

# Fact Sheet



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

Permit Number: **R30-10900018-2017**  
Application Received: **February 29, 2016**  
Plant Identification Number: **109-00018**  
Permittee: **Dominion Transmission, Inc.**  
Facility Name: **Oscar Nelson Compressor Station**  
Mailing Address: **925 White Oaks Blvd.**  
**Bridgeport, WV 26330**

*Revised: NA*

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Physical Location:	Marianna, Wyoming County, West Virginia
UTM Coordinates:	445.76 km Easting • 4161.72 km Northing • Zone 17
Directions:	Take Interstate 77 South to the Mabscott/MacArthur exit. Turn south on State Route 16 and travel approximately 16 miles to Maben in Wyoming County. Turn right onto State Route 97 West and go 20.2 miles to Marianna. Turn Left at Phillips Coal Road off of Route 97 (Just before Turkey Creek Road). Go across the bridge crossing the Guyandotte River. Turn right at the end of the bridge and go 0.5 miles to the station.

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### Facility Description

Natural Gas Compressor Station, SIC Code – 4922. The facility is a production gathering station that services a transmission pipeline system to recompress natural gas flowing through a pipeline for transportation. It has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of six (6) 880 HP natural gas fired reciprocating engines, one (1) dehydrator reboiler, one (1) dehydration unit with flare, one (1) auxiliary generator, and five (5) 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)	155.76	40.5291
Nitrogen Oxides (NO <sub>x</sub> )	1,518.78	390.4196
Particulate Matter (PM <sub>2.5</sub> )	7.47	0.5506
Particulate Matter (PM <sub>10</sub> )	7.47	1.0361
Total Particulate Matter (TSP)	9.42	1.0361
Sulfur Dioxide (SO <sub>2</sub> )	0.12	0.0391
Volatile Organic Compounds (VOC)	121.53	33.3630

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

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2015 Actual Emissions</b>
Acetaldehyde	1.51	0.0345
Acrolein	1.51	0.0231
Benzene	0.54	0.0951
Ethylbenzene	0.48	0.0053
Formaldehyde	7.24	1.8575
Hexane	0.12	0.0286
Toluene	0.75	0.0471
Xylene	0.63	0.0131
Total HAPs	12.78	2.1043

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

### Title V Program Applicability Basis

This facility has the potential to emit 155.76 TPY of CO, 1,518.78 TPY of NO<sub>x</sub>, and 121.53 TPY of VOCs. 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	Construction permits.
	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 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
State Only:	45CSR4	No objectionable odors.
	45CSR17	To Prevent And Control 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> )
R13-2626D	December 13, 2013	

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 the third Title V renewal for this facility. The following changes were made during the renewal:

### Section 1.1 Emission Units

- In the previous Title V Permit, Emission Units EN01, EN02, EN03, EN04, EN05, and EN06 were incorrectly described as rich burn engines when they are actually lean burn engines; this has been corrected.
- AUX01 emission unit description was corrected from a Waukesha FZ000G to a Waukesha F1905 GRU.
- The following tanks have been removed from the facility: TK01, TK04 and TK08.
- The following tanks were added to the facility: TK09 and TK10.

### Section 3.0 Facility-Wide Requirements

- The following old conditions 3.1.9, 3.1.10, 3.2.2, and 3.2.3 were source specific requirements so they were moved to Section 5.
- Monthly visual emission checks of Flare F2 were already required under section 5 condition 5.2.2 so condition 3.2.1 was deleted.

### Section 5.0 Source Specific Requirements [emission unit ID(s): DEHY1 & F2]

- Old Condition 5.1.9 contained all the applicable provisions of 40 C.F.R. 63 Subpart HH. This condition was split, so that each subsection in the old condition now has its own condition, as follows: 5.1.7 and 5.1.8.
- Added conditions 5.1.10, 5.1.11, 5.2.5, and 5.2.6 which were old conditions 3.1.9, 3.1.10, 3.2.2, and 3.2.3.

### 6.0 Source-Specific Requirements [emission point ID(s): EN01, EN02, EN03, EN04, EN05, EN06 and AUX01]

- Old Condition 6.1.1 contained all the applicable limits and standards of 40 C.F.R. 63 Subpart ZZZZ. This condition was split, so that each subsection in the old condition is now its own condition, as follows: 6.1.1, 6.1.2, 6.1.3, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.1.8, 6.1.9, 6.1.10, and 6.1.11.
- Removed old condition 6.2.1. since none of the engines were subject to emission or operating limits.
- Old Condition 6.4.1 contained all the applicable recordkeeping requirements of 40 C.F.R. 63 Subpart ZZZZ. This condition was split, so that each subsection in the old condition is now its own condition, as follows: 6.4.1, 6.4.2, 6.4.3, 6.4.4, and 6.4.5.

## **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 Subpart JJJJ.** The compressor engines (EN01 through EN06) are not subject to this subpart since they were manufactured pre 1947, before the applicability date.

**40 C.F.R. 60 Subpart OOOO.** This subpart does not apply to the facility since the facility is a gathering facility that does not have gas wells, centrifugal compressors, reciprocating compressors, and/or pneumatic controllers constructed, modified, or reconstructed after August 23, 2011, and on or before September 18, 2015.

**40 C.F.R. 63 Subpart HHH.** This subpart does not apply to the facility since the facility is not a transmission or storage station and is not a major source of HAPs.

**40 C.F.R. 63 Subpart DDDDD.** The reboiler (REB1) is not subject to this subpart since the facility is not a major source of HAPs.

**40 C.F.R. 63 Subpart JJJJJ.** The reboiler (REB1) is not subject to this subpart since it is considered a “process heater,” which is excluded from the definition of boiler in §63.11237.

**40 C.F.R. 64.** The dehy unit (DEHY1) is not subject to CAM since the unit is subject to 40 C.F.R. 63 Subpart HH, which has provisions for compliance monitoring established after 1990 (exemption per §64.2(b)(1)(i)). In addition, since the R13-2626D permit specifies a “continuous compliance determination method” (e.g. continuously monitoring the flare using a thermocouple to detect the presence of a flame) which was included in the Title V permit, CAM does not apply (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: Wednesday, December 21, 2016  
Ending Date: Friday January 20, 2017

#### **Point of Contact**

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

Robert Mullins  
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. 1243 • Fax: 304/926-0478  
Robert.A.Mullins@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.