

Fact Sheet



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

Permit Number: **R30-10900021-2012**
Application Received: **November 2, 2011**
Plant Identification Number: **109-00021**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Huff Creek Compressor Station**
Mailing Address: **1700 MacCorkle Avenue, SE, Charleston, WV 25314**

Physical Location: Hanover, Wyoming County, West Virginia
UTM Coordinates: 430.4 km Easting • 4,156.1 km Northing • Zone 17
Directions: From Hanover proceed south on US 52 approximately 1.7 miles. Turn left onto Little Huff Creek Road (County Route 8), site entrance is approximately 0.28 miles on the right.

Facility Description

Huff Creek Compressor Station is a natural gas transmission 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 two (2) 800-hp, one (1) 880-hp, one (1) 206-hp and one (1) 3,712-hp natural gas fired reciprocating engines, one (1) 20-hp fan drive engine, one (1) 20-hp cooling water pump, one (1) 1.25 MMBtu/hr dehydrator reboiler, one (1) triethylene glycol (TEG) dehydrator, and numerous storage tanks of various sizes. On-site support equipment includes three (3) emergency generators (two (2) 142-hp and one (1) 530-hp) and two heating system boilers (0.96 MMBtu/hr and 1.2 MMBtu/hr).

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2010 Actual Emissions
Carbon Monoxide (CO)	185.84	57.23
Nitrogen Oxides (NO _x)	268.37	35.81
Particulate Matter (PM ₁₀)	7.41	4.27
Total Particulate Matter (TSP)	7.41	4.27
Sulfur Dioxide (SO ₂)	0.17	0.08
Volatile Organic Compounds (VOC)	61.83	35.98

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2010 Actual Emissions
Formaldehyde	12.10	6.30
Other HAPs	4.31	1.06
Total HAPs	16.41	7.36

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

Title V Program Applicability Basis

This facility has the potential to emit 268.4 tons/yr of NO_x, 185.8 tons/yr of CO and 12.1 tons/yr of Formaldehyde. 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, LLC 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 | Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers |
| 45CSR6 | Open burning prohibited. |
| 45CSR10 | Prevent and Control Air Pollution from the Emission of Sulfur Oxides |
| 45CSR11 | Standby plans for emergency episodes. |
| 45CSR13 | Permits for Construction, Modification, Relocation and Operation of 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 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart HHH	National Emissions Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities
	40 C.F.R. Part 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	To Prevent and Control Particulate Matter Air Pollution From Materials Handling, Preparation, Storage and Other Sources of 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)
R13-2066C	April 25, 2006	

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

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.

Changes from the existing registration include the following:

- 1) Reciprocating Engine/Air Compressor (017A1) has been removed from the site and subsequently from the permit.
- 2) **40 C.F.R. Part 63 Subpart ZZZZ RICE MACT:**

The facility is subject to this subpart because the facility owns and operates a stationary RICE at a major source of HAP emissions.

 - Engines 01701, 01702, 01703, and 01705 are existing non-emergency SI 2SLB engines > 500 HP located at a major source of HAPs. Pursuant to 40 CFR §63.6595(a) these engines have to comply with 40 CFR Part 63 Subpart ZZZZ no later than June 15, 2007. Pursuant to 40 C.F.R. §§63.6590(b)(3)(i) and 63.6600(c) these engines do not have any requirements under 40 CFR Part 63 Subpart ZZZZ.
 - Engine 01704 is an existing non-emergency SI 4SRB engine greater than 100 HP and less than 500 HP located at a major source of HAPs. Pursuant to 40 C.F.R. §63.6595(a) this engine has to comply with 40 CFR Part 63 Subpart ZZZZ no later than October 19, 2013. Engine 01704 is subject to the following sections of 40 CFR Part 63 Subpart ZZZZ:

§63.6595(a); §63.6602 (Table 2c, Item 11); §§63.6612 and 63.6620 (Table 4, Items 2 and 3; Table 5, Items 12 and 13); §63.6625(h); §63.6630 (Table 5, Items 12 and 13); §63.6605; §63.6640; §63.6645; §63.6655 except (c), (e) and (f); §63.6650 except (g); and the general provisions of 40 C.F.R. Part 63.
 - Engine 017F1 is an existing non-emergency SI 4SRB engine < 100 HP located at a major source of HAPs. Pursuant to 40 C.F.R. §63.6595(a) this engine has to comply with 40 CFR Part 63 Subpart ZZZZ no later than October 19, 2013. Engine 017F1 is subject to the following sections of 40 CFR Part 63 Subpart ZZZZ:

