

Fact Sheet



*For Final Renewal Permitting Action Under 45CSR30 and
Title V of the Clean Air Act*

Permit Number: **R30-00100100-2010**
Application Received: **January 26, 2010**
Plant Identification Number: **001-00100**
Permittee: **Dominion Transmission, Inc.**
Facility Name: **Pepper Compressor Station**
Mailing Address: **445 West Main Street; Clarksburg, WV 26301**

Revised NA

Physical Location:	Belington, Barbour County, West Virginia
UTM Coordinates:	574.20 km Easting • 4337.79 km Northing • Zone 17
Directions:	Interstate 79 North to the Nutterfork exit. Turn right off the exit ramp onto Rt 20. Continue approximately 6 miles until turning left onto Rt 57. Stay on Rt 57 for approximately 10 miles then turn left onto Stewarts Run (CR18). Stay on Stewarts Run until turning left onto Brushy Fork Road (CR-7). Stay on Brushy Fork for 1 mile, station will be on left.

Facility Description

The Pepper Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) 4922.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2009 Actual Emissions
Carbon Monoxide (CO)	35.92	33.14
Nitrogen Oxides (NO _x)	180.0	223.81
Particulate Matter (PM ₁₀)	0.8	0.31
Total Particulate Matter (TSP)	0.8	0.31
Sulfur Dioxide (SO ₂)	0.026	0.02
Volatile Organic Compounds (VOC)	60.82	56.60

PM₁₀ is a component of TSP.

The PTE for NO_x emissions has decreased due to a revision of the emission factor.

The PTE for VOC emissions has increased due to the addition of Fugitive Emissions.

Hazardous Air Pollutants	Potential Emissions	2009 Actual Emissions
Formaldehyde	2.32	1.2
Acrolein	0.33	0.2
Acetaldehyde	0.33	0.2
Benzene	0.09	0.1
Ethylbenzene	0.02	0.0
n-Hexane	0.12	0.1
Toluene	0.05	0.0
Xylene	0.03	0.0

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 180 tons per year of nitrogen oxides. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Dominion Transmission, Inc. 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction Permits
	45CSR17	Fugitive Particulate Matter
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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 (<i>if any</i>)
NA		

Conditions from this facility's Rule 13 permit(s) 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). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes were made from the previous Title V permit:

Removal of SO₂ and H₂S Limits from 45CSR10

45CSR10 has been determined not to be applicable to engines (see Non-Applicability Determinations). Therefore, the SO₂ and H₂S limits in Conditions 3.1.9. and 3.1.10. of this facility's previous Title V permit were removed.

Removal of Monitoring Requirements

The facility-wide monitoring requirements in Section 3.2 of the previous Title V permit were removed from this permit. These conditions required monitoring of SO₂ and H₂S to ensure compliance with Conditions 3.1.9. and 3.1.10. of the previous permit and streamlined more stringent Federal Energy Regulatory Commission (FERC) requirements with those of 45CSR10.

Since the SO₂ and H₂S permit limits were removed, these monitoring requirements are unnecessary. The facility must still comply with FERC regulations, but these regulations are not under the jurisdiction of the WVDAQ and were not included in this permit.

Non-Applicability Determinations

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

45CSR2—To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers: 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.

45CSR10—To Prevent and Control Air Pollution from the Emission of Sulfur Oxides: The director has determined that 45CSR10 does not apply to engines; the engines do not meet the definition of a fuel burning unit in 45CSR§10-2.8 or a manufacturing process in 45CSR§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.

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: The drip gas and new engine oil tanks (Emission Points 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 JJJJ—Standards of Performance for Stationary Spark Ignition Internal Combustion Engines: The Ajax CPD-600 Reciprocating Engines/Integral Compressors (Emission Points EN01 and EN02) are spark ignition engines with a maximum engine power greater than 500 horsepower. However, they are exempt from this subpart per 40 C.F.R.60 § 4230 since they were manufactured before 2007.

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.

40 CFR 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines: The engines of the Ajax DPC-600 compressors are exempt from this subpart per 40 C. F. R. 63 § 6585 since this facility is not a major HAP source.

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: March 3, 2010
Ending Date: April 2, 2010

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

Rex Compston
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
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

Rex Compston
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.