

# Fact Sheet



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

Permit Number: **R30-01300002-2017**  
Application Received: **February 1, 2016**  
Plant Identification Number: **013-00002**  
Permittee: **Dominion Transmission, Inc.**  
Facility Name: **Orma Compressor Station**  
Mailing Address: **925 White Oaks Blvd.**  
**Bridgeport, WV 26330**

*Revised: NA*

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Physical Location: Orma, Calhoun County, West Virginia  
UTM Coordinates: 492.68 km Easting • 4,288.86 km Northing • Zone 17  
Directions: From the intersection of Rt. 33/Rt. 119 West & 16 South at Arnoldsburg take Rt. 16 South 4.7 miles to Orma, turn left onto Euclid/Nicut Road and travel 1.0 mile, turn left onto Crooked Run Road and go 0.1 miles to station on the left.

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### Facility Description

Orma Compressor Station is a natural gas compressor station 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 two (2) 660 HP natural gas fired reciprocating engines, one 112.2 HP emergency generator, one (1) dehydrator reboiler, one (1) dehydration unit with flare, and seven (7) 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)	42.46	14.51
Nitrogen Oxides (NO <sub>x</sub> )	256.69	91.51
Particulate Matter (PM <sub>2.5</sub> )	1.83	0.020
Particulate Matter (PM <sub>10</sub> )	1.83	0.150
Total Particulate Matter (TSP)	2.31	0.296
Sulfur Dioxide (SO <sub>2</sub> )	0.03	0.009
Volatile Organic Compounds (VOC)	40.97	12.82

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

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2015 Actual Emissions</b>
Acetaldehyde	0.37	0.103
Acrolein	0.37	0.103
Benzene	0.21	0.026
Ethylbenzene	0.09	0.0014
Formaldehyde	2.62	0.498
n-Hexane	0.07	0.013
Toluene	0.44	0.013
Xylene	1.06	0.004
Total HAPs	5.23	1.3444

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

### Title V Program Applicability Basis

This facility has the potential to emit 256.69 ton of NO<sub>x</sub>. 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
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	45CSR6	Open burning prohibited.
	45CSR10	To Prevent and Control Air Pollution from The Emission of Sulfur Oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	New Source Construction
	45CSR16	Standards of Performance for New Stationary Sources.
	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 60, Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63, Subpart HH	Area Source Natural Gas Production
	40 C.F.R. 63, Subpart ZZZZ	RICE MACT
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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> )
R13-2945A	October 17, 2012	

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

- Removed the following tanks from the Emission Units table: TK02, TK04, TK05, and TK06.
- Added the following tanks to the Emission Units table: TK08, TK09, TK11, TK12, and TK13. The addition of these tanks did not require a R13 permit. Each tank has potential VOC emissions

less than 6 TPY and as such are not subject to the requirements of 40 C.F.R. 60 Subpart OOOO for storage vessels. These tanks have no applicable requirements.

#### Section 3.0 Facility-Wide Requirements

- Old Conditions 3.1.9, 3.1.10, 3.2.1, and 3.2.2 were Source specific requirements for emission unit DEHY02. As such they were moved to Section 4.0 and are now conditions 4.1.6, 4.1.7, 4.2.4, and 4.2.5.

#### Section 4.0 Source-Specific Requirements [emission point ID(s): RBR02, DEHY02, and F1]

- Old Condition 4.1.7 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 is now its own condition, as follows: 4.1.9 and 4.1.10.
- Condition 4.2.6 was added to require visible emission checks every calendar month to demonstrate compliance with the opacity limit in condition 4.1.3.
- Recordkeeping requirements of 40 C.F.R. §63.774(d)(1)(ii) were added as condition 4.4.3.

