

Fact Sheet



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

Permit Number: **R30-05100100-2017**
Application Received: **March 25, 2016**
Plant Identification Number: **03-054-05100100**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Adaline Compressor Station**
Mailing Address: **1700 MacCorkle Avenue SE, Charleston, WV 25314**

Revised: N/A

Physical Location:	Cameron, Marshall County, West Virginia
UTM Coordinates:	530.456 km Easting • 4,401.860 km Northing • Zone 17
Directions:	Located in Liberty District, Marshall County and south of Cameron, which is 25 miles south of Wheeling on US Rt 250. From intersection in Cameron, travel west a short distance to a “Y” intersection. Go left, cross bridge, then up a hill on a brick road. Proceed south along this road (Cameron Ridge Rd) for approximately 7 miles to station that is on left side of the road and partially visible.

Facility Description

The Adaline facility is a natural gas transmission facility covered by Standard Industrial Classification (SIC) Code 4922. The facility has the capacity to operate twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year. The station consists of three (3) 880 hp Clark HRA-8, 2SLB engines, two (2) 2,000 hp Clark TLA-6, 2SLB engines, and one (1) 440 hp Waukesha VGF18GL, 4SLB emergency generator, one (1) 1,080 hp Solar Saturn T-1001 turbine, one (1) 1.0 MM Btu/hr natural gas line heater, three (3) 0.55 MMBtu/hr reboiler heaters, three (3) DEG dehydration units rated at 117 MMscf/d each, and one (1) 3.48 MMBtu/hr heating system boiler, all of which are fueled by natural gas.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2015 Actual Emissions ¹
Carbon Monoxide (CO)	137.11	60.75
Nitrogen Oxides (NO _x)	851.76	422.2
Particulate Matter (PM _{2.5})	10.07	5.09
Particulate Matter (PM ₁₀)	10.07	5.09
Total Particulate Matter (TSP)	10.07	5.09
Sulfur Dioxide (SO ₂)	0.27	0.103
Volatile Organic Compounds (VOC)	42.42	17.8
Hazardous Air Pollutants	Potential Emissions	2015 Actual Emissions ¹
Benzene	1.26	0.3846
Toluene	0.84	0.2954
Ethylbenzene	0.38	0.1389
Xylene	0.47	0.2016
n-Hexane	0.21	0.0149
Formaldehyde	15.06	7.278
Acetaldehyde	2.13	Not reported
Total HAPs	20.33	8.31

¹ The actual emissions are from SLEIS for 2015.

Title V Program Applicability Basis

This facility has the potential to emit 137.11 tpy of CO, 851.76 tpy of NO_x, and 15.06 tpy of formaldehyde. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, and over 10 tons per year of a single HAP, Columbia Gas Transmission, LLC's Adaline Compressor Station 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	PM from Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for construction/modification

	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 HAPs
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63 Subpart HHH	Natural Gas Transmission MACT
	40 C.F.R. 63 Subpart ZZZZ	Major/Area Source RICE MACT
	40 C.F.R. 63 Subpart DDDDD	Major Source Boiler & Process Htr. MACT
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	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 (if any)
R13-2149C	January 13, 2010	

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

Unless otherwise noted or defined by the context, the language *current permit* in the following discussion means operating permit R30-05100100-2012.

1. **45CSR2 – To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.** The applicable requirements for BLR4, BLR5, BLR6, BLR7, and HTR2 were included in the current permit section 4.0. These requirements have been included in this renewal operating permit section 4.0.

2. **45CSR4 – To Prevent and Control the Discharge of Air Pollutants into the Open Air Which Causes or Contributes to an Objectionable Odor or Odors.** The requirements of this rule are typically incorporated into a Title V permit in the “boilerplate” section of the permit as condition 3.1.4. The current operating permit listed 45CSR§§4-4.1., 6.1., and 6.2., in addition to the typical requirement from 45CSR§4-3.1. 45CSR§§4-6.1. and 6.2. make provisions for when objectionable odors occur, and are not necessary for the operating permit considering that applicable requirement 45CSR§4-4.1. requires the person responsible to report the objectionable odor to the Director. Therefore, condition 3.1.4. has been modified to only include the requirements from 45CSR§§4-3.1. and 4.1., which are the typical boilerplate standard for no objectionable odors and the reporting requirement when an objectionable odor occurs.

3. **45CSR6 – Control of Pollution from Combustion of Refuse.** The flare FLLP1 is subject to the mass rate limit and opacity standards in subsections 4.1., 4.3., and 4.4. These requirements have been included in the renewal operating permit as further discussed below.

Mass Rate Limit

According to technical correspondence, the density of the gas is 0.047 lb/ft³ and heating value is 1,020 Btu/ft³. The flare design capacity is 2.5 MMBtu/hr; therefore the volumetric flow rate is (2.5 MMBtu/hr) / (1,020 Btu/ft³) = 2,451 ft³/hr. Multiplying the volumetric flow rate by the density yields (2,451 ft³/hr) × (0.047 lb/ft³) = 115.2 lb/hr. This weight rate has been used in the equation specified by 45CSR§6-4.1., which is included in renewal permit condition 8.1.7. It is expected that combustion of natural gas will not result in formation of PM, and therefore compliance with this limit is achieved by combusting natural gas.

Opacity Limitations

The 20% opacity limitation in 45CSR§6-4.3. is applicable, but is streamlined by the more stringent standard of no visible emissions in requirement 7.1.2. of R13-2149C (condition 8.1.5.b.). The streamlining language from the current permit condition 14.1.2.b. has been utilized for the Title V condition. The streamlining also accounts for the applicability of the 40% opacity standard for startups prescribed in 45CSR§6-4.4.

4. **45CSR13, Permit No. R13-2149C.** The requirements of this permit have been incorporated into the renewal operating permit as described in the following table.

R13-2149C	Title V	Discussion
General Recordkeeping for Monitoring and Control Devices		
4.1.1.	3.4.1.	The requirement has been cited in the Title V condition 3.4.1., but the emission units in Section 1.0 of R13-2149C have been listed in parenthesis after the citation of authority since this underlying requirement does not apply to all of the sources listed in subsection 1.1. of the Title V permit.
4.1.2.	8.1.3.	The requirement has been written in the renewal permit for the flare FLLP1, which is the only control device listed in Section 1.0 of R13-2149C.
4.1.3.	8.4.2.	The requirement has been written in the renewal permit for the flare FLLP1, which is the only control device listed in Section 1.0 of R13-2149C.
Engine 081G3		
5.1.1.	8.1.1.	The requirement for engine 081G3 has been written in the permit.
5.1.2.	8.1.2.	The requirement for engine 081G3 has been written in the permit.
5.2.1.	None	This requirement refers to facility-wide monitoring in its boilerplate subsection 3.2. No condition is warranted for the Title V permit.

