

Williams Ohio Valley Midstream LLC
100 Teletech Drive, Suite 2
Moundsville, WV 26041
(304) 843-4559
(304) 843-3196 fax

January 11, 2017

Beverly McKeone
New Source Review Program Manager
Division of Air Quality
West Virginia Department of Environmental Protection
601 57th Street SE
Charleston, WV 25304-2345

**Subject: Application for Class I Administrative Permit Update
Williams Ohio Valley Midstream LLC
Francis Compressor Station
Marshall County, West Virginia**

Dear Ms. McKeone:

Williams Ohio Valley Midstream LLC (OVM) is submitting an Application for Class I Administrative Update to Permit R13-3289 for the Francis Compressor Station located approximately 3.7 miles southeast of Moundsville in Marshall County, West Virginia.

This Application for Class I Administrative Update has been prepared and submitted to correct Conditions 4.1.2g and 4.1.4d of Permit R13-3289 which incorrectly specify requirements under NSPS Subpart OOOO. As the Francis Compressor Station commenced construction after September 18, 2015 it is subject to NSPS Subpart OOOOa requirements instead of NSPS Subpart OOOO requirements.

Please note there are no proposed changes to the facility equipment or emissions at this time. This permit application is solely to replace NSPS Subpart OOOO requirements with NSPS Subpart OOOOa requirements.

If you have any questions regarding this submittal or need additional information, please contact me at (304) 843-4559 or erika.baldauff@williams.com.

Sincerely,

A handwritten signature in blue ink that reads "Erika Baldauff". The signature is written in a cursive style.

Erika Baldauff
Environmental Specialist

Enclosures:
Application for Class I Administrative Permit Update

**APPLICATION FOR 45CSR13
CLASS I ADMINISTRATIVE PERMIT UPDATE**

For the:

**Williams Ohio Valley Midstream LLC
FRANCIS COMPRESSOR STATION**
Marshall County, West Virginia

Submitted to:



**WEST VIRGINIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY**

Submitted by:



Williams Ohio Valley Midstream LLC
100 Teletech Drive, Suite 2
Moundsville, WV 26041

Prepared by:



EcoLogic Environmental Consultants, LLC
864 Windsor Court
Santa Barbara, CA 93111

January 2017

**APPLICATION FOR 45CSR13
CLASS I ADMINISTRATIVE PERMIT UPDATE**

**Williams Ohio Valley Midstream LLC
FRANCIS COMPRESSOR STATION**
Marshall County, West Virginia

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APPLICATION FOR 45CSR13 CLASS I ADMINISTRATIVE PERMIT UPDATE

APPLICATION FOR NSR PERMIT

- Section I. General
- Section II. Additional Attachments and Supporting Documents
- Section III. Certification of Information



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY

601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
www.dep.wv.gov/daq

**APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION
(OPTIONAL)**

PLEASE CHECK ALL THAT APPLY TO NSR (45CSR13) (IF KNOWN):

- CONSTRUCTION MODIFICATION RELOCATION
 CLASS I ADMINISTRATIVE UPDATE TEMPORARY
 CLASS II ADMINISTRATIVE UPDATE AFTER-THE-FACT

PLEASE CHECK TYPE OF 45CSR30 (TITLE V) REVISION (IF ANY):

- ADMINISTRATIVE AMENDMENT MINOR MODIFICATION
 SIGNIFICANT MODIFICATION

IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS ATTACHMENT S TO THIS APPLICATION

FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.