#### Section 5.0 Source Specific Requirements [emission point ID(s): EN01 & EN02]

- EN01 and EN02 are existing non-emergency 2SLB engines greater than 500HP located at an area source of HAPs and as such they are subject to the requirements of 40 C.F.R. 63 subpart ZZZZ. These requirements were included in the last renewal. Only minor updates needed to be included in this renewal.
- Old condition 5.1.2 required compliance with 40 C.F.R. 63 Subpart ZZZZ by October 19, 2013. Since this condition has already been fulfilled, it was removed.
- The General Provision exceptions of 40 C.F.R. §63.6645(a)(5) were included in condition 5.1.4 which requires the permittee to comply with General Provisions according to Table 8 of 40 C.F.R. 63 subpart ZZZZ.
- Old condition 5.5.1 was removed because it does not apply to EN01 and EN02.

#### 6.0 Source-Specific Requirements [emission point ID(s): EG01]

- EG01 is a new 4SRB natural gas fired 112.2 HP engine located at an area source of HAPs. This unit is subject to the requirements of R13-2945A, 40 C.F.R. 60 subpart JJJJ, and 40 C.F.R. 63 Subpart ZZZZ. There were updates to 40 C.F.R. 60 Subpart JJJJ that resulted in changes in the following condition: 6.2.2 and 6.4.2.

#### 7.0 Source Specific Flare (F1) Compliance Assurance Monitoring (CAM) in accordance with 40 C.F.R. 64

- This section of the permit was removed since it contained only CAM language for DEHY02 and F1 (see Non-Applicability Determinations for CAM).

### 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 and EN02) are not subject to this subpart since they were manufactured before 1965, 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. None of the tanks meet the applicability requirements in 40 C.F.R. § 60.5365(e).

**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 (RBR02) 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 (RBR02) is not subject to this subpart since it is considered a “process heater,” which is excluded from the definition of “boiler.”

### Removal of CAM Language

The previous permit for this facility included CAM language for the Dehydration Unit (DEHY02) and the Flare (F1) in Section 7.0.

The Dehydration unit (DEHY02) is a potential PSEU for VOC and HAP emissions because it meets the applicability criteria in 40 C.F.R. §64.2(a):

- (1) it has emission limits for VOCs and HAPs (condition 4.1.13)
- (2) it uses a control device (Flare) to achieve compliance with these limits, and
- (3) potential pre-control device emissions of HAPs and VOC are higher than the major source applicability criteria (10 TPY single HAP, 25 TPY aggregated HAPs, and 100 TPY criteria Pollutants).

However, the DEHY02 meets the exemption in 40 C.F.R. §64.2(b)(1)(i) for HAP emissions, since the facility is subject to 40 C.F.R. 63 subpart HH; therefore, CAM is not applicable to the DEHY02 for HAPs.

For VOC emissions of DEHY02, it was determined during the review of R30-01300002-2011(SM02) in 2013 that DEHY 02 didn't meet any exemptions in 40 C.F.R. §64.2(b), and met the applicability criteria in 40 C.F.R. §64.2(a), therefore it was subject to CAM. The CAM plan was included with the permit at that time (issued on January 15, 2013).

However, per the company's request, the CAM applicability for DEHY02 for VOC emissions was reconsidered during this permit renewal process. It was found that per 40 C.F.R. §64.5(b), the CAM applicability determination should have been conducted during the current permit renewal process, and not during the significant modification process (SM02) in 2013 since, per 40 C.F.R. §64.5(a), the DEHY02 was not considered a large PSEU for VOC (VOC emissions after control device were limited to 7.82 TPY).

Upon conducting the CAM applicability determination for the renewal process, it has been determined that CAM is not applicable to DEHY02 for VOC because it is exempt per 40 C.F.R. §64.2(b)(1)(vi), since the Title V permit already specifies “a continuous compliance determination method” (condition 4.1.15, underlying R13-2945A condition 4.1.5) included in the permit during SM02 (issued January 15, 2013). Therefore, all the CAM requirements included in the permit on January 15, 2013 during SM02, were removed (Section 7.0).

**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: Thursday, November 24, 2016  
Ending Date: Tuesday, December 27, 2016

**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  
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**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.