

# Fact Sheet



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

Permit Number: **R30-08300019-2018**  
Application Received: **April 18, 2017**  
Plant Identification Number: **03-054-083-00019**  
Permittee: **Columbia Gas Transmission, LLC**  
Facility Name: **Files Creek Compressor Station**  
Mailing Address: **1700 MacCorkle Avenue SE, Charleston, WV 25314**

*Revised: N/A*

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Physical Location: Beverly, Randolph County, West Virginia  
UTM Coordinates: 601.1 km Easting • 4,297.3 km Northing • Zone 17  
Directions: The station is located on Files Creek Road and WV Secondary Route 37/8, approximately 3 miles south of the town of Beverly.

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### Facility Description

The Files Creek Station is a natural gas transmission facility 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) 2,000-hp natural gas-fired reciprocating compressor engines, one (1) natural gas fired emergency generator, four (4) natural gas-fired turbine-driven compressors, two (2) line heaters, and numerous comparatively small space heaters of various sizes.

## Emissions Summary

| <b>Plantwide Emissions Summary [Tons per Year]</b> |                            |   |
|--|----------------------------|---|
| <b>Regulated Pollutants</b>                        | <b>Potential Emissions</b> | <b>2016 Actual Emissions <sup>1</sup></b> |
| Carbon Monoxide (CO)                               | 301.33                     | 3.63                                      |
| Nitrogen Oxides (NO <sub>x</sub> )                 | 979.41                     | 4.32                                      |
| Particulate Matter (PM <sub>2.5</sub> )            | 33.19                      | 0.30                                      |
| Particulate Matter (PM <sub>10</sub> )             | 33.19                      | 0.30                                      |
| Total Particulate Matter (TSP)                     | 33.19                      | 1.14                                      |
| Sulfur Dioxide (SO <sub>2</sub> )                  | 1.31                       | 5.84 × 10 <sup>-4</sup>                   |
| Volatile Organic Compounds (VOC)                   | 100.86                     | 1.32                                      |
| <b>Hazardous Air Pollutants <sup>2</sup></b>       | <b>Potential Emissions</b> | <b>2016 Actual Emissions <sup>1</sup></b> |
| Formaldehyde                                       | 17.42                      | 0.21                                      |
| Total HAPs   | 25.14                      | 0.3                                       |

<sup>1</sup> Actual emissions values were transcribed from the 2016 Total Emissions by Source Summary Report provided by the State and Local Emission Inventory System (SLEIS).

<sup>2</sup> The facility has the potential to emit other HAPs, such as: acetaldehyde, benzene, ethylbenzene, n-Hexane, toluene, xylene (mixed isomers). Each of these speciated HAPs has potential emissions less than 10 tpy with the highest being acetaldehyde at 2.36 tpy.

### Title V Program Applicability Basis

This facility has the potential to emit 301.33 tpy of CO; 979.41 tpy of NO<sub>x</sub>; 100.86 tpy of VOC; 17.42 tpy of formaldehyde; and 25.14 tpy of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Columbia Gas Transmission's Files Creek 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                    | Control of 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. |
|                    | 45CSR16                   | New Source Performance Standards   |

|                              |   |
|------------------------------|---|
| 45CSR30                      | Operating permit requirement.                   |
| 45CSR34                      | Emission standards for HAPs                     |
| 40 C.F.R. 60 Subpart JJJJ    | Spark Ignition Internal Combustion Engines NSPS |
| 40 C.F.R. 60 Subpart KKKK    | Turbine NSPS                                    |
| 40 C.F.R. Part 61            | Asbestos inspection and removal                 |
| 40 C.F.R. 63 Subpart YYYY    | Turbine MACT                                    |
| 40 C.F.R. 63 Subpart DDDDD   | Boiler MACT                                     |
| 40 C.F.R. 63 Subpart ZZZZ    | RICE MACT                                       |
| 40 C.F.R. Part 82, Subpart F | Ozone depleting substances                      |

|             |         |                         |
|-------------|---------|-------------------------|
| State Only: | 45CSR4  | No objectionable odors. |
|             | 45CSR17 | Particulate Fugitive    |

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) |
|--------------------------------|------------------|---|
| R13-3164B                      | May 6, 2016      |   |

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 B," which may be downloaded from DAQ's website.

**Determinations and Justifications**

- I. **45CSR2 – To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.** The applicable requirements for HTR2, HTR4, and HTR5 have been primarily included in renewal permit section 4.0. Each of these emission units are subject to the 10 percent opacity standard and the compliance demonstration methodology specified in 45CSR§§2-3.1. and 3.2., respectively (conditions 4.1.1. and 4.3.1.). However, they are exempt from the mass rate limit and other testing and MRR requirements in rule sections 4, 5, 6, 8, and 9 due to the heat input of each emission unit being less than 10 MMBtu/hr in accordance with 45CSR§2-11.1. The heaters HTR1, HTR3, and HTR6 do not meet the definition of a “fuel burning unit” in 45CSR§2-2.10.; therefore, they are not listed in the Section 4.0 heading.

