

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on December 20, 2011.

Permit Number: **R30-08500004-2011**
Application Received: **April 3, 2015**
Plant Identification Number: **03-54-085-00004**
Permittee: **Dominion Transmission, Inc.**
Facility Name: **Craig Compressor Station**
Mailing Address: **925 White Oaks Blvd, Bridgeport, WV 26330**

Permit Action Number: *MM01* Revised: *May 3, 2016*

Physical Location:	Smithville, Ritchie County, West Virginia
UTM Coordinates:	491.49 km Easting • 4324.68 km Northing • Zone 17
Directions:	From Clarksburg, take Route 50 West for 41 miles to Ellensboro exit. Go left on Route 16 South for 18 miles thru Harrisville to Route 47. Turn left and go 0.2 miles across bridge then turn right on Route 16 South. Go approximately 20 feet and turn right up hill. Go 0.3 miles to station.

Facility Description

Craig 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 currently consists of three (3) 869 HP natural gas fired reciprocating engines, two (2) emergency generators, one (1) dehydrator reboiler, one (1) dehydration unit with a flare, and six (6) storage tanks of various sizes.

The proposed Title V modification (MM01) incorporates changes associated with the modification permit R13-2497A to replace the existing glycol dehydrator unit (GDU) with a new unit, the existing GDU flare with a new thermal oxidizer and the existing dehydrator reboiler with a new dehydrator reboiler.

Emissions Summary

The change in potential emissions are as follows:

Regulated Pollutants	Change in Potential Emissions (+ or -), TPY
Volatile Organic Compounds (VOC)	-8.0
Total HAPs	-4.0

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of a criteria pollutant (i.e., 245 tpy of NO_x and 214 tpy of VOC). Therefore, 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 Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers
45CSR6	Control Of Air Pollution From Combustion Of Refuse
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR30	Operating permit requirement.
45CSR34	Emission Standards For Hazardous Air Pollutants
40 CFR Part 63, Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities

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)
R13-2497A	August 24, 2015	
R13-2503	February 19, 2003	

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," which may be downloaded from DAQ's website.

Determinations and Justifications

- 1) The "Emission Units" table was updated to add the new dehydration unit (DEHY02), the new dehydration reboiler (RBR02) and the new thermal oxidizer (2C) and to remove the old dehydration unit (DEHY01), the old dehydration reboiler (RBR01) and the old flare (DEHY).
- 2) Condition 1.2. - The Permit Number has been updated to R13-2497A with the date of issuance of August 24, 2015.
- 3) Condition 3.4.1. – "45CSR13, R13-2497, 4.4.1." has been added to the citation of authority.
- 4) Section 4.0 – This section has been updated to include the requirements from R13-2497A for the new dehydration reboiler.
- 5) Section 5.0 - This section has been revised and updated to include the requirements and language of permit R13-2497A, 45CSR6, and 40 CFR 63 Subpart HH for the replacement of the old dehydrator unit and flare with the new dehydrator unit and thermal oxidizer. Additionally:
 - Condition 5.1.1. – The PM emissions calculation has been revised to reflect the new thermal oxidizer. Based on information taken from GRI-GLYCalc, the uncontrolled weight rate of hydrocarbons going to the thermal oxidizer is 217 lb/hr (0.11 tons/hr). Using this amount as the capacity of the thermal oxidizer, it has a particulate matter limit of 0.59 lb/hr.
 - Conditions 5.1.11. and 5.1.12. – The requirements of these conditions have been deleted and replaced with "Reserved." 45CSR10 has requirements limiting SO₂ emissions from "fuel burning units," limiting in stack SO₂ concentrations of "manufacturing processes," and limiting H₂S concentrations in process gas streams. The facility is not a manufacturing process and the reboiler does not burn process gas. Therefore the existing requirements in these conditions have been deemed to be non-applicable.

The reboiler has been determined to meet the definition of a "fuel burning unit" under 45CSR10. The MDHI is less than 10 mmBtu/hr and therefore, pursuant to the exemption given under §45-10-10.1, the unit is not subject to the limitations for fuel burning units under 45CSR10.
 - Condition 5.1.15. – Condition 5.1.7. contains a benzene emission limit of 0.20 tpy thereby meeting the exemption of 40 CFR §63.764(e). Therefore, §63.764(d) has been deleted from condition 5.1.15.

- Conditions 5.2.2. and 5.2.3. – These conditions contained monitoring for conditions 5.1.11. and 5.1.12. and therefore have been marked as “Reserved.”
- Condition 5.2.4. – The compliance requirements in Condition 5.2.5. will demonstrate compliance with the dehydration unit throughput and condition 5.3.2. will demonstrate compliance with the emission limits and minor source status. Therefore condition 5.2.4. has been labeled “Reserved.”
- Condition 5.3.3. – The language in this condition was updated to match the language of 40 CFR 63 Subpart HH. Also:
 - Since 40 CFR §63.764(e)(i) is included in Permit R13-2497A and consequently added in condition 5.1.15. of the Title V permit, the procedures of §63.772(b)(1) to determine the average flowrate of natural gas to the dehydration unit have been added to this condition.
 - The procedures of §63.772(b)(2)(ii), which were previously omitted, have been added to this condition.
 - Since Condition 5.2.4. has been removed, the streamlining language has been removed.
- Condition 5.4.5. – The records of this condition are duplicative of condition 5.2.5. Therefore condition 5.4.5. has been labeled “Reserved.”

Non-Applicability Determinations

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

40 CFR 60, Subparts D, Da, Db, Dc,	These subparts apply to steam generating units of various sizes, all greater than 10 MMBtu/hr. The proposed reboiler will have a rated capacity of 0.75 MMBtu/hr and therefore the requirements of these subparts do not apply.
40 CFR 60, Subpart OOOO	The dehydration unit is not located at an onshore natural gas processing plant site and therefore, pursuant to 40 CFR §60.5365(f)(2) is exempt from the provisions of §§60.5400, 60.5401, 60.5402, 60.5421, and 60.5422 under this subpart.
40 CFR 63, Subpart HHH	The Craig Compressor Station is a gathering facility located upstream of the point of custody transfer and is an area (minor) source of HAPs.
40 CFR 63, Subpart DDDDD	Craig compressor station is an area source of HAP emissions.
40 CFR 63, Subpart JJJJJ	The reboiler is a gas-fired boiler and therefore not subject to this subpart pursuant to 40 CFR §63.11195(e).

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: Not Applicable for minor modifications.
 Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478
frederick.tipane@wv.gov

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.

Response to Comments (Statement of Basis)

Not applicable.