

# Fact Sheet



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

Permit Number: **R30-03300014-2016**  
Application Received: **November 30, 2015**  
Plant Identification Number: **033-00014**  
Permittee: **Dominion Transmission, Inc.**  
Facility Name: **Law Compressor Station**  
Mailing Address: **925 White Oaks Blvd.**  
**Bridgeport, WV 26330**

Revised: *N/A*

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Physical Location: Good Hope, Harrison County, West Virginia  
UTM Coordinates: 545.88 km Easting • 4335.35 km Northing • Zone 17  
Directions: From Clarksburg take Route 19 South thru Good Hope for 11 miles.  
Turn right across an iron bridge onto Two Lick Road. Go 1.1 miles then  
turn right thru gate. Go 0.3 miles to station at top of hill.

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### Facility Description

Law Compressor Station is a natural gas gathering 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, two (2) 192.5 HP emergency generators, one (1) dehydrator reboiler, one (1) dehydration unit with a flare, one (1) air compressor, and seven (7) storage tanks of various sizes.

### Emissions Summary

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Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2014 Actual Emissions
Carbon Monoxide (CO)	38.99	24.25

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<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2014 Actual Emissions</b>
Nitrogen Oxides (NO <sub>x</sub> )	259.85	162.23
Particulate Matter (PM <sub>2.5</sub> )	1.84	0.022
Particulate Matter (PM <sub>10</sub> )	1.84	0.189
Total Particulate Matter (TSP)	2.33	0.58
Sulfur Dioxide (SO <sub>2</sub> )	0.03	0.012
Volatile Organic Compounds (VOC)	96.94	64.54

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2014 Actual Emissions</b>
Acetaldehyde	0.37	0.13
Acrolein	0.37	0.13
Benzene	0.27	0.061
Ethylbenzene	0.11	0.0018
Formaldehyde	2.64	0.93
Hexane	0.14	0.048
Toluene	0.48	0.055
Xylene	0.66	0.069

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

### **Title V Program Applicability Basis**

This facility has the potential to emit 259.85 TPY of NO<sub>x</sub>. 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Opacity Requirements for boilers
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur requirements for fuel burned
	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR Permits
	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.
	40 C.F.R. Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart HH	Oil and natural gas production facilities.
	40 C.F.R. Part 63, Subpart ZZZZ	Reciprocating internal combustion engines.
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	Control fugitive particulate matter

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 ( <i>if any</i> )
G60-C041	10/13/2011	
R13-2963A	1/4/2016	

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**

The following changes were made to the permit as part of this renewal.

Section 1.0. Emission Units and Active R13, R14, and R19 Permits

- The following changes to the Emission Units table were made:
  - Removed Emission Unit CPR01 (Air compressor; Ingersoll Rand 15-T).
  - Added Emission Unit CPR02 (Emergency air compressor; Ford L8G-4231-6007-Z).
  - Removed Emission Units TK01 (vertical, above ground tank containing lube oil) and TK03 (2,000 gallon horizontal aboveground storage tank containing drip gas).
  - Made a correction to the design capacity of Emission Unit TK04. Capacity was previously listed as 5,075 gallons which was incorrect; the correct capacity is 1,000 gallons.

- Added Emission Unit TK08 (2,000 gallon horizontal, above ground tank containing ethylene glycol).

### Section 3.0. Facility-Wide Requirements

- Updated the Permit Shield. (See Non-Applicability Determinations)

### Section 5.0 Source-Specific Requirements (F1, DEHY02)

- Removed old Conditions 5.1.12, 5.2.15, 5.3.5, 5.4.8, and 5.5.6. These conditions were removed under R13-2963A since Law Compressor Station is not subject to 40 C.F.R. 60 Subpart OOOO. (See Non-Applicability Determinations)
- Old Condition 5.1.15. (renumbered to 5.1.14) was revised so that Table 2 of 40 C.F.R. 63 subpart HH, which specifies the provisions of 40 C.F.R. 63 subpart A (General Provisions) that apply to sources affected under 40 C.F.R. 63 subpart HH, is incorporated by reference instead of being included as Attachment B.
- Removed requirements for submittal of a Notification of Compliance Status report for 40 C.F.R. 63 Subpart HH in old Condition 5.5.7. Dominion has already submitted this report.
- Removed old Conditions 5.2.5, 5.2.6, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.11, 5.4.10, and 5.5.10; and deleted the CAM citations in conditions 5.2.6 (old Condition 5.2.13), 5.4.5 (old Condition 5.4.6), and 5.5.2 (old Condition 5.5.3). CAM is not applicable to DEHY02 and F1. (see Non-Applicability Determinations)
- Conditions were renumbered as needed due to removal of conditions.

### Section 6.0. Source-Specific Requirements (EN01, EN02, CPR02)

- Air Compressor (CPR01) was removed and replaced with Emergency Air Compressor (CPR02) which is an existing 40 HP emergency stationary SI RICE located at an area source of HAPs. The 40 C.F.R. 63 Subpart ZZZZ requirements in this section were updated to reflect this change.

