

Dominion Resources Services, Inc.  
5000 Dominion Boulevard, Glen Allen, VA 23060  
dom.com



April 27, 2017

**BY: U.S. CERTIFIED MAIL, RETURN RECEIPT REQUESTED**

7015 0640 0001 0352 4925

William F. Durham  
Director, Division of Air Quality  
WVDEP  
601 57<sup>th</sup> Street  
Charleston, WV 25304

**RE: Dominion Transmission, Inc. – Cornwell Compressor Station (ID# 039-00051)  
R13 Class I Administrative Update (Permit No. R13-2346D)**

Dear Mr. Durham,

Enclosed are one complete original and two (2) cd copies of a 45 CSR 13 Class I Administrative Update permit application for a request to add "continuous monitoring language" for the flare into the R13-2346D permit at Dominion Transmission, Inc.'s (DTI) Cornwell Compressor Station, located in Kanawha County, WV. The enclosed application also includes the Title V Operating Permit revision forms for permit R30-03900051-2012.

No application fee is needed for this R13 application since it is a Class I Administrative Update.

If you have any questions regarding this application, please feel free to contact Rebekah Kiss at (804) 273-3536 or [Rebekah.J.Kiss@dom.com](mailto:Rebekah.J.Kiss@dom.com).

Sincerely,

A handwritten signature in blue ink that reads "Amanda B. Tornabene". The signature is fluid and cursive, with the first name being the most prominent.

Amanda B. Tornabene  
Director, Environmental Services (Gas Infrastructure & Power Delivery)

Cc: Rebekah Kiss, Dominion  
Bobbie Scroggie, WVDEP ([Bobbie.Scroggie@wv.gov](mailto:Bobbie.Scroggie@wv.gov))

Enclosure: R13 Class I Administrative Update Application

**APPLICATION FOR R13 PERMIT  
CLASS I ADMINISTRATIVE UPDATE**

**Dominion Transmission, Inc.  
Cornwell Compressor Station  
Station ID# 039-00051**

April 2017

**DOMINION TRANSMISSION, INC.  
CORNWELL COMPRESSOR STATION**

**CLASS I ADMINISTRATIVE UPDATE**

**TABLE OF CONTENTS**

Application for Permit to Construct, Modify, Relocate or Administratively Update a Stationary Source of Air Pollutants

**ATTACHMENTS**

Attachment A:	Business Certificate
Attachment D:	Regulatory Discussion
Attachment E:	Plot Plan
Attachment G:	Process Description
Attachment S:	Title V Permit Revision Information

\*\*Note: There are no Attachments B, C, F, H-P, Q, or R for this permit application.



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
**DIVISION OF AIR QUALITY**  
 601 57<sup>th</sup> Street, SE  
 Charleston, WV 25304  
 (304) 926-0475  
[www.dep.wv.gov/daq](http://www.dep.wv.gov/daq)

**APPLICATION FOR NSR PERMIT  
 AND  
 TITLE V PERMIT REVISION  
 (OPTIONAL)**

PLEASE CHECK ALL THAT APPLY TO **NSR (45CSR13)** (IF KNOWN):

CONSTRUCTION     MODIFICATION     RELOCATION  
 CLASS I ADMINISTRATIVE UPDATE     TEMPORARY  
 CLASS II ADMINISTRATIVE UPDATE     AFTER-THE-FACT

PLEASE CHECK TYPE OF **45CSR30 (TITLE V)** REVISION (IF ANY):

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION  
 SIGNIFICANT MODIFICATION

IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS **ATTACHMENT S** TO THIS APPLICATION