II. **45CSR13, Permit No. R13-3164B.** The requirements of this underlying NSR permit have been incorporated into the renewal operating permit as described in the following table.

| NSR  | Title V | Discussion   |
|--|---------|--|
| <b>Facility-wide Requirements</b>            |         |  |
| 4.1.1.                                       | 9.4.3.  | The record of monitoring requirement has been written in the renewal permit.   |
| 4.1.2.                                       | 9.1.6.  | The general requirement for air pollution control devices (APCD) has been written in the renewal permit.   |
| 4.1.3.                                       | 9.4.4.  | The recordkeeping of APCD malfunctions has been written in the renewal permit.   |
| 4.1.4.                                       | 9.1.7.  | The fugitive emissions source requirement has been written in the renewal permit.  |
| <b>Turbines (009T1, 009T2, 009T3, 009T4)</b> |         |  |
| 5.1.1.                                       | 9.1.1.  | The requirement has been written in the renewal permit.  |
| 5.1.2.                                       | 9.1.2.  | The requirement has been written in the renewal permit.  |
| 5.1.3.                                       | 9.1.3.  | The requirement has been written in the renewal permit.  |
| 5.1.4.                                       | 9.1.4.  | The requirement has been written in the renewal permit.  |
| 5.1.5.                                       | 9.1.5.  | The requirement has been written in the renewal permit.  |
| 5.1.6.                                       | 8.1.1.  | The first statement in this requirement agrees with §60.4320(a), which points to applicable requirements in Table 1 to Subpart KKKK. Within Table 1, the third row and twelfth row are applicable, and both are included in the underlying NSR permit requirement that has been cited with the Subpart KKKK requirement in renewal permit condition 8.1.1.   |
| 5.1.7.                                       | 8.1.2.  | The requirement has been cited for the permit condition embodying the underlying NSPS Subpart KKKK requirement.  |
| 5.1.8.                                       | 8.1.3.  | The requirement has been cited for the permit condition embodying the underlying NSPS Subpart KKKK requirement.  |
| 5.2.1.                                       | 8.3.1.  | The requirement has been cited for the permit condition embodying the underlying NSPS Subpart KKKK requirement.  |
| 1 <sup>st</sup> 5.2.2.                       | 9.3.1.  | There are two requirements in the NSR permit designated as 5.2.2. The first is testing for compliance with CO emission limits in underlying requirements 5.1.2. through 5.1.4. None of these limits are related to NSPS Subpart KKKK since the regulation does not set any standards for CO. The second requirement 5.2.2. is vague as to its application. However, review of the previous NSR permit R13-3164A reveals that the CO testing requirement was added as part of revision B. As such, the second 5.2.2. in the current version B applies only to the NSPS Subpart KKKK NO <sub>x</sub> testing in requirement 5.2.1. To avoid confusion, the second requirement 5.2.2. has been combined with 5.2.1. to form one permit condition 8.3.1. |
| 2 <sup>nd</sup> 5.2.2.                       | 8.3.1.  |  |
|  |         | The first requirement 5.2.1. for CO testing has been written as a separate permit condition 9.3.1.   |
| 5.3.1.                                       | 9.4.1.  | The requirement has been written in the renewal permit.  |
| 5.3.2.                                       | 8.2.1.  | The fuel monitoring requirement has been included in the renewal permit.   |
| 5.3.3.                                       | 9.4.2.  | The requirement has been written in the renewal permit.  |
| 5.4.1.                                       | 8.5.2.  | The requirement has been cited for the permit condition embodying the underlying NSPS Subpart KKKK requirement.  |

