

Fact Sheet



For Draft/Proposed Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on November 3, 2010.

Permit Number: **R30-02100002-2010**
Application Received: **September 7, 2011**
Plant Identification Number: **03-54-02100002**
Permittee: **Dominion Transmission, Inc.**
Facility Name: **Jones Station**
Mailing Address: **445 West Main Street**
Clarksburg, WV 26301

Permit Action Number: *SM01* Revised: *Draft/Proposed*

Physical Location: Lockney, Gilmer County, West Virginia
UTM Coordinates: 502.87 km Easting • 4300.26 km Northing • Zone 17

Directions: Interstate 79 to Burnsville Exit 79. Take Rt. 5 west. Go 15.1 miles to junction of Rt.33/119. Turn left and go 1.1 miles to Glenville stoplight. Continue through on Rt.33/119 south for 13 miles to Jones station on left.

Facility Description

Jones 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 two (2) 660-hp natural gas fired reciprocating engines, one (1) 7.0 mmcf/day dehydration unit with flare, and seven (7) storage tanks of various sizes.

Emissions Summary

The emission changes associated with this application are shown in the following table:

Pollutant	Annual Emissions Before this modification (tons/year)	Annual Emissions After this modification (tons/year)	Emissions Change (tons/year)
Volatile Organic Compounds (VOC)	60.11	63.54	3.43
Total HAPs*	5.88	6.71	0.83

* HAPs are not speciated because no applicability was triggered.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 258.70 tons of NOx. 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:

45CSR13	Permits For Construction, Modification
45CSR30	Operating permit requirement.
40 C.F.R. Part 63, Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities
40 C.F.R. Part 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 C.F.R. Part 64	Compliance Assurance Monitoring

State Only: N/A

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, 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)
R13-2669A	November 22, 2011	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

This is a Significant Modification (SM01) application Received on September 7, 2011. The significant modification incorporates the requirements of Permit R13-2669A for increasing the throughput limitation to the glycol dehydration unit (dehy). Throughout the permit, R13-2669 requirements and citations are replaced by R13-2669A requirements and citations. This significant modification also addresses CAM plan for dehy and 40 C.F.R. 63 Subpart ZZZZ requirements for the engines.

1) Emission Units Table Section 1.1

The table was updated to include the dehydration unit throughput change.

2) Title V Boilerplate changes

Condition 3.1.4 – “State Enforceable Only” citation is added according to Boilerplate because 45CSR4 is “State Enforceable Only”.

Condition 3.1.13 and 3.5.10 – According to Director’s directive 45CSR42 (Greenhouse gas Emissions Rule) requirements are deleted.

Condition 3.3.1. – According to Boilerplate Subsection “d” was added to this condition.

3) Section 4 – The emission limits for reboiler were eliminated in R13-2669A – according to 45CSR13 permit writer the emission limits were eliminated because they were insignificant.

4) Section 5 – The Rule 13 construction permit, R13-2669 was modified for an increase to the throughput limitation to the glycol dehydration unit rated at 7 mmcf/day. Emissions from the dehy are routed to flare (F1), rated at 4 MMBtu/hr, for VOC, HAP and odor control. The requirements from the Rule 13 modified permit R13-2669A have been incorporated into Section 5 of the Title V permit.

Condition 5.1.4 and 5.1.5 – These flare conditions are now consolidated in section 5.1.4 as stated in R13-2669A.

Condition 5.1.4.b. - The Rule 6 opacity requirement (45CSR§6-4.3) of 20 % has been streamlined with the no visible emissions requirement of R13-2669A. An exception is provided in R13-2669A that allows visible emissions for periods not to exceed a total of 5 minutes during any 2 consecutive hours. Therefore *“During the exception period when visible emissions are allowed, the visible emissions shall not exceed 20% opacity except for periods of start-up as outlined in 45CSR§6-4.4. (i.e., less than forty (40%) percent opacity, for a period or periods aggregating no more than eight (8) minutes per start-up)”* has been added in order to meet the Rule 6 opacity requirement during the exception period.

Condition 5.1.15 – The dehydration unit emissions go to the flare. According to 45CSR13-2669A evaluation the maximum potential particulate emission from the flare is less than 0.01 lb/hr; therefore the flare shall meet 45CSR§6-4.1 limit of 0.2698 lb/hr.

Condition 5.3.1. – The language in this condition is primarily that of the R13-2669A requirement. A frequency for testing and language for utilizing other test methods if approved by the DAQ has been added to R13-2669A requirement to be consistent with other natural gas compressor station permits.

Condition 5.3.3. –The following sentence from R13-2669A is deleted because it is not in the rule 40 C.F.R. §§63.772(b)(2)(i)-(ii) – “Permittees with federally enforceable controls are exempt from the requirements to conduct site-specific extended gas analysis”.

Section 6.1.2 (a) and (b) of R13-2669A cites both 40 C.F.R. 63 Subpart HH and HHH requirements – only 40 C.F.R. 63 Subpart HH is applicable to this facility.

Compliance with this condition will be streamlined by demonstrating compliance with the monitoring specified within 5.2.1 and the testing provision of 5.3.3.

Condition 5.5.2. – Language addressing the submission of a test protocol if alternative test methods are proposed has been added to the R13-2669A language.

