

# Fact Sheet



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

Permit Number: **R30-03900049-2012**  
Application Received: **November 2, 2011**  
Plant Identification Number: **03900049**  
Permittee: **Columbia Gas Transmission, LLC**  
Facility Name: **Coco Compressor Station**  
Mailing Address: **1700 MacCorkle Avenue, S.E.**  
**Charleston, WV 25314**

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Physical Location: Elkview, Kanawha County, West Virginia  
UTM Coordinates: 463.6 km Easting • 4250.3 km Northing • Zone 17  
Directions: Traveling from the intersection of State Route 114 and secondary route 49, proceed 3.4 miles and bear right on Route 49. Go 3.6 miles from the intersection of Routes 47 and 49 and turn left onto secondary County Route 71 (Coco Road). Travel approximately 1.5 miles, the station is located on the right side of the road.

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### Facility Description

The Coco Station is a natural gas storage facility covered by Standard Industrial Classification (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of five (5) 880-hp, one (1) 1,100-hp and one (1) 4,000-hp natural gas fired reciprocating engines, one (1) 275-hp and one (1) 306-hp emergency generators, one (1) heating system boiler, two (2) heaters, and numerous storage tanks of various sizes.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2011 Actual Emissions</b>
Carbon Monoxide (CO)	177.03	23.27
Nitrogen Oxides (NO <sub>x</sub> )	991.85	300.08
Particulate Matter (PM <sub>10</sub> )	14.00	3.94
Total Particulate Matter (TSP)	14.00	3.94
Sulfur Dioxide (SO <sub>2</sub> )	0.41	0.08
Volatile Organic Compounds (VOC)	45.90	5.65
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2011 Actual Emissions</b>
Formaldehyde	19.72	5.63
Total HAPs	23.84	5.65

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

### Title V Program Applicability Basis

The facility has the potential to emit over 100 tons per year of criteria pollutants (CO and NO<sub>x</sub>) and over 10 tons per year of a single hazardous air pollutant (HAP). Due to this facility's potential to emit over 100 tons per year of criteria pollutant and over 10 tons per year of a single HAP, Columbia Gas Transmission Corporation 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	Particulate Matter emissions
	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for construction, modification, relocation, etc.
	45CSR16	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	Hazardous Air Pollutants
	40 C.F.R. Part 60, Subpart Kb	Tanks
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart ZZZZ	NESHAPs for RICE

	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	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 (if any)
R13-2087D	June 5, 2008	August 13, 2012 letter

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. Miscellaneous  
 This facility was previously registered under General Permit R30-NGGP-2007 for Natural Gas Compressor Facilities. The Division of Air Quality did not renew the general permit for natural gas compressor facilities, therefore this facility's renewal will be issued as a source-specific permit. The source-specific permit includes various requirements which are potentially applicable to natural gas compressor stations. The applicable requirements column in the Section 1.0 Emission Units Table of the permit indicates which of the requirements in Sections 2.0 through 24.0 are applicable to each emissions unit.

Heater H4 has been removed from service.

The 4.0 MMBTU Boiler BLR1 that was installed in 1986 has been replaced by a 4.2 MMBTU Boiler in 2012. The emission unit is now called BLR3 and emission point is now BL3 to maintain consistency with an off permit change. Approval for the tank change was granted in a June 7, 2012 Permit Applicability Determination.

2. 40CFR63, Subpart ZZZZ "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" [E01-E07, G1 and G2]  
 The facility is subject to the major source requirements of this Subpart. The facility has 9 engines. E01-E07 are existing, non-emergency, 2-cycle lean burn spark ignition engines, all greater than 500 hp. Pursuant to 40 C.F.R. §§63.6590(b)(3)(i) and 63.6600(c), these engines do not have any requirements under 40CFR63, Subpart ZZZZ. G1 and G2 are existing emergency 4-cycle rich burn spark ignition engines less than 500 hp. Section 10 lists Subpart ZZZZ, while the specific applicable

requirements for these engines are given in Section 1.0. The compliance date for G1 and G2 is October 19, 2013.

### **Non-Applicability Determinations**

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

1. 40 C.F.R. 64 - Compliance Assurance Monitoring (CAM)

According to 40 C.F.R. §64.2(a), CAM applies to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria: 1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under 40 C.F.R. §64.2(b)(1); 2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and 3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. 40 C.F.R. §64.2(b)(1)(i) exempts emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act; and 40 C.F.R. §64.2(b)(1)(vi) exempts emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method.

The facility does not have a control device for any emission units at this facility. Therefore, CAM does not apply.

2. Greenhouse Gas Tailoring Rule

This is a renewal Title V Permit and there have been no changes that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

3. 40 C.F.R. 60 Subpart IIII *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*. There are no compression ignition engines at the facility.

4. 40 C.F.R. 60 Subpart JJJJ *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*. Engines at the facility were constructed, reconstructed, or modified prior to June 12, 2006.

5. 40 C.F.R. 60 Subpart Kb *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*. The 51,500 gallon Pipeline Liquids Storage Tank (A14) collects the water that remains after the hydrocarbon portion is separated off from the pipeline liquids. The water in the tank has a maximum true vapor pressure less than 3.5 kPa, and is thus exempt from the requirements of this subpart.

6. 40 C.F.R. 63 Subpart HHH *National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities*

40 C.F.R. §63.1270 lists affected sources for major sources as follows:

(b) The affected source is each new and existing glycol dehydration unit specified in paragraphs (b)(1) through (3) of this section.

(1) Each large glycol dehydration unit;

(2) Each small glycol dehydration unit for which construction commenced on or before August 23, 2011, is an existing small glycol dehydration unit.

(3) Each small glycol dehydration unit for which construction commenced after August 23, 2011, is a new small 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.

Since the facility does not have glycol dehydration units, they are not subject to 40CFR63, Subpart HHH.

### **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: September 5, 2012  
Ending Date: October 5, 2012

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

Mike Egnor  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> 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**

Mike Egnor  
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. 1208 • Fax: 304/926-0478

### **Response to Comments (Statement of Basis)**

As a result of comments from the facility by email October 15, 2012, the following changes have been made:

- 1) The 4.2 MM BTU/hr boiler BLR1 in Section 1.0 has been renamed BLR3 and emission point BL3 to maintain consistency with the permit determination form and from off-permit change documents.
- 2) Identified footnote 1 of Table 2C of 40CFR63, Subpart ZZZZ as being applicable to Emission Units 008G1 and 008G2.
- 3) The facility requested removal of storage tank A14 from Table 1.0 due to it not being subject to 40CFR60, Subpart Kb. 40CFR§60.110b(b) says in part “This subpart does not apply to storage vessels with a capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure less

than 3.5 kilopascals...” Storage tank A14 does have less than 3.5 kPa, and has been removed from the Permit.

As a result of comments from EPA by email October 5, 2012, the following changes have been made:

- 1) 40CFR63, Subpart HHH has been added to the Non-Applicability Determinations Section. It describes that since the facility does not use glycol dehydration units, this Subpart does not apply.
- 2) Condition 22.1.1 has been added to specify that regarding R13-2087D, the tons per year (TPY) limitations of Condition 4.1.1, the yearly gas usage limitation of Conditions 4.1.2 and 4.1.3, and the recordkeeping requirements from Condition 4.3.2 shall all be based on a 12-month rolling total. This Section is now cited as being applicable to Gas Heater HTR2 in the emission units table in Section 1.0