R13-2149C	Title V	Discussion
5.3.1.	None	This requirement refers to facility-wide testing in its boilerplate subsection 3.3. No condition is warranted for the Title V permit.
5.4.1.	8.4.1.	The requirement for engine 081G3 has been written in the permit.
5.5.1.	None	This requirement refers to facility-wide reporting in its boilerplate subsection 3.5. No condition is warranted for the Title V permit.
Reboilers BLR5, BLR6, BLR7		
6.1.1.	4.1.1.	The requirement has been written in the permit. However, since permit R13-2149C affects BLR5, BLR6, and BLR7, but not BLR4 and HTR2, the affected emission units have been specified after a separate underlying permit citation of authority in order clarify the extent of the applicability of the underlying permit requirement.
6.1.2.	4.1.2.	Same as for underlying requirement 6.1.1. and Title V condition 4.1.1. discussed above.
6.1.3.	4.1.3.	The requirement has been written in the permit.
6.1.4.	4.1.4.	The requirement has been written in the permit.
6.2.1.	4.2.1.	The requirement has been written in the permit. Since this underlying permit requirement 6.2.1. is applicable only to BLR5, BLR6, and BLR7, the requirement has been made applicable to BLR4 and HTR2 by including 45CSR§30-5.1.c. in the citation of authority.
6.3.1. 6.4.1. 6.5.1.	None	These requirements refer to facility-wide testing, recordkeeping, and reporting in the underlying permit boilerplate subsections 3.3., 3.4., and 3.5., respectively. No condition is warranted for the Title V permit.
Natural Gas Dehydration Units (DEG-DEHY1, DEG-DEHY2, DEG-DEHY3) not subject to MACT controlled by Flare (FLLP1)		
7.1.1.	8.1.4.	The requirement has been written in the permit.
7.1.2.	8.1.5.	The requirement has been written in the permit.
7.1.3.	8.1.6.	The requirement has been written in the permit.
7.2.1.	8.2.1.	The requirement has been written in the permit.
7.2.2.	8.2.2.	The requirement has been written in the permit.
7.3.1.	8.3.1.	The requirement has been written in the permit.
7.3.2.	8.3.2.	The requirement has been written in the permit.
7.4.1.	8.4.3.	The requirement has been written in the permit.
7.4.2.	8.4.4.	The requirement has been written in the permit.
7.4.3.	8.4.5.	The requirement has been written in the permit. The references to underlying permit subsections 7.2. and 7.3. have been changed to refer to the specific Title V conditions rather than referring to the Title V subsection. This has been done in case any other requirements not in the underlying NSR permit are incorporated into those subsections, thereby appropriately limiting the applicability of this requirement to these specific permit conditions.
7.4.4.	8.4.6.	The requirement has been written in the permit.
7.4.5.	8.4.7.	The requirement has been written in the permit.
7.4.6.	8.4.8.	The requirement has been written in the permit.
7.5.1.	8.5.1.	The requirement has been written in the permit.
7.5.2.	8.5.2.	The requirement has been written in the permit.

The certification of data accuracy at the end of R13-2149C is not mentioned in any of its requirements; therefore, it has not been included in the renewal operating permit.

5. **45CSR13, Permit to Relocate No. R13-2362-P6.** This permit was referenced as being applicable in the 2012 operating permit renewal (condition 21.0.2.). This portable type permit was for the installation of a relocated mobile glycol reclaiming unit consisting of a 0.19 MMBtu/hr boiler/preheater and a 0.20 MMBtu/hr vacuum reboiler. These were identified in the 2012 Title V permit as emission units M-BLR1 and M-BLR2. Requirement A.4. of the underlying permit required the permittee to provide written notification when glycol reclaiming operations have stopped. This writer reviewed the file for permit R13-2362-P6 and no notifications were found. However, the permittee has stated in 12/5/2016 technical correspondence that the sources have been removed from service; therefore, the emission units and associated requirements in permit R13-2362-P6 have not been included in this operating permit renewal.

6. **45CSR17 – To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.** The current Title V permit includes the requirements of 45CSR§17-3.1. and 3.2. as a recordkeeping requirement in condition 3.4.4. While 45CSR§17-3.1. is an applicable standard, and should be in section 3.1., the requirements in 45CSR§17-3.2. may become required by the Director when a person is found in violation of this rule. Since at the time of writing this 2017 renewal permit the permittee has not been found in violation, and the Director has not required the permittee to perform any requirement in 45CSR§17-3.2., it is unnecessary to include the language of 45CSR§17-3.2. Refer to permit condition 3.1.11.

7. **40 C.F.R. Part 63 Subpart HHH - National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities.** This subpart applies to owners and operators of natural gas transmission and storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user (if there is no local distribution company), and that are major sources of hazardous air pollutants (HAP) emissions as defined in §63.1271.

For the diethylene glycol dehydration units (DEG-DEHY1, DEG-DEHY2, and DEG-DEHY3) controlled by the flare (FLLP1) the applicable sections of Subpart HHH are listed in section 1.1. of the current operating permit with a general description of the requirement. The language from the regulation for each of the requirements has been incorporated into the Title V permit renewal as described in Table HHH below. Note that non-applicable language within the regulation has been excluded from each permit condition. The language “this subpart” has been changed to “40 C.F.R. 63 Subpart HHH”.

Table HHH

Title V Condition	Subpart HHH	Requirement and Discussion
7.1.1.	§63.1270(d)(1)	The compliance date has been included in the permit. The last statement about area sources that become major has been excluded since it is not applicable in this case.
7.1.2.	§63.1272(d)	Affirmative defense for violations of emission standards during malfunctions has been included since it was in the current permit and was in the suggested permit language with the application.
General Standards		
None	§63.1274(a)	The general standards and provisions in subpart A may be referred to at any time without specifying them in the operating permit; therefore, no permit condition is warranted.
7.5.1.	§63.1274(b)	This requirement to submit reports to the Administrator has been included in the renewal permit.