**FOR TITLE V FACILITIES ONLY:** Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.

**Section I. General**

1. Name of applicant (as registered with the WV Secretary of State's Office): <a href="#">Dominion Transmission, Inc.</a>		2. Federal Employer ID No. (FEIN): <a href="#">550629203</a>	
3. Name of facility (if different from above): <a href="#">Cornwell Compressor Station</a>		4. The applicant is the: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> BOTH	
5A. Applicant's mailing address: <a href="#">925 White Oaks Blvd.</a> <a href="#">Bridgeport, WV 26330</a>		5B. Facility's present physical address: <a href="#">2883 River Haven Road</a> <a href="#">Clendenin, WV 25045</a>	
6. <b>West Virginia Business Registration.</b> Is the applicant a resident of the State of West Virginia? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO – If YES, provide a copy of the <b>Certificate of Incorporation/Organization/Limited Partnership</b> (one page) including any name change amendments or other Business Registration Certificate as <b>Attachment A</b> . – If NO, provide a copy of the <b>Certificate of Authority/Authority of L.L.C./Registration</b> (one page) including any name change amendments or other Business Certificate as <b>Attachment A</b> .			
7. If applicant is a subsidiary corporation, please provide the name of parent corporation:			
8. Does the applicant own, lease, have an option to buy or otherwise have control of the <i>proposed site</i> ? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO – If YES, please explain: <a href="#">Own</a> – If NO, you are not eligible for a permit for this source.			
9. Type of plant or facility (stationary source) to be <b>constructed, modified, relocated, administratively updated</b> or <b>temporarily permitted</b> (e.g., coal preparation plant, primary crusher, etc.): <a href="#">Natural gas compressor station</a>		10. North American Industry Classification System (NAICS) code for the facility:  <a href="#">486210</a>	
11A. DAQ Plant ID No. (for existing facilities only): <a href="#">039-00051</a>		11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): <a href="#">R13-2175D</a> <a href="#">R30-03900051-2012</a> <a href="#">R13-2346D</a>	

**All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.**

<p>12A.</p> <ul style="list-style-type: none"> <li>For <b>Modifications, Administrative Updates or Temporary permits</b> at an existing facility, please provide directions to the <i>present location</i> of the facility from the nearest state road;</li> <li>For <b>Construction or Relocation permits</b>, please provide directions to the <i>proposed new site location</i> from the nearest state road. Include a <b>MAP as Attachment B</b>.</li> </ul> <p>From I-79, take exit 19 to WV State Route 4. Take Route 4 north to Clendenin, cross Elk River on Queen Shoals Road (Route 1). Turn left onto River Haven Road (Route 1/6) and proceed 2.5 miles to the station.</p>		
12.B. New site address (if applicable):	12C. Nearest city or town: Clendenin	12D. County: Kanawha
12.E. UTM Northing (KM): 4,259.58	12F. UTM Easting (KM): 476.19	12G. UTM Zone: 17
<p>13. Briefly describe the proposed change(s) at the facility: Adding continuous monitoring language for flare pilot flame</p>		
<p>14A. Provide the date of anticipated installation or change: asap</p> <ul style="list-style-type: none"> <li>If this is an <b>After-The-Fact</b> permit application, provide the date upon which the proposed change did happen: / /</li> </ul>		<p>14B. Date of anticipated Start-Up if a permit is granted: N/A</p>
<p>14C. Provide a <b>Schedule</b> of the planned <b>Installation of/Change</b> to and <b>Start-Up</b> of each of the units proposed in this permit application as <b>Attachment C</b> (if more than one unit is involved).</p>		
<p>15. Provide maximum projected <b>Operating Schedule</b> of activity/activities outlined in this application: Hours Per Day 24 Days Per Week 7 Weeks Per Year 52</p>		
<p>16. Is demolition or physical renovation at an existing facility involved? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>		
<p>17. <b>Risk Management Plans.</b> If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your <b>Risk Management Plan (RMP)</b> to U. S. EPA Region III.</p>		
<p>18. <b>Regulatory Discussion.</b> List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (<i>if known</i>). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (<i>if known</i>). Provide this information as <b>Attachment D</b>.</p>		
<p><b>Section II. Additional attachments and supporting documents.</b></p>		
<p>19. Include a check payable to WVDEP – Division of Air Quality with the appropriate <b>application fee</b> (per 45CSR22 and 45CSR13).</p>		
<p>20. Include a <b>Table of Contents</b> as the first page of your application package.</p>		
<p>21. Provide a <b>Plot Plan</b>, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as <b>Attachment E</b> (Refer to <b>Plot Plan Guidance</b>) .</p> <ul style="list-style-type: none"> <li>Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).</li> </ul>		
<p>22. Provide a <b>Detailed Process Flow Diagram(s)</b> showing each proposed or modified emissions unit, emission point and control device as <b>Attachment F</b>.</p>		
<p>23. Provide a <b>Process Description</b> as <b>Attachment G</b>.</p> <ul style="list-style-type: none"> <li>Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).</li> </ul>		
<p><b>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</b></p>		
<p>24. Provide <b>Material Safety Data Sheets (MSDS)</b> for all materials processed, used or produced as <b>Attachment H</b>.</p> <ul style="list-style-type: none"> <li>For chemical processes, provide a MSDS for each compound emitted to the air.</li> </ul>		

