

Fact Sheet



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

Permit Number: R30-03300011-2006
Application Received: May 8, 2002
Plant Identification Number: 03300011
Permittee: Dominion Transmission, Inc
Facility Name: Wilsonburg Compressor Station
Mailing Address: 445 West Main Street
Clarksburg, WV 26301

Physical Location: Wilsonburg, Harrison County, West Virginia
UTM Coordinates: 549.9 km Easting • 4348.7 km Northing • Zone 17

Directions: From the intersection of Rt 50 and SR 98 near Clarksburg, go west on Rt 50 for 1.3 miles to intersection. Turn right onto Paleo Road and travel 100 feet to gravel road on the right. Go through the gate and follow gravel road to the station.

Facility Description

Wilsonburg Compressor Station is a natural gas facility covered by Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of a total of three (3) natural gas fired reciprocating engines - 350, 360 & 800-hp, one (1) 0.75 MMBtu/hr dehydration unit with flare, and seven (7) storage tanks of various sizes.

Emissions Summary

| Plantwide Emissions Summary [Tons per Year] | | |
|--|----------------------------|------------------------------|
| Criteria Pollutants | Potential Emissions | 2004 Actual Emissions |
| Carbon Monoxide (CO) | 46.428 | 31.70 |
| Nitrogen Oxides (NO _x) | 240.24 | 169.09 |
| Particulate Matter (PM ₁₀) | 0.613 | 0.17 |
| Total Particulate Matter (TSP) | 1.22 | 0.34 |
| Sulfur Dioxide (SO ₂) | 0.0368 | 0.02 |
| Volatile Organic Compounds (VOC) | 154.80 | 46.88 |

PM₁₀ is a component of TSP.

| Hazardous Air Pollutants | Potential Emissions | 2004 Actual Emissions |
|---------------------------------|----------------------------|------------------------------|
| Total HAPs* | 11.13 | 6.17 |

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

* HAPs are not speciated because no applicability was triggered.

Title V Program Applicability Basis

This facility has the potential to emit 240.02 tons of NO_x and 154.80 tons of VOC. 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: | 45CSR2 | Opacity Requirements for boilers |
| | 45CSR6 | Open burning prohibited. |
| | 45CSR10 | Sulfur requirements for fuel burned |
| | 45CSR11 | Standby plans for emergency episodes. |
| | 45CSR13 | New Source Construction |
| | WV Code § 22-5-4 (a) (14) | The Secretary can request any pertinent information such as annual emission inventory reporting. |
| | 45CSR30 | Operating permit requirement. |
| State Only: | 40 C.F.R. Part 61 | Asbestos inspection and removal |
| | 40 C.F.R. Part 82, Subpart F | Ozone depleting substances |
| | 45CSR4 | No objectionable odors. |
| | 45CSR17 | Control fugitive particulate matter |

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, 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>) |
|--------------------------------|------------------|--|
| 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

Since the last modification of the existing permit, additional MRR (Monitoring, recordkeeping and reporting) has been added regarding the glycol dehydration system.

Calculations of SO₂ emissions using the FERC limit for total sulfur of 20 grains/100ft³ along with stoichiometric conversions from grains of total sulfur/100 ft³ in the fuel to dry standard cubic feet of SO₂ per MMBtu and equation 19-1 of EPA Method 19 indicate that emissions from the engines are only a small fraction (<5%) of the 2000 ppm_v limit established by 45 CSR 10.

Calculations of particulate matter emissions using AP-42 factors for Natural Gas Combustion and Soot Formation at Flares (Sections 1.4-3 and 13.5-1, respectively) indicate that emissions from the flare are only a small fraction (<10%) of the mass limit established by 45CSR6. As a result of this finding and due to the nature of this control device, the visual emissions performance tests as per Section 5.2.2 of the permit may be used as an indicator of compliance with 45CSR6 requirements and shall be sufficient for compliance certification purposes.

According to 45 CSR §2-11, RBR01 is exempt from MRR (Monitoring, recordkeeping and reporting) requirements because RBR01's heat input is less than ten (10) million B.T.U's per hour.

Since the last modification of this permit WVDEP has determined that 45CSR10 is not applicable to the engines.

Non-Applicability Determinations

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

40 CFR 64 - Engines do not have any control; Glycol Dehydration unit is not a major source of HAPs. Therefore, in accordance with 40 C.F.R § 64.2(a), CAM is not applicable to this facility.

40 C.F.R § 60.18 – Flare is used only to control the odor. Even without flare the facility is not a major source of HAPs. Therefore, 40 C.F.R § 60.18 is not applicable.

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: June 3, 2006
Ending Date: July 3, 2006

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

U.K.Bachhawat
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

U.K.Bachhawat
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1256 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

1. Due to company's comment first sentence of Section 5.2.4 in the permit was changed from "At a minimum of once per year, sample and analyze the inlet gas stream utilizing gas chromatography for the presence of H₂S" to "At a minimum of once per year, sample and analyze the inlet gas stream to the station utilizing gas chromatography for the presence of H₂S".
By indicating the stream to be sampled is the inlet to the station the condition is consistent with Section 5.2.3 with respect to sampling location.
2. Due to company's comment the following potential emissions were changed in the fact sheet: VOC – 154.80 Tons/Year instead of 162.83 Tons/Year and HAPs – 11.13 Tons/Year from 16.52 Tons/Year. The changes in potential emissions are due to a recalculation of the dehydration unit emissions using GLYCalc incorporating current operating parameters of the system.