

Fact Sheet



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

Permit Number: R30-NGGP-2012
Natural Gas Compressor Facilities General Permit

Facility Description

This General Permit is for facilities designed and operated for the purpose of gathering, dehydrating, transmitting, processing or compressing natural gas and is included in SIC codes 1311, 1321 & 4922 with corresponding NAICS codes 486210, 211112 & 211111. The General Permit language will be the same for all facilities that want to use this permit. The Registration forms will be different for each facility. The Registration form shall list all emission sources and sections of the general permit, which are applicable to the particular facility.

Advantages of General Permit over individual Permits:

1. Permits are streamlined – The General Permit provides more uniformity between permits for different facilities which translates into consistent compliance measures that should help companies with numerous sources.
2. The registration under General Permit will not involve advertisement. This will save permitting process time.
3. Modifications will be easier and faster. For example, if equipment is added which is similar to equipment covered by the General Permit, the permittee will only be required to submit a modification request to add the new equipment to their registration. No advertisement will be required.

To apply for Registration permittee shall do the following:

- Request for Registration under General Permit R30-NGGP-2012.
 - In the Title V application forms; in the equipment table, include which sections of General Permit are applicable to the facility and each individual piece of equipment;

Title V Program Applicability Basis

Due to this facility's potential to emit over 100 tons per year of a criteria pollutant and/or over 10 tons per year of a single HAP and/or over 25 tons per year of aggregate HAPs, the Facility 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 eligible facility may be subject to the following applicable rules as specified in the Registration:

Federal and State:	45CSR2	Particulate Air Pollution from Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR10	Emission of Sulfur Oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction Permit
	45CSR16	Standards of Performance for New Stationary Sources
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	45CSR40	Control of Ozone season NOx
	40 C.F.R. Part 60, Subpart GG	Turbine NSPS
	40 C.F.R. Part 60, Subpart KKKK	Turbine NSPS (constructed after February 18, 2005)
	40 C.F.R. Part 60, Subpart Kb	Storage Vessel NSPS
	40 C.F.R. Part 60, Subpart Dc	Small Steam Generating Units NSPS
	40 C.F.R. Part 60, Subpart IIII	Stationary Compression Ignition Internal Combustion Engines NSPS
	40 C.F.R. Part 60, Subpart JJJJ	Stationary Spark Ignition Internal Combustion Engines NSPS
	40 C.F.R. Part 60, Subpart OOOO	Crude Oil and Natural Gas Production, Transmission and Distribution NSPS
	40 C.F.R. Part 63, Subpart HH	Emission Standards for HAPs for Natural Gas Production Facility
	40 C.F.R. Part 63, Subpart HHH	Emission Standards for HAPs for Natural Gas Transmission Facility
	40 C.F.R. Part 63, Subpart DDDDD	Emission Standards for HAPs for Boilers & Process Heaters at Major Sources
	40 C.F.R. Part 63, Subpart YYYYY	Emission Standards for HAPs for Stationary Combustion Turbines
	40 C.F.R. Part 63, Subpart ZZZZ	Emission Standards for HAPs for Stationary RICE
	40 C.F.R. Part 63, Subpart JJJJJJ	Emission Standards for HAPs for Boilers at Area Sources
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	Fugitive Particulate emissions

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: Please see the registration

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. 45CSR2 - To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.

Section 4.0 of the permit - According to 45CSR§2-11.1, Miscellaneous Indirect Heat Exchangers including Reboilers and Regeneration Gas Heaters < 10 MMBtu/hr are exempt from 45CSR§§2- 4, 5, 6, 8 & 9.

Section 5.0 of the permit - According to 45CSR§2A-3.1.b, Miscellaneous Indirect Heat Exchangers including Reboilers and Regeneration Gas Heaters < 100 MMBtu/hr do not require monitoring and testing frequencies to show compliance with opacity limit and weight emission testing.

2. 45CSR4 - To Prevent and Control the Discharge of Air Pollution into the Open Air which Causes or Contributes to an Objectionable Odor or Odors

Some facilities might use a flare for controlling odor. Flares have to comply with 45CSR6.

