

Fact Sheet



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

Permit Number: **R30-07100008-2012**
Application Received: **November 2, 2011**
Plant Identification Number: **07100008**
Permittee: **Columbia Gas Transmission Corporation, LLC**
Facility Name: **Seneca Compressor Station**
Mailing Address: **1700 MacCorkle Ave., SE, Charleston, WV 25314-1273**

Issued: Draft/Proposed

Physical Location: Seneca Rocks, Pendleton County, West Virginia
UTM Coordinates: 639.50 km Easting • 4,301.10 km Northing • Zone 17
Directions: Traveling US Route 33 East from Elkins, turn left at the intersection with State Route 28 (Seneca Rocks). Proceed approximately 2 miles to the station which is located on the left.

Facility Description

The Seneca 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 one (1) 13,750hp and two (2) 7,700hp natural gas fired turbine engines, two (2) emergency generators, two (2) heating system boilers, one (1) liquids knockout system and fourteen (14) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2011 Actual Emissions
Carbon Monoxide (CO)	252.77	175.28
Nitrogen Oxides (NO _x)	280.00	40.56
Particulate Matter (PM ₁₀)	5.20	0.51
Total Particulate Matter (TSP)	5.20	0.51
Sulfur Dioxide (SO ₂)	0.84	0.11
Volatile Organic Compounds (VOC)	8.43	4.09

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2011 Actual Emissions
Formaldehyde	0.99	0.11
Other HAPs	0.30	0.12
Total HAPs	1.29	0.23

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

Title V Program Applicability Basis

This facility has the potential to emit 280.00 tons/yr of NO_x and 252.77 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	To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes
	45CSR13	New Source Review permits for stationary sources
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. Part 60
	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 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines
	40 C.F.R. Part 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE).
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45 CSR17	To Prevent and Control Particulate 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)
R13-2715B	January 7, 2008	

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

The changes to this permit are discussed below:

- Emission Unit IDs- HTR1, 03701, 03702 and 03703 have been removed from this permit.
- 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.

Below is a discussion of applicable rules:

1. 45CSR2; *To prevent and control particulate air pollution from combustion of fuel in indirect heat exchangers*-The two(2) 2.52 mmBtu/hr heating system boilers (BL1 and BL2) are subject to 45CSR§2-3.1.

According to 45CSR§2-11.1, the heating system boilers are exempt from Sections 45CSR§§2-4, 5, 6, 8 and 9; Weight Emission Standards, Control of Fugitive Particulate Matter, Registration, Testing, Monitoring, Recordkeeping and Reporting, and Start-ups, Shutdowns and Malfunctions, respectively.

2. 45CSR4; *To Prevent and Control the Discharge of Air Pollutants into the Open Air which Causes or Contributes to an Objectionable Odor or Odors*-This facility is subject to 45CSR4 according to sections 3.1.4 and 3.4.3 of the permit.
3. 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.

4. 40 C.F.R. Part 63 Subpart ZZZZ; *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)*- Seneca Station has two reciprocating engines (Emission Unit IDs- 037G1, 037G2). These existing engines are emergency SI, less than 500 HP located at an area source. They are subject to 40 C.F.R. Part 63 Subpart ZZZZ and requirements from this subpart were specified in section 1.0 of the Title V permit.
5. 40 C.F.R. Part 60 Subpart KKKK; *Standards of Performance for Stationary Combustion Turbines*- The Seneca Compressor Station's two natural gas-fired Solar Taurus turbines are subject to 40 C.F.R. Part 60 Subpart KKKK. 40 C.F.R. Part 60 Subpart KKKK regulates nitrogen oxide (NO_x) and sulfur dioxide (SO₂) emissions. Columbia Gas demonstrates compliance for the nitrogen oxide (NO_x) emission limitations by conducting performance tests as well as maintaining records.

For sulfur dioxide (SO₂) emission, Columbia Gas must document that the fuel is covered by a valid tariff sheet or transportation contract limiting total sulfur content to ≤ 20 grains of sulfur per 100 standard cubic feet (40 C.F.R. §60.4365 (a)).

The applicable requirements from 40 C.F.R. 60 Subpart KKKK are specified in section 1.0 of the Title V permit.

Non-Applicability Determinations

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

1. 45CSR10; *To Prevent and Control Air Pollution from the Emission of Sulfur Oxides*- The two heating boilers are not subject to 45CSR10 since the design heat input for each heating system boiler is less than 10 MMBtu/hr.
2. 45CSR6; *Control of air pollution from combustion of refuse*- This facility does not have any incinerator (or flare); hence this rule is not applicable to this facility.

3. 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.
4. 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 weight. 45CSR§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.”
5. 40 C.F.R. Part 60 Subpart Ka; *Standards of Performance for Storage Vessels for Petroleum Liquids* - All tanks at the Seneca Compressor Station are below 40,000 gallons in capacity.
6. 40 C.F.R. Part 60 Subpart K; *Standards of Performance for Storage Vessels for Petroleum Liquids* - All tanks at the Seneca Compressor Station are below 40,000 gallons in capacity.
7. 40 C.F.R. Part 60 Subpart Kb; *Standards of Performance for Volatile Organic Liquid Storage Vessels*- All tanks at Seneca station are below 75 m³ in capacity.
8. 40 C.F.R. Part 60 Subpart Dc; *Standards of Performance for Steam Generating Units*- The Seneca Compressor Station is not subject to 40 C.F.R. Part 60 Subpart Dc since the boilers at this facility are less than 10 MMBtu/hr.
9. 40 C.F.R. Part 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.
10. 40 C.F.R. Part 60 Subpart IIII; *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* - There are no compression ignition engines at the facility.
11. 40 C.F.R. Part 60 Subpart GG; *Standards of Performance for Stationary Gas Turbines*- The two Solar Taurus turbines (E05 and E06) at Seneca Compressor Station are not subject to Subpart GG since they are subject to 40 C.F.R. Part 60 Subpart KKKK. Turbine E04 was constructed prior to the applicability date of October 3, 1977.
12. 40 C.F.R. Part 60 Subpart KKK; *Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant*- Seneca Compressor 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.
13. 40 C.F.R. Part 63 Subpart YYYY; *National Emissions Standards for Hazardous Air Pollutants for Stationary Combustion Turbines*- Seneca Station is not subject to Subpart YYYY since it is not a major source of HAPs.
14. 40 C.F.R. Part 63 Subpart HH; *National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities* -The Seneca Compressor Station is not subject to Subpart HH since Seneca Compressor Station is not a natural gas production facility.
15. 40 C.F.R. Part 63 Subpart HHH ; *National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities*- The Seneca Compressor Station is not subject to Subpart HHH since the station does not have a dehydration facility as well as the station is not a major source of HAPs.
16. 40 C.F.R. Part 63 Subpart DDDDD; *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters* -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.

17. 40 C.F.R. Part 63 Subpart JJJJJ; *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*-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.

18. 40 CFR 64; *Compliance Assurance Monitoring*- The facility does not have any pollutant specific emissions units (PSEU) at this facility that satisfy all of the applicability criteria requirements of 40 CFR §64.2(a), i.e., that: 1) have pre-control regulated pollutant potential emissions (PTE) equal to or greater than the “major” threshold limits to be classified as a major source; 2) are subject to an emission limitation or standard and; 3) have a control device to achieve compliance with such emission limitation or standard. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule.

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

None

Insignificant Activities

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

Comment Period

Beginning Date: September 13, 2012
Ending Date: October 15, 2012

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

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Response to Comments (Statement of Basis)

Not applicable.