

Fact Sheet



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

Permit Number: R30-04100010-2011
Application Received: December 20, 2010
Plant Identification Number: 041-00010
Permittee: Dominion Transmission, Inc.
Facility Name: Camden Station
Mailing Address: 445 West Main Street
Clarksburg, WV 26301

Physical Location: Camden, Lewis County, West Virginia
UTM Coordinates: 534.85 km Easting • 4323.27 km Northing • Zone 17
Directions: Interstate 79 North to the Weston Exit. Turn left on Route 33 West through Weston. Turn left onto Smith Run Road and go 1.5 miles. Turn left onto gravel road and proceed 0.3 miles to station on the left.

Facility Description

Camden Compressor Station (CS) is a natural gas transmission facility covered by Standard Industrial Classification (SIC) Code 4922 and North American Industry Classification System (NAICS) Code 48621. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of five (5) 600 HP natural gas fired reciprocating engines, one (1) emergency generator, one (1) dehydrator reboiler, one (1) dehydration unit, one (1) air compressor, and seven (7) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2009 Actual Emissions
Carbon Monoxide (CO)	127.49	83.18

Nitrogen Oxides (NO _x)	647.74	558.72
Particulate Matter (PM ₁₀)	1.31	Not reported
Total Particulate Matter (TSP)	1.31	0.92
Sulfur Dioxide (SO ₂)	0.10	0.06
Volatile Organic Compounds (VOC)	222.40	195.96

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions**	2009 Actual Emissions
Total*	11.2	17.1

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

*No single HAP is more than 10 tpy. Largest single HAP emission is Formaldehyde with potential emission of 4.55 tpy.

**Potential emissions is the emissions after enforceable flare. A new dehy with enforceable flare was installed in July 2009. 2009 actual emissions did not take into account enforceable flare. This explains why 2009 actual HAP emissions is more than Potential HAP emissions.

Title V Program Applicability Basis

This facility has the potential to emit 647.74 tpy of NO_x, 127.49 tpy of CO, and 222.40 tpy of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Dominion Transmission, Inc. Camden Compressor Station 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 45CSR6 45CSR10 45CSR11 45CSR13 WV Code § 22-5-4 (a) (14) 45CSR30 40 C.F.R. Part 61 40 C.F.R. Part 64 40 C.F.R. Part 82, Subpart F 40 C.F.R. Part 60 Subpart JJJJ	Control of PM from Combustion of Fuel in Indirect Heat Exchangers Open burning prohibited. Sulfur requirements for fuel burned Standby plans for emergency episodes. Construction permit requirement. The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. Asbestos inspection and removal Compliance Assurance Monitoring Ozone depleting substances Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
Federal Only:	40 C.F.R. 63 Subpart HH	NESHAP: Oil & 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 (RICE)
State Only:	45CSR4	No objectionable odors.
	45CSR17	Fugitive Particulate
	45CSR42	Greenhouse Gas Emissions Inventory Program

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 (<i>if any</i>)
R13-2792	March 4, 2009	N/A
G60-C014	December 4, 2009	

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 significant modification of this permit on April 13, 2010, the following changes are made to the permit:

1. Emission Units Table in Section 1.1 of the permit – type of the engines have been added – e.g. Reciprocating Engine/Integral Compressor; Cooper GMXE-8 is a 2SLB (2 stroke lean burn) SI (Spark ignition) engine. These engines are subject to 40 C.F.R. 63 Subpart ZZZZ (see sections 5, 6 & 7 below); the type of engine determines which sections of 40 C.F.R. 63 Subpart ZZZZ are applicable to these engines.
2. Section 2.1.4 has been added to define “rolling yearly total”.
3. The citation in section 3.1.3 has been changed from 40 C.F.R. 61 to 40 C.F.R. §61.145(b).
4. Sections 3.1.9 and 3.5.10 have been added due to new rule 45CSR42 for greenhouse gas emissions.
5. This facility is not a major source of HAPs. According to 40 C.F.R. § 63.6585, this facility is subject to 40 C.F.R 63 Subpart ZZZZ because the facility operates a stationary RICE (A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work) at an area source of HAP emissions (an area source of HAP emissions is a source that is not a major source). According to the definition above, all the engines at this facility are RICE and are subject to 40 C.F.R 63 Subpart ZZZZ.
6. Emergency generator EG01 was installed in 2009. According to 40 C.F.R. § 63.6590(a)(2)(iii), “*New stationary RICE*” is defined as “A stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006”. As defined above