3. 45CSR6 - *To Prevent And Control Air Pollution From Combustion of Refuse.*

This rule defines flares as incinerators and sets the following limits:

The particulate matter emission limit from each flare is determined by the following formula:

PM Emissions (lb/hr) = F x Incinerator Capacity (tons/hr)

Where: F = 5.43 (*from 45CSR§6-4.1*)

Compliance with the 45CSR§6-4.1 particulate matter weight limit (section 14.1.4 of the permit) shall be demonstrated by using site specific emission factors or by using AP-42 factors (Sections 14.2.2 and/or 14.2.4).

The visible emission limit from each flare is 20% opacity with the exception to smoke which is less than forty (40%) percent opacity, for a period or periods aggregating no more than eight (8) minutes per start-up. These limits were streamlined with a no visible emissions limit for the flare in Section 14.1.2.b. Compliance will be demonstrated through monthly visible emission checks and record keeping (Sections 14.3.1 and 14.4.5).

This rule also prohibits from the flares, the emission of particles of unburned or partially burned refuse or ash which are large enough to be individually distinguished in the open air (section 14.1.5 of the permit). The rule requires the flares, including all associated equipment and grounds, be designed,

operated and maintained so as to prevent the emission of objectionable odors (section 14.1.6 of the permit).

4. 45CSR10 - *To Prevent and Control Emission of Sulfur Oxides.*

a. According to the following calculation, compliance with FERC (Federal Energy Regulatory Commission) limit for total sulfur of 20 grains/100 cu.ft will assure compliance with the 45CSR10 limit of 2000 ppm SO₂ (Section 3.1.9 of the permit):

$$(20\text{grains of S}/100 \text{ cu.ft of gas}) \times (1\text{lb}/7000 \text{ grains}) \times (1\text{lbmol S}/32 \text{ lb S}) \times (1\text{lbmol SO}_2/1\text{lbmol S}) \times (385.1 \text{ cu.ft of gas}/1\text{lbmol gas}) \times 10^6 = 343 \text{ ppm of SO}_2.$$

Compliance with FERC limit for H₂S of 0.25 grains/100 cu.ft will assure compliance with 45CSR10 limit of 50 grains/100 cu.ft (Section 3.1.10 of the permit).

b. Pipeline quality natural gas has very low H₂S content and total sulfur includes H₂S. Hence H₂S is not required to be tested at the inlet gas stream.

c. From various field data it is evident that Glycol Dehydration units do not extract any sulfur from the natural gas stream. Therefore, if the incoming pipeline quality natural gas meets the FERC limit it is sufficient for the glycol dehy unit to show compliance with 45CSR10 limit of 2000ppm SO₂.

Section 4.0 of the permit - According to 45CSR§10-10.1, fuel burning units < 10 MMBtu/hr are exempt from 45CSR§§10-3, 6, 7, and 8 which include the sulfur dioxide weight emission standards and testing, monitoring, recordkeeping, and reporting requirements.

Section 5.0 of the permit - According to 45CSR§10-10.3, fuel burning units which combust natural gas are exempt from the testing, monitoring, recordkeeping and reporting requirements in 45CSR§10-8.

5. 45CSR17 - *To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.*

This rule sets a standard for fugitive particulate matter, which is not to be discharged beyond the facility boundary lines which causes statutory air pollution.

Section 3.4.4 of the permit specifies the applicable section of this rule.

6. 40 C.F.R. Part 60 Subpart Kb (Section 11.0 of the permit)

(The following are excerpts from 40 C.F.R. Part 60 Subpart Kb as of January 19, 2012, and are subject to change):

(a) Except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m³) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

(b) This subpart does not apply to storage vessels with a capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa.

40 C.F.R § 60.110b specifies detailed applicability and designation of affected facility for this rule.

7. 40 C.F.R. Part 60 Subpart Dc (Section 19.0 of the permit)

Except as provided in paragraphs (d), (e), (f), and (g) of 40 C.F.R § 60.40c, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of

29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).

