West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

For Final 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 August 8, 2011.

Permit Number: **R30-01300002-2011**
Application Received: **July 17, 2012**
Plant Identification Number: **03-54-01300002**
Permittee: **Dominion Transmission, Inc.**
Facility Name: **Orma Station**
Mailing Address: **445 West Main Street**
Clarksburg, WV 26301

Permit Action Number: *SM02* Revised: January 15, 2013

Physical Location:	Orma, Calhoun County, West Virginia
UTM Coordinates:	492.68 km Easting • 4288.86 km Northing • Zone 17
Directions:	From the intersection of Rt. 33/Rt. 119 West & 16 South at Arnoldsburg take Rt. 16 South 4.7 miles to Orma, turn left onto Euclid/Nicut Road and travel 1.0 mile, turn left onto Crooked Run Road and go 0.1 miles to station on the left.

Facility Description

Orma Compressor Station is a natural gas transmission 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 112.2 HP emergency generator, one (1) dehydrator reboiler, one (1) 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)	176.68	114.25	-62.43
Carbon Monoxide (CO)	41.27	42.46	1.19
Nitrogen Oxides (NOx)	259.38	259.7	0.32
Particulate Matter (PM_{10})	0.5	0.5	0
Total Particulate Matter (TSP)	0.5	0.5	0
Sulfur Dioxide (SO_2)	0.04	0.04	0
Total HAPs*	21.44	6.52	-14.92

* 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 259.7 tons per year of NOx and 114.25 tons per year 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.

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

Federal and State:

45CSR2	To prevent and control PM from combustion of fuel in indirect heat exchangers
45CSR6	Control of air pollution from combustion of refuse
45CSR13	Permits for Construction, Modification
45CSR30	Operating permit requirement.
40 C.F.R. §63.11	Control Device Requirements
40 C.F.R. 63, Subpart HH	National Emission Standards for HAPs from Oil and Natural Gas Production Facilities
40 C.F.R. 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)*
R13-2945A	10-17-2012	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 (SM02) application received on July 17, 2012. The significant modification incorporates the requirements of Permit R13-2945A for replacement of the existing Glycol Dehydration Unit (GDU) with a new Cameron Glycol Dehydration Unit. The existing dehydration unit still, reboiler, and flare will be taken out of service.

1) **Emission Units Table Section 1.1**
The table was updated to include the new dehy, reboiler and flare (DEHY02, RBR02 and F1) and take out the old dehy, reboiler and flare (DEHY01, RBR01 and DEHY).

2) **Section 3.0** – Condition 3.3.2 was added to include section 4.3.1 of R13-2945A.

3) **Section 4.0 –** References to DEHY01, RBR01 and DEHY were changed to DEHY02, RBR02 and F1 throughout the section.

   The proposed flare is designed to be “smokeless” and should emit only trace amounts of particulate matter; this will show compliance with 45CSR§6-4.1 limit of 0.2952 lb/hr on PM emissions for the flare in condition 4.1.2.

   Section 4.1.7 was changed because new dehy was constructed after July 8, 2005.

   New sections 4.1.9 to 4.1.13, 4.2.3, 4.3.3, 4.3.4, 4.4.3 to 4.4.9, 4.5.3 and 4.5.4 were added because of new requirements in R13-2945A.

   Section 4.2.2 was revised to replace the existing flare opacity monitoring requirements with new language in R13-2945A.

4) **Section 6.0** - Changes have been made to Section 6.0 to reflect changes in R13-2945A from R13-2945. These changes mainly consist of the changes to the R13-2945 citations & the addition of a footnote to the table in condition 6.1.2.

5) **40CFR64** – Compliance Assurance Monitoring (CAM) - Flare F1 is used to control HAPs and VOC emissions from the new Dehy. The new Dehy has potential pre-control device VOC, Xylene and total HAP emissions greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. The Dehy is also subject to emission limitations for VOC, Xylene and total HAPs according to section 4.1.10 of the permit; and the Dehy uses the flare to achieve compliance with the emission limitations. The new Dehy is a PSEU (Pollutant specific emission unit) for VOC, Xylene and total HAPs.

   Condition 4.1.12 of the permit requires operation of the flare (Control Device F1) with a flame present at all times whenever emissions may be vented to the flare. In order to demonstrate compliance with this requirement, the permit condition 4.1.12 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, Xylene and total HAP emission limits. Section 7.0 is added to the permit to address all CAM requirements.

Monitoring per the CAM Plan will be as follows:

		PSEUs F1 (VOC, Xylene and total HAPs)	
		Indicator No. 1	**Indicator No. 2**
I.	**Indicator**	Flare (F1) operation	Opacity
	Monitoring Approach	Continuous monitoring of the flame using a computerized data acquisition, feedback, and control system to ensure the flare operates at all times the dehydration unit is in operation. Condition 7.2.1 of the permit.	Opacity is measured and recorded by Method 22. Conditions 7.2.1 & 7.4.1 of the permit.
II.	**Indicator Range**	Indicator provides data regarding presence or absence of flame. Condition 7.2.1 of the permit.	The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. Condition 7.2.1 of the permit.
	A. QIP threshold	QIP threshold is spelled out in condition 7.2.5.b of the permit.	QIP threshold is spelled out in condition 7.2.5.c of the permit.
III	**Performance Criteria A. Data Representa-tiveness**	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.	N/A
	B. Verification of Operational Status	All manufacturer's recommendations regarding periodic testing/checks for the proper installation and operation of the flame detecting device will be followed. Condition 7.2.1 of the permit.	Visual emissions assessed by trained observer using Method 22. Condition 4.2.2 of the permit.
	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. Condition 7.2.1 of the permit.	The observer shall be trained and have a working knowledge of VE reading methodology in accordance with 40 C.F.R. 60, Appendix A, Method 9. Condition 4.2.2 of the permit.
	D. Monitoring frequency	Continuous	A method 22 VE test shall be conducted upon detecting any excess opacity during periods of operation. Condition 7.2.1.b of the permit.
	E. Data Collection Procedure	Continuous, alarmed signal is sent to the control panel and recorded in Mhealth, Dominion's computerized data acquisition, monitoring, and statistical analysis system. Conditions 7.4.1 amd 7.4.2 of the permit.	The method 22 test shall be conducted over a two hour period of operations. Condition 4.2.2 of the permit.
	F. Averaging Period	N/A.	2 hours. Condition 4.2.2 of the permit.

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: November 29, 2012
Ending Date: January 2, 2013

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)

None