25. Fill out the <b>Emission Units Table</b> and provide it as <b>Attachment I</b> .															
26. Fill out the <b>Emission Points Data Summary Sheet (Table 1 and Table 2)</b> and provide it as <b>Attachment J</b> .															
27. Fill out the <b>Fugitive Emissions Data Summary Sheet</b> and provide it as <b>Attachment K</b> .															
28. Check all applicable <b>Emissions Unit Data Sheets</b> listed below: <table style="width: 100%; border: none;"> <tr> <td style="width: 33%;"><input type="checkbox"/> Bulk Liquid Transfer Operations</td> <td style="width: 33%;"><input type="checkbox"/> Haul Road Emissions</td> <td style="width: 33%;"><input type="checkbox"/> Quarry</td> </tr> <tr> <td><input type="checkbox"/> Chemical Processes</td> <td><input type="checkbox"/> Hot Mix Asphalt Plant</td> <td><input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities</td> </tr> <tr> <td><input type="checkbox"/> Concrete Batch Plant</td> <td><input type="checkbox"/> Incinerator</td> <td><input type="checkbox"/> Storage Tanks</td> </tr> <tr> <td><input type="checkbox"/> Grey Iron and Steel Foundry</td> <td><input type="checkbox"/> Indirect Heat Exchanger</td> <td></td> </tr> <tr> <td><input type="checkbox"/> General Emission Unit, specify</td> <td></td> <td></td> </tr> </table>	<input type="checkbox"/> Bulk Liquid Transfer Operations	<input type="checkbox"/> Haul Road Emissions	<input type="checkbox"/> Quarry	<input type="checkbox"/> Chemical Processes	<input type="checkbox"/> Hot Mix Asphalt Plant	<input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities	<input type="checkbox"/> Concrete Batch Plant	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Storage Tanks	<input type="checkbox"/> Grey Iron and Steel Foundry	<input type="checkbox"/> Indirect Heat Exchanger		<input type="checkbox"/> General Emission Unit, specify		
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Fill out and provide the <b>Emissions Unit Data Sheet(s)</b> as <b>Attachment L</b> .															
29. Check all applicable <b>Air Pollution Control Device Sheets</b> listed below: <table style="width: 100%; border: none;"> <tr> <td style="width: 33%;"><input type="checkbox"/> Absorption Systems</td> <td style="width: 33%;"><input type="checkbox"/> Baghouse</td> <td style="width: 33%;"><input type="checkbox"/> Flare (Vapor Incinerator)</td> </tr> <tr> <td><input type="checkbox"/> Adsorption Systems</td> <td><input type="checkbox"/> Condenser</td> <td><input type="checkbox"/> Mechanical Collector</td> </tr> <tr> <td><input type="checkbox"/> Afterburner</td> <td><input type="checkbox"/> Electrostatic Precipitator</td> <td><input type="checkbox"/> Wet Collecting System</td> </tr> <tr> <td colspan="3"><input type="checkbox"/> Other Collectors, specify</td> </tr> </table>	<input type="checkbox"/> Absorption Systems	<input type="checkbox"/> Baghouse	<input type="checkbox"/> Flare (Vapor Incinerator)	<input type="checkbox"/> Adsorption Systems	<input type="checkbox"/> Condenser	<input type="checkbox"/> Mechanical Collector	<input type="checkbox"/> Afterburner	<input type="checkbox"/> Electrostatic Precipitator	<input type="checkbox"/> Wet Collecting System	<input type="checkbox"/> Other Collectors, specify					
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Fill out and provide the <b>Air Pollution Control Device Sheet(s)</b> as <b>Attachment M</b> .															
30. Provide all <b>Supporting Emissions Calculations</b> as <b>Attachment N</b> , or attach the calculations directly to the forms listed in Items 28 through 31.															
31. <b>Monitoring, Recordkeeping, Reporting and Testing Plans.</b> Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as <b>Attachment O</b> . ➤ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.															
32. <b>Public Notice.</b> At the time that the application is submitted, place a <b>Class I Legal Advertisement</b> in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and <b>Example Legal Advertisement</b> for details). Please submit the <b>Affidavit of Publication</b> as <b>Attachment P</b> immediately upon receipt.															
33. <b>Business Confidentiality Claims.</b> Does this application include confidential information (per 45CSR31)? <div style="text-align: center;"> <input type="checkbox"/> YES      <input checked="" type="checkbox"/> NO         </div> ➤ If <b>YES</b> , identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's " <b>Precautionary Notice – Claims of Confidentiality</b> " guidance found in the <b>General Instructions</b> as <b>Attachment Q</b> .															
<b>Section III. Certification of Information</b>															
34. <b>Authority/Delegation of Authority.</b> Only required when someone other than the responsible official signs the application. Check applicable <b>Authority Form</b> below: <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;"><input type="checkbox"/> Authority of Corporation or Other Business Entity</td> <td style="width: 50%;"><input type="checkbox"/> Authority of Partnership</td> </tr> <tr> <td><input type="checkbox"/> Authority of Governmental Agency</td> <td><input type="checkbox"/> Authority of Limited Partnership</td> </tr> </table>	<input type="checkbox"/> Authority of Corporation or Other Business Entity	<input type="checkbox"/> Authority of Partnership	<input type="checkbox"/> Authority of Governmental Agency	<input type="checkbox"/> Authority of Limited Partnership											
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Submit completed and signed <b>Authority Form</b> as <b>Attachment R</b> .															
<i>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</i>															