Section I. General

1. Name of applicant (as registered with the WV Secretary of State's Office): WILLIAMS OHIO VALLEY MIDSTREAM LLC (OVM)		2. Federal Employer ID No. (FEIN): 27-0856707	
3. Name of facility (if different from above): FRANCIS COMPRESSOR STATION (FCS) (AT THE OAK GROVE GAS PLANT (OGGP))		4. The applicant is the: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> BOTH	
5A. Applicant's mailing address: WILLIAMS OHIO VALLEY MIDSTREAM LLC (OVM) 100 TELETECH DR, STE 2 MOUNDSVILLE, WV 26041		5B. Facility's present physical address: ~0.4 MILES NORTH OF 5258 FORK RIDGE ROAD ~3.7 MILES SE OF MOUNDSVILLE MOUNDSVILLE, MARSHALL COUNTY, WV 26041	
6. West Virginia Business Registration. Is the applicant a resident of the State of West Virginia? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <ul style="list-style-type: none"> - If YES, provide a copy of the Certificate of Incorporation/Organization/Limited Partnership (one page) including any name change amendments or other Business Registration Certificate as Attachment A. - If NO, provide a copy of the Certificate of Authority/Authority of L.L.C./Registration (one page) including any name change amendments or other Business Certificate as Attachment A. 			
7. If applicant is a subsidiary corporation, please provide the name of parent corporation: THE WILLIAMS COMPANIES, INC.			
8. Does the applicant own, lease, have an option to buy, or otherwise have control of the proposed site? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <ul style="list-style-type: none"> - If YES, please explain: APPLICANT OWNS THE PROPERTY - If NO, you are not eligible for a permit for this source. 			
9. Type of plant or facility (stationary source) to be constructed, modified, relocated, administratively updated or temporarily permitted (e.g., coal preparation plant, primary crusher, etc.): SIC CODE 1389 - OIL AND GAS FIELD SERVICES, N.E.C.		10. North American Industry Classification System (NAICS) code for the facility: 213112 - SUPPORT ACTIVITIES FOR OIL AND GAS OPERATIONS	
11A. DAQ Plant ID No. (existing facilities): FRANCIS COMPRESSOR STATION (FCS): 051-00157 OAK GROVE GAS PLANT (OGGP): 051-00157		11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (existing facilities): OGGP: R13-3070 - ISSUED 07/12/13 OGGP: R13-3070A - ISSUED 01/05/16 OGGP: R30-05100157-2016 - ISSUED 04/26/16 FCS: R13-3289 - ISSUED 04/12/16	
All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.			

<p>12A. Directions to the facility:</p> <ul style="list-style-type: none"> – For Modifications, Administrative Updates or Temporary permits at an existing facility, please provide directions to the <i>present location</i> of the facility from the nearest state road; – For Construction or Relocation permits, please provide directions to the <i>proposed new site location</i> from the nearest state road. Include a MAP as Attachment B. <p>FROM LAFAYETTE AVE IN MOUNDSVILLE: A. HEAD EAST ONTO 12TH ST ~1.1 MI; B. CONTINUE ONTO FORK RIDGE RD ~5.4 MI; C. ENTRANCE TO SITE IS ON THE LEFT</p>		
12.B. New site address (if applicable): NA	12C. Nearest city or town: MOUNDSVILLE	12D. County: MARSHALL
12.E. UTM Northing (KM): 4,413.806 KM NORTHING	12F. UTM Easting (KM): 526.243 KM EASTING	12G. UTM Zone: 17S
<p>13. Briefly describe the proposed change(s) at the facility: THIS APPLICATION IS PREPARED AND SUBMITTED TO CORRECT CONDITIONS 4.1.2G AND 4.1.4D OF PERMIT R13-3289 WHICH INCORRECTLY SPECIFY REQUIREMENTS UNDER NSPS SUBPART OOOO. AS THE FRANCIS COMPRESSOR STATION COMMENCED CONSTRUCTION AFTER SEPTEMBER 18, 2015 IT IS SUBJECT TO NSPS SUBPART OOOOa REQUIREMENTS INSTEAD OF NSPS SUBPART OOOO REQUIREMENTS.</p>		
<p>14A. Provide the date of anticipated installation or change: NA</p> <ul style="list-style-type: none"> – If this is an After-The-Fact permit application, provide the date upon which the proposed change did happen: NA 		<p>14B. Date of anticipated Start-Up if a permit is granted: NA</p>
<p>14C. Provide a Schedule of the planned Installation of/Change to and Start-Up of each of the units proposed in this permit application as Attachment C (if more than one unit is involved).</p>		
<p>15. Provide maximum projected Operating Schedule of activity/activities outlined in this application: Hours Per Day: 24 Days Per Week: 7 Weeks Per Year: 52</p>		
<p>16. Is demolition or physical renovation at an existing facility involved? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>		
<p>17. Risk Management Plans. If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your Risk Management Plan (RMP) to U.S. EPA Region III.</p>		
<p>18. Regulatory Discussion. List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (<i>if known</i>). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (<i>if known</i>). Provide this information as Attachment D.</p>		

Section II. Additional attachments and supporting documents.