8. 40 C.F.R. Part 60 Subpart JJJJ (Section 13.0 of the permit)

The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (5) of 40 C.F.R. § 60.4230.

9. 40 C.F.R. Part 60 Subpart IIII (Section 12.0 of the permit)

The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (3) of 40 C.F.R. § 60.4200.

10. 40 C.F.R. Part 60 Subpart GG (Section 7.0 of the permit)

If the facility has a stationary gas turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the lower heating value of the fuel fired, which commenced construction, modification, or reconstruction after October 3, 1977, the turbine is subject to this subpart except as provided in paragraphs (e) and (j) of 40 C.F.R. §60.332.

11. 40 C.F.R. Part 60 Subpart KKKK (Section 8.0 of the permit)

If the facility has a stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005, the turbine is subject to this subpart. Stationary combustion turbines regulated under this subpart are exempt from the requirements of subpart GG of this part.

40 C.F.R. § 60.4305 spells out detailed applicability for this rule.

12. 40 C.F.R. Part 63 Subpart YYYY (Section 9.0 of the permit)

(The following are excerpts from 40 C.F.R. Part 63 Subpart YYYY as of January 19, 2012 and are subject to change:)

40 C.F.R. §63.6085 Am I subject to this subpart?

You are subject to this subpart if you own or operate a stationary combustion turbine located at a major source of HAP emissions.

40 C.F.R. §63.6090 What parts of my plant does this subpart cover? (Note: The following section numbers match those of 40 C.F.R. §63.6090)

This subpart applies to each affected source.

(a) *Affected source.* An affected source is any existing, new, or reconstructed stationary combustion turbine located at a major source of HAP emissions.

(1) *Existing stationary combustion turbine.* A stationary combustion turbine is existing if you commenced construction or reconstruction of the stationary combustion turbine on or before January 14, 2003. A change in ownership of an existing stationary combustion turbine does not make that stationary combustion turbine a new or reconstructed stationary combustion turbine.

(2) *New stationary combustion turbine.* A stationary combustion turbine is new if you commenced construction of the stationary combustion turbine after January 14, 2003.

- (3) *Reconstructed stationary combustion turbine.* A stationary combustion turbine is reconstructed if you meet the definition of reconstruction in 40 C.F.R. §63.2 of subpart A of this part and reconstruction is commenced after January 14, 2003.
- (b) *Subcategories with limited requirements.* (1) A new or reconstructed stationary combustion turbine located at a major source which meets either of the following criteria does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of 40 C.F.R. §63.6145(d):
- (i) The stationary combustion turbine is an emergency stationary combustion turbine.
- (3) An existing, new, or reconstructed stationary combustion turbine with a rated peak power output of less than 1.0 megawatt (MW) at International Organization for Standardization (ISO) standard day conditions, which is located at a major source, does not have to meet the requirements of this subpart and of subpart A of this part. This determination applies to the capacities of individual combustion turbines, whether or not an aggregated group of combustion turbines has a common add-on air pollution control device. No initial notification is necessary, even if the unit appears to be subject to other requirements for initial notification. For example, a 0.75 MW emergency turbine would not have to submit an initial notification.
- (4) Existing stationary combustion turbines in all subcategories do not have to meet the requirements of this subpart and of subpart A of this part. No initial notification is necessary for any existing stationary combustion turbine, even if a new or reconstructed turbine in the same category would require an initial notification.

40 C.F.R §§ 63.6085, 63.6090 and 63.6092 spells out detailed applicability, 40 C.F.R. §63.6095 specifies compliance dates for this rule.

13. 40 C.F.R. Part 63 Subpart HH (Section 16.0 of the permit)

(Note: The following section numbers match those of 40 C.F.R. §63.760) (The following are excerpts from 40 C.F.R. Part 63 Subpart HH as of January 19, 2012 and are subject to change):

This subpart applies to the owners and operators of the emission points, specified in paragraph (b) of 40 C.F.R § 63.760 that are located at oil and natural gas production facilities that meet the specified criteria in paragraphs (a)(1) and either (a)(2) or (a)(3) of this section.