Title V Condition	Subpart HHH	Requirement and Discussion
7.1.5.	§63.1274(c)	This section simply requires compliance with other requirements in Subpart HHH. Therefore, wherever §§63.1275 (dehy process vents), 63.1283 (monitoring), 63.1284 (recordkeeping), and 63.1285 (reporting) requirements are incorporated into the operating permit, the appropriate paragraph in §63.1274(c) has been included in the citation of authority.
7.1.3. 7.1.4.	§§63.1274(g) and (h)	These standards regarding repair of leaks regulated by Subpart HHH, and good air pollution control practices, have been incorporated into the renewal operating permit.
Glycol Dehydration Unit Process Vent Standards		
7.1.5.	§63.1275(b)(1)(ii)	<p>The requirements for control to be less than 1 tpy benzene have been incorporated into the renewal operating permit.</p> <p>For the reasons discussed above concerning §63.1274(c), this permit condition also cites §63.1274(c)(1) for glycol dehydration unit process vents.</p>
7.1.6.	§63.1275(b)(2)	<p>The requirements for control for safety vents has been incorporated into the renewal operating permit.</p> <p>For the reasons discussed above concerning §63.1274(c), this permit condition also cites §63.1274(c)(1) for glycol dehydration unit process vents.</p>
7.1.7.	§63.1275(c)(3)(ii)	<p>The requirements for control may be exempted for a flash tank separator if meeting one of the levels specified in §63.1275(c)(3)(i) through (iv). The permittee is meeting the level specified in §63.1275(c)(3)(ii), which has been incorporated into the renewal operating permit.</p> <p>For the reasons discussed above concerning §63.1274(c), this permit condition also cites §63.1274(c)(1) for glycol dehydration unit process vents.</p>
Control Equipment Requirements		
7.1.8. 7.1.9. 7.3.1. 7.1.10.	§§63.1281(a), (c), (d)(1)(iii), (d)(3), (d)(4)(i)	<p>Control Equipment Requirements</p> <ul style="list-style-type: none"> • §63.1281(a) – The first statement of this paragraph provides for the applicability of this section. The second statement provides that compliance with this section shall be by review of records, reports, review of performance tests, and inspections. This paragraph does not require the permittee to do anything. It simply states how a person (other than the permittee) will determine compliance. No permit condition is warranted for this paragraph. • §63.1281(c) – The closed-vent system requirements have been incorporated into the renewal operating permit as condition 7.1.8.

Title V Condition	Subpart HHH	Requirement and Discussion
		<ul style="list-style-type: none"> • §63.1281(d) – The permittee utilizes a flare to meet the requirements of §63.1281(d)(1). The regulation language “...shall be one of the control devices specified in paragraphs (d)(1)(i) through (iii) of this section” has been changed to “...shall be the control device specified in paragraph (iii) of this condition” for precision and clarity of the requirement based upon the permittee’s choice to utilize a flare as the control device. Refer to permit condition 7.1.9. • §63.1281(d)(3) – This paragraph requires that the control device meet the performance requirements of §63.1281(d)(1) by following the procedures in §63.1282(d). Therefore, the permit condition 7.3.1 for §63.1282(d) (discussed below) will also cite §63.1281(d)(3). • §63.1281(d)(4) – Paragraph (i) specifies operational requirements for the flare. Refer to permit condition 7.1.10.
Compliance Procedures		
7.2.1. 7.3.1.	§§63.1282 (a)(2), (b), (d)(1)(i), (d)(2)	Compliance Procedures <ul style="list-style-type: none"> • §63.1282(a)(2) has been included in the renewal operating permit as testing condition 7.2.1. • §63.1282(b) is the <i>No detectable emissions test procedure</i>, which specifies various test methods, and detection instrument criteria and parameters. According to paragraph E.2.c. of USEPA guidance¹ on IBR, test method procedures may be incorporated by reference. Therefore, any applicable requirement included in the renewal operating permit that refers to §63.1282(b) is sufficient in such IBR without further need to include the content of §§63.1282(b)(1) through (8) in the renewal permit as a permit condition. • §63.1282(d) prescribes control device performance test procedures. §63.1282(d)(1) provides for certain control devices that are exempt from the performance tests and design analyses of §63.1282. However, the first exception in §63.1282(d)(1)(i) makes an exception in the case of §63.1282(d)(2). The permittee’s flare is subject to §63.1282(d)(2). That is, flares (as defined in §63.1271) that are designed and operated in accordance with §63.11 are exempt from the requirements to conduct performance tests and design analyses under §63.1282(d), instead, they must meet the provisions of §63.1282(d)(2). Non-applicable language in §63.1282(d) has been excluded from renewal permit condition 7.3.1. Note that this condition also cites §63.1281(d)(3) for the reason discussed above.

¹ U.S. EPA’s White Paper Number 2 for Improved Implementation of the Part 70 Operating Permit Program (March 5, 1996), located at <https://www.epa.gov/sites/production/files/2015-08/documents/wtppr-2.pdf> and accessed by the writer on January 12, 2017.

Title V Condition	Subpart HHH	Requirement and Discussion
Inspection and Monitoring Requirements		
7.3.1. 7.2.2. 7.2.3. 7.2.4. 7.2.5.	§§63.1283 (a), (c), (d)(1), (d)(3)(i)(C), (d)(6), and (d)(7)	<p>Inspection and Monitoring Requirements</p> <ul style="list-style-type: none"> • Since the permittee utilized air emission controls in accordance with §63.1275, then §63.1283 is applicable. §63.1283(a) has been included in the renewal operating permit by citing it with testing procedure condition 7.3.1. • Applicable requirements in §63.1283(c) for the closed-vent system inspection and monitoring requirements have been included in the renewal operating permit as monitoring condition 7.2.2. • Applicable requirements in §§63.1283(d) and (d)(1) for the control device monitoring requirements have been included in the renewal operating permit as monitoring condition 7.2.3. • Applicable requirements in §63.1283(d)(3)(i)(C) for the flare monitoring requirements have been included in the renewal operating permit as monitoring condition 7.2.4. • Applicable requirements in §§63.1283(d)(6) and (d)(7) for defining excursions and violations have been included in the renewal operating permit as monitoring condition 7.2.5.
Recordkeeping		
7.4.1. 7.4.2. 7.4.3. 7.4.4. 7.4.5. 7.4.6.	§§63.1284 (a), (b)(1), (b)(2), (b)(3), (b)(4)(i), (b)(4)(ii)(A), (b)(4)(iii), (b)(4)(iv), (b)(5), (b)(6), (b)(7), (b)(8), (c), (e), and (f)	<p>Recordkeeping</p> <ul style="list-style-type: none"> • §63.1284(a) refers to Table 2 to Subpart HHH wherein are specified the subpart A requirements that are applicable to operators of facilities subject to Subpart HHH. No permit condition is warranted for this paragraph. <p>Recordkeeping requirements in §63.1284(b) are specified in §§63.1284(b)(1) through (10), and have been further discussed below. Each condition's citation of authority also includes a citation of §63.1274(c)(3).</p> <ul style="list-style-type: none"> • Requirements in §§63.1284(b)(1), (2), and (3) have been included in the renewal operating permit as recordkeeping condition 7.4.1. • Requirements in §63.1284(b)(4) have been included in the renewal operating permit as recordkeeping condition 7.4.2. • Requirements in §63.1284(b)(5) through (b)(8) have been included in the renewal operating permit as recordkeeping condition 7.4.3. The requirement in §63.1284(b)(7)(ix) has been excluded since the permittee is not utilizing a carbon adsorption system.

