

Fact Sheet



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

Permit Number: R30-03900051-2007
Application Received: April 18, 2006
Plant Identification Number: 03900051
Permittee: Dominion Transmission, Inc.
Facility Name: Cornwell Station
Mailing Address: 200 River Haven Road
Clendenin, WV 25045

Physical Location: Clendenin, Kanawha County, West Virginia
UTM Coordinates: 476.19 km Easting • 4,259.58 km Northing • Zone 17
Directions: From I-79 take exit 19 to WV State Route 4. Then take Route 4 north to Clendenin, cross Elk River on Queen Shoals Road (Route 1). Turn left onto River Haven Road (Route 1/6), and proceed 2.5 miles to station.

Facility Description

Cornwell Station is a natural gas transmission and production station covered by SIC Code 4922. The natural gas is compressed to a higher pressure by the 13 integral compressors powered by the natural gas-fired reciprocating engines. The station also has one (1) 23 mmscf/day glycol dehydration unit with flare and a 4.2 mmBtu/hr boiler. The dehydration system is on a production line as are 3 of the engines.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Criteria Pollutants	Potential Emissions	2005 Actual Emissions
Carbon Monoxide (CO)	531.28	253.42
Nitrogen Oxides (NO _x)	3,421.63	1,615.44

Particulate Matter (PM ₁₀)	6.18	3.18
Total Particulate Matter (TSP)	6.18	3.18
Sulfur Dioxide (SO ₂)	0.67	0.18
Volatile Organic Compounds (VOC)	433.80	215.11

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2005 Actual Emissions
Formaldehyde	24.55	12.4
Other HAPs	14.53	6.0
Total HAP	39.08	18.4

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

Title V Program Applicability Basis

This facility has the potential to emit 531.28 tons/yr of CO, 3,421.63 tons/yr of NO_x, 433.80 tons/yr of VOC, 24.55 tons/yr of Formaldehyde and 39.08 tons/yr of 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, 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	Boilers
	45CSR6	Open burning prohibited.
	45CSR10	SO ₂
	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. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	40 C.F.R. Part 63, Subpart HH	Natural Gas Production MACT
	40 C.F.R. § 63.11	Flare MACT
State Only:	45CSR4	No objectionable odors.
	45CSR17	Particulate Fugitive

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>)
R13-2346B	May 30, 2003	
R13-2175C	April 5, 2007	

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.

Note: Two 45CSR13 permits R13-2175A and R13-2175B were issued. The project for which R13-2175A and R13-2175B were issued has been canceled by the permittee. The permittee has agreed to submit a letter requesting R13-2175A and R13-2175B to be placed in inactive status. A new permit R13-2175C was issued on April 5, 2007 which superseded R13-2175, R13-2175A and R13-2175B.

Determinations and Justifications

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 5.2.1 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 & BLR01 are exempt from MRR (Monitoring, recordkeeping and reporting) requirements because RBR01 & BLR01's heat input are less than ten (10) million B.T.U's per hour. Visual emission check for RBR01 and BLR01 in the last modification of the permit has been taken out.

According to 45CSR2A, BLR01 & RBR01 are exempt from 45CSR2 monitoring because BLR01 & RBR01 combust only natural gas. According to 45CSR10A, BLR01 & RBR01 are exempt from 45CSR10 monitoring because BLR01 & RBR01 combust only natural gas. According to 45CSR§10-10.1, BLR01 & RBR01 are exempt from 45CSR§10-3 and 45CSR§§10-6 thru 8 because design heat input is less than 10 million BTU's per hour; no other part of 45CSR10 applies.

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

40 C.F.R Subpart Kb is not applicable because all the tanks are less than 75 m³. Recordkeeping requirements for tanks TK01 and TK02 in the last modification has been taken out.

The emission limits from flare in Section 5.1.7 of the permit were based on maximum processing/production rate of natural gas through the dehy stated in section 5.1.8. Recordkeeping according to Section 5.4.2 to show compliance with production limitation in section 5.1.8 will show compliance with flare emission limits in section 5.1.7.

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 add-on control; Therefore, in accordance with 40 C.F.R § 64.2(a), CAM is not applicable to the engines.

There is no applicable requirement for tanks because there is no tank equal to or greater than 75 m³.

The engines at this facility are 2-stroke lean burns and 4-stroke lean burns and they are all gas fired. Hence according to 40 C.F.R § 63.6600 the engines at this facility are not subject to any requirements of 40 C.F.R 63 Subpart ZZZZ, or Subpart A.

Sections 4.3.2 (Record of Maintenance of Air Pollution Control Equipment) and 4.3.3 (Record of Malfunction of Air Pollution Control Equipment) of R13-2175C applicable to Engine 07 (EN07) is not included in the Title V permit because Engine 07 does not have any control device.

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: February 15, 2007
Ending Date: March 17, 2007

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)

Comment: Within Section 1.0 Emission Units, Unit 006-02 the 4.2 mmbtu/hr boiler is not longer present at the facility.

This change corrects the permitted unit list with the equipment onsite.

Condition 6.1.1 should be amended to read:

Carbon Monoxide	2.857 pounds/hour & 12.514 tons per year
Oxides of Nitrogen	6.161 pounds/hour & 26.9852 tons per year
Particulate Matter	0.060 pounds/hour & 0.2628 tons per year
Sulfur Dioxide	0.0036 pounds/hours & 0.01577 tons per year
Volatile Organic Compounds	0.714 pounds/hours & 3.127 tons per year

Dominion submitted an Administrative Amendment on February 2, 2007 to eliminate the speciated hazardous air pollutant emissions from condition A.1 of R13-2175 for Cornwell Station. Through previous discussions, the department has expressed a policy of eliminating the inclusion of emissions limitations within permits if the pollutant levels are de minimis and not required by a rule or standard. The pollutant limitations within condition A.1 are each below 1 ton/year and are not required under an underlying rule or standard.

Answer to comment: Unit 006-02 (BLR01) has been taken out from the draft permit. R13-2175C (Administrative amendment to R13-2175) has been approved on April 5, 2007. The draft permit has been changed to include conditions from R13-2175C which addresses the above comment.