19. Include a check payable to WVDEP – Division of Air Quality with the appropriate application fee (per 45CSR22 and 45CSR13).
20. Include a Table of Contents as the first page of your application package.
21. Provide a Plot Plan , e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as Attachment E (Refer to Plot Plan Guidance). <ul style="list-style-type: none"> – Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).
22. Provide a Detailed Process Flow Diagram(s) showing each proposed or modified emissions unit, emission point and control device as Attachment F .
23. Provide a Process Description as Attachment G . <ul style="list-style-type: none"> – Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).
All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

24.	Provide Material Safety Data Sheets (MSDS) for all materials processed, used or produced as Attachment H . – For chemical processes, provide a MSDS for each compound emitted to the air.															
25.	Fill out the Emission Units Table and provide it as Attachment I .															
26.	Fill out the Emission Points Data Summary Sheet (Table 1 and Table 2) and provide it as Attachment J .															
27.	Fill out the Fugitive Emissions Data Summary Sheet and provide it as Attachment K .															
28.	<p>Check all applicable Emissions Unit Data Sheets listed below:</p> <table border="0"> <tr> <td><input type="checkbox"/> Bulk Liquid Transfer</td> <td><input type="checkbox"/> Haul Road Emissions</td> <td><input type="checkbox"/> Quarry</td> </tr> <tr> <td><input type="checkbox"/> Chemical Processes</td> <td><input type="checkbox"/> Hot Mix Asphalt Plant</td> <td><input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities</td> </tr> <tr> <td><input type="checkbox"/> Concrete Batch Plant</td> <td><input type="checkbox"/> Incinerator</td> <td><input type="checkbox"/> Storage Tanks</td> </tr> <tr> <td><input type="checkbox"/> Grey Iron and Steel Foundry</td> <td><input type="checkbox"/> Indirect Heat Exchanger</td> <td></td> </tr> <tr> <td><input type="checkbox"/> General Emission Unit, specify:</td> <td></td> <td></td> </tr> </table> <p>Fill out and provide the Emissions Unit Data Sheet(s) as Attachment L.</p>	<input type="checkbox"/> Bulk Liquid Transfer	<input type="checkbox"/> Haul Road Emissions	<input type="checkbox"/> Quarry	<input type="checkbox"/> Chemical Processes	<input type="checkbox"/> Hot Mix Asphalt Plant	<input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities	<input type="checkbox"/> Concrete Batch Plant	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Storage Tanks	<input type="checkbox"/> Grey Iron and Steel Foundry	<input type="checkbox"/> Indirect Heat Exchanger		<input type="checkbox"/> General Emission Unit, specify:		
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29.	<p>Check all applicable Air Pollution Control Device Sheets listed below:</p> <table border="0"> <tr> <td><input type="checkbox"/> Absorption Systems</td> <td><input type="checkbox"/> Baghouse</td> <td><input type="checkbox"/> Flare</td> </tr> <tr> <td><input type="checkbox"/> Adsorption Systems</td> <td><input type="checkbox"/> Condenser</td> <td><input type="checkbox"/> Mechanical Collector</td> </tr> <tr> <td><input type="checkbox"/> Afterburner</td> <td><input type="checkbox"/> Electrostatic Precipitator</td> <td><input type="checkbox"/> Wet Collecting System</td> </tr> <tr> <td><input type="checkbox"/> Other Collectors, specify:</td> <td></td> <td></td> </tr> </table> <p>Fill out and provide the Air Pollution Control Device Sheet(s) as Attachment M.</p>	<input type="checkbox"/> Absorption Systems	<input type="checkbox"/> Baghouse	<input type="checkbox"/> Flare	<input type="checkbox"/> Adsorption Systems	<input type="checkbox"/> Condenser	<input type="checkbox"/> Mechanical Collector	<input type="checkbox"/> Afterburner	<input type="checkbox"/> Electrostatic Precipitator	<input type="checkbox"/> Wet Collecting System	<input type="checkbox"/> Other Collectors, specify:					
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<input type="checkbox"/> Other Collectors, specify:																
30.	Provide all Supporting Emissions Calculations as Attachment N , or attach the calculations directly to the forms listed in Items 28 through 31.															
31.	<p>Monitoring, Recordkeeping, Reporting and Testing Plans. Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as Attachment O.</p> <p>➤ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.</p>															
32.	Public Notice. At the time that the application is submitted, place a Class I Legal Advertisement in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and <i>Example Legal Advertisement</i> for details). Please submit the Affidavit of Publication as Attachment P immediately upon receipt.															
33.	<p>Business Confidentiality Claims. Does this application include confidential information (per 45CSR31)?</p> <p style="text-align: center;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p> <p>➤ If YES, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's "Precautionary Notice – Claims of Confidentiality" guidance found in the <i>General Instructions</i> as Attachment Q.</p>															