35A. **Certification of Information.** To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

**Certification of Truth, Accuracy, and Completeness**

I, the undersigned  **Responsible Official** /  **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

**Compliance Certification**

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE  DATE: 04-17-17  
(Please use blue ink) (Please use blue ink)

35B. Printed name of signee: Brian Sheppard		35C. Title: Vice President, Pipeline Operations
35D. E-mail: Brian.C.Sheppard@dom.com	36E. Phone: (681) 842-3733	36F. FAX: (681) 842-3323
36A. Printed name of contact person (if different from above): Rebekah Kiss		36B. Title: Environmental Consultant
36C. E-mail: Rebekah.J.Kiss @dom.com	36D. Phone: 804-273-3536	36E. FAX: 804-273-2964

**PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:**

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Attachment A: Business Certificate<br><input type="checkbox"/> Attachment B: Map(s)<br><input type="checkbox"/> Attachment C: Installation and Start Up Schedule<br><input checked="" type="checkbox"/> Attachment D: Regulatory Discussion<br><input checked="" type="checkbox"/> Attachment E: Plot Plan<br><input type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s)<br><input checked="" type="checkbox"/> Attachment G: Process Description<br><input type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS)<br><input type="checkbox"/> Attachment I: Emission Units Table<br><input type="checkbox"/> Attachment J: Emission Points Data Summary Sheet | <input type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet<br><input type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s)<br><input type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s)<br><input type="checkbox"/> Attachment N: Supporting Emissions Calculations<br><input type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans<br><input type="checkbox"/> Attachment P: Public Notice<br><input type="checkbox"/> Attachment Q: Business Confidential Claims<br><input type="checkbox"/> Attachment R: Authority Forms<br><input checked="" type="checkbox"/> Attachment S: Title V Permit Revision Information<br><input type="checkbox"/> Application Fee |
|---|--|

*Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.*

**FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:**

- Forward 1 copy of the application to the Title V Permitting Group and:
- For Title V Administrative Amendments:
  - NSR permit writer should notify Title V permit writer of draft permit,
- For Title V Minor Modifications:
  - Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,
  - NSR permit writer should notify Title V permit writer of draft permit.
- For Title V Significant Modifications processed in parallel with NSR Permit revision:
  - NSR permit writer should notify a Title V permit writer of draft permit,
  - Public notice should reference both 45CSR13 and Title V permits,
  - EPA has 45 day review period of a draft permit.

