

# Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on June 27, 2016.

Permit Number: **R30-03900047-2016**  
Application Received: **February 16, 2018**  
Plant Identification Number: **039-00047**  
Permittee: **Columbia Gas Transmission, LLC**  
Facility Name: **Lanham Compressor Station**  
Mailing Address: **1700 MacCorkle Avenue, SE**  
**Charleston, WV 25314**

Permit Action Number: *SM01*      Revised: *July 9, 2018*

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Physical Location:                      Rocky Fork, Kanawha County, West Virginia  
UTM Coordinates:                      438.0 km Easting • 4258.8 km Northing • Zone 17  
Directions:                                Traveling I-64, exit at Cross Lanes and turn right onto State Route 622.  
Continue on Route 622 to the station which is located at the intersection  
of State Route 622 and Secondary Route 7.

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### Facility Description

The Lanham compressor station compresses natural gas for pipeline transmission. The facility operates under SIC code 4922. This facility uses one (1) heating system boiler, one (1) natural gas line heater, eight (8) reciprocating engines/integral compressors, one (1) reciprocating engine/air compressor, and two (2) reciprocating engines/generators.

This modification is for the replacement of the natural gas line heater.

## Emissions Summary

Plantwide Increase in Potential Emissions [Tons per Year]	
Regulated Pollutants	Increase in Potential Emissions
Carbon Monoxide (CO)	0.26
Nitrogen Oxides (NO <sub>x</sub> )	0.33
Particulate Matter (PM <sub>2.5</sub> )	0.02
Particulate Matter (PM <sub>10</sub> )	0.02
Total Particulate Matter (TSP)	0.02
Sulfur Dioxide (SO <sub>2</sub> )	<0.01
Volatile Organic Compounds (VOC)	<0.01

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

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 264.54 TPY of CO, 1901.09 TPY of NO<sub>x</sub>, 24.50 TPY of Formaldehyde, and 29.69 TPY of Total HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Particulate matter emissions.
	45CSR13	NSR permit.
	45CSR30	Operating permit requirement.
	45CSR34	Hazardous air pollutants.
	40 C.F.R. Part 63, Subpart DDDDD	Boiler MACT.

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> )
R13-3397	4/17/18	

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

### Description of Modification

Columbia is replacing the existing natural gas fired pipeline heater (H1) at the station. The new pipeline heater (H2) will heat the natural gas being transmitted through the pipeline to ensure hydrates do not form. This heater will have a maximum design heat input of 1.0 MMBtu/hr (limited to 0.54 MMBtu/hr in R13-3397), and will be fueled with natural gas.

### Permit Changes

In addition to the changes discussed in detail later in this fact sheet, the following changes were made to this permit:

- H1 was removed from the Emission Units Table, and H2 was added in its place.
- R13-3397 was added to the Active R13, R14, and R19 Permits Table.
- Condition 3.4.1 is a boilerplate condition requiring records of monitoring information. A citation was added referencing condition 4.4.1 of R13-3397.

Conditions 4.1.2, 4.4.2, and 4.4.3 from R13-3397 were not incorporated into this Title V permit. These conditions address air pollution control equipment, and no air pollution control equipment was permitted in R13-3397.

The following permit conditions were changed or modified to incorporate R13-3397:

Title V Condition	Summary of Permit Condition	Regulatory Citation	R13-3397 Condition
4.1.1. <sup>1</sup>	10% Opacity limit. Compliance for H2 is satisfied by complying with condition 4.1.4.	45CSR§2-3.1.	4.1.1.d.
4.1.3. <sup>2</sup>	Maximum heat input of H2 is 0.54 MMBtu/hr which exempts the heater from certain sections of 45CSR2 and 45CSR10	45CSR§2-11.1., and 45CSR§10-10.1.	4.1.1.b.
4.1.4. <sup>2</sup>	H2 fueled with "pipeline quality natural gas" which is "gas 1 fuel" under Subpart DDDDD of Part 63.	N/A	4.1.1.c.

<sup>1</sup>This was an existing permit condition with language added stating that compliance with condition 4.1.4. satisfies compliance with this condition for H2.

<sup>2</sup>New permit condition.

Several conditions in R13-3397 contained requirements from 40CFR63, Subpart DDDDD, the boiler MACT. This language was already included in the Title V permit, and citations were added to reference the applicable portions of R13-3397 as follows:

<b>Title V Condition</b>	<b>Summary of Permit Condition</b>	<b>Regulatory Citation</b>	<b>R13-3397 Condition</b>
6.1.1.	Work practice standards—tune-up	45CSR34; 40 CFR§§63.7500(a)(1) and (3); 40 C.F.R. 63, Subpart DDDDD Table 3 (Item 1)	4.1.1.a.
6.1.4.	Initial compliance demonstration	45CSR34; 40 CFR§63.7510(g)	4.1.1.a.
6.1.5.	Continuous Compliance Demonstration and Tune-up	45CSR34; 40 CFR§63.7540(a)(10)	4.1.1.a. and 4.4.4.
6.1.6.	Boiler tune-up	45CSR34; 40 CFR§63.7540(a)(12)	4.1.1.a.
6.3.1.	Performance tune-up	45CSR34; 40 CFR§63.7515(d)	4.1.1.a.
6.5.1.	Notification of Compliance Status containing the results of the initial compliance demonstration	45CSR34; 40 CFR§63.7530(f)	4.5.1.
6.5.2.	Notification of Compliance Status	45CSR34; 40 CFR§§63.7545(e)(1) & (8)	4.5.1.
6.5.3.	Submission of reports	45CSR34; 40 CFR§§63.7550(b) and (b)(5)	4.5.2.
6.5.4.	Compliance Report	45CSR34; 40 CFR§§63.7550(c)(1), (c)(5)(i)-(iii), (c)(xiv), and (c)(xvii);	4.5.2.

Several energy assessment and existing source requirements were removed from this permit since they applied to H1, but not H2. The conditions that were removed are summarized below:

- Item 4 of the table in Condition 6.1.1. (existing boiler requirements)
- Condition 6.1.3. (existing affected sources)
- Energy assessment requirements in condition 6.5.1
- Energy assessment and fuel use language in conditions 6.5.2.b.2 and 3

**Non-Applicability Determinations**

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

None

**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: Tuesday, May 22, 2018  
Ending Date: Thursday, June 21, 2018

### **Point of Contact**

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

Rex Compston, P.E.  
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. 1209 • Fax: 304/926-0478  
[Rex.E.Compston@wv.gov](mailto:Rex.E.Compston@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.