Section III. Certification of Information

34.	<p>Authority/Delegation of Authority. Only required when someone other than the responsible official signs the application. Check applicable Authority Form below: NA</p> <table border="0"> <tr> <td><input type="checkbox"/> Authority of Corporation or Other Business Entity</td> <td><input type="checkbox"/> Authority of Partnership</td> </tr> <tr> <td><input type="checkbox"/> Authority of Governmental Agency</td> <td><input type="checkbox"/> Authority of Limited Partnership</td> </tr> </table> <p>Submit completed and signed Authority Form as Attachment R.</p> <p><i>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</i></p>	<input type="checkbox"/> Authority of Corporation or Other Business Entity	<input type="checkbox"/> Authority of Partnership	<input type="checkbox"/> Authority of Governmental Agency	<input type="checkbox"/> Authority of Limited Partnership
<input type="checkbox"/> Authority of Corporation or Other Business Entity	<input type="checkbox"/> Authority of Partnership				
<input type="checkbox"/> Authority of Governmental Agency	<input type="checkbox"/> Authority of Limited Partnership				

35A. Certification of Information. To certify this permit application, a Responsible Official (45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

Certification of Truth, Accuracy, and Completeness

I, the undersigned **Responsible Official** / **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE: 
(Please use blue ink)

DATE: January 11, 2017
(Please use blue ink)

35B. Printed name of signee: PAUL V. HUNTER	35C. Title: GENERAL MANAGER OHIO RIVER SUPPLY HUB
35D. E-mail: PAULV.HUNTER@WILLIAMS.COM	36E. Phone: (412) 787-5561
	36F. FAX: (412) 787-6002
36A. Printed name of contact person: ERIKA BALDAUFF	36B. Title: ENVIRONMENTAL SPECIALIST
36C. E-mail: ERIKA.BALDAUFF@WILLIAMS.COM	36D. Phone: (304) 843-4559
	36E. FAX: (304) 843-3196

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

- | | |
|---|---|
| <input type="checkbox"/> Attachment A: Business Certificate | <input type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet |
| <input type="checkbox"/> Attachment B: Map(s) | <input type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s) |
| <input type="checkbox"/> Attachment C: Installation and Start Up Schedule | <input type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s) |
| <input type="checkbox"/> Attachment D: Regulatory Discussion | <input type="checkbox"/> Attachment N: Supporting Emissions Calculations |
| <input type="checkbox"/> Attachment E: Plot Plan | <input type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans |
| <input type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s) | <input type="checkbox"/> Attachment P: Public Notice |
| <input type="checkbox"/> Attachment G: Process Description | <input type="checkbox"/> Attachment Q: Business Confidential Claims (NA) |
| <input type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS) | <input type="checkbox"/> Attachment R: Authority Forms (NA) |
| <input type="checkbox"/> Attachment I: Emission Units Table | <input checked="" type="checkbox"/> Attachment S: Title V Permit Revision information |
| <input type="checkbox"/> Attachment J: Emission Points Data Summary Sheet | <input type="checkbox"/> Application Fee |

Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.

FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:

- Forward 1 copy of the application to the Title V Permitting Group and
- For Title V Administrative Amendments:
 - NSR permit writer should notify Title V permit writer of draft permit
- For Title V Minor Modifications:
 - Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,
 - NSR permit writer should notify Title V permit writer of draft permit.
- For Title V Significant Modifications processed in parallel with NSR Permit revision:
 - NSR permit writer should notify a Title V permit writer of draft permit,
 - Public notice should reference both 45CSR13 and Title V permits,
 - EPA has 45 day review period of a draft permit.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

**APPLICATION FOR 45CSR13
CLASS I ADMINISTRATIVE PERMIT UPDATE**

ATTACHMENT S - TITLE V PERMIT REVISION INFORMATION

Williams Ohio Valley Midstream LLC
Francis Compressor Station
Application for 45CSR13 Class I Administrative Permit Update

Attachment S

Title V Permit Revision Information

1. New Applicable Requirements Summary	
Mark all applicable requirements associated with the changes involved with this permit revision:	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input checked="" type="checkbox"/> Section 111 NSPS (Subpart(s) <u>OOOOa</u>)	<input type="checkbox"/> Section 112(d) MACT standards (Subpart(s) _____)
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64) ⁽¹⁾
<input type="checkbox"/> NO _x Budget Trading Program Non-EGUs (45CSR1)	<input type="checkbox"/> NO _x Budget Trading Program EGUs (45CSR26)
⁽¹⁾ If this box is checked, please include Compliance Assurance Monitoring (CAM) Form(s) for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why Compliance Assurance Monitoring is not applicable:	

2. Non Applicability Determinations

List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.