- (a) (1) Facilities that are major or area sources of hazardous air pollutants (HAP) as defined in 40 C.F.R §63.761. Emissions for major source determination purposes can be estimated using the guidelines in 40 C.F.R §63.760
- (2) Facilities that process, upgrade, or store hydrocarbon liquids prior to the point of custody transfer.
- (3) Facilities that process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. For the purposes of this subpart, natural gas enters the natural gas transmission and storage source category after the natural gas processing plant, when present. If no natural gas processing plant is present, natural gas enters the natural gas transmission and storage source category after the point of custody transfer.

40 C.F.R § 63.760 spells out detailed applicability, compliance dates for this rule.

14. 40 C.F.R. Part 63 Subpart HHH (Section 15.0 of the permit)

(Note: The following section numbers match those of 40 C.F.R. §63.1270) (The following are excerpts from 40 C.F.R. Part 63 Subpart HHH as of January 19, 2012 and are subject to change):

- (a) This subpart applies to owners and operators of natural gas transmission and storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a

final end user (if there is no local distribution company), and that are major sources of hazardous air pollutants (HAP) emissions as defined in 40 C.F.R. §63.1271. Emissions for major source determination purposes can be estimated using the maximum natural gas throughput calculated in either paragraph (a)(1) or (2) of 40 C.F.R. §63.1270 and paragraphs (a)(3) and (4) of 40 C.F.R. §63.1270. As an alternative to calculating the maximum natural gas throughput, the owner or operator of a new or existing source may use the facility design maximum natural gas throughput to estimate the maximum potential emissions. Other means to determine the facility's major source status are allowed, provided the information is documented and recorded to the Administrator's satisfaction. A compressor station that transports natural gas prior to the point of custody transfer or to a natural gas processing plant (if present) is not considered a part of the natural gas transmission and storage source category. A facility that is determined to be an area source, but subsequently increases its emissions or its potential to emit above the major source levels (without first obtaining and complying with other limitations that keep its potential to emit HAP below major source levels), and becomes a major source, must comply thereafter with all applicable provisions of this subpart starting on the applicable compliance date specified in paragraph (d) of 40 C.F.R. §63.1270. Nothing in this paragraph is intended to preclude a source from limiting its potential to emit through other appropriate mechanisms that may be available through the permitting authority.

- (b) The affected source is each glycol dehydration unit.
- (c) The owner or operator of a facility that does not contain an affected source, as specified in paragraph (b) of this section, is not subject to the requirements of this subpart.
- (f) *Exemptions.* A facility with a facilitywide actual annual average natural gas throughput less than 28.3 thousand standard cubic meters per day, where glycol dehydration units are the only HAP emission source, is not subject to the requirements of this subpart. Records shall be maintained as required in 40 C.F.R. §63.10(b)(3).

40 C.F.R § 63.1270 spells out detailed applicability, compliance dates for this rule.

15. 40 C.F.R. Part 63 Subpart DDDDD (Section 18.0 of the permit)

(The following are excerpts from 40 C.F.R. Part 63 Subpart DDDDD as of January 19, 2012 and are subject to change):

40 C.F.R. § 63.7485 Am I subject to this subpart?

You are subject to this subpart if you own or operate an industrial, commercial, or institutional boiler or process heater as defined in 40 C.F.R. §63.7575 that is located at, or is part of, a major source of HAP as defined in 40 C.F.R. §63.2 or 40 C.F.R. §63.761 (40 CFR part 63, subpart HH, National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities), except as specified in 40 C.F.R. §63.7491.