- EG01 is new stationary RICE. EG01 has 475 HP design capacity. Because EG01 is new stationary RICE and less than 500 HP, EG01 is subject to section 6.1.3 of the permit. According to section 6.1.3, since EG01 must only meet the requirements of 40 C.F.R. Part 60 Subpart JJJJ, no additional requirements from 40 C.F.R. Part 63 Subpart ZZZZ were included in the permit for EG01.
7. Engines EN01-05 are existing stationary RICE. According to 40 C.F.R. § 63.6590(a)(1)(iii), “Existing stationary RICE” is defined as “For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006”. EN01 – 05 were installed from 1962 to 1964. EN01-05 are stationary non-emergency SI 2SLB engines > 500 HP located at an area source of HAPs; EN01-05 are subject to following sections of 40 C.F.R. Part 63 Subpart ZZZZ – 40 C.F.R. §§ 63.6603 (Table 2d – Section 6), 63.6595, 63.6605, 63.6640, 63.6665, 63.6625, 63.6655, 63.6645.
 Air Compressor CPR01 is an existing stationary RICE. According to 40 C.F.R. § 63.6590(a)(1)(iii), “Existing stationary RICE” is defined as “For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006”. CPR01 was installed in 1972. CPR01 is a stationary non-emergency SI 4SRB engines < 500 HP located at an area source of HAPs; CPR01 is subject to following sections of 40 C.F.R. Part 63 Subpart ZZZZ – 40 C.F.R. §§ 63.6603 (Table 2d – Section 9), 63.6595, 63.6605, 63.6640, 63.6665, 63.6625, 63.6655, 63.6645.
 8. There are no Greenhouse Gas Clean Air Act requirements for this facility because this is a renewal Title V permit and there have been no modifications that would have triggered a PSD permit.
 9. The requirement to perform initial and subsequent sampling was developed for non-controlled dehyds to ensure they do not exceed the MACT threshold of emissions. This condition was inserted into the permit prior to the new dehy installation which is equipped with a controlled flare. Since the dehy at the facility is now controlled with a federally enforceable flare that already meets the MACT standards and emissions with the control efficiency will be below the MACT threshold, there is no need to require a sampling schedule. This requirement was not from the construction permit for the new unit. Section 5.3.1 has been changed such that the permittee will determine the composition of wet natural gas at Director’s request.
 10. This is the second permit renewal for this facility. The facility was found not to be subject to CAM at the time of the first renewal. A significant modification was approved for the permit on June 9, 2009. A new DEHY was added during June 9, 2009 modification. The new DEHY is subject to 40CFR64 [CAM (Compliance Assurance Monitoring)]. CAM was addressed in June 9, 2009 revision.
 11. Paragraph d was added to Section 3.3.1 regarding submission of testing report.
 12. “Federally-enforceable only” citation has been taken out from sections 5.1.12, 5.1.13 and 5.3.3 of the permit. Although non-major area source MACT 40 C.F.R. Part 63 Subpart HH is excluded from state delegation in 45CSR34, its requirements are considered enforceable under 45CSR30 because of the definition in section 2.6.d, which includes any requirement subject to §112 of the CAA. This, coupled with section 5.2.a of 45CSR30, allows enforcement (by DAQ) of these non-delegated requirements.

Non-Applicability Determinations

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

The following tanks are taken out from the permit because they are small tanks and do not have any regulatory requirements.

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
TK01	TK01	Vertical, above ground tank containing Triethylene Glycol	1991	2730 gallon	N/A
TK02	TK02	Vertical, above ground tank containing used oil	1991	2730 gallon	N/A
TK03	TK03	Vertical, above ground tank containing ethylene glycol	1991	4200 gallon	N/A

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
TK04	TK04	Vertical, above ground tank containing ethylene glycol	1962	2100 gallon	N/A
TK05	TK05	Horizontal above ground tank containing produced fluids	2003	2000 gallon	N/A
TK06	TK06	Vertical above ground tank containing wastewater	1962	2730 gallon	N/A
TK07	TK07	Vertical, above ground tank containing lube oil	2003	7000 gallon	N/A

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: March 9, 2011
Ending Date: April 8, 2011

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)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.