

Fact Sheet



For General Permit Registration Under 45CSR30 and Title V of the Clean Air Act

Permit Number: R30-NGGP-2007-08300019

Application Received: December 3, 2001

Plant Identification Number: 08300019

Permittee: **Columbia Gas Transmission**

Facility Name: Files Creek Compressor Station

Mailing Address: 1700 MacCorkle Avenue, S.E.

Charleston, WV 25314

Issued: August 27, 2007

Physical Location: Beverly, Randolph County, West Virginia
UTM Coordinates: 601.1 km Easting • 4,297.3 km Northing • Zone 17
Directions: The station is located on Files Creek Road and WV Secondary Route 37/8, approximately 3 miles south of the town of Beverly.

Facility Description

The Files Creek Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of six (6) 1,100-hp and four (4) 2,000-hp natural gas fired reciprocating compressor engines, two (2) natural gas fired emergency generators, a wastewater evaporation injection system and numerous storage tanks of various sizes. For comfort heating purposes the facility also operates a number of small space heaters (de minimus).

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2005 Actual Emissions
Carbon Monoxide (CO)	272.69	59.12
Nitrogen Oxides (NO _x)	2,071.28	812.87

Particulate Matter (PM ₁₀)	21.37	9.04
Total Particulate Matter (TSP)	21.37	9.04
Sulfur Dioxide (SO ₂)	0.42	0.17
Volatile Organic Compounds (VOC)	77.65	38.96

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2005 Actual Emissions
Formaldehyde	30.89	13.0
Other HAPs	6.45	0.0
Total HAPs*	37.34	13.0

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

Title V Program Applicability Basis

This facility has the potential to emit 272.69 tons of CO, 2,071.28 tons of NO_x, 30.89 tons of Formaldehyde and 37.34 tons of total HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP and over 25 tons per year of aggregate HAPs, Columbia Gas Transmission Corporation 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:	45CSR2	Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for construction, modification
	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
State Only:	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	40 C.F.R. Part 60, Subpart Kb	Tank NSPS
	45CSR4	No objectionable odors.
	45CSR17	Particulate Fugitive

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the 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, 45CSR15, 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)
None	N/A	N/A

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

According to 40 C.F.R § 60.110b(b), one 55,000 gallon tank (A12) at this facility is exempt from 40 C.F.R 60 Subpart Kb because the material currently stored isn't a volatile organic liquid and has a vapor pressure less than 3.5 kPa. The facility has to keep records according to 40 C.F.R § 60.116b to show that the vapor pressure is less than 3.5 kPa.

Non-Applicability Determinations

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

- a. 40 C.F.R. 60 Subparts K,Ka; *Standards of Performance for Storage Vessels for Petroleum Liquids* - All tanks (except for tank A12) at Files Creek station are below 40, 000 gallons in capacity. Tank A12 does not store petroleum liquids, hence it is exempt.
- b. 40 C.F.R. 60 Subpart Kb; *Standards of Performance for Volatile Organic Liquid Storage Vessels* - All tanks (except for tank A12) at Files Creek station are below 75 m³ in capacity. 40 C.F.R. 60 Subpart Kb could possibly be applicable to only tank A12.
- c. 40 C.F.R. 60 Subpart KKK; *Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant* - Files Creek station is not engaged in the extraction or fractionation of natural gas liquids from field gas, the fractionation of mixed natural gas liquids to natural gas products, or both.
- d. 45CSR21; *To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds*: This facility is not located in one of the affected counties
- e. 45CSR27; *To Prevent and Control the Emissions of Toxic Air Pollutants*: Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment "used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight."
- f. 40 C.F.R. 63 Subpart ZZZZ; *RICE MACT* - All reciprocating engines are existing (installed before December 19, 2002) 4-cycle, lean burn or less than 500 HP; Hence Rice MACT is not applicable to this facility pursuant to 40 C.F.R § 63.6590(b)(3).

This facility is a major source of HAPs; this facility is not subject to any MACT because of section f above.

Since the last Title V modification WVDEP has determined that 45CSR10 does not apply to gas fired engines.

40 CFR 64 - Engines do not have any add-on control; therefore, in accordance with 40 C.F.R § 64.2(a), CAM is not applicable to this facility.

Request for Variances or Alternatives

None

Insignificant Activities

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

Comment Period

Title V general Permit has already been advertised and finalized. This fact sheet for facility registration is written for the file. This fact sheet states which rules are applicable to the particular facility and which rules are not applicable.

Procedure for Requesting Public Hearing

N/A

Point of Contact

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Division of Air Quality
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Response to Comments (Statement of Basis)

N/A