40 C.F.R. § 63.7490 What is the affected source of this subpart? (Note: The following section numbers match those of 40 C.F.R. §63.7490)

- (a) This subpart applies to new, reconstructed, or existing affected sources as described in paragraphs (a)(1) and (2) of this section.
 - (1) The affected source of this subpart is the collection of all existing industrial, commercial, and institutional boilers and process heaters within a subcategory located at a major source as defined in 40 C.F.R. §63.7575.
 - (2) The affected source of this subpart is each new or reconstructed industrial, commercial, or institutional boiler or process heater located at a major source as defined in 40 C.F.R. §63.7575.

- (b) A boiler or process heater is new if you commence construction of the boiler or process heater after January 13, 2003, and you meet the applicability criteria at the time you commence construction.
- (c) A boiler or process heater is reconstructed if you meet the reconstruction criteria as defined in 40 C.F.R. §63.2, you commence reconstruction after January 13, 2003, and you meet the applicability criteria at the time you commence reconstruction.
- (d) A boiler or process heater is existing if it is not new or reconstructed.

40 C.F.R §§ 63.7490 and 63.7491 spells out detailed applicability and 40 C.F.R. §63.7495 spells out compliance dates for this rule.

16. 40 C.F.R. Part 63 Subpart JJJJJ (Section 20.0 of the permit)

(The following are excerpts from 40 C.F.R. Part 63 Subpart JJJJJ as of January 19, 2012 and are subject to change):

40 C.F.R. §63.11193 Am I subject to this subpart?

You are subject to this subpart if you own or operate an industrial, commercial, or institutional boiler as defined in 40 C.F.R. §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in 40 C.F.R. §63.2, except as specified in 40 C.F.R. §63.11195.

40 C.F.R. §63.11194 What is the affected source of this subpart? (Note: The following section numbers match those of 40 C.F.R. §63.11194)

- (a) This subpart applies to each new, reconstructed, or existing affected source as defined in paragraphs (a)(1) and (2) of this section.
 - (1) The affected source is the collection of all existing industrial, commercial, and institutional boilers within a subcategory (coal, biomass, oil), as listed in 40 C.F.R. §63.11200 and defined in 40 C.F.R. §63.11237, located at an area source.
 - (2) The affected source of this subpart is each new or reconstructed industrial, commercial, or institutional boiler within a subcategory, as listed in 40 C.F.R. §63.11200 and as defined in 40 C.F.R. §63.11237, located at an area source.
- (b) An affected source is an existing source if you commenced construction or reconstruction of the affected source on or before June 4, 2010.
- (c) An affected source is a new source if you commenced construction or reconstruction of the affected source after June 4, 2010 and you meet the applicability criteria at the time you commence construction.
- (d) A boiler is a new affected source if you commenced fuel switching from natural gas to solid fossil fuel, biomass, or liquid fuel after June 4, 2010.

40 C.F.R. §63.11195 Are any boilers not subject to this subpart? (Note: The following section number match those of 40 C.F.R. §63.11195)

- (e) A gas-fired boiler as defined in 40 C.F.R. Part 63 Subpart JJJJJ.

40 C.F.R §§ 63.11194 and 63.11195 spells out detailed applicability and 40 C.F.R. §63.11196 spells out compliance dates for this rule.

17. 40 C.F.R. Part 63 Subpart ZZZZ (Section 17.0 of the permit)

(The following are excerpts from 40 C.F.R. Part 63 Subpart ZZZZ as of January 19, 2012 and are subject to change):

The facility is subject to this subpart if the facility own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

(a) A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

(b) A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site.

(c) An area source of HAP emissions is a source that is not a major source.

40 C.F.R § 63.6585 spells out detailed applicability for this rule.

18. 40 C.F.R. Part 60 Subpart OOOO (Section 23.0 of the permit)

This is a new rule not yet published in the Federal Register. The final rule's effective date will be 60 days after the date of publication in the Federal Register. An owner or operator is subject to the applicable provisions of 40 C.F.R. 60 Subpart OOOO if they have one or more of the onshore affected facilities listed in paragraphs 40 C.F.R. §60.5365(a) through (g) and commence construction, modification or reconstruction after August 23, 2011. This NSPS includes requirements for storage tanks with emissions of 6 tons a year or more at natural gas processing plants and natural gas compressor stations; and compressors at natural gas processing plants.

