

# Fact Sheet



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

Permit Number: R30-NGGP-2007-04300002  
Application Received: **December 3, 2001**  
Plant Identification Number: **04300002**  
Permittee: **Columbia Gas Transmission**  
Facility Name: **Hubball Compressor Station**  
Mailing Address: **1700 MacCorkle Avenue, SE**  
**Charleston, WV 25314**  
Issued: November 1, 2007

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Physical Location: Hubball, Lincoln County, West Virginia  
UTM Coordinates: 395.9 km Easting • 4228.7 km Northing • Zone 17  
Directions: Take Exit 11 from I-64 to 10 south. Travel 10 south to Branchland. At Branchland cross the bridge to secondary route 36/1, then go approximately 2 miles south on 36/1 to Hubball station.

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### **Facility Description**

The Hubball 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 two (2) 1,320-hp and one (1) 600-hp natural gas fired reciprocating engines, one (1) air compressor, one (1) emergency generator, one (1) heating system boiler, one (1) Triethylene glycol (TEG) dehydration unit with corresponding glycol reboiler (controlled by an enforceable NATCO SHV flare) and numerous storage tanks of various sizes.

### **Emissions Summary**

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Criteria Pollutants</b>	<b>Potential Emissions</b>	<b>2006 Actual Emissions</b>
Carbon Monoxide (CO)	75.7	17.1

Nitrogen Oxides (NO <sub>x</sub> )	107.1	25.7
Particulate Matter (PM <sub>10</sub> )	0.7	0.02
Total Particulate Matter (TSP)	0.7	0.02
Sulfur Dioxide (SO <sub>2</sub> )	0.8	0.3
Volatile Organic Compounds (VOC)*	24.1	13.6
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2005 Actual Emissions</b>
Total HAPs*	11.5	6.2
<p><i>Some of the above HAPs may be counted as PM or VOCs.</i></p> <p>HAPs are not speciated because no applicability was triggered.</p> <p>* Includes enforceable flare for control of emissions associated with dehydration unit.</p>		

**Title V Program Applicability Basis**

This facility has the potential to emit 107.1 tons/yr of NO<sub>x</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, 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.
	45CSR10	SO <sub>2</sub> Emissions
	45CSR11	Standby plans for emergency episodes.
	45CSR13	
	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 60.18	NSPS Flare 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.
	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 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 ( <i>if any</i> )
CO-R1-C-2007-4A	March 1, 2007	
R13-2479B	November 7, 2005	

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 boilers at the facility are < 10 MMBtu/hr and gas fired; hence Section 4.0 of the Title V General Permit is applicable to the boiler and heaters. According to 45CSR§10-10 these boilers are exempt from MRR and 45CSR§10-3.

Flare - Based on an incinerator capacity of 0.072 ton/hr, and a value of F = 5.43, the corresponding particulate limit according to 45CSR§6-4.1 is 0.392 lb/hr. According to R13-2479B, PM-10 emission limit is 0.01 lb/hr. Compliance with PM-10 limit of 0.01 lb/hr shall show compliance with 45CSR§6-4.1 limit of 0.392 lb/hr limit.

Flare – Considering the maximum flow rate of assist gas and waste gas through the flare, 2000 ppm limit for SO<sub>2</sub> (45CSR§10-4.1) translates into 1.3 lb/hr SO<sub>2</sub> limit. According to R13-2479B, SO<sub>2</sub> emission limit is 0.06 lb/hr. Compliance with SO<sub>2</sub> limit of 0.06 lb/hr shall show compliance with 45CSR§10-4.1 limit of 2000 ppm.

Synthetic Minor permit R13-2479B with enforceable flare which is designed and operated according to 40 C.F.R § 60.18 makes this source a minor source in regards to 40 C.F.R 63 Subpart HH [Note: According to some testing results submitted by Columbia Gas Transmission Corporation this facility is a production source, not a transmission source according to the existing Title V permit].

Since the last Title V issuance permittee has submitted a request to terminate R13-2362-P2, portable glycol reclaimer permit.

### Non-Applicability Determinations

This facility is not a major source of HAPs.

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 at Hubball station are below 40,000 gallons in capacity.
- b. 40 C.F.R. 60 Subpart Kb; *Standards of Performance for Volatile Organic Liquid Storage Vessels* - All tanks at Hubball station are below 75 m<sup>3</sup> in capacity.

- c. 40 C.F.R. 60 Subpart KKK; *Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant* - Hubball 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. 60 Subparts Dc; *Standards of Performance for Steam Generating Units* – The boiler and gas heaters at this facility are less than 10 MMBtu/hr; Hence Subpart Dc is not applicable.

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. The boilers are not a major source; therefore, CAM is not applicable. For Dehydration unit, existing Title V permit specified a continuous compliance demonstration method, as defined in 40 C.F.R § 64.1, hence the Dehydration unit is exempted from CAM requirements.

#### **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