Title V Condition	Subpart HHH	Requirement and Discussion
		<ul style="list-style-type: none"> Requirements in §63.1284(c) for the benzene emission limit have been included in the renewal operating permit as recordkeeping condition 7.4.4. Requirements in §63.1284(e) for the flare have been included in the renewal operating permit as recordkeeping condition 7.4.5. Requirements in §63.1284(f) for malfunctions have been included in the renewal operating permit as recordkeeping condition 7.4.6.
Reporting		
7.5.2. 7.5.3. 7.5.4.	§§63.1285 (a), (b)(5), (b)(6), (d)(2)(i), (ii), and (iii), (d)(7), (d)(9), (e), (f), and (g)	<p>Reporting</p> <ul style="list-style-type: none"> §63.1285(a) refers to Table 2 to Subpart HHH wherein are specified the subpart A requirements that are applicable to operators of facilities subject to Subpart HHH. No permit condition is warranted for this paragraph <p>Reporting requirements in §63.1285 are specified in §§63.1285(a) through (g), and have been further discussed below. Each condition's citation of authority also includes a citation of §63.1274(c)(3).</p> <ul style="list-style-type: none"> Requirements in §63.1285(b)(5) has been cited in the renewal operating permit as Periodic Reports condition 7.5.3, based upon §63.1285(e), further discussed below. Requirements in §63.1285(b)(6) for reporting malfunctions have been included in the renewal operating permit as reporting condition 7.5.2. Requirements in §63.1285(d) for the NOCS have not been included in the renewal operating permit since the NOCS is a one-time report that was submitted within 180 days after the compliance date. Furthermore, there are no on-going requirements in §63.1285(d) for the NOCS. For these reasons, no permit condition is warranted for §63.1285(d). Requirements in §63.1285(e) for Periodic Reports have been included in the renewal operating permit as reporting condition 7.5.3. For the reason discussed above, §63.1285(b)(5) has been cited for this condition as well. The requirement pertaining to condensers in §63.1285(e)(2)(xi) has not been included in the permit. Requirements in §63.1285(f) for Notification of process change have been included in the renewal operating permit as reporting condition 7.5.4.

Title V Condition	Subpart HHH	Requirement and Discussion
		<ul style="list-style-type: none"> Requirements in §63.1285(g) for Electronic reporting have not been included in the renewal operating permit since this paragraph applied to performance testing, and the permittee is only required to perform Method 22 visible emissions observations. Moreover, records of these observations are already a required component of the Periodic reports in permit condition 7.5.3.

8. **40 C.F.R. 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.** This subpart establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations (cf. §63.6580).

The current Title V permit section 1.1. footnote states that the engines 08101, 08102, 08103, 08104 and 08105 are subject to 40 C.F.R. Part 63 Subpart ZZZZ because of being included within the source category, but are not subject to requirements at this time according to 40 C.F.R. §63.6600(c) and 40 C.F.R. §63.6590(b)(3)(i). This determination remains accurate for this renewal.

For the existing 440-hp 4SLB emergency generator 081G3 the applicable sections of Subpart ZZZZ are listed in section 1.1. of the current operating permit with a general description of the requirement. The language from the regulation for each of those requirements listed below has been incorporated into the Title V permit renewal as described in Table ZZZZ below. Note that non-applicable language within the regulation has been excluded from each permit condition where doing so does not affect the coherence of the condition.

Table ZZZZ

Title V Condition	Subpart ZZZZ	Requirement and Discussion
5.1.2.	§63.6595(a)	The applicable compliance date is October 19, 2013.
5.1.1.	§63.6602 Table 2c Item 6	The applicable substantive requirement for the engine are the work practices in item 6 of Table 2c to Subpart ZZZZ, which have been set forth as a permit condition. In footnote 2 to the condition’s table, a parenthetical reference to permit condition 5.2.4. (i.e., oil analysis program) has been added.
5.1.3.	§§63.6605(a) and (b)	This section sets forth general compliance requirements. The language “emission limitations” has been excluded from the condition since 081G3 is not subject to Subpart ZZZZ emission limitations.
5.2.1.	§63.6625(e)	This requirement is related to following manufacturer’s instructions for operation of the RICE. The language in §63.6625(e) has been combined with the applicable engine type specified in §63.6625(e)(2). The regulation language “and after-treatment control device (if any)” has been excluded since no control device is utilized for the engine.
5.2.2.	§63.6625(f)	This applicable section requires the installation of an hour meter if not already installed.

Title V Condition	Subpart ZZZZ	Requirement and Discussion
5.2.3.	§63.6625(h)	This applicable section requires the permittee to minimize idle start time. The regulation language “after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply” has been excluded from the permit condition since the engine is subject only to work practices and is not subject to Subpart ZZZZ emission standards.
5.2.4.	§63.6625(j)	This applicable section provides for utilization of the oil analysis program, which is referenced in footnote 2 of permit condition 5.1.1. The non-applicable Table 2d and items in Table 2c have been excluded from the permit condition for precision.
5.2.1.	§63.6640(a) Table 6 Item 9	This applicable section requires continuous compliance with the applicable work practices. This requirement has been combined with the requirement in §63.6625(e).
None	§63.6640(b)	This requirement applies to sources subject to Subpart ZZZZ emission or operating limits. In this case, the unit is subject only to work practice standards. Condition 5.5.2. based upon §63.6650(f) requires the permittee to report all deviations, and the definition of <i>Deviation</i> in §63.6675 includes failing to meet any requirement or obligation established by Subpart ZZZZ, which includes work practice standards. Based upon these facts, it is not necessary to include §63.6640(b) in the operating permit.
5.5.1.	§63.6640(e)	This applicable section requires reports pertaining to Table 8. This requirement has been incorporated into the renewal permit.
5.1.4.	§63.6640(f)	This applicable section sets forth emergency operating limitations. §63.6640(f)(4) has been excluded since it pertains to area sources of HAP.
None	§§63.6645(a) and (a)(5)	None of the notifications specified in §63.6645(a) (including initial notification) are required since 081G3 is an existing stationary emergency RICE exempted in §63.6645(a)(5).
None	§63.6650(d)	This requirement is to report deviations from an emission or operating limitation. RICE 081G3 is not subject to Subpart ZZZZ emission or operating limitations; therefore, this section is not applicable. Further, other deviations under this subpart must be reported pursuant to §63.6640(b), which has been incorporated into the operating permit renewal.
5.5.2.	§63.6650(f)	This requirement is to report deviations in the Title V semi-annual monitoring report.
None	§63.6655(a)	This requirement is to keep records if complying with a Subpart ZZZZ emission or operating limitation. RICE 081G3 is not subject to Subpart ZZZZ emission or operating limitations; therefore, this section is not applicable.
None	§63.6655(d)	<p>This requirement states that “<i>You must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you.</i>”</p> <p>First, there are no records in Table 6 applicable to RICE 081G3. Within Table 6, only item 9 is applicable. Item 9 is the requirement to operate and maintain the RICE according to the manufacturer’s emission-related instructions, or develop and follow your own maintenance plan. There is no specific recordkeeping mentioned in item 9 of Table 6, or at the heading of Table 6.</p>