19. Changes to the existing permit (R30-NGGP-2007):

- (i) Boilerplate changes: The following changes have been made due to boilerplate changes:
 - a. Sections 2.1.4, 2.3, 3.3, 3.4.2, 3.4.3 and 3.5.2 have been changed to reflect boilerplate changes.
 - b. Section 3.1.1 has been changed to reflect new 45CSR§6-3.1 language.
 - c. Section 3.1.2 has been changed to reflect new 45CSR§6-3.2 language.
 - d. Section 3.1.3 regarding asbestos and the citation of the section have been changed due to change in boilerplate.
 - f. Paragraph d has been added to section 3.3.1 to reflect boilerplate change requiring reporting of stack test results. As a result, section 3.3.2 was no longer needed and has been deleted. Previous section 3.3.3 was renumbered as 3.3.2.
 - g. Sections 3.5.3 and 3.5.5 are changed to include electronic report submittal to EPA.

(ii) NAICS codes are added on Page 2 of the permit.

(iii) Sources subject to 40 C.F.R. 63 Subpart HH and/or 40CFR64 will be eligible for registration under this permit.

(iv) 40 C.F.R. 60 Subpart K, Ka are taken out because none of the facilities were found to be subject to these rules. Sources subject to 40 C.F.R. 60 Subpart KKK are not eligible for this permit (added to section 2.0.1.2.e of the permit). 40 C.F.R. 60 Subparts KKKK, IIII, JJJJ, OOOO and 40CFR64 have been added. 40 C.F.R. 63 Subparts YYYY, HH & JJJJJ have been added.

(v) Removed 45CSR1 and added 45CSR40. 45CSR1 requirements applicable to Stationary Internal Combustion Engines have now been moved to 45CSR40. 45CSR§40-90 (Ozone Season NO_x Reduction Requirements for Stationary Internal Combustion Engines) are applicable to some Columbia Gas Transmission and Dominion engines. These are the engines subject to NO_x Budget trading program, hence section 2.0.1.2.h in the existing permit (Sources subject to NO_x budget trading program not eligible for this permit) is taken out.

- (vi) Appendix A to I listing NSPS and MACT requirements (as of certain date) have been taken out because they are subject to change. Appendix J listing 45CSR1 has been taken out because 45CSR1 has been repealed.
- (vii) Section 14.3.1 has been modified to include monthly visible emission checks.
- (viii) Section 18.0.2 has been added for Title V Boiler MACT (40 C.F.R. 63 Subpart DDDDD) placeholder language because of uncertainties regarding Boiler MACT implementation.
- (ix) Old sections 3.1.9, 3.1.10 and 3.1.11 have been moved to Section 5.1.10, 5.1.11 and 5.1.12.
- (x) Section 14.1.1 (former section 12.1.1) was modified such that a source can choose either a limit on the potential HAPs or actual average benzene emissions, or both. 40 C.F.R. 63, Subpart HH is subject to both major and area sources, but has a 1 ton/year benzene exemption. Former Section 12.1.7 was removed and language was added to section 14.1.1.b that calculation of the actual average benzene emissions shall be determined using the methods in 40 C.F.R. 63, Subparts HH or HHH.
- (xi) Section 14.4.9 is added for recordkeeping of actual benzene emissions.
- (xii) Section 6.0 has been modified to include applicable requirements for all reciprocating internal combustion engines, emergency generators, and combustion turbines and not just for those that are not subject to NSPS, 40 C.F.R. 60. Section 6.2.1 of the existing permit is taken out because the director has determined that 45CSR10 is not applicable to engines and turbines. The remaining conditions have been renumbered.
- (xiii) Section 14.0 (former section 12.0) has been modified to include applicable requirements for all natural gas dehydration units and not just for those that are not subject to MACT standards.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following: 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: May 16, 2012
Ending Date: June 22, 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
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Response to Comments (Statement of Basis)

Not applicable.