

# Fact Sheet



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

Permit Number: **R30-03300011-2017**  
Application Received: **April 22, 2016**  
Plant Identification Number: **03-54-033-00011**  
Permittee: **Dominion Transmission, Inc.**  
Facility Name: **Wilsonburg Compressor Station**  
Mailing Address: **925 White Oaks Blvd, Bridgeport, WV 26330**

*Revised: NA*

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Physical Location:	Wilsonburg, Harrison County, West Virginia
UTM Coordinates:	549.9 km Easting • 4348.7 km Northing • Zone 17
Directions:	From the intersection of Route 50 and SR98 near Clarksburg, go west on Route 50 for 1.3 miles to intersection. Turn right onto Paleo Road and travel 100 feet to gravel road on the right. Go through the gate and follow gravel road to the station.

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### **Facility Description**

Wilsonburg Compressor Station is a natural gas facility covered by Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of a total of two (2) natural gas fired reciprocating engines, two (2) emergency generators, one (1) dehydration unit with flare, one (1) reboiler and six (6) storage tanks of various sizes.

**Emissions Summary**

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2015 Actual Emissions</b>
Carbon Monoxide (CO)	34.97 <sup>a</sup>	24.40
Nitrogen Oxides (NO <sub>x</sub> )	186.42 <sup>a</sup>	150.00
Particulate Matter (PM <sub>2.5</sub> )	2.12 <sup>b</sup>	0.01
Particulate Matter (PM <sub>10</sub> )	2.12 <sup>b</sup>	0.19
Total Particulate Matter (TSP)	2.12 <sup>b</sup>	0.38
Sulfur Dioxide (SO <sub>2</sub> )	0.03 <sup>a</sup>	0.01
Volatile Organic Compounds (VOC)	106.65 <sup>a</sup>	64.46

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions*</b>	<b>2015 Actual Emissions</b>
Total HAPS	5.92 <sup>a</sup>	1.94

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

*a - The PTE has decreased due to the removal of Engine #1*

*b - The PTE have increased due to updated emission factors*

**Title V Program Applicability Basis**

This facility has the potential to emit 186.42 tons per year of NO<sub>x</sub> and 106.65 tons per year of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Dominion Transmission, Inc 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.
- 45CSR10 To 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 Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation

45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60
WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
45CSR30	Requirements For Operating Permits.
45CSR34	Emission Standards For Hazardous Air Pollutants.
40 C.F.R. 60, Subpart JJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
40 C.F.R. Part 61	Asbestos inspection and removal
40 C.F.R. Part 63, Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production 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
<u>State Only:</u>	
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 ( <i>if any</i> )
R13-2856B	May 7, 2015	

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," which may be downloaded from DAQ's website.

**Determinations and Justifications**

This is a renewal of the Title V permit which was issued on October 21, 2011 and modified on February 1, 2016. Changes to the most recent version of the Title V Permit consist of the following:

**1) Title V Boilerplate changes:**

- **Conditions 3.5.3., 3.5.5. and 3.5.6.** - These conditions were revised to require electronic submittal of the Title V compliance certifications (annual and semi-annual), self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols to the WV DAQ.