Title V Condition	Subpart ZZZZ	Requirement and Discussion
		<p>Second, the applicable recordkeeping of maintenance performed for 081G3 is in §63.6655(e), which will be addressed below.</p> <p>Third, all applicable requirements in Table 6, item 9, have been incorporated into the permit as condition 5.2.1.</p> <p>Finally, this requirement is for demonstrating compliance with each “emission or operating limitation that applies to you.” As mentioned several times above, RICE 081G3 is not subject to Subpart ZZZZ emission or operating limitations; therefore, this requirement is not applicable.</p>
5.4.1.	§63.6655(e)	This requirement is for keeping records of maintenance performed. The regulation language in §§63.6655(e) and (e)(2) have been combined for one permit condition.
5.4.2.	§63.6655(f)	This requirement is for keeping records of operating hours. The regulation language in §§63.6655(f) and (f)(1) have been combined for one permit condition.
5.4.3.	§63.6660	This requirement is for the accessibility and retention period of the Subpart ZZZZ records.
5.1.5.	§63.6665	General Provisions. Except as specified in §63.6645(a)(5), the following do not apply: §§63.7(b) and (c), 63.8(e), (f)(4), and (f)(6), and 63.9 (b)-(e), (g), and (h)

Other requirements in Subpart ZZZZ not addressed in the table above are not applicable to the emergency generator engine 081G3 for one or more of the following reasons:

- The engine is not new or reconstructed, as these terms are specified in §63.6675.
- The engine is not subject to pollutant emission limits or operating limitations pursuant to 40 C.F.R. 63 Subpart ZZZZ.
- The engine is not equipped with an add-on air pollution control device.
- The engine does not combust a fuel to which the requirement applies.
- The horsepower range for the requirement does not apply to the engine.
- The combustion cycle for the requirement does not apply to the engine.
- The engine is not a *Limited use stationary RICE*, as this term is defined in §63.6675.
- The engine is not monitored with a CMS, CPMS, or CEMS.

9. **40 C.F.R. 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.** This subpart establishes national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and work practice standards.

Affected Source Designation

The facility is a major source of the HAP formaldehyde. The permittee operates two sources subject to this regulation, which are given in the following table. Other sources not subject to Subpart DDDDD are discussed after the table.

Emission Unit ID	Emission Unit Description	Year Installed	Design Capacity	Control Device	Unit Type
BLR4	Heating System Boiler; American Standard Model #1-B-J-3	1961	3.48 MMBtu/hr	None	Boiler
HTR2	Natural Gas Line Heater BS&B Model #70S-2	1956	1.0 MMBtu/hr	None	Process Heater

Reboilers BLR5, BLR6, and BLR7 not subject to Subpart DDDDD

The DEG Dehydrator Reboiler/Regenerators designated as BLR5, BLR6, and BLR7, are not subject to the requirements of Subpart DDDDD in accordance with §63.7491(h), which exempts “[a]ny boiler or process heater that is part of the affected source subject to another subpart of this part, such as boilers and process heaters used as control devices to comply with subparts JJJ, OOO, PPP, and U of this part.” The reboilers BLR5, BLR6, and BLR7 are each part of a glycol dehydration unit (i.e., an affected source) subject to 40 C.F.R. Part 63, Subpart HHH. The definition of *Glycol dehydration unit* in §63.1271 states that the reboiler is part of the affected source in its next to last statement: “This [“rich”] glycol is then regenerated in the glycol dehydration unit reboiler.” Clearly, the reboiler is part of the affected source because the reboiler is necessary for the removal of water from the rich glycol. To meet the exemption in §63.7491(h) it is only necessary for the emission unit to be “part of the affected source”, and not necessarily be a control device for the affected source. This interpretation is consistent with the exemption when it provides examples by stating “such as”. The exemption is not stating that the unit must be a control device for an affected source subject to another MACT. The exemption is simply providing examples. For these reasons, it has been determined that the reboilers BLR5, BLR6, and BLR7, are not subject to the requirements of Subpart DDDDD.

Applicable Substantive Requirements

Construction commenced for BLR4 and HTR2 before June 4, 2010, which is the new source construction date in §63.7490(b). The units are therefore existing (§63.7490(d)). The units do not meet any of the exemption criteria in §63.7491. These units are categorized in the “Units designed to burn gas 1 fuels” sub-category since they burn only natural gas (§63.7499(l) and §63.7575). The units must be in compliance with Subpart DDDDD as of January 31, 2016 (§63.7495(b)). According to technical correspondence received from the permittee on 12/5/2016, none of the units are equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio. The units are subject to the requirement in §63.7500(a)(1) to meet each applicable standard in Tables 1 through 3, and 11 through 13, of Subpart DDDDD. Within these tables, the requirement that applies to the units is Item 1 in Table 3 since each unit’s heat input capacity is less than 5 MMBtu/hr combusting a gas 1 fuel. Further, because the facility operates existing affected sources located at a major source of HAPs, the permittee is also subject to Item 4 in Table 3. To summarize, the substantive requirements applicable to BLR4 and HTR2 are:

- The permittee must conduct a **tune-up every five (5) years** per Item 1 in Table 3 to Subpart DDDDD. Specifically, §63.7540(a)(12) is applicable and requires the tune-up, and refers to the requirements in §63.7540(a)(10) to demonstrate continuous compliance. The permittee’s NOCS (dated March 30, 2016) states that the initial tune-up has been completed for HTR2 and BLR4.
- The permittee must complete a **one-time energy assessment** as required by Item 4 in Table 3. The permittee’s NOCS (dated March 30, 2016) states that an energy assessment was performed on July 8, 2015.

Incorporation of Applicable Requirements into the Title V Operating Permit

Table DDDDD below lists the sections of Subpart DDDDD and their applicability (and non-applicability where necessary) to the affected emission units BLR4 and HTR2, and discusses how the applicable requirements are incorporated into the renewal operating permit. Based upon U.S. EPA guidance², the permit will include all applicable emission limitations and standards, and all applicable monitoring and reporting to assure compliance with the limitations and standards. Monitoring, recordkeeping, reporting, and all other applicable requirements necessary to assure compliance with the permit terms will not be IBR. Paraphrasing of regulation language will not be utilized. However, as much as practicable, non-applicable regulatory language has been excluded from permit conditions for precision and disambiguation of the permit terms.

