

Fact Sheet



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

Permit Number: **R30-04100012-2017**
Application Received: **August 17, 2016**
Plant Identification Number: **041-00012**
Permittee: **Dominion Transmission, Inc**
Facility Name: **Sweeney Compressor Station**
Mailing Address: **925 White Oaks Blvd., Bridgeport, WV 26330**
Revised: NA

Physical Location: Camden, Lewis County, West Virginia
UTM Coordinates: 530.50 km Easting • 4328.80 km Northing • Zone 17
Directions: Interstate I-79 North to the Weston/Buckhannon exit (exit 99). Take Route 33 to Weston. Go straight through two stoplights and at the third light (at Main Street) turn left. Go one block to 2nd Street, next light, and turn right, following Route 33 West. Travel approximately 6 miles to Camden. Turn right on County Route 9 and go 6.3 miles to County Route 6 and go 1.7 miles. Station is on left side of road across a small bridge.

Facility Description

Sweeney Station is a storage and compressor facility that services a natural gas storage pool and pipeline system covered by Standard Industrial Classification (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of four (4) natural gas fired reciprocating compressor engines, two (2) non-emergency auxiliary generators, one (1) dehydration unit with flare, one (1) reboiler, one (1) boiler and eleven (11) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2015 Actual Emissions
Carbon Monoxide (CO)	184.09	58.56
Nitrogen Oxides (NO _x)	1,092.01	315.78
Particulate Matter (PM _{2.5})	7.78	0.17
Particulate Matter (PM ₁₀)	7.78	0.99
Total Particulate Matter (TSP)	10.48	1.94
Sulfur Dioxide (SO ₂)	0.17	0.06
Volatile Organic Compounds (VOC)	180.58	48.61

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2015 Actual Emissions
Total HAPs	12.33*	6.72

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

**Each individual HAP is less than 10 tons per year*

Title V Program Applicability Basis

This facility has the potential to emit 1,092.01 tons per year of Nitrogen Oxides, 184.09 tons per year of Carbon Monoxide, and 180.58 tons per year of Volatile Organic Compounds. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Dominion Transmission, Inc.'s Sweeney 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	To Prevent And Control Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers
45CSR6	Open burning prohibited.
45CSR10	To Prevent And Control Air Pollution From The Emission Of Sulfur Oxides
45CSR11	Standby plans for emergency episodes.
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation

WV Code § 22-5-4 (a) (14) 45CSR30 45CSR34 40 C.F.R. Part 61 40 C.F.R. Part 63, Subpart ZZZZ 40 C.F.R. Part 82, Subpart F <u>State Only:</u> 45CSR4 45CSR17	The Secretary can request any pertinent information such as annual emission inventory reporting. Requirements For Operating Permits. Emission Standards For Hazardous Air Pollutants. Asbestos inspection and removal National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines Ozone depleting substances No objectionable odors. To Prevent And Control Particulate Matter Air Pollution From Materials Handling, Preparation, Storage And Other Sources Of Fugitive Particulate Matter
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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>)
R13-2498B	July 25, 2011	

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 a renewal of the Title V permit which was issued on June 12, 2012. Changes to the most recent version of the Title V Permit consist of the following:

- 1) **Title V Boilerplate changes:**
 - **Conditions 3.5.3., 3.5.5. and 3.5.6.** - These conditions were revised to require electronic submittal of the Title V compliance certifications (annual and semi-annual), self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols to the WV DAQ.
- 2) **Emission Units Table Section 1.1** – The following changes have been made to the equipment table:
 - The type of engine has been added to the description for the Compressors and auxiliary generators (i.e., “2SLB” for EN01, EN02, EN03, EN04 and “4SRB” for AUX03 and AUX04)

