

Fact Sheet



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

Permit Number: **R30-00700100-2012**
Application Received: **November 2, 2011**
Plant Identification Number: **007-00100**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Frametown Compressor Station**
Mailing Address: **1700 MacCorkle Avenue, SE**
Charleston, WV 25314

Issued: Draft/Proposed

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|--------------------|--|
| Physical Location: | Frametown, Braxton County, West Virginia |
| UTM Coordinates: | 511.99 km Easting • 4,279.09 km Northing • Zone 17 |
| Directions: | Travel approximately 0.5 miles north from Frametown on State Route 4 and turn left onto County Route 9. Proceed on CR 9 approximately 1.5 miles to the station which is on the right side of the road. |

Facility Description

The Frametown Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) Code 4922, North American Industrial Classification System (NAICS) Code 48621. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of one (1) 12,500-hp, one (1) 3,350-hp, and one (1) 3,550-hp turbine engines, one (1) 400-hp emergency generator, one (1) 6.84 mmBtu/hr heating system boiler, and multiple storage tanks of various sizes.

Emissions Summary

| Plantwide Emissions Summary [Tons per Year] | | |
|--|----------------------------|------------------------------|
| Regulated Pollutants | Potential Emissions | 2010 Actual Emissions |
| Carbon Monoxide (CO) | 389.37 | 104.38 |
| Nitrogen Oxides (NO _x) | 396.30 | 98.86 |
| Particulate Matter (PM ₁₀) | 2.37 | 0.48 |
| Total Particulate Matter (TSP) | 2.37 | 0.48 |
| Sulfur Dioxide (SO ₂) | 1.63 | 0.18 |
| Volatile Organic Compounds (VOC) | 7.45 | 2.29 |

PM₁₀ is a component of TSP.

| Hazardous Air Pollutants | Potential Emissions | 2010 Actual Emissions |
|---------------------------------|----------------------------|------------------------------|
| Formaldehyde | 1.43 | 0.18 |
| Other HAPs | 0.34 | 0.01 |
| Total HAPs | 1.77 | 0.19 |

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

Title V Program Applicability Basis

This facility has the potential to emit 396.3 tons/yr of NO_x and 389.37 tons/yr of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, 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 | Particulate Air Pollution from Indirect Heat Exchangers |
| | 45CSR6 | Open burning prohibited. |
| | 45CSR11 | Standby plans for emergency episodes. |
| | 45CSR13 | Construction Permit |
| | WV Code § 22-5-4 (a) (14) | The Secretary can request any pertinent information such as annual emission inventory reporting. |
| | 45CSR30 | Operating permit requirement. |
| | 40 C.F.R. Part 61 | Asbestos inspection and removal |
| | 40 C.F.R. Part 63, Subpart ZZZZ | RICE MACT |
| | 40 C.F.R. Part 82, Subpart F | Ozone depleting substances |

| | | |
|-------------|-------------------|---|
| State Only: | 45CSR4 45CSR17 | No objectionable odors. Particulate Fugitive |
|-------------|-------------------|---|

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>) |
|-----------------------------------|---------------------|---|
| R13-2234 | August 7, 1998 | N/A |

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

Changes from the existing registration:

1. 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.
2. The following is added in "Other Specific Requirements" (Section 22.0) to define compliance with the annual natural gas usage limit for engine 045G4 in permit R13-2234: "Compliance with the annual natural gas consumption limit in permit condition A.2 of R13-2234 shall be calculated on a "rolling yearly total" basis.

Below is a discussion of applicable rules:

1. 45CSR2 – Heating System boiler BLR1 (6.84 mmBtu/hr) is subject to 45CSR2.

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.
2. 45CSR4 – This facility is subject to 45CSR4 according to sections 3.1.4 and 3.4.3 of the permit.
3. 45CSR10 - Heating System boiler BLR1 (6.84 mmBtu/hr) is not subject to 45CSR10. According to 45CSR§10-10.1, a fuel burning unit with a design heat input under 10 MMBtu/hr is exempt from 45CSR§§10- 3, 6, 7 & 8. Also, BLR1 does not meet the definition of manufacturing process in 45CSR§10-2.11.
The director has determined that 45CSR10 does not apply to engines; the engines do not meet the definition of a fuel burning unit in 45CSR§10-2.8 or a manufacturing process in 45CSR§10-2.11.

4. 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.

Compliance with this standard will be met by the facility submitting a control plan if the Director finds the facility in violation of this rule.

5. 40 C.F.R. Part 63 Subpart ZZZZ:

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

Engine 045G4 is an existing emergency SI 4SLB engine < 500 HP located at an area source of HAPs. According to 40 C.F.R. § 63.6590, for stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006. Engine 045G4 is subject to the following sections of 40 C.F.R. Part 63 Subpart ZZZZ -

Compliance date is – October 19, 2013.