NEW SOURCE PERFORMANCE STANDARDS (NSPS)

- NSPS D - No boiler greater than 250 MMBtu/hr (40CFR60.40(a)(1))
- NSPS Da - No boiler greater than 250 MMBtu/hr (40CFR60.40a(a)(1))
- NSPS Db - No boiler greater than 100 MMBtu/hr (40CFR60.40b(a))
- NSPS K - No tank greater than 40,000 gallons (40CFR 60.110(a))
- NSPS Ka - No tank greater than 151.416 m³ (40,000 gal) (40CFR60.110a(a))
- NSPS Kb - No tank greater than 75 m³ (19,815 gal) (40CFR60.110b(a))
- NSPS GG - No stationary gas turbine (40CFR60.330(a))
- NSPS KKK - Plant construction commenced after 08/23/11 (40CFR60.630(b))
- NSPS LLL - No sweetening units on site (40CFR60.640(a))
- NSPS IIII - No stationary compression ignition engine (§60.4200(a))
- NSPS KKKK - No stationary combustion turbine (§60.4300(a))

NATIONAL EMISSION STANDARDS FOR HAZAROUS AIR POLLUTANTS (NESHAP)

- NESHAP HH - Not a major source of HAP and no TEG dehydration unit (§63.760(b)(2))
- NESHAP HHH - No natural gas transmission or storage prior to local distribution (§63.1270(a))
- NESHAP YYYY - No stationary gas turbine (§63.6080(a))
- NESHAP DDDDD - Not a major source of HAP (§63.7485(a))
- NESHAP JJJJJ - No boiler as defined (§63.11195(e))

COMPLIANCE ASSURANCE MONITORING (CAM)

CAM - This rule does not apply because there no pollutant specific emission units subject to an emissions limitation or standard that require a control device be used to achieve compliance. (§64.2a))

WEST VIRGINIA AIR QUALITY REGULATIONS

- 45CSR14 - Not a PSD major source or PSD major modification
- 45CSR19 - Not located in a non-attainment area for NO_x, CO, or VOC
- 45CSR21 - Control of VOCs - Not located in Putnam, Kanawha, Cabell, Wayne, or Wood County
- 45CSR27 - Exempt because equipment is used in the production and distribution of petroleum products
- 45CSR28 - Voluntary Emission Trading Program - Applicant chooses not to participate
- 45CSR29 - Not in Putnam, Kanawha, Cabell, Wayne, or Wood County
- 45CSR34 - Not a major source of HAP or otherwise subject to NESHAP requirements

Permit Shield Requested *(not applicable to Minor Modifications)*

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

3. Suggested Title V Draft Permit Language

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision? Yes No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
R13-3289	04/12/16	Conditions 4.1.2g and 4.1.4d
	/ /	

5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
	/ /	
	/ /	
	/ /	

6. Change in Potential Emissions

Pollutant	Change in Potential Emissions (+ or -), TPY
Nitrogen Oxides (NOx)	+0.00
Carbon Monoxide (CO)	+0.00
Volatile Organic Compounds (VOC)	+0.00
Sulfur Dioxide (SO2)	+0.00
Particulate Matter (PM)	+0.00
Formaldehyde (HCHO)	+0.00
Total Hazardous Air Pollutants (HAPs)	+0.00

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

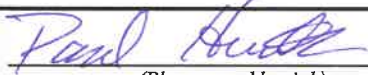
7. Certification For Use Of Minor Modification Procedures (Required Only for Minor Modification Requests)

Note: This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:

- i. Proposed changes do not violate any applicable requirement;
- ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;
- iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;
- v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;
- vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

(Signed):		Date:	01 / 11 / 17
	(Please use blue ink)		(Please use blue ink)
Named (typed):	Paul V. Hunter	Title:	General Manager Ohio River Supply Hub

Note: Please check if the following included (if applicable):

<input type="checkbox"/>	Compliance Assurance Monitoring Form(s)
<input type="checkbox"/>	Suggested Title V Draft Permit Language

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.