2. The Active Permit Table was updated for R13-2346C.

3. Condition 4.1.2. was updated to coincide with R13-2346C.

4. Section 5.0. was updated as follows:

   - The PM emissions limit in Condition 5.1.1. was recalculated for the new flare.
   - All R13-2346C citations were updated because the NSR permit is now in the new format.
   - All references to DEHY01 were changed to F1.
   - The visible PM exception from 45CSR§6-4.4. was added to Condition 5.1.2.
   - The emissions limit table in Condition 5.1.7. (now 5.1.9.) was revised to include limits for DEHY01 and update limits for F1 authorized by R13-2346C.
   - Old Condition 5.1.11. (now 5.1.8.) and Condition 5.1.10 were updated to coincide with R13-2346C. Conditions 5.1.11., 5.1.13., and 5.4.4. through 5.4.9. were added due to R13-2346C additions. The citation for Condition 3.4.1. was updated to include R13-2346C.
   - The citation for Condition 5.2.1. was changed to include the applicable MACT standard.

40 CFR 63, Subpart HH changes - Cornwell Compressor Station has separate equipment that services a natural gas pipeline system and a production gathering pipeline system. The dehydration unit and associated control device are on the production side. Based on the definition of a *major source* in 40 CFR §63.761, the production side of the Cornwell Compressor station meets the definition of an area source and the applicability requirements of 40 CFR §63.760.

The dehydration plant continues to be subject to 40 CFR Part 63, Subpart HH because the facility processes natural gas prior to entering the transmission amd storage process. The existing Glycol Dehydration Unit is the only affected source. The facility is not located in an urbanized area plus offset (UA plus offset) or urban cluster (UC) boundary. The amendments to Subpart HH were published in the Federal Register August 16, 2012 and became effective October 15, 2012.

The amendments to Subpart HH replaced the “startups, shutdowns, and malfunctions” in section 40 CFR §63.762 with “affirmative defense for violations of emission standards during malfunction”. Therefore old Conditions 5.1.9. and 5.1.13. were deleted and a new second paragraph was added to Condition 5.1.12. along with new Monitoring, Recordkeeping, and Reporting requirements (Sections 5.2., 5.4., and 5.5.) to incorporate new amendments to Subpart HH.

The Cornwell Station is exempt from the requirements of 40 CFR §63.764(d) because the actual annual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 Mg/yr. This is determined in accordance with 40 CFR §63.772(b) according to the exemption criteria of 40 CFR §63.764(e)(1)(ii), except that the records of the determination of these criteria must be maintained as required in 40 CFR §63.774(d)(1).

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 CFR Part 60, Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution. This subpart establishes emission standards and compliance schedules for the control of VOCs and SO_2 emissions from affected facilities that commence construction, modification, or reconstruction after August 23, 2011. The dehydration unit was installed in 1999 and is therefore not subject to this Subpart. This permit modification is to replace the flare associated with the dehydration unit.

Compliance Assurance Monitoring - The emissions from the new equipment are below the threshold at which the equipment would be considered a major source. Therefore, CAM is not applicable to this equipment in accordance with 40 CFR §64.2(a)(3).

Greenhouse Gas Permitting - This modification does not trigger a PSD permit and total CO_2e emissions from the new equipment are well below the threshold of 75,000 tpy, therefore, there are no applicable GHG requirements.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: February 15, 2013
Ending Date: March 18, 2013

All written comments should be addressed to the following individual and office:

Bobbie Scroggie
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, S.E.
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

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Response to Comments

No comments were received.