| NSR                                | Title V | Discussion   |
|------------------------------------|---------|--|
| 5.4.2.                             | 9.5.1.  | The requirement has been written in the renewal permit.  |
| 5.4.3.                             | 9.5.2.  | The requirement has been written in the renewal permit.  |
| 5.4.4.                             | 9.5.3.  | The requirement has been written in the renewal permit.  |
| <b>Emergency Generator (009G4)</b> |         |  |
| 6.1.1.                             | 9.1.8.  | The operation limitation has been written in the renewal permit.   |
| 6.1.2.                             | 9.1.9.  | The emission limits have been written in the renewal permit.   |
| 6.1.3.                             | 9.1.8.  | This requirement repeats the last two statements in requirement 6.1.1. Therefore, requirement 6.1.3. has been cited with permit condition 9.1.8. rather than writing a redundant Title V permit condition.   |
| 6.1.4.                             | None    | This underlying permit requirement is a statement of non-applicability for SI ICE being tested at an engine test cell/stand and does not require the permittee to do anything. Therefore, no Title V permit condition is warranted.  |
| 6.1.5.                             | None    | This underlying permit requirement is a statement of non-applicability of the Title V program under certain circumstances, which in this case does not apply. Therefore, no Title V permit condition is warranted.   |
| 6.1.6.                             | None    | This underlying permit requirement is a statement of possible exemption from Subpart JJJJ as described in 40 CFR part 1068, subpart C. At this renewal the exemption is not applicable; therefore, no Title V permit condition is warranted.   |
| 6.1.7.                             | None    | This underlying permit requirement is a statement of non-applicability for ICE that are acting as temporary units. Since all engines have been installed for longer than 1 year, this requirement is not applicable, and no Title V permit condition is warranted.   |
| 6.1.8.                             | None    | The NSR permit requirement is based upon the underlying RICE MACT requirements in §63.6605(b). However, since the engine meets the criteria in §63.6590(b)(1)(i), it does not have to meet the requirements of 40 C.F.R. 63 Subpart ZZZZ and of subpart A of Part 63 except for the initial notification requirements of §63.6645(f). Therefore, 63.6605 is not applicable and the NSR permit requirement based upon it has been excluded from the renewal permit. |
| 6.1.9.                             | 5.1.1.  | A requirement based upon the current version of Subpart ZZZZ has been written in the renewal permit. The NSR permit requirement is cited after the condition since it is based upon underlying requirements in §63.6640(f).  |
| 6.2.1.                             | 7.1.1.  | The requirement has been written in the renewal permit.  |
| 6.2.2.                             | 7.1.2.  | The requirement has been written in the renewal permit.  |
| 6.2.3.                             | 7.1.3.  | The requirement has been written in the renewal permit.  |
| 6.3.1.                             | 7.1.4.  | The requirement has been written in the renewal permit.  |
| 6.3.2.                             | 7.1.3.  | The requirement has been written in the renewal permit and is the same as requirement 6.2.3.   |
| 6.3.3.                             | 7.1.5.  | The requirement has been written in the renewal permit.  |
| 6.4.1.                             | 7.1.6.  | The requirement has been written in the renewal permit.  |
| 6.4.2.                             | 7.1.7.  | The requirement has been written in the renewal permit.  |
| 6.4.3.                             | 7.1.8.  | The requirement has been written in the renewal permit.  |
| 6.4.4.                             | None    | The requirement is not applicable since the engine is non-certified.   |
| 6.5.1.                             | 7.3.1.  | The requirement has been written in the renewal permit.  |
| 6.6.1.                             | 7.4.1.  | The requirement has been written in the renewal permit.  |
| 6.6.2.                             | 5.5.1.  | The requirement has been written in the renewal permit.  |
| <b>Heaters (HTR1 through HTR6)</b> |         |  |

| NSR   | Title V | Discussion  |
|---|---------|---|
| 7.1.1.  | 9.1.10. | The requirement has been written in the renewal permit.   |
| 7.1.2.  | 4.1.1.  | The requirement has been written in the renewal permit. Since in the underlying NSR permit this requirement applies to the heaters HTR1 through HTR6, they have been specified after the citation of authority in the renewal permit.   |
| 7.2.1.  | 4.2.1.  | The requirement has been written in the renewal permit.   |
| 7.3.1.  | 4.3.1.  | The requirement has been written in the renewal permit.   |
| 7.4.1.  | 4.4.1.  | The requirement has been written in the renewal permit.   |
| <b>40 C.F.R. 63 Subpart DDDDD Requirements (HTR2, HTR4, HTR5)</b> |         |   |
| 8.1.1.  | None    | This requirement is a general statement of the purpose of Subpart DDDDD and does not place any specific requirement upon the permittee; therefore, no permit condition is warranted.  |
| 8.1.2.  | None    | This requirement is a general statement of the applicability of Subpart DDDDD and does not place any specific requirement upon the permittee; therefore, no permit condition is warranted.  |
| 8.1.3.  | None    | This requirement is a statement of the applicability of Subpart DDDDD to new, reconstructed, and existing affected sources and does not place any specific requirement upon the permittee; therefore, no permit condition is warranted.   |
| 8.1.4.  | None    | This requirement is a statement of how a new affected source is defined in Subpart DDDDD and does not place any specific requirement upon the permittee; therefore, no permit condition is warranted. Note that HTR2, HTR4, and HTR5 are new affected sources as further discussed in Section XI of this Fact Sheet.  |
| 8.1.5.  | None    | This requirement is the compliance date for new affected sources. Since at the time of issuance of this renewal permit the compliance date has passed, no permit condition is warranted.  |
| 8.1.6.  | None    | This NSR permit requirement pertains to notifications in §63.7545. However, as further discussed in Section XI of this Fact Sheet, the requirements in §63.7545 are no longer applicable; therefore, no permit condition is warranted.  |
| 8.1.7.  | None    | This requirement is a statement of the subcategory that applies to the affected emission units and does not place any specific requirement upon the permittee; therefore, no permit condition is warranted. Note that HTR2, HTR4, and HTR5 are in the <i>Units designed to burn gas 1 fuels</i> subcategory specified in §63.7499(l) as further discussed in Section XI of this Fact Sheet. |
| 8.1.8.  | 6.1.2.  | This general duty requirement has been included in the renewal permit.  |
| 8.1.9.  | 6.1.1.  | The requirement to conduct a tune-up every 5 years has been included in the renewal permit.   |
| 8.1.10.   | None    | The underlying Subpart DDDDD requirement is not applicable for the reasons further discussed in Section XI of this Fact Sheet. Therefore, no permit condition has been written for this NSR permit requirement.   |
| 8.2.1.  | 6.1.3.  | This NSR permit requirement has been cited in the permit condition that embodies the applicable requirement in §63.7510(g).   |
| 8.3.1.  | 6.1.3.  | This NSR permit requirement has been cited in the permit condition that embodies the applicable requirement in §63.7515(d).   |
| 8.4.1.  | None    | This NSR permit requirement has been excluded from the renewal permit since the Notification of Compliance Status (NOCS) report has been submitted and there is no associated ongoing requirement.  |