Table DDDDD

Subpart DDDDD Section	Title V	Discussion
§63.7495(b)	6.1.1.	The applicable compliance date requirement for existing sources is January 31, 2016. The substantive requirements for the unit are the 5-year tune-up and one-time energy assessment (cf. discussion below of §63.7500(a)), which must be complete no later than this date in accordance with §63.7510(e) (also discussed below). The permittee has completed both of these according to the NOCS dated 3/30/2016. The compliance date has been included as permit condition 6.1.1. Typically, this writer does not include compliance dates that are past in a renewal Title V permit. However, since there are other MACT subparts that apply to sources at the facility, and the permittee included the compliance date in the suggested permit language in the application, the compliance date has been incorporated into the Title V permit.
§63.7495(d)	None	This section references the notification requirements in §63.7545. In particular, the requirements of §63.7545(b) are applicable, and the permittee has submitted the initial notification accordingly. Since at the time of this renewal the 120-day period after January 31, 2013 has passed, and there are no on-going requirements in this section, no permit condition is required.
Limitations and Standards		
§63.7500(a)(1)	6.1.2.	<u>Work Practice Standards:</u> §63.7500(a)(1) requires the permittee to meet each limit and standard in Tables 1 through 3, and 11 through 13 of Subpart DDDDD. However, the unit is not subject to the emission limits in Tables 1 and 2 or 11 through 13, or the operating limits in Table 4 in accordance with the last sentence in §63.7500(e) (discussed below). Therefore, only Table 3 work practice standards must be examined for burning gas 1. Item #1 of Table 3 is applicable to the unit, which requires a tune-up every 5 years (condition 6.1.2.). Additionally, the one-time energy assessment prescribed in item #4 of Table 3 is applicable since the unit is existing; is located at a major source of HAP; and it is not a limited use unit. According to the NOCS dated 3/30/2016, the facility had an energy assessment performed according to this section. Since this is a one-time requirement that has been completed and there are no other ongoing requirements associated with the energy assessment, a permit condition embodying item #4 of Table 3 to Subpart DDDDD is not warranted.
§63.7500(a)(2)	None	This paragraph is not applicable to the units.

² U.S. EPA’s White Paper Number 2 for Improved Implementation of the Part 70 Operating Permit Program (March 5, 1996), located at <https://www.epa.gov/sites/production/files/2015-08/documents/wtpr-2.pdf> and accessed by the writer on November 2, 2016.

Subpart DDDDD Section	Title V	Discussion
§63.7500(a)(3)	6.1.2.	The general duty requirement in §63.7500(a)(3) is applicable and is therefore included in the permit.
§63.7500(b)	None	The application does not mention any request (or intent to request) alternative work practice standards; therefore, this requirement is not applicable.
§63.7500(c)	None	This requirement is not applicable to the units since they are not limited use.
§63.7500(d)	None	This requirement is not applicable to the units since they are not in either the Gas 2 or light liquid fuel subcategories.
§63.7500(e)	6.1.2.	The units qualify for the first range of design heat input (DHI) in this requirement since they combust gas 1 fuel at a rate less than 5 MMBtu/hr. This requirement, however, simply reiterates the requirement in §63.7500(a) to conduct a tune-up every 5 years. Therefore, this requirement has been added to the citation of authority for the permit condition. Additionally, this requirement does provide that while burning gas 1, the unit is not subject to the emission limits in Tables 1 and 2 or 11 through 13, or the operating limits in Table 4, which has already been considered in the discussion of §63.7500(a).
§63.7500(f)	None	This section requires compliance with the standards at all times the affected unit is operating, except during periods of startup and shutdown during which time the permittee must comply only with Table 3 to Subpart DDDDD. However, the startup and shutdown requirements of Table 3 (items #5 and #6) are not applicable since they pertain to standards in Tables 1 or 2 or 11 through 13 of Subpart DDDDD. Moreover, the requirement to conduct a tune-up and energy assessment is not affected whether the unit is normally operating, or is in a period of startup or shutdown. Thus, this section of the regulation does not apply.
§63.7505(a)	6.1.2.	This section requires compliance with the emission limits, work practice standards, and operating limits in Subpart DDDDD. The section is cited with the condition for the tune-up work practice standard.
Initial Compliance Requirements		
§63.7510(e)	None	This section states that the initial tune-up and one-time energy assessment must be complete before the compliance date. According to the NOCS dated 3/30/2016, the permittee has completed both of these requirements before the compliance date; therefore, including this requirement in the permit is not necessary.
§63.7515(d)	6.1.2.	This section requires the tune-ups to be no more than 61 months after the previous tune-up. Therefore, this applicable requirement has been included in the permit condition as the first bullet statement.
§63.7515(g)	6.1.2.	The last statement in this requirement reads, “You must complete a subsequent tune-up by following the procedures described in §63.7540(a)(10)(i) through (vi) and the schedule described in §63.7540(a)(13) for units that are not operating at the time of their scheduled tune-up.” The sections referred to within this requirement have been included in the permit condition; therefore, §63.7515(g) has been added to the citation of authority for the permit condition.
§63.7530(a)	None	This section regarding initial performance tests and fuel analyses is not applicable since the units are not subject to emission limits.

Subpart DDDDD Section	Title V	Discussion
§63.7530(b)	None	This section regarding performance testing and fuel analyses is not applicable since the units are not subject to emission limits, and thereby are not subject to Subpart DDDDD testing and fuel analyses.
§63.7530(c)	None	This section regarding fuel analyses is not applicable since the units are not subject to emission limits.
§63.7530(e)	None	The NOCS (dated 3/30/2016) states that the facility had an energy assessment performed on July 8, 2015. It does not specify that it was completed according to Table 3 of Subpart DDDDD, or that it was an accurate depiction of the facility at the time of the assessment. It also does not mention on-site technical hours. However, since the NOCS has been submitted and there are no ongoing requirements in this section, no permit condition is warranted.
§63.7530(f)	None	This requirement states the NOCS must contain the results of the initial compliance demonstration according to §63.7545(e). Since the NOCS has been submitted and there are no ongoing requirements in this section, no permit condition is warranted.
§63.7533	None	The unit is not complying using the alternative equivalent output-based emission limits; therefore, no permit condition is warranted.
Continuous Compliance Requirements		
§63.7535	None	The unit is not subject to a Subpart DDDDD requirement to monitor and collect data pursuant to this section.
§63.7540(a)(10)	6.1.2.	The introductory paragraph of this section does not apply to the units because they are each rated less than 10 MMBtu/hr. However, the specific requirements for tune-ups within §§63.7540(a)(10)(i) through (vi) are applicable since they are referenced in applicable requirement in §63.7540(a)(12). §63.7540(a)(10)(vi)(C) has been excluded since the unit is only capable of burning natural gas.
§63.7540(a)(11)	None	This section does not apply since the units are subject to §63.7540(a)(12).
§63.7540(a)(12)	6.1.2.	This section is applicable since the units are each rated less than 5 MMBtu/hr heat input.
§63.7540(a)(13)	6.1.2.	This requirement allows a 30-day delay for the tune-up if the unit is not operating the day the tune-up is scheduled. Since this pertains to the tune-up it has been written as the second bullet statement in the permit condition.
§63.7540(b)	6.5.1.	The purpose of this requirement is to report deviations to applicable requirements. While the requirement reads that it pertains to emission limits and operating limits (to which the units are not subject), it also pertains to those requirements in Tables 1 through 4 or 11 through 13. The units are subject to a work practice standard in Table 3 (conditions 6.1.2.). Therefore, the condition has been written to refer to work practice standards in Table 3.
§63.7540(c)	None	This section is not applicable since the units are not subject to Subpart DDDDD mercury limitations or standards.
§63.7540(d)	None	This section is not applicable since items #5 and #6 in Table 3 apply to units subject to emission limits in Table 1 or 2 or 11 through 13 to Subpart DDDDD, to which the units in this case are not subject.
Notification, Reports, and Records		
§63.7545(a)	None	<p>§§63.7(b) and (c) are not applicable since the units are not subject to Subpart DDDDD performance testing.</p> <p>§63.8(e) is not applicable since no CMS is utilized.</p>