Emission Limitations: 40 C.F.R. §63.6603, Table 2d, Item 5

Operating Limitations: No Requirements

Fuel Requirements: No Requirements

Performance Tests: No Requirements

Monitoring, Installation, Collection, Operation and Maintenance Requirements: 40 C.F.R. §§63.6625 (e), (f), (h) and (j)

Initial Compliance: No Requirements

Continuous Compliance: 40 C.F.R. §§63.6605, 63.6640(a), Table 6, Item 9.

Notification Requirements: No Requirements

Recordkeeping Requirements: 40 C.F.R. §63.6655 (except §63.6655(c))

Reporting Requirements: Footnote 2 of Table 2d, 40 C.F.R. §§63.6640(b), (e) and (f).

General Provisions (40 CFR part 63) – 40 C.F.R. §63.6665, except per 40 C.F.R. §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).

Non-Applicability Determinations

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

1. 45CSR6 – This facility does not have any incinerator (or flare); hence this rule is not applicable to this facility.
2. 40 C.F.R. Part 60 Subpart Kb: This subpart does not apply to this facility because all the tanks at this facility are less than 75 cubic meters(m³) capacity.

3. 40 C.F.R. Part 60 Subpart Dc

The heating system boiler (6.84 mmBtu/hr) was installed in 1959. No modifications to the boiler have occurred since the original installation; hence according to 40 C.F.R § 60.40c, this rule is not applicable because the boiler was constructed before June 9, 1989 and has a maximum design heat input capacity less than 2.9 MW (10 MMBtu/hr).

4. 40 C.F.R. Part 60 Subpart JJJJ

Emergency engine 045G4 was installed in 1998; hence according to paragraph (a)(4)(iv) of 40 C.F.R § 60.4230 this engine is not subject to this rule.

5. 40 C.F.R. Part 60 Subpart IIII

The provisions of this subpart are not applicable to this facility because there are no stationary compression ignition (CI) internal combustion engines (ICE) at this facility.

6. 40 C.F.R. Part 60 Subpart GG

There are three turbines at Frametown station which were installed from 1969 to 1973. No modifications to the turbines have occurred since the original installation. According to 40 C.F.R §60.330(b), 40 C.F.R. Part 60 Subpart GG is not applicable to the turbines because they were constructed before October 3, 1977. No modifications to the turbine have occurred since the original installation.

7. 40 C.F.R. Part 60 Subpart KKKK

There are three turbines at Frametown station which were installed from 1969 to 1973. No modifications to the turbines have occurred since the original installation. According to 40 C.F.R §60.4305(a), 40 C.F.R. Part 60 Subpart KKKK is not applicable to the turbines because they were constructed before February 18, 2005.

8. 40 C.F.R. Part 63 Subpart YYYY:

The provisions of this subpart are not applicable to this facility because the facility is not a major source of HAP emissions. According to 40 C.F.R. §63.6085, 40 C.F.R. Part 63 Subpart YYYY applies to turbines at a major source of HAP emissions.

9. 40 C.F.R. Part 63 Subpart HH – This rule is not applicable to this facility because this facility is not an oil and gas production facility.

10. 40 C.F.R. Part 63 Subpart HHH – This facility is not a major source of HAPs. According to 40 C.F.R. §63.1270 (a), Subpart HHH applies to natural gas transmission and storage facilities that are major sources of HAPs.

11. 40 C.F.R. Part 63 Subpart DDDDD - The provisions of this subpart are not applicable to this facility because the facility is not a major source of HAP emissions. According to 40 C.F.R. §63.7485, 40 C.F.R. Part 63 Subpart DDDDD applies to boilers at a major source of HAPs.

12. 40 C.F.R. Part 63 Subpart JJJJJ – This facility operates a gas fired heating system boiler. According to 40 C.F.R. §63.11195(e), a gas fired boiler is not subject to 40 C.F.R. Part 63 Subpart JJJJJ.

13. 40 CFR 64 - 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.

14. 40 C.F.R. 60 Subpart OOOO – According to 40 C.F.R. §60.5365 this rule is not applicable to this facility because none of the units were constructed, modified or reconstructed after August 23, 2011.

There are no Greenhouse Gas Clean Air Act requirements for this facility because the facility has not made any changes that triggered a PSD permit modification.

Request for Variances or Alternatives

N/A

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: August 28, 2012
Ending Date: September 27, 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
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Division of Air Quality
601 57th Street SE
Charleston, WV 25304
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Response to Comments (Statement of Basis)

Not applicable.