| NSR    | Title V | Discussion  |
|--------|---------|---|
| 8.4.2. | None    | This NSR permit requirement has been excluded from the renewal permit since the Notification of Compliance Status (NOCS) report has been submitted and there is no associated ongoing requirement.  |
| 8.5.1. | 6.1.3.  | This NSR permit requirement is for the continuous compliance with the applicable work practice standards; therefore, it has been cited with the tune-up requirements.   |
| 8.5.2. | 6.1.3.  | This NSR permit requirement is for conducting the applicable work practice standards; therefore, it has been cited with the tune-up requirements.   |
| 8.5.3. | 6.1.3.  | This NSR permit requirement is for conducting the applicable work practice standards within 30 days of startup if the unit was not operating on the required date for the tune-up; therefore, it has been cited with the tune-up requirements.  |
| 8.6.1. | None    | This NSR permit requirement pertains to notifications in §63.7545. However, as further discussed in Section XI of this Fact Sheet, the requirements in §63.7545 are no longer applicable; therefore, no permit condition is warranted.  |
| 8.6.2. | None    | This NSR permit requirement pertains to notifications in §63.7545. However, as further discussed in Section XI of this Fact Sheet, the requirements in §63.7545 are no longer applicable; therefore, no permit condition is warranted.  |
| 8.6.3. | None    | This NSR permit requirement has been excluded from the renewal permit since the Notification of Compliance Status (NOCS) report has been submitted and there is no associated ongoing requirement.  |
| 8.6.4. | None    | This NSR permit requirement pertains to notifications in §63.7545(f). However, as further discussed in Section XI of this Fact Sheet, the requirements in §63.7545(f) are not applicable; therefore, no permit condition is warranted.  |
| 8.6.5. | None    | This NSR permit requirement pertains to notifications in §63.7545(h). However, as further discussed in Section XI of this Fact Sheet, the requirements in §63.7545(h) are not applicable; therefore, no permit condition is warranted.  |
| 8.7.1. | 6.5.1.  | This NSR permit requirement is for submitting each report in Table 9 to Subpart DDDDD that is applicable; therefore, it has been cited with the Compliance Report requirement.  |
| 8.7.2. | 6.5.1.  | This NSR permit requirement pertains to the Compliance Report reporting period and submittal deadline; therefore, it has been cited with the Compliance Report requirement.   |
| 8.7.3. | 6.5.1.  | <p>This NSR permit requirement pertains to the Compliance Report content; therefore, it has been cited with the Compliance Report requirement. The NSR permit requirement included the total operating time specified in §63.7550(c)(5)(iv) as being part of the report content. However, the current regulation reads in §63.7550(c)(1):</p> <p>“If the facility is subject to the requirements of a tune up you must submit a compliance report with the information in paragraphs (c)(5)(i) through (iii) of this section, (xiv) and (xvii) of this section, and paragraph (c)(5)(iv) of this section for limited-use boiler or process heater.”</p> |