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

**Attachment A**

Current Business Certificate



**WEST VIRGINIA  
STATE TAX DEPARTMENT  
BUSINESS REGISTRATION  
CERTIFICATE**

ISSUED TO:  
**DOMINION TRANSMISSION INC  
445 W MAIN ST  
CLARKSBURG, WV 26301-2843**

**BUSINESS REGISTRATION ACCOUNT NUMBER: 1038-3470**

This certificate is issued on: 06/8/2011

*This certificate is issued by  
the West Virginia State Tax Commissioner  
in accordance with Chapter 11, Article 12, of the West Virginia Code*

*The person or organization identified on this certificate is registered  
to conduct business in the State of West Virginia at the location above.*

This certificate is not transferrable and must be displayed at the location for which issued.  
This certificate shall be permanent until cessation of the business for which the certificate of registration  
was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

Change in name or change of location shall be considered a cessation of the business and a new  
certificate shall be required.

TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them.  
CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of  
this certificate displayed at every job site within West Virginia.

## **Attachment D**

Regulatory Discussion

## REGULATORY DISCUSSION

This section provides an air quality regulatory review of the proposed Class I Administrative Update to Cornwell Compressor Station (Cornwell).

- West Virginia Minor Source Permitting (WV Regulation 13)
- Compliance Assurance Monitoring (CAM) (40 CFR 64)

### **West Virginia Minor Source Regulations (R13)**

Recently, a Class II Administrative Update was issued to Cornwell Compressor Station's R13-2346 permit (R13-2346D was issued on 2/3/17) to revise applicable 40 CFR 63 Subpart HH requirements. As part of this Administrative Update, the continuous monitoring language for the flare pilot flame was accidentally removed. With the Cornwell Compressor Station's Title V renewal permit application currently being reviewed at WVDEP, it was presumed the "continuous monitoring language" would be placed in the Title V permit as periodic monitoring. After discussions with WVDEP, the Title V group has requested that this language be incorporated back into the R13 permit for Compliance Assurance Monitoring (CAM) purposes.

Therefore, the addition of the "continuous monitoring language" is considered a Class I Administrative Update in accordance with R13 regulations since it is a "*correction of a typographical error*" per §45-13-4.2.a.1. No emission changes are associated with this permit action.

### **Compliance Assurance Monitoring (CAM)**

To be subject to CAM, an emission unit needs to meet 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;
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. For purposes of this paragraph, "potential pre-control device emissions" shall have the same meaning as "potential to emit," as defined in §64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.

The dehydration unit (DEHY01) at Cornwell is potentially subject to CAM as it meets all three (3) criteria mentioned above (i.e. is subject to an emission limitation, is controlled by a flare, and has potential to emit emissions of VOC over 100 tons/yr).

Per §64.2(b), exemptions to CAM are as follows:

The requirements of this part shall not apply to any of the following emission limitations or standards:

- Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act.
- Emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in §64.1.

DEHY01 meets both of these requirements as:

- It is subject to NESHAP Subpart HH, which has provisions for compliance monitoring established after 1990. CAM was established to build in provisions for how compliance would be demonstrated for emission limits if not adequately covered by a NSPS or NESHAP rule. Therefore, CAM will not apply.
- For VOC purposes, since the R13 permit for the facility (R13-2346) will clearly specify a “continuous compliance determination method” condition (e.g. continuously monitoring the flare using a thermocouple to detect the presence of a flame) and the R13 condition will be rolled into the Title V permit, CAM will not apply.

With this “continuous monitoring language” addition request, it will clarify that Cornwell is using a “continuous compliance determination method” as defined in §64.1.