Condition 5.5.4. – Previous permit conditions 5.5.2 and 5.5.3 regarding submission of test report for wet gas analysis have been eliminated from new R13-2669A permit. Condition 5.5.4 has been added regarding submission of test report for wet gas analysis.

40 CFR 63, Subpart HH Area Source Requirements – The facility is a minor source of HAPs and has benzene emissions less than 1 ton per year. The GACT requirements of 40 CFR 63 Subpart HH and associated requirements are included in permit conditions 5.1.11 through 5.1.13, 5.2.1, 5.3.1, 5.3.3, 5.4.9, 5.4.13 and 5.5.4.

- 5) **Section 6.0** – This section of the permit has been added for the reciprocating engines EN-01 & EN-02 and incorporates the requirements of 40 CFR 63, Subpart ZZZZ applicable to the engines.

40 CFR 63, Subpart ZZZZ RICE MACT Applicability – The two Cooper GMXE-8 engines are existing spark-ignition (SI) two-stroke lean burn (2SLB) Reciprocating Engines/Integral Compressors that combust pipeline quality natural gas and are rated at 660 HP each. These engines meet the definition of reciprocating internal combustion engines (RICE) according to 40 CFR § 63.6685(a):

Since, this facility is not a major source of HAPS, the 40 CFR 63, Subpart ZZZZ area source requirements apply. The horsepower range for the engines fits into the greater than 500 HP category as established by the regulation

The two (2SLB) engines are subject to the maintenance requirements (every 4,320 hours change oil/filter, inspect spark plugs, and inspect hoses/belts).

- 6) **40 CFR Part 64 – Compliance Assurance Monitoring (CAM)**

The emission unit D1 is a pollutant-specific emissions unit (PSEU) for the pollutant VOC. The PSEU meets all of the applicability criteria in 40 CFR §§64.2(a)(1)-(3). That is, the PSEU is subject to an emission limit for VOC (condition 5.1.7); uses a control device (flare F1) to achieve compliance with the VOC emission limit; and has potential pre-control device emissions of VOC greater than 100 tpy. Furthermore, the PSEU does not meet any of the exemptions given under 40 CFR §64.2(b) for VOC.

Condition 5.1.4.c. of the permit requires operation of the flare (Control Device ID# F1) with a flame present at all times whenever emissions may be vented to the flame. In order to demonstrate compliance with this requirement, the permit condition 5.2.2 requires monitoring of the presence or absence of a flare pilot flame using a thermocouple or other equivalent device. Therefore, continuous monitoring of the detector signal that indicates the presence of the pilot flame will provide reasonable assurance of ongoing compliance with the VOC limit. Conditions 5.2.2, 5.2.5 through 5.2.10, 5.4.10, 5.4.11, and 5.5.5 contain the CAM requirements.

Monitoring per the CAM Plan will be as follows:

		PSEU D1	
		Indicator No. 1	
I.	Indicator	Flare (F1) operation	
	Monitoring Approach	Continuous monitoring of the pilot flame using a computerized data acquisition, feedback, and control system to ensure the flare operates at all times the dehydration is in operation.	
II	Indicator Range	Indicator provides data regarding presence or absence of flame.	
	A. QIP threshold	The permittee has chosen not to propose a threshold at this time since it is not required for this permitting action by 40 C.F.R. §64.8(a). Although the threshold is not required, the language for a QIP as it relates to other applicable requirements is set forth as permit condition 5.2.9.	
III	Performance Criteria	The detector will be installed, as specified by the manufacturer, to sight the most stable part of the flare flame at all firing rates. The installation will be performed by a trained, experienced representative of the manufacturer.	
	A. Data Representativeness		
	B. Verification of Operational Status		All manufacturer's recommendations regarding periodic testing/checks for the proper installation and operations of the flame detecting device will be followed.
	C. QA/QC Practices and Criteria		For the device that detects the presence of a flame; calibration, maintenance, and operation will be conducted in accordance with manufacturer's specifications.
	D. Monitoring frequency		Continuous
	E. Data Collection Procedure		Continuous, alarmed signal is sent to the control panel and recorded in <i>Mhealth</i> , Dominion's computerized data acquisition, monitoring, and statistical analysis system.
	F. Averaging Period	There is no averaging period since the flare pilot flame is either present or absent.	

The emissions of HAPs from D1 are not subject to 40 CFR Part 64 because they are subject to 40 CFR Part 63, Subpart HH. Being subject to Subpart HH meets the exemption criterion at 40 CFR §64.2(b)(1)(i) for the affected HAPs. Table 1 of Subpart HH lists the specific HAPs that are subject to Subpart HH. All of the HAPs that have limits in condition 5.1.7 of permit are listed in Table 1 of Subpart HH. Therefore, all of the HAPs with limits in Title V condition 5.1.7, which are emitted from D1, are not subject to 40 CFR Part 64.

Non-Applicability Determinations

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

Greenhouse Gas Permitting - There have been no modifications that have triggered a PSD permit. Therefore, there are no applicable GHG requirements.

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: January 5, 2012
Ending Date: February 6, 2012

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
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Response to Comments (Statement of Basis)

Not applicable.