| NSR    | Title V   | Discussion   |
|--------|-----------|--|
|        |           | The affected sources in this case are not limited-use units; therefore, §63.7550(c)(5)(iv) in the current regulation is not applicable and has been excluded from the permit condition.  |
| 8.7.4. | 6.5.1.    | This NSR permit requirement pertains to the Compliance Report electronic submittal; therefore, it has been cited with the Compliance Report requirement.   |
| 8.8.1. | 6.4.1.    | The NSR permit requirement has been included in the renewal permit. However, the requirement in §63.7555(a)(2) is not applicable for the reasons further discussed in Section XI of this Fact Sheet.   |
| 8.8.2. | None      | This NSR permit requirement based upon §63.7555(h) has been excluded from the renewal permit for the reasons further discussed in Section XI of this Fact Sheet.   |
| 8.8.3. | None      | The NSR permit requirement is based upon a former version of §63.7555(i), which is no longer in the regulation at §63.7555(i). It is, however, currently located in §63.7555(d)(9). It should be noted that §63.7555(d) applies to an affected unit that is subject to a Subpart DDDDD emission limit in Tables 1, 2, or 11 through 13 of this subpart. Since none of the emission units are subject to a Subpart DDDDD emission limit, then the recordkeeping in §63.7555(d) is not applicable. For this reason, no permit condition has been written for the NSR permit requirement. |
| 8.8.4. | None      | The NSR permit requirement is based upon a former version of §63.7555(j), which is no longer in the regulation at §63.7555(j). This requirement is not applicable based upon the same rationale as requirement 8.8.3., except that it is §63.7555(d)(10) that does not apply.  |
| 8.8.5. | 6.4.2.(a) | The NSR permit requirement has been cited with the permit condition that embodies the underlying Subpart DDDDD recordkeeping requirements.   |
| 8.8.6. | 6.4.2.(b) | The NSR permit requirement has been cited with the permit condition that embodies the underlying Subpart DDDDD recordkeeping requirements.   |
| 8.8.7. | 6.4.2.(c) | The NSR permit requirement has been cited with the permit condition that embodies the underlying Subpart DDDDD recordkeeping requirements.   |

III. **45CSR16 – Standards of Performance for New Stationary Sources.** This rule establishes and adopts standards of performance for new stationary sources promulgated by the United States Environmental Protection Agency pursuant to section 111(b) of the federal Clean Air Act, as amended. This rule codifies general procedures and criteria to implement the standards of performance for new stationary sources set forth in 40 CFR Part 60. Therefore, the citation of authority for every requirement from 40 C.F.R. Part 60 will have an accompanying citation of 45CSR16.

- IV. **45CSR17 – To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.** The purpose of this rule is to prevent and control particulate matter air pollution from materials handling, preparation, storage and other sources of fugitive particulate matter. In the renewal application the permittee suggested a new condition setting out the standard in 45CSR§§17-3.1. and 3.2. While 45CSR§17-3.1. is an applicable standard, and should be in section 3.1. of the permit, 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 2018 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 3.1.9.
- V. **45CSR34 – Emission Standards for Hazardous Air Pollutants.** This rule has been cited with all applicable NESHAPs-MACT requirements in the renewal permit, which includes Subparts YYYY, ZZZZ, and DDDDD of 40 C.F.R. Part 63.
- VI. **40 C.F.R. 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.** The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in §§60.4230(a)(1) through (6). This subpart is applicable to the Dresser Waukesha VGF-L36GL emergency generator designated by emission unit ID 009G4. This subpart does not apply to the compressor engines (emission unit IDs: 00907, 00908, 00909, 00910) since they were all constructed prior to any of the applicability dates in §§60.4230(a)(1) through (6). The applicable Subpart JJJJ requirements have been included in NSR Permit No. R13-3164B, which has been incorporated into this Title V renewal permit.
- VII. **40 C.F.R. 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines.** This subpart establishes emission standards and compliance schedules for the control of emissions from stationary combustion turbines that commenced construction, modification, or reconstruction after February 18, 2005. The applicable requirements of this regulation were incorporated into the current operating permit and have been carried over to this renewal in Section 8. The sections of Subpart KKKK specified in the current Title V permit as being applicable have been listed in Table KKKK below explaining how they have been included in the renewal permit.

**Table KKKK**

| Section        | Condition | Discussion   |
|----------------|-----------|--|
| §60.4320(a)    | 8.1.1.    | This paragraph requires compliance with NO <sub>x</sub> limit specified in Table 1 to this subpart. The current permit specifies this limit as 25 ppm at 15 percent O <sub>2</sub> or 150 ng/J of useful output (1.2 lb/MWh), which is the third row in Table 1. The application Attachment E states the maximum design heat input is 89.84 MMBtu/hr at peak load, which meets the heat input range in the second column of the third row; therefore, this confirms the NO <sub>x</sub> limit in the current permit. |
| §60.4330(a)(2) | 8.1.2.    | This paragraph allows the permittee to choose one of three SO <sub>2</sub> emission limits. The limit in §60.4330(a)(2) has been retained in the renewal permit. Language pertaining to Alaska in §60.4330(a) has been excluded from the condition.  |
| §60.4333(a)    | 8.1.3.    | The general compliance requirement has been included in the renewal permit.  |
| §60.4340(a)    | 8.3.1.    | The requirement specifying the frequency of performance tests has been included in the renewal permit.   |