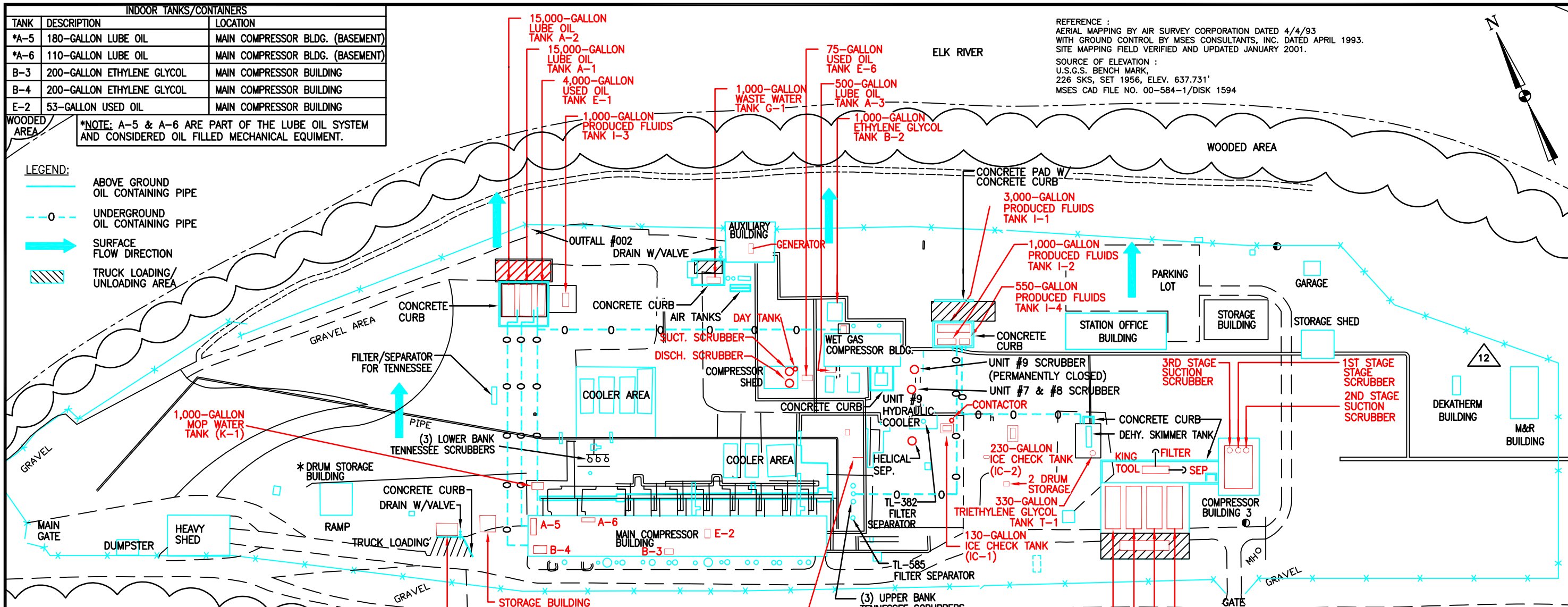
# **Attachment E**

Plot Plan

INDOOR TANKS/CONTAINERS		
TANK	DESCRIPTION	LOCATION
*A-5	180-GALLON LUBE OIL	MAIN COMPRESSOR BLDG. (BASEMENT)
*A-6	110-GALLON LUBE OIL	MAIN COMPRESSOR BLDG. (BASEMENT)
B-3	200-GALLON ETHYLENE GLYCOL	MAIN COMPRESSOR BUILDING
B-4	200-GALLON ETHYLENE GLYCOL	MAIN COMPRESSOR BUILDING
E-2	53-GALLON USED OIL	MAIN COMPRESSOR BUILDING

\*NOTE: A-5 & A-6 ARE PART OF THE LUBE OIL SYSTEM AND CONSIDERED OIL FILLED MECHANICAL EQUIPMENT.

- LEGEND:**
- ABOVE GROUND OIL CONTAINING PIPE
  - - - UNDERGROUND OIL CONTAINING PIPE
  - SURFACE FLOW DIRECTION
  - ▨ TRUCK LOADING/UNLOADING AREA



OIL CONTAINING MECHANICAL EQUIPMENT		
QUANTITY	MATERIAL	LOCATION
8@250-GALLONS EACH	LUBE OIL	COOPER GMV10 MAIN COMPRESSOR BUILDING
2@350-GALLONS EACH	LUBE OIL	INGERSOL RAND KVT MAIN COMPRESSOR BUILDING
2@110-GALLONS EACH	LUBE OIL	COOPER GMX SECONDARY COMPRESSOR BUILDING
90-GALLONS	LUBE OIL	CATERPILLAR 3512 COMPRESSOR SKID
95-GALLONS	LUBE OIL	AJAX DPC 2804 COMPRESSOR BUILDING 3
90-GALLONS	LUBE OIL	CATERPILLAR GENERATOR AUXILIARY BUILDING
>200-GALLONS	HYDRAULIC OIL	HYDRAULIC COOLER OUTSIDE SECONDARY COMPRESSOR BUILDING
798-GALLONS	DISTILLATE	DEHY. SKIMMER TANK
6@1,855-GALLONS EACH	PIPELINE FLUIDS	(3) UPPER AND (3) LOWER BANK TENNESSEE GAS SCRUBBERS
228-GALLONS	PIPELINE FLUIDS	TL-382 FILTER SEPARATOR
795-GALLONS	PIPELINE FLUIDS	TL-585 FILTER SEPARATOR
1,395-GALLONS	PIPELINE FLUIDS	TENNESSEE FILTER SEPARATOR

