

# Fact Sheet



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

Permit Number: R30-NGGP-2007-10900021  
Application Received: February 12, 2004  
Plant Identification Number: **10900021**  
Permittee: **Columbia Gas Transmission**  
Facility Name: **Huff Creek Compressor Station**  
Mailing Address: **1700 MacCorkle Avenue, SE**  
**Charleston, WV 25314**  
Issued: November 6, 2007

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Physical Location: Hanover, Wyoming County, West Virginia  
UTM Coordinates: 430.4 km Easting • 4156.1 km Northing • Zone 17  
Directions: Travel Approx. 2 miles south of town of Hanover on US Route 52. The station is on Little Huff Creek approx. 0.2 miles from US 52.

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## Facility Description

Huff Creek Compressor 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) 800-hp, one (1) 880-hp, one (1) 206-hp and one (1) 3712-hp natural gas fired reciprocating engines, one (1) 20-hp air compressor, one (1) 20-hp fan drive engine, two (2) 20-hp cooling water pumps, one (1) 1.25 MMBtu/hr dehydrator reboiler, one (1) triethylene glycol (TEG) dehydrator, and numerous storage tanks of various sizes. On-site support equipment includes two (2) emergency generators (142-hp and 530-hp) and two heating system boilers (0.96 MMBtu/hr and 1.2 MMBtu/hr).

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Criteria Pollutants</b>	<b>Potential Emissions</b>	<b>2005 Actual Emissions</b>
Carbon Monoxide (CO)	192.8	71.4
Nitrogen Oxides (NO <sub>x</sub> )	415.0	49.9
Particulate Matter (PM <sub>10</sub> )	7.4	4.6
Total Particulate Matter (TSP)	7.4	4.6
Sulfur Dioxide (SO <sub>2</sub> )	0.2	0.1
Volatile Organic Compounds (VOC)	61.9	39.9
<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>
Formaldehyde	12.1	6.8
Other HAPs	4.3	1.8
Total HAPs	16.5	8.5
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		

### Title V Program Applicability Basis

This facility has the potential to emit 415 tons/yr of NO<sub>x</sub>, 192.8 tons of CO and 12.1 tons of Formaldehyde. Due to this facility's potential to emit over 100 tons per year of criteria pollutant and over 10 tons of individual HAP, 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	Permit 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
	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> )
R13-2066C	April 25, 2006	

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**

This facility is a major source of HAPs

40 C.F.R 63 Subpart HHH - This facility is a major source of HAPs because of potential emissions of more than 10 tons of formaldehyde. The permittee shall be exempt from 40 C.F.R 63 Subpart HHH using Annual Average Flow Of Gas Exemption (Less than 10 mmscf/day) according to 40 C.F.R §63.1274 (d)(1) and/or Actual Average Benzene Emissions from Dehydration Unit <0.90 megagram per year according to 40 C.F.R §63.1274 (d)(2) .

**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 at Huff Creek 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 Huff Creek 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* - Huff 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. 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.
- g. 40 C.F.R. 63 Subpart ZZZZ; *RICE MACT* - All the engines except for G3 are 2-cycle or 4-cycle, lean burn or less than 500 HP; G3 is an emergency generator and not subject to any requirement of RICE MACT. Hence Rice MACT is not applicable to this facility even though this facility is a major source of HAPs.
- h. 40 C.F.R. 63 Subpart DDDDD; *Boiler MACT* – All the boilers and Heaters [new (constructed after January 13, 2003) or existing] in this facility use gaseous fuel and are less than 10 MMBtu/hr; Hence Boiler MACT is not applicable to this facility even though this facility is a major source of HAPs. Boiler MACT regulations were vacated on July 30<sup>th</sup> 2007 in accordance with D.C. Circuit of Appeals June 8<sup>th</sup> 2007 ruling.

Since the last Title V modification WVDEP has determined that 45CSR10 does not apply to gas fired engines. Also 45CSR10 is not applicable to the facility boilers and heater because they are less than 10 MMBtu/hr.

40 CFR 64 - Engines and dehydration unit 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.

On July 10, 2000 WVDEP wrote a letter stating only E05 has to be tested to verify the accuracy of the limits on fuel consumption and hourly operation. Engine E05 was tested on January 12, 2001 to show compliance with permit limits. E01-E04, G3 and BL3 shall be tested, to verify compliance with emission limits if required by the Secretary.

### **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  
601 57<sup>th</sup> Street SE  
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### **Response to Comments (Statement of Basis) N/A**