*West Virginia Department of Environmental Protection*
*Division of Air Quality*

# Fact Sheet

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

Permit Number: R30-01700003-2010
Application Received: January 26, 2010
Plant Identification Number: 01700003
Permittee: **Dominion Transmission, Inc**
Facility Name: **L.L. Tonkin Compressor Station**
Mailing Address: 445 West Main Street
Clarksburg, WV 26301

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|---|---|
| Physical Location: | West Union, Doddridge County, West Virginia |
| UTM Coordinates: | 518.82 km Easting • 4351.18 km Northing • Zone 17 |
| Directions: | Take Route 50 east from Parkersburg. Approximately 45 miles take West Union Exit, Route 18 North. Go approximately 3.5 miles – Tonkin station is on the left. |

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**Facility Description**

The L.L.Tonkin Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) 4922.

**Emissions Summary**

**Plantwide Emissions Summary [Tons per Year]**

| Regulated Pollutants | Potential Emissions | 2009 Actual Emissions |
|---|---|---|
| Carbon Monoxide (CO) | 40.0 | 6.48 |
| Nitrogen Oxides ($NO_X$) | 123.6 | 38.21 |
| Particulate Matter ($PM_{10}$) | 5.5 | N/A |
| Particulate Matter ($PM_{2.5}$) | 2.785 | N/A |

| | | |
|---|---|---|
| Total Particulate Matter (TSP) | 5.5 | 0.79 |
| Sulfur Dioxide ($SO_2$) | 0.185 | 0.07 |
| Volatile Organic Compounds (VOC) | 14.84 | 6.79 |

*$PM_{10}$ is a component of TSP.*

| Hazardous Air Pollutants | Potential Emissions | 2009 Actual Emissions |
|---|---|---|
| Total HAPs | 0.45 | 0.1 |

*Some of the above HAPs may be counted as PM or VOCs. Total HAPs is much less than 10.*

## Title V Program Applicability Basis

This facility has the potential to emit 123.6 tons of NOx. Due to this facility's potential to emit over 100 tons per year of NOx, 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 | Indirect Heat Exchangers |
| | 45CSR6 | Open burning prohibited. |
| | 45CSR10 | Emission of Sulfur Oxides |
| | 45CSR11 | Standby plans for emergency episodes. |
| | 45CSR13 | |
| | 45CSR17 | Fugitive Particulate Matter |
| | 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 60 Subpart GG | Turbine NSPS |
| | 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. |

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, 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)* |
|---|---|---|
| R13-1077 | April 7, 1989 | |

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

1. BLR01 – This boiler's design capacity is 0.52 MMBtu/hr. This boiler is subject to 45CSR2. According to 45CSR§2-11.1 (this section is applicable to fuel burning unit having a heat input under 10 million B.T.U's per hour) this boiler is exempt from 45CSR§2-4, 5, 6, 8 and 9 which includes monitoring, recordkeeping and reporting; hence condition requiring visible emission checks for BLR01 in the existing permit has been deleted.

2. There are no other changes to the existing permit.

## Non-Applicability Determinations

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

40CFR64 – CAM – This facility is a major source for NOx. None of the pollutant-specific emission units have a control device; hence according to 40C.F.R§64.2(a), CAM is not applicable to any pollutant-specific emission units at this facility.

45CSR10 - The WVDEP has determined that 45CSR10 is not applicable to engines/generators; hence 45CSR10 is not applicable to TRB01 (turbine) and AUX01 (generator).
BLR01 (Boiler) has design heat input less than 10 MMBtu/hr; hence according to 45CSR§10-10.1, BLR01 is exempt from sections 3, 6 thru 8 of 45CSR10. Boiler is not a manufacturing process source operation; hence 45CSR§10-4.1 is not applicable to the boiler. BLR01 burns pipeline quality natural gas which is not a refinery process gas stream and has to meet FERC limit of 0.25 grains of $H_2S$/100 ft3; hence 45CSR§10-5.1 is not applicable to the boiler.
Due to above, requirements subjecting TRB01, AUX01 and BLR01 to 45CSR§10-4.1 and 5.1 and conditions requiring analysis of S and $H_2S$ to demonstrate compliance with 45CSR§10-4.1 and 5.1 have been taken out.

Area source MACT non-applicability:
1. L.L.Tonkin is a gas transmission facility. At present time there is no area source MACT applicable to a gas transmission facility.
2. L.L.Tonkin has a gas fired 169HP reciprocating (Spark ignition) engine. At present there is no area source MACT requirement for this kind of engine. In an upcoming additional rulemaking change to 40CFR63, Subpart ZZZZ, EPA will finalize requirements for existing stationary spark ignition (SI) engines that are located at area sources of HAP emissions by August 10, 2010.

## 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: April 13, 2010
Ending Date: May 13, 2010

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)

Not applicable.