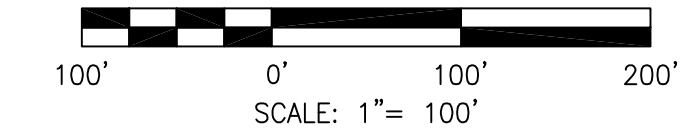
OIL CONTAINING MECHANICAL EQUIPMENT		
QUANTITY	MATERIAL	LOCATION
1128 GALLONS	PIPELINE FLUIDS	HELICAL SEPARATOR
72 GALLONS	PRODUCED FLUIDS	KINGTOOL FUEL GAS FILTER SEPARATOR
1504 GALLONS	PRODUCED FLUIDS	UNIT #7 & #8 SCRUBBER
141 GALLONS	PRODUCED FLUIDS	SUCTION SCRUBBER COMPRESSOR SHED
73 GALLONS	PRODUCED FLUIDS	DISCHARGE SCRUBBER COMPRESSOR SHED
435 GALLONS	PRODUCED FLUIDS	FILTER/SEPARATOR (KINGTOOL)
215 GALLONS	PRODUCED FLUIDS	1ST STAGE SUCTION SCRUBBER COMPRESSOR BUILDING 3
195 GALLONS	PRODUCED FLUIDS	2ND STAGE SUCTION SCRUBBER COMPRESSOR BUILDING 3
115 GALLONS	PRODUCED FLUIDS	3RD STAGE SUCTION SCRUBBER COMPRESSOR BUILDING 3

SYM.	DATE	BY	REVISION DESCRIPTION	PRJ/TSK	APP.	SCALE	DATE
13	3/06/17	JAR	REVISED PER REBECCA DALRYMPLE'S MARK UPS			1" = 100'	07/17/06
12	01/13/17	JAR	ADDED M&R AND DEKATHERM BLDGS AND CHANGED ROAD AND GRAVEL AREA				
11	10/17/16	JAR	REMOVED A-4 & E-4, ADDED (BASEMENT) TO A-5, CHANGED B-5 TO ETHYLENE GLYCOL				
10	01/28/16	TBB	REVISED PER TIM JACKSON MARK UPS				
9	10/13/14	TBB	SCALED CORRECTLY & ADDED ADJACENT PROPERTIES				

REFERENCE :  
 AERIAL MAPPING BY AIR SURVEY CORPORATION DATED 4/4/93  
 WITH GROUND CONTROL BY MSES CONSULTANTS, INC. DATED APRIL 1993.  
 SITE MAPPING FIELD VERIFIED AND UPDATED JANUARY 2001.  
 SOURCE OF ELEVATION :  
 U.S.G.S. BENCH MARK,  
 226 SKS, SET 1956, ELEV. 637.731'  
 MSES CAD FILE NO. 00-584-1/DISK 1594

NOTE: THE OIL PIPING RUNS SHOWN ON THIS DRAWING ARE APPROXIMATE; FOR MORE DETAIL REFER TO "AS-BUILT" DRAWINGS MAINTAINED IN DTI'S DRAFTING & RECORDS DEPARTMENT.

NOTE: THE MAXIMUM NUMBER OF DRUMS IN THE DRUM STORAGE BUILDING SHOULD TYPICALLY NOT EXCEED 50 DRUMS. THE TYPE AND LOCATION ON SITE CAN VARY DEPENDENT ON OPERATIONAL NEEDS FOR DRUMS ON SITE.



**Dominion Transmission, Inc.**  
 925 White Oaks Blvd. Bridgeport, West Virginia 26330 / Phone: (681) 842-3000

FOR: **CORNWELL COMPRESSOR STATION**

TITLE: **ENVIRONMENTAL EMERGENCY SITE PLAN**

DIR: DOCUMENTUM	GROUP: PD	DWG. NO.: X9780	REV.: 13
FILE: PRJ/TSK:			

## **Attachment G**

### Process Description

## PROCESS DESCRIPTION

Cornwell Station is a natural gas transmission/storage and production station for Dominion Transmission, Inc.(DTI) in West Virginia. The Cornwell Station is located in Clendenin, Kanawha County, WV. The natural gas is compressed by 13 integral compressors powered by the natural gas-fired reciprocating engines.