- The description for the Auxiliary Generators AUX03 and AUX04 has been revised to indicate they are non-emergency.
- Tank TK07 was previously described as a produced fluids tank. The description has been corrected to show it as a distillate oil tank.
- The flare (FL02) design capacity was previously shown to be 99% destruction efficiency. At the permittee's request, the design capacity has been changed to 4.0 mmBtu/hr.
- The equipment table has been updated to add the following equipment which has been previously added to the facility:
 - BLR02 - Cleaver Brooks Boiler (3.5 MMBtu/hr)
 - TK10 - 2,000 gal Horizontal Aboveground Storage Tank (Produced Fluids)
 - TK11 - 1,000 gal Horizontal Aboveground Storage Tank (Produced Fluids)
 - TK12 - 455 gal Horizontal Aboveground 7-Chambered Storage Tank (Lube Oil)
 - TK13 - 1,000 gal Horizontal Aboveground Storage Tank (Triethylene Glycol)
 - TK14 - 4,000 gal Horizontal Aboveground Storage Tank (Distillate Oil)
- The equipment table has been updated to remove the following equipment which has been previously removed from the facility:
 - CPR01 - Waukesha XAHU-5746X Emergency Air Compressor (50 hp)
 - HTR01 - Parkersburg IH3000 Pipeline Heater (3.0 MMBtu/hr)
 - BLR01 - Weil-McLain Boiler (3.74 MMBtu/hr)
 - TK04 - 65 gal Horizontal Aboveground Storage Tank (Methanol)
 - TK08 - 4,200 gal Vertical Aboveground Storage Tank (Triethylene Glycol)
 - TK09 - 4,200 gal Vertical Aboveground Storage Tank (Ethylene Glycol)
- 3) **Condition 3.1.12.** – This condition has been deleted. It contained the requirements of R13-2498B §4.1.22. which are obsolete.
- 4) **Condition 3.4.2.** – This condition has been re-written to combine the Title V permit and R13-2498B permit boilerplate language. The requirements from 40 CFR §63.10(b)(1) which are required by 40 CFR §63.6660 have also been added to this condition.
- 5) **Condition 3.7.2.** – The permittee requested a permit shield for several non-applicable regulations. They have been included in this condition of the permit.
- 6) **Condition 5.1.5.** – The exception language in this condition has been deleted for two reasons.
 - First, although the language is part of 45CSR§10-4.1 it is not included in the R13-2498B permit condition.

- Second, the exceptions in 45CSR§§10-4.1.a. through 4.1.e. are not applicable to the Sweeny Station.
- 7) **Condition 5.1.6.** – The exception language in this condition has been deleted. Although the language is part of 45CSR§10-5.1 it is not included in the R13-2498B permit condition.
- 8) **Section 6.0** – The permittee has requested that the auxiliary generator engines be classified as non-emergency “remote” engines. Therefore the 40 CFR 63 Subpart ZZZZ emergency engine requirements have been removed and replaced with non-emergency non-black start 4SRB remote stationary RICE requirements. Since most of the applicable Subpart ZZZZ requirements for the auxiliary engines (AUX03, AUX04) are also applicable to the 2SLB compressor engines (EN01, EN02, EN03, EN04), the requirements for the compressor engines have been moved to Section 6.0. Where specific requirements are applicable to only the auxiliary generators or compressor engines, the conditions containing those requirements specify to which engines the requirement pertains.
- 9) **Section 7.0** – As discussed in Item 8) above, the 40 CFR 63 Subpart ZZZZ compressor engine requirements have been moved to Section 6.0. Therefore, Section 7.0 has been deleted.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility based on the determinations set forth below:

- a. **45 CSR 10** – This rule is not applicable to internal combustion engines (i.e. Compressor engines EN01, EN02, EN03, EN04 or auxiliary generator engines AUX03 and AUX04).
- b. **40 CFR 60 Subpart JJJJ** – The compressor engines (EN01, EN02, EN03, EN04, installed in 1956) and the auxiliary generator engines (AUX03 and AUX04 installed in 1996) are not subject to this subpart since they were installed before the applicability date.
- c. **40 CFR 60 Subpart Dc** - The boiler (BLR02) is less than 10 mmBtu/hr and is not subject to this subpart per 40 CFR §60.40c(a)
- d. **40 CFR 60 Subpart OOOO** – There are no affected facilities located at the Sweeny Compressor Station that commenced construction, modification, or reconstruction after August 23, 2011, and on or before September 18, 2015. None of the newly installed tanks onsite meet the applicability requirements in 40 CFR §60.5365(e).
- e. **40 CFR 60 Subpart OOOOa** – There are no affected facilities located at the Sweeny Compressor Station that commenced construction, modification, or reconstruction after September 18, 2015. None of the newly installed tanks onsite meet the applicability requirements in 40 CFR §60.5365a(e).
- f. **40 CFR 63 Subpart HH** – The facility is a “natural gas transmission and storage facility” and not a “natural gas production facility.” Therefore, the requirements of this subpart do not apply.
- g. **40 CFR 63 Subpart HHH** – The facility is not defined as a major source of HAPs. Therefore, this subpart is not applicable to the facility.
- h. **40 CFR 63 Subpart DDDDD** – The facility is not defined as a major source of HAPs. Therefore, this subpart is not applicable to the reboiler (RBR02) or the boiler (BLR02).

- i. **40 CFR 63 Subpart JJJJJJ** – The reboiler (RBR02) is a gas-fired “process heater” and therefore excluded from the definition of “boiler” pursuant to §63.11237. The boiler (BLR02) is a gas-fired boiler and therefore is not subject to this subpart per 40 CFR §63.11195(e).
- j. **40 CFR 64** – The dehydration unit (DEHY02) is exempt from CAM for HAPs and VOCs pursuant to §64.2(b)(1)(vi) since a “continuous compliance determination method” is specified in the current Title V permit. The compressor engines (EN01, EN02, EN03, EN04) are not equipped with control devices nor do they have emission limits.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Wednesday, April 12, 2017
Ending Date: Friday, May 12, 2017

Point of Contact

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

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th 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.