§63.6595(a); §63.6602 (Table 2c, Item 7); §§63.6625(e), (h), and (j); §63.6605; §63.6640 (Table 6, Item 9); §63.6655 except (c) and (f); General Provisions of 40 CFR Part 63 except per §63.6645(a)(5), the following do not apply: §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).
 - Engines 017G1, 017G2, and 017P2 are existing emergency SI engines < 500 HP located at a major source of HAPs. Pursuant to 40 CFR §63.6595(a) these engines have to comply with 40 CFR Part 63 Subpart ZZZZ no later than October 19, 2013. Engines 017G1, 017G2, and 017P2 are subject to the following sections of 40 C.F.R. Part 63 Subpart ZZZZ:

§63.6595(a); §63.6602 (Table 2c, Item 6); §§63.6625(e), (f), (h), (j); §§63.6605 and 63.6640 (Table 6, Item 9); §63.6655 except (c); Footnote 1 of Table 2c; General Provisions of 40 CFR Part 63 except per §63.6645(a)(5), the following do not apply: §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).
 - Engine 017G3 is an existing emergency SI engine > 500 HP located at a major source of HAPs. Engine 017G3 is subject to 40 C.F.R. §63.6640(f).
- 3) **40 C.F.R. Part 63 Subpart HHH** – Removed the exemption language from Section 3 of the registration. This subpart was amended on August 16, 2012 eliminating the exemptions of §63.1274(d). Also, under the amended rule, the TEGDEHY1 is defined as a “small glycol dehydration unit” (see §63.1271). As such, pursuant to §63.1285(b)(1)(ii) an initial notification is required to be submitted by October 15, 2013 and pursuant to §63.1270(d)(3), compliance with the

provisions of this subpart shall be achieved no later than October 15, 2015. These applicable requirement sections have been added to the “Emissions Unit” table for TEGDEHY1. Also, language to comply with all applicable requirements of 40 CFR 63, Subpart HHH for small glycol dehydration units has been added in condition 22.1.1. of the permit.

- 4) **40 CFR Part 64 Compliance Assurance Monitoring (CAM)** - No facility emission sources have add-on controls; therefore, in accordance with 40 C.F.R § 64.2(a), CAM is not applicable to this facility.

Non-Applicability Determinations

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

- 40 C.F.R. 60 Subparts K, Ka; Standards of Performance for Storage Vessels for Petroleum Liquids** - All tanks at Huff Creek station are below 40,000 gallons in capacity.

- 40 C.F.R. 60 Subpart Kb; Standards of Performance for Volatile Organic Liquid Storage Vessels** - All tanks at Huff Creek station are below 75 m³ in capacity.

- 40 C.F.R. Subpart KKK; Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant** – Huff Creek station is not engaged in the extraction or fractionation of natural gas liquids from field gas, the fractionation of mixed natural gas liquids to natural gas products, or both.

- 45CSR21; To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds:**
This facility is not located in one of the affected counties.

- 45CSR27; To Prevent and Control the Emissions of Toxic Air Pollutants:** Natural gas is included as a petroleum product and contains less than 5% benzene by weights. 45 CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”

- 40 C.F.R 60 Subparts Dc; Standards of Performance for Steam Generating Units** – The boiler and gas heaters at this facility are less than 10 mmBtu/hr; Hence Subpart Dc is not applicable.

- 40 C.F.R. 63 Subpart DDDDD; Boiler MACT** – All the boilers and heaters in this facility are existing small gaseous fuel boilers less than 10 mmBtu/hr; Hence the Boiler MACT is not applicable to this facility per §63.7506(c)(3) even though this facility is a major source of HAPs.

- 45CSR10; Control of Sulfur Dioxide Emissions from Indirect Heat Exchangers** - WVDEP has determined that 45CSR10 does not apply to gas fired engines. Also, 45CSR10 is not applicable to the facility boilers and heater because they are less than 10 mmBtu/hr in accordance with 45CSR§10-10.1.

- 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.

- 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.

- 40 C.F.R. 60 Subpart GG; Standards of Performance for Stationary Gas Turbines** – There are no turbines at the facility.

40 C.F.R. 60 Subpart KKKK; *Standards of Performance for Stationary Combustion Turbines* – There are no turbines at the facility.

40 C.F.R. 63 Subpart YYYY; *National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines* – There are no turbines at the facility.

Greenhouse Gas Permitting - This is a renewal Title V permit and there have been no modifications that would have triggered a PSD permit. Therefore, there are no applicable GHG requirements.

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 12, 2012
Ending Date: October 12, 2012

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

Frederick Tipane
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

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

Response to Comments (Statement of Basis)

Not applicable.