DTI is submitting this Class I Administrative Update permit application for a request to add “continuous monitoring language” for the flare pilot flame. Recently, a Class II Administrative Update was issued to Cornwell Compressor Station’s R13-2346 permit (R13-2346D was issued on 2/3/17) to revise applicable 40 CFR 63 Subpart HH requirements. As part of this Administrative Update, the continuous monitoring language for the flare pilot flame was accidentally removed. With the Cornwell Compressor Station’s Title V renewal permit application currently being reviewed at WVDEP, it was presumed the “continuous monitoring language” would be placed in the Title V permit as periodic monitoring. After discussions with WVDEP, the Title V group has requested that this language be incorporated back into the R13 permit for Compliance Assurance Monitoring (CAM) purposes.

Therefore, DTI is requesting to add the following continuous monitoring language in the R13 permit:

*In order to demonstrate compliance with the requirements of Section ##, the permittee shall monitor the presence or absence of a flare pilot flame using a thermocouple or any other equivalent device, except during SSM events.*

With this addition request, it will clarify that the Cornwell Compressor Station is using a “continuous compliance determination method” as stated in 40 CFR Part 64, Compliance Assurance Monitoring (CAM).

As a result, the dehydration unit (DEHY01) at Cornwell Compressor Station will not be subject to CAM per §64.2(b)(1)(vi), which states “*emission limitations or standards for which a part 70 or 71 permit specified a continuous compliance determination method, as defined in 64.1*” is exempt from CAM. Since the R13 permit for the facility (R13-2346) will specify a “continuous compliance determination method” condition (e.g. continuously monitoring the flare using a thermocouple to detect the presence of a flame) and that R13 condition will be rolled into the Title V permit, CAM will not apply.



## **Attachment S**

Title V Permit Revision Information

**Attachment S**  
**Title V Permit Revision Information**

<b>1. New Applicable Requirements Summary</b>	
Mark all applicable requirements associated with the changes involved with this permit revision:	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS (Subpart(s) _____)	<input type="checkbox"/> Section 112(d) MACT standards (Subpart(s) _____)
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64) <sup>(1)</sup>
<input type="checkbox"/> NO <sub>x</sub> Budget Trading Program Non-EGUs (45CSR1)	<input type="checkbox"/> NO <sub>x</sub> Budget Trading Program EGUs (45CSR26)
<p><sup>(1)</sup> If this box is checked, please include <b>Compliance Assurance Monitoring (CAM) Form(s)</b> for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why <b>Compliance Assurance Monitoring</b> is not applicable:</p> <p style="margin-left: 40px;">The dehy unit (DEHY01) is not subject to CAM since it is subject to NESHAP Subpart HH (exempt per 64.2(b)(1)(i)). In addition, for VOC purposes, the dehy unit is not subject to CAM per 64.2(b)(1)(vi). Since this R13 permit action will clarify a “continuous compliance determination method” condition (e.g. continuously monitoring the flare using a thermocouple to detect the presence of a flame) and the R13 will be rolled into the Title V permit, CAM does not apply.</p>	

<b>2. Non Applicability Determinations</b>
<p>List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.</p> <p style="margin-left: 40px;">N/A</p>
<p><input type="checkbox"/> <b>Permit Shield Requested</b> (not applicable to Minor Modifications)</p>

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

**3. Suggested Title V Draft Permit Language**

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision?  Yes  No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

**4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision**

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
R13-2346D	2/3/2017	

**5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision**

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
N/A		

**6. Change in Potential Emissions**

Pollutant	Change in Potential Emissions (+ or -), TPY
N/A	

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

**7. Certification For Use Of Minor Modification Procedures (Required Only for Minor Modification Requests)**

**Note:** This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:

- i. Proposed changes do not violate any applicable requirement;
- ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;
- iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;
- v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;
- vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

(Signed):  Date: 04 / 17 / 17  
 (Please use blue ink) (Please use blue ink)

Named (typed): Brian Sheppard Title: VP Pipeline Operations

**Note: Please check if the following included (if applicable):**

- Compliance Assurance Monitoring Form(s)
- Suggested Title V Draft Permit Language

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.