Subpart DDDDD Section	Title V	Discussion
		<p>§§63.8(f)(4) and (6) are not applicable since neither an alternative monitoring method, nor an alternative to the relative accuracy test is utilized.</p> <p>Among §§63.9(b) through (h), only the NOCS requirement of §63.9(h) is applicable. However, the NOCS has been submitted and there are no ongoing requirements in this section; therefore, no permit condition is warranted.</p>
§63.7545(b)	None	This operating permit renewal is past the 120-day period after January 31, 2013; therefore, no permit condition is required.
§63.7545(c)	None	This section is not applicable since the units were constructed prior to January 31, 2013.
§63.7545(d)	None	This section is not applicable since the units are not subject to a Subpart DDDDD performance testing requirement.
§63.7545(e)	None	The NOCS has been submitted and there are no ongoing requirements in this section; therefore, no permit condition is warranted.
§63.7545(f)	None	This requirement is not applicable since the permittee does not intend to use a fuel other than natural gas.
§63.7545(g)	None	This section is not applicable since the units will not combust solid waste.
§63.7545(h)	None	This requirement is not applicable since the permittee does not combust any fuel other than natural gas in the units.
§63.7550(a)	6.5.2.	This section points to Table 9 of Subpart DDDDD, which requires a compliance report. The requirements in Table 9 are based on items that can vary as to applicability. Therefore, the condition is written based on applicable requirements in Table 9. Non-applicable language (e.g., emission limits, operating limits, startups/shutdowns, and CMS-related) is excluded from the condition. Furthermore, since the unit is subject to the 5-year frequency for tune-ups, the compliance report frequency will be submitted at the same frequency.
§63.7550(b)	6.5.2.	The requirements of this section are referenced by §63.7550(a), Table 9. Since the unit is on a 5-year tune-up frequency, the applicable language of §63.7550(b)(1) through (5) are included in condition 6.5.2.
§63.7550(c)	6.5.2.a.	The requirements of this section are referenced by §63.7550(a), Table 9. Only certain sections of the requirements in §63.7550(c)(1) through (5) are applicable. Requirement §63.7550(c)(2) is not applicable since fuel analyses is not utilized. Requirement §63.7550(c)(3) is not applicable since there are no applicable emission limits and performance testing is not utilized. Requirement §63.7550(c)(4) is not applicable since there are no applicable emission limits and a CMS is not utilized. Only §63.7550(c)(1) is applicable, which references §63.7550(c)(5). §63.7550(c)(1) specifies that paragraphs §63.7550(c)(5)(i) through (iii), (xiv), and (xvii) apply. Since the unit is not limited use, §63.7550(c)(5)(iv) is not applicable per §63.7550(c)(1).
§63.7550(d)	None	This section is not applicable since the units are not subject to Subpart DDDDD emission limits.
§63.7550(e)	None	This section is not applicable since the units are not subject to a Subpart DDDDD emission limit, operating limit, or CMS requirement.
§63.7550(f)	None	This section is reserved.
§63.7550(g)	None	This section is reserved.

Subpart DDDDD Section	Title V	Discussion
§63.7550(h)(1)	None	This requirement is not applicable since no Subpart DDDDD performance test is required.
§63.7550(h)(2)	None	This requirement is not applicable since no CEMS is utilized or required by Subpart DDDDD.
§63.7550(h)(3)	6.5.2.	Since this requirement pertains to the report required by Table 9 of Subpart DDDDD, then it is also written with the compliance report condition.
§63.7555(a)	6.4.1.	This applicable recordkeeping requirement is set forth as a permit condition. The language in this paragraph refers to semiannual compliance reports. The permittee is required to submit a compliance report every 5 years based upon the applicable tune-up frequency. To clarify that the permittee is not subject to a semiannual compliance report under Subpart DDDDD, an italicized note has been added to refer to the 5-year frequency specified in condition 6.5.2.
§63.7555(b)	None	This section is not applicable since CEMS, COMS, and CMS are not utilized.
§63.7555(c)	None	None of the requirements in this section, or Table 8 that it references, are applicable since the units are not subject to emission limitations and are not equipped with air pollution control devices.
§63.7555(d)	None	This section is not applicable since the units are not subject to emission limitations and operating limitations in Tables 1, 2, or 11 through 13 of Subpart DDDDD.
§63.7555(e)	None	This section is not applicable since the units are not subject to emission limitations, and thus emissions averaging is not applicable.
§63.7555(f)	None	This section is not applicable since efficiency credits are not being utilized.
§63.7555(g)	None	This section is not applicable since the units are not required to meet the specification for mercury.
§63.7555(h)	None	This section is not applicable since the units will not use an alternative fuel other than natural gas.
§63.7560	6.4.2.	These applicable recordkeeping requirements are set forth as a permit condition.

Other requirements in Subpart DDDDD not addressed in the table above are not applicable to emission units BLR4 and HTR2 for one or more of the following reasons:

- The units are not new or reconstructed, as these terms are specified in §§63.7490(b) and (c).
- The units are not an EGU.
- The units are not subject to pollutant emission limits pursuant to 40 C.F.R. 63 Subpart DDDDD.
- The units are not equipped with an add-on air pollution control device.
- The fuel subcategory for the requirement does not apply to the units.
- The heat input range for the requirement does not apply to the units.
- The units are not a *limited-use boiler or process heater*, as this term is defined in §63.7575.
- The units do not combust another gas 1 fuel.
- The units do not utilize a CMS, CEMS, COMS, or CPMS to comply with any Subpart DDDDD requirement.