| Section              | Condition        | Discussion   |
|----------------------|------------------|--|
| §§60.4365(a), (b)    | 8.2.1.           | <p>The fuel monitoring requirement has been included in the renewal permit. Certain language described below has been excluded since it is not applicable to the facility.</p> <p>From §60.4365 the following has been excluded: “and 180 ng SO<sub>2</sub>/J (0.42 lb SO<sub>2</sub>/MMBtu) heat input for units located in noncontinental areas or a continental area that the Administrator determines does not have access to natural gas and that the removal of sulfur compounds would cause more environmental harm than benefit”.</p> <p>From §60.4365(a) the following has been excluded: “oil use in continental areas is 0.05 weight percent (500 ppmw) or less and 0.4 weight percent (4,000 ppmw) or less for noncontinental areas, the total sulfur content for”. Also excluded is: “and 140 grains of sulfur or less per 100 standard cubic feet for noncontinental areas”. Finally, the following language has been excluded: “and has potential sulfur emissions of less than less than 180 ng SO<sub>2</sub>/J (0.42 lb SO<sub>2</sub>/MMBtu) heat input for noncontinental areas”.</p> <p>The fuel sampling in §60.4365(b) is the second of two alternatives for monitoring fuel sulfur content. Permit R13-3164B, requirement 5.3.2. does not include it, and the permittee did not include §60.4365(b) in its suggested permit language in the renewal application. For these reasons, §60.4365(b) has not been retained in the renewal Title V permit.</p> |
| §§60.4375(a) and (b) | 8.5.1.<br>8.5.2. | <p>The excess emissions reporting and performance test reporting in §§60.4375(a) and (b), respectively, have been included in the renewal permit.</p>  |
| §60.4400             | IBR in 8.3.1.    | <p>This section pertains to conducting initial and subsequent performance tests for NO<sub>x</sub>. Particularly, this section specifies test methodologies. According to U.S. EPA guidance<sup>1</sup>, appropriate use of incorporation by reference (IBR) includes referencing of test method procedures, inspection and maintenance plans, and calculation methods for determining compliance. Since the applicable requirement from §60.4340(a) (permit condition 8.3.1.) refers to performing tests in accordance with §60.4400, and the content of §60.4400 is test methods, then the requirements of §60.4400 are IBR as provided by the U.S. EPA guidance and no additional permit condition is warranted to set forth the content of §60.4400.</p>   |

The current Title V permit also listed 40 C.F.R. §60.7(a)(3) and §60.8(a) as being applicable with respect to Subpart KKKK. The initial startup notification requirements of §60.7(a)(3) have been

<sup>1</sup> 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 29, 2018. See section E.2.c. on page 38 of the guidance, which reads that IBR in permits may be appropriate and useful under several circumstances.

included as condition 8.5.3. since at least two of the turbines are still scheduled for initial startup<sup>2</sup>. The performance testing requirement in §60.8(a) has been included with the testing requirement in permit condition 8.3.1.

VIII. **40 C.F.R. 60 Subpart OOOOa - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015.** The GHG and VOC requirements defined by this NSPS are not applicable to any emission unit at this site because construction commenced prior to September 18, 2015 for all potentially affected sources, with the exception of the two dry seal centrifugal compressors (009T3 and 009T4), which are not subject to 40 C.F.R. §60.5365a(b) that affects only wet seal centrifugal compressors. However, the installation of compressors 009T3 and 009T4 caused the facility to be subject to the fugitive emissions requirements in §§60.5397a(a) through (j) as demonstrated below.

§60.5365a provides that a permittee is subject to the applicable provisions of this subpart if it owns or operates one or more of the onshore affected facilities listed in paragraphs (a) through (j) of §60.5365a for which the permittee commenced construction, modification, or reconstruction after September 18, 2015. Among the paragraphs (a) through (j), in this case §60.5365a(j) is applicable, which designates the collection of fugitive emissions components at a compressor station, as defined in §60.5430a, as an affected facility. For purposes of §60.5397a, a “modification” to a compressor station occurs when:

- (1) An additional compressor is installed at a compressor station; or
- (2) One or more compressors at a compressor station is replaced by one or more compressors of greater total horsepower than the compressor(s) being replaced. When one or more compressors is replaced by one or more compressors of an equal or smaller total horsepower than the compressor(s) being replaced, installation of the replacement compressor(s) does not trigger a modification of the compressor station for purposes of §60.5397a.

Permit action SM01 (associated with R13-3164) added two (2) 10,682-hp (at 0 °F) turbines (T01 and T02) to replace six existing reciprocating internal combustion engines (E01 through E06) in 2015. However, according to the renewal application, construction of T01 and T02 commenced before September 18, 2015. Therefore, T01 and T02 are not subject to the requirements of Subpart OOOOa and do not trigger applicability of other Subpart OOOOa requirements.

