West Virginia Department of Environmental Protection Division of Air Quality





# For Draft/Proposed 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 November 21, 2016.

Permit Number: **R30-03900074-2016** Application Received: **February 28, 2020** Plant Identification Number: **03-54-039-00074** Permittee: **Columbia Gas Transmission, LLC** Facility Name: **Walgrove Compressor Station** Mailing Address: **1700 MacCorkle Avenue, SE Charleston, WV 25314** 

Permit Action Number: SM01 Revised: Draft/Proposed

Physical Location:Walgrove, Kanawha County, West VirginiaUTM Coordinates:461.76 km Easting • 4,257.32 km Northing • Zone 17Directions:Traveling I-79N from Charleston, exit at Elkview and turn right, go a<br/>short distance to US Route 119, turn left and proceed on US Rt. 119 to<br/>the town of Blue Creek. Turn right onto Secondary Route 57, travel<br/>across the Elk River and turn left at the intersection, the station is<br/>approximately 1.5 miles from the intersection.

## **Facility Description**

The purpose of this significant modification is to include requirements for one (1) emergency generator (G1) within the facility. The installation of emergency generator (G1) was approved under R13-3487.

#### **Emissions Summary**

The PTE changes due to this modification are as follows:

Regulated Pollutants	Potential Emissions (TPY)
PM	0.01
PM <sub>10</sub> /PM <sub>2.5</sub>	0.01
NO <sub>x</sub>	0.33
СО	12.87
$SO_2$	0.01
VOC	0.01
Total HAPS	0.01

# **Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit 240.85 TPY of  $NO_x$  Due to this facility's potential to emit over 100 tons per year of criteria pollutant, 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:	45CSR13	Construction permit requirement
	45CSR16	Standards of performance for new stationary sources
	45CSR30	Operating permit requirement.
	45CSR34	National Emission Standards for hazardous Air Pollutants (NESHAPs)
	40 C.F.R. 60 Subpart JJJJ	Standards of performance for stationary spark ignition internal combustion engines
	40 C.F.R. 63 Subpart ZZZZ	National emissions standards for hazardous air pollutants for stationary reciprocating internal combustion engines.
State Only:	N/A	

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	Date of	Permit Determinations or Amendments That
Consent Order Number	Issuance	Affect the Permit ( <i>if any</i> )
R13-3487	May 19, 2020	

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**

The purpose of this modification is to include the applicable requirements for a new emergency generator (G1), which was approved under permit R13-3487.

Section 1.0

The new Emergency Generator G1, was added to Table 1.1 and R13-3487 was added to Table 1.2

## Section 3.0

- Added new R13-3487 requirements as conditions 3.1.10 and 3.1.11
- Updated contact information for the DAQ and EPA in conditions 3.5.3, 3.5.5 and 3.5.6.
- Deleted 40 C.F.R. 60 Subpart JJJJ from the permit shield section in condition 3.7.2 because the new generator is subject to 40 C.F.R. 60 Subpart JJJJ

#### Section 4.0

No updates to Section 4.0

#### Section 5.0

- Section 5.0 was added due to the installation of the new emergency generator which has 40 C.F.R. 60 Subpart JJJJ and 45CSR13 requirements.
- 40 C.F.R. 60 Subpart JJJJ
  - This emergency engine is between 25 and 100 hp and is not certified; therefore, it is subject to 40 C.F.R. §§ 60.4233(d), 60.4234, 60.4236(c), 60.4237(c), 60.4243(b)(2), (b)(2)(i) and (f), 60.4243(d), 60.4244, 60.4245 (a), (b), and (d) and Table 1. For a non-certified engine, an initial performance test is required.
- 45CSR13 Requirements
  - The maximum annual operating hours shall not exceed 500 hours per year
  - NOx, CO, and VOC hourly and annual emission limits are included
  - Records of the hours of operation of the emergency generator must be maintained
  - Standards, Testing, Recordkeeping, and Reporting requirements under NSPS for Stationary SI ICE specified in Subpart JJJJ and/or the NESHAP for Stationary SI ICE specified in Subpart ZZZZ must be followed.
- 40 C.F.R. 63 Subpart ZZZZ
  - According to 40 C.F.R. § 63.6590(c)(1), compliance with 40 C.F.R. 63 Subpart ZZZZ is shown through compliance with 40 C.F.R. 60 Subpart JJJJ.

## **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:	June 25, 2020
Ending Date:	July 27, 2020

## **Point of Contact**

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

Nikki Moats 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. 41282 • Fax: 304/926-0478 Nikki.B.Moats@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)**

(Choose) Not applicable.

## OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.