10. Miscellaneous Revisions

- a. The turbine engine/centrifugal compressor identified as emission unit number 08106 has been deleted from permit subsection 1.1. due to having been removed from service.
- b. In permit subsection 1.1. the emission point ID has been changed from E07 to A07 for the Mercaptan Tank (Em. Unit A07) as specified by the permittee in the renewal application.
- c. The emission unit IDs for the boiler and heater have been added to permit shield paragraphs 3.7.2.a. and 3.7.2.d.

Non-Applicability Determinations

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

- a. **45CSR10 – To Prevent and Control Air Pollution from the Emission of Sulfur Oxides** – This rule is not applicable to the facility’s boiler (BLR4) and heater (HTR2) because their maximum design heat input (DHI) is less than 10 MMBtu/hr.
- b. **45CSR21– To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds** – All storage tanks at the station, which are listed as insignificant sources, are below 40,000 gallons in capacity which exempts the facility from 45CSR§21-28. The compressor station is not engaged in the extraction or fractionation of natural gas which exempts the facility from 45CSR§21-29.
- c. **45CSR27 – To Prevent and Control the Emissions of Toxic Air Pollutants** – Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.
- d. **40 C.F.R. 60 Subpart Dc – Standards of Performance for Steam Generating Units** – The heating system boiler (BLR4) and line heater (HTR2) at this facility are both less than 10 mmBtu/hr; Hence Subpart Dc is not applicable in accordance with §60.40c(a).
- e. **40 C.F.R. 60 Subpart K, Ka – Standards of Performance for Storage Vessels for Petroleum Liquids** – All tanks at the facility are below 40,000 gallons in capacity as specified in §60.110a(a).
- f. **40 C.F.R. 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels** – All tanks at the facility are below 75m³ (19,813 gallons) in capacity as specified in §60.110b(a).
- g. **40 C.F.R. 60 Subpart GG – Standards of Performance for Stationary Gas Turbines** – The Solar Turbine was installed in 1966 which predates this NSPS’s applicability trigger date of October 3, 1977 as defined in §60.330(b).
- h. **40 C.F.R. 60 Subpart KKK – Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant** – This compressor station is not engaged in the extraction or fractionation of natural gas liquids from field gas, the fractionation of mixed natural gas liquids to natural gas products, or both.
- i. **40 C.F.R. 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines** – There are no compression ignition engines at this facility.

- j. **40 C.F.R. 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines:** All engines at the facility were constructed, reconstructed, or modified prior to the June 12, 2006 applicability date listed in §60.4230(a)(4).
- k. **40 C.F.R. 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines –** The Solar Turbine was installed in 1966, which predates this NSPS’s applicability date of February 18, 2005 as specified in §60.4305(a).
- l. **40 C.F.R. 60 Subpart OOOO – Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution –** This subpart does not apply to the facility since the facility is a transmission facility. So it is exempt from the requirements for gas wells, centrifugal compressors, reciprocating compressors, and/or pneumatic controllers. Although this applies to storage vessels located at transmission facilities, there have been no storage vessels constructed, modified, or reconstructed after August 23, 2011 in accordance with §60.5365(e).
- m. **40 C.F.R. 60 Subpart YYYY – Turbine MACT –** The Solar Turbine which was installed in 1966 was constructed prior to the January 14, 2003 compliance date, and is therefore considered an exempt existing source in accordance with §63.6090(b)(4).
- n. **40 C.F.R. Part 64 – Compliance Assurance Monitoring (CAM) –** There are no add-on controls at this facility, with the exception of the DEG dehys, which are subject to 40 C.F.R. 63, Subpart HHH; therefore, in accordance with 40 C.F.R. §64.2(b)(1)(i), CAM is not applicable to HAPs emitted from these sources. Moreover, the DEG Dehys are not subject to any other non-exempt pollutant limitation (such as VOC or PM), thereby not meeting the applicability criterion in §64.2(a)(1). Based upon these facts, CAM does not apply to any source at the facility.

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: February 3, 2017
Ending Date: March 6, 2017

Point of Contact

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

Denton B. McDerment, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478
denton.b.mcderment@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)

Public Comments

The permittee's consultant, SLR International Corporation, submitted the following comment via e-mail on February 23, 2017:

- The company would like the site's address reflected as the following:

18123 Fish Creek Rd. Cameron, WV 26033

The requested change has been made on page 1 of the final permit.

The permittee's consultant, SLR International Corporation, submitted the following comments via e-mail on the last day of the comment period, March 6, 2017:

- Condition 5.5.1 – This reporting condition applied to sources with emission or operating limits and what we have for the generator is considered a work practice standard. I know EPA's language related to operating limits is somewhat misleading at best in ZZZZ, but I feel it applies to the requirements to install oxidation catalyst or NSCRs on area sources greater than 500 Hp in non-remote areas.
 - Response – The requirement had been included in the draft permit since §63.6640(b) generally refers to requirements in Table 2c, which contains the applicable work practice standards. However, considering that draft condition 5.5.3. based upon §63.6650(f) requires the permittee to report all deviations, and the definition of *Deviation* in §63.6675 includes failing to meet any requirement or obligation established by Subpart ZZZZ, then it is not necessary to include §63.6640(b) in the final operating permit. Moreover, §63.6640(b) requires the deviations be reported according to the requirements in §63.6650. Based upon these facts, the requested change has been made and subsequent conditions renumbered. The discussion of Subpart ZZZZ in this final Fact Sheet has also been revised to reflect this change.
- Condition 7.5.5 – The reporting of stack testing will not apply to the dehy flares since they are only required to conduct VE testing.
 - Response – Considering that the semiannual Periodic Report requirement in condition 7.5.3. specifies that for a flare, the records specified in §63.1284(e) must be reported, and this includes all visible emission readings as specified in permit condition 7.4.5., then there is no relaxation or elimination of reporting by not including §63.1285(g). For this reason, the electronic reporting specific requirements in draft condition 7.5.5. based upon §63.1285(g) have been removed for the final permit.

U.S. EPA Comments

Mr. Paul Wentworth with U.S. EPA Region III submitted the following statement in a 3/13/2017 e-mail:

I have done a detailed review of this permit. This review included but was not limited to verifying that the permit contains all the appropriate requirements and emissions limits; checking that adequate emissions monitoring is included to assure compliance for each emissions limits, reviewing actual and potential emissions calculations contained in the application. Upon the completion of the review, I can find no reason to object to the issuance of this permit.

Other Changes

The content of permit conditions 3.5.3., 3.5.5., and 3.5.6. has been modified to include new instructions and e-mail addresses for electronic submittal of information specified in the conditions.