**2) Emission Units Table Section 1.1**

- The table was updated to correct the tank TK02 capacity to 550 gallons which was incorrectly listed as 1000 gallons.
  - Tank TK06 has been removed from the site and therefore deleted from the table.
- 3) Condition 3.4.2.** – The permittee requested that condition 6.4.4 (Retention of records from R13-2856) be relocated to the facility-wide section of the permit. Therefore Condition 3.4.2. has been rewritten to combine the Title V permit and R13-2856 permit boilerplate language.
  - 4) Condition 3.4.4.** – The permittee requested that condition 6.4.1. be relocated to the facility-wide section of the permit. Therefore, it has been relocated as condition 3.4.4.
  - 5) Condition 3.7.2.** – The permittee requested a permit shield for several non-applicable regulations. They have been included in this condition of the permit.
  - 6) Condition 5.1.12.** – This requirement has been satisfied and therefore deleted from the renewal permit. The subsequent requirement has been renumbered.
  - 7) Conditions 5.2.7. through 5.2.12., 5.4.11., 5.4.12., and 5.5.5.** – These conditions of the current permit containing Compliance Assurance Monitoring (CAM) requirements, have not been included in the renewal permit. The CAM requirements were for compliance of the dehydration unit for VOC emissions using a flare. Since the Title V permit specifies a “continuous compliance determination method” (e.g., Continuously monitoring the flare using a thermocouple to detect the presence of a flame - see condition 5.2.1.) CAM does not apply pursuant to 40 CFR §64.2(b)(1)(vi).
  - 8) Condition 5.4.9.** – Since the permittee requested that condition 6.4.4 (Retention of records from R13-2856) be relocated to the facility-wide section of the permit and this condition contained the same requirements, it also has been relocated to condition 3.4.2. The language has been replaced with “(see Condition 3.4.2.)”
  - 9) Condition 6.1.1.** – Since the permittee requested that condition 6.1.1. (*Minor Source of Hazardous Air Pollutants (HAP)*) be relocated to the facility-wide section of the permit it has been relocated as condition 3.1.10. The subsequent conditions have been renumbered.
  - 10) Condition 6.1.6. (now condition 6.1.5.)** – The emergency generator engines (EG01 and EG02) are both certified engines. Therefore, at the request of the permittee, the requirement for purchasing a non-certified engine (6.1.6.b.) has been deleted
  - 11) Condition 6.1.8.** – This condition has been added to the renewal permit to include the requirements of 40 CFR §60.4243(d) for the emergency generators.
  - 12) Condition 6.3.1.** – The generator engines (EG01 and EG02) are both certified engines and are not required to conduct the performance testing requirements of 40 CFR §§60.4244(a)-(g) or permit R13-2856 §4.3.1. as long as they are operated and maintained in accordance with 40 CFR §60.4243(a)(1). Therefore, the testing requirements of this condition have been replaced with “Reserved.”
  - 13) Condition 6.4.1.** – As discussed in Item 3) above, this requirement has been relocated to the facility-wide section as condition 3.4.4. The subsequent conditions have been renumbered.

- 14) **Condition 6.4.4. (now condition 6.4.3.)** – Since the permittee requested that condition 6.4.4 (Retention of records from R13-2856) be relocated to the facility-wide section of the permit it has been relocated to condition 3.4.2. The language has been replaced with “(see Condition 3.4.2.)”
- 15) **Condition 6.5.1.** – The generator engines (EG01 and EG02) are both certified engines and are not required to conduct the performance testing requirements of 40 CFR §§60.4244 or permit R13-2856 §4.4.7. as long as they are operated and maintained in accordance with 40 CFR §60.4243(a)(1). Therefore, the reporting requirements of this condition have been replaced with “Reserved.”
- 16) **Condition 7.1.1.** – The facility has met the requirements of this condition rendering it obsolete. Therefore, this condition has been removed from the renewal permit. The subsequent conditions have been renumbered.
- 17) **Condition 7.4.1.c.** – Since the compressor engines (EN02 and EN03) are not subject to performance tests, CEMS performance evaluation, or opacity and visible emission requirements, condition 7.4.1.c. has been deleted.
- 18) **40 CFR 63 Subpart ZZZZ** –The language in conditions 7.1.2.b. and 7.2.1.c. of the renewal permit has been updated to the slightly revised language in the current version of Subpart ZZZZ.

### Non-Applicability Determinations

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

- 1) **45 CSR 10** – This rule is not applicable to internal combustion engines (i.e. Compressor engines “EN02” and “EN03”).
- 2) **40 CFR 60 Subpart JJJJ** – The compressor engines “EN02” and “EN03” were installed in 1987 and 1983 respectively, and therefore are not subject to this subpart since they were installed before the applicability date.
- 3) **40 CFR 60 Subpart OOOO** – There are no affected facilities located at the Wilsonburg Compressor Station that commenced construction, modification, or reconstruction after August 23, 2011.
- 4) **40 CFR 63 Subpart HHH** – The facility is not defined as a major source of HAPs. Therefore, this subpart is not applicable to the facility.
- 5) **40 CFR 63 Subpart DDDDD** – The facility is not defined as a major source of HAPs. Therefore, this subpart is not applicable to the reboiler.
- 6) **40 CFR 63 Subpart JJJJJ** – The reboiler (RBR02) is a gas-fired “process heater” and therefore excluded from the definition of “boiler” pursuant to §63.11237.
- 7) **40 CFR 64** – The dehydration unit (DEHY02) is not subject to CAM for HAPS since the unit is subject to 40 CFR 63 Subpart HH, which has provisions for compliance monitoring established after 1990 (exemption per §64.2(b)(1)(i)). In addition, dehydration unit (DEHY02) is not subject to CAM for VOCs, since a “continuous compliance determination method” is specified in the current Title V permit (exemption per §64.2(b)(1)(vi)).

### 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: March 3, 2017  
Ending Date: April 3, 2017

### **Point of Contact**

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

Frederick Tipane  
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. 1215 • Fax: 304/926-0478  
frederick.tipane@wv.gov

### **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.

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

Not applicable.