### Section 7.0. Source-Specific Requirements (EG01 & EG02)

- In the previous Title V Permit the R13 general permit registration G60-C041 was included as Attachment C. With this Title V renewal application, Dominion Transmission requested that the applicable requirements of G60-C041 and G60-C be included in the body of the Title V Permit.

Attachment A was removed from the Permit since it contained Table 3 to 40 C.F.R. 60 Subpart OOOO. This Facility is not subject to 40 C.F.R. 60 Subpart OOOO.

Attachment B was removed. Table 2 of 40 C.F.R. 63 Subpart HH is now incorporated by reference in Condition 5.1.14.

Attachment C, Class II General Permit G60-C, was removed since the applicable requirements are included in Section 7.0.

### **Non-Applicability Determinations**

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

- a. 45CSR§10-3 – To Prevent and Control Air Pollution from the Emissions of Sulfur Oxides: The flare (F1) is exempt from this section of the rule according to 45CSR§10-2.8; the flare does not meet the definition of a fuel-burning unit in 45CSR§10-2.8.

- b. 40 C.F.R. 60 Subpart JJJJ – The compressor engines (EN01 and EN02) and air compressor (CPR02) are not subject to this subpart since the engines were manufactured in 1973 and the air compressor in 1989, before the applicability date.
- c. 40 C.F.R. 60 Subpart OOOO – This subpart does not apply to the facility since the facility is a gathering facility that does not have tanks, gas wells, centrifugal compressors, reciprocating compressors, and/or pneumatic controllers constructed, modified, or reconstructed after August 23, 2011.
- d. 40 C.F.R. 63 Subpart HHH – This subpart does not apply to the facility since the facility is not a transmission or storage station and is not a major source of HAPs.
- e. 40 C.F.R. 63 Subpart DDDDD – The reboiler (RBR02) is not subject to this subpart since the facility is not a major source of HAPs.
- f. 40 C.F.R. 63 Subpart JJJJ – The reboiler (RBR02) is not subject to this subpart since it is considered a “process heater,” which is excluded from the definition of “boiler.”
- g. 40 C.F.R. 64 CAM – Compliance Assurance Monitoring. According to the renewal application, the engines (EN01 and EN02), the emergency air compressor (CPR02), and the reboiler (RBR02) do not have any control devices. Since these emission units do not meet the applicability criterion at 40CFR§64.2(a), CAM is not applicable to them.

Emergency Generators (EG01 and EG02) have NSCR control devices, but since the use of the NSCRs is required by 40 C.F.R 60 Subpart JJJJ, emission units EG01 and EG02 are exempt from CAM under 40 C.F.R. 64.2(b)(1)(i).

The dehydration unit (DEHY02) is a PSEU for HAPs and VOC emissions because it meets all of the applicability criteria in 40CFR§64.2(a): (1) it has emission limits for HAPs and VOC (condition 5.1.9), (2) it uses a control device (Flare) to achieve compliance with these limits, and (3) potential pre-control device emissions of HAPs and VOC are higher than the major source applicability criteria (10 TPY for a single HAP, 25 TPY of aggregated HAPs, and 100 TPY for criteria pollutants). However, the DEHY02 meets the exemption in 40CFR§64.2(b)(1)(i) for HAP emissions, since the facility is subject to 40 C.F.R. 63 Subpart HH; therefore CAM is not applicable to the DEHY02 for HAPs.

For the VOC emissions of the DEHY02, it was determined during the review of R30-03300014-2011 (SM01) in 2013 that the DEHY02 didn't meet any exemption in 40CFR§64.2(b), and met the applicability criteria in 40CFR§64.2(a), therefore it was subject to CAM. The CAM plan was included with the permit at that time (on July 9, 2013).

However, per the company's request, the CAM applicability for the DEHY02 for VOC emissions was re-considered during this permit renewal process. It was found that per 40CFR§64.5(b), the CAM applicability determination should have been conducted during this permit renewal process in 2016, and not during the significant modification process (SM01) in 2013 since, per 40CFR§64.5(a), the DEHY02 is not considered a large PSEU for VOC (VOC emissions after control device are limited to 10.64 TPY). While conducting the CAM applicability determination during this permit renewal in 2016, it has been determined that CAM was not applicable to the DEHY02 for VOC because it is exempted per 40CFR§64.2(b)(1)(vi) since the Title V permit already specified “a continuous compliance determination method” (condition 5.2.6, underlying R13-2963 condition 6.2.4) included in the permit during SM01 (issued on July 9, 2013).

Therefore, based on the information above all the requirements of the CAM plan included in the permit

on July 9, 2013 during SM01, were removed.

### **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: Wednesday, May 25, 2016  
Ending Date: Friday, June 24, 2016

### **Point of Contact**

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

Robert Mullins  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478  
Robert.A.Mullins@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)**

**(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.