Subsequently, permit action SM03 (associated with R13-3164B) added two (2) new Solar Taurus 70 combustion turbines (T03 and T04) each rated 10,418-hp (at 32 °F) to be installed in 2017. Because additional compressors have been installed after September 18, 2015, a “modification” has occurred per §60.5365a(j)(1). Therefore, the collection of fugitive emissions components at the Files Creek Compressor Station, as defined in §60.5430a, is an affected facility under this subpart. 40 C.F.R. §60.5397a requires that for each affected facility under §60.5365a(j), the permittee must reduce GHG (in the form of a limitation on emissions of methane) and VOC emissions by complying with the requirements of paragraphs (a) through (j) of §60.5397a.

Refer to Section 10.0 in the renewal permit for the Subpart OOOOa fugitive emissions requirements.

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<sup>2</sup> E-mail from the permittee dated February 9, 2018.

- IX. **40 C.F.R. 63 Subpart YYYYY – National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines.** Subpart YYYYY establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emissions from stationary combustion turbines located at major sources of HAP emissions, and requirements to demonstrate initial and continuous compliance with the emission and operating limitations. The applicable requirements of this regulation were incorporated into the current permit and have been carried over to this renewal in Section 9. The sections of Subpart YYYYY specified in the current Title V permit as being applicable have been listed in Table YYYYY below explaining how they have been included in the renewal permit.

**Table YYYYY**

| Section     | Condition | Discussion   |
|-------------|-----------|--|
| §63.6095(d) | 9.1.11.   | This section requires compliance with the Initial Notification requirements in §63.6145, and states that the affected unit need not comply with any other Subpart YYYYY requirement until EPA takes final action and publishes a document in the FR. Since this section summarily states the current obligations of the permittee with regard to this subpart, it has been included as a permit condition. The regulation language “this subpart” has been replaced with “40 C.F.R. 63 Subpart YYYYY” for clarification. |
| §63.6145(a) | 9.5.1.(a) | This applicable requirement has been incorporated into the renewal permit through underlying NSR permit requirement 5.4.2.(a).   |
| §63.6145(c) | 9.5.1.(c) | This applicable requirement has been incorporated into the renewal permit through underlying NSR permit requirement 5.4.2.(c).   |

- X. **40 C.F.R. 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.** The facility is a major source of HAPs. Pertinent details concerning each engine are given below. State rule 45CSR34 has been cited with the applicable MACT requirements.

Affected Emission Unit

The engine identified by emission unit ID 009G4 is subject to the requirements of Subpart ZZZZ. The engine drives a generator set designated as Emergency Generator #3. It is rated at 880-hp, was installed in 2015, and is not equipped with an air pollution control device. As such, it is a new stationary RICE in accordance with §63.6590(a)(2)(i).

The subpart states in §63.6590(b)(1) that an affected source that meets either of the criteria in paragraphs §§63.6590(b)(1)(i) through (ii) does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of §63.6645(f). The engine 009G4 meets the criteria in §63.6590(b)(1)(i) since it is a new emergency stationary RICE with a site rating of more than 500-bhp located at a major source of HAP emissions and it does not operate or is not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §§63.6640(f)(2)(ii) and (iii).

According to the current operating permit, the sections specified in Table ZZZZ below are applicable to 009G4 and have been incorporated into the renewal permit as discussed in the table.

**Table ZZZZ**

| Section                       | Condition               | Discussion   |
|-------------------------------|-------------------------|--|
| §63.6590(b)(1)(i)             | None                    | This section specifies the non-applicability of this subpart and subpart A and does not require the permittee to do anything other than submit the initial notification. Therefore, no permit condition is warranted for this section.   |
| §63.6605                      | None                    | This section is not applicable since the emission unit is subject only to the initial notification requirement as prescribed in §63.6590(b)(1)(i).   |
| §§63.6640(f)(1), (2), and (3) | 5.1.1.(1), (2), and (3) | The applicable content of §63.6640(f) has been included in the renewal permit because it specifies the criteria that must continue to be met for the engine 009G4 to be considered an emergency stationary RICE for the purposes of Subpart ZZZZ. The engine 009G4 must be an emergency stationary RICE to continue meeting the criteria in §63.6590(b)(1)(i) which provides that the engine does not have to meet the requirements of Subpart ZZZZ and of Subpart A of Part 63 except for the initial notification requirements of §63.6645(f). |
| §63.6645(f)                   | 5.5.1.                  | The initial notification is required by the exemption in §63.6590(b)(1)(i) and has been included in the renewal permit.  |

No Applicable Requirements for Compressor Engines

The compressor engines (emission unit IDs: 00907, 00908, 00909, and 00910) are existing, non-emergency, SI 2SLB engines greater than 500-bhp and are located at a major source of HAPs. Since the engines meet the criteria in §63.6590(b)(3)(i) for *Stationary RICE subject to limited requirements*, they do not have to meet the requirements of 40 C.F.R. 63 Subpart ZZZZ and of Subpart A of part 63, including initial notification requirements. No further sections or requirements of the regulation are applicable to the engines.

- XI. **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. A facility is subject to this subpart if the permittee owns or operates an industrial, commercial, or institutional boiler or process heater as defined in §63.7575 that is located at, or is part of, a major source of HAP, except as specified in §63.7491. For purposes of this subpart, a major source of HAP is as defined in §63.2, except that for oil and natural gas production facilities, a major source of HAP is as defined in §63.7575. Files Creek Compressor Station is a major source of HAP emissions that utilizes industrial process heaters as defined in Subpart DDDDD.

#### Affected Emission Units

The following emission units are subject to the requirements of Subpart DDDDD for the reasons stated:

- Line Heaters HTR2 and HTR4 – The line heaters meet the definition of *Process heater* in §63.7575. The emission units were constructed in 2015. Since construction commenced after June 4, 2010, each is considered a new source per §63.7490(b). Since the units combust only natural gas, they are in the “Units designed to burn gas 1 fuels” subcategory specified in §63.7499(l). Based upon these criteria, and that the facility is a major HAP source, each of the line heaters are an affected source as specified in §63.7490(a). The design heat input<sup>3</sup> for each emission unit is 0.5 MMBtu/hr.
- Fuel Gas Heater HTR5 – The fuel gas heater meets the definition of *Process heater* in §63.7575. The fuel gas heater was constructed in 2017. Since construction commenced after June 4, 2010, it is considered a new source per §63.7490(b). Since the unit combusts only natural gas, it is in the “Units designed to burn gas 1 fuels” subcategory specified in §63.7499(l). Based upon these criteria, and that the facility is a major HAP source, the fuel gas heater is an affected source as specified in §63.7490(a). The design heat input for the emission unit is 0.25 MMBtu/hr.

#### Non-applicability to Certain Emission Units

The following emission units are not subject to Subpart DDDDD requirements for the reasons stated:

- Space Heaters HTR1 – The space heaters #1 through #9 have a total design heat input of 0.965 MMBtu/hr. The individual space heaters that make up the collective emission unit designated as HTR1 are neither a *Boiler*, nor a *Process heater*, as these terms are defined in §63.7575. They are not boilers since they do not produce steam or hot water. Furthermore, the definition of *Process heater* specifically excludes units used for comfort heat or space heat. Based upon these facts, HTR1 does not meet the criteria for an affected source in §63.7490(a) and is therefore not subject to Subpart DDDDD requirements.
- Catalytic Space Heaters HTR3 – The eighty-five (85) catalytic space heaters have a total design heat input of 2.82 MMBtu/hr. The rationale for non-applicability to HTR3 is the same as that above for HTR1.
- Catalytic Heaters HTR6 – The twenty-two (22) catalytic heaters have a total design heat input of 1.32 MMBtu/hr. The rationale for non-applicability to HTR6 is the same as that above for HTR1.

#### Incorporation of Applicable Requirements into the Title V Permit Renewal

Table DDDDD below contains the Subpart DDDDD sections specified as being applicable in the current Title V permit and discusses how they have been incorporated into this renewal permit if the requirement is still applicable.

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<sup>3</sup> The permittee confirmed in an e-mail dated 2/09/2018 that the design heat input of both HTR2 and HTR4 is 0.5 MMBtu/hr rather than 0.65 MMBtu/hr as in the current operating permit. The current underlying permit R13-3164B specifies 0.5 MMBtu/hr.

**Table DDDDD**

| <b>Section</b>                     | <b>Condition</b> | <b>Discussion</b>  |
|------------------------------------|------------------|--|
| §63.7480                           | None             | This section states the purpose of this subpart. No permit condition is warranted for this section.  |
| §63.7485                           | None             | This section states who is subject to this subpart but does not state any specific requirement. No permit condition is warranted for this section.   |
| §§63.7490(a) & (b)                 | None             | This section states the affected sources that are subject to this subpart but does not state any specific requirement. No permit condition is warranted for this section.  |
| §§63.7495(a) & (d)                 | None             | <p>Since startup of the affected source was after April 1, 2013, and it is now passed, the compliance date from §63.7495(a) is not necessary for a permit condition.</p> <p>§63.7495(d) requires the permittee to meet the notification requirements in §63.7545. For the reasons discussed below, none of the requirements in §63.7545 are applicable for this renewal permit; therefore, no renewal permit condition cites §63.7545.</p>   |
| §§63.7500(a)(1), (a)(3), (e) & (f) | 6.1.1.<br>6.1.2. | <p>§63.7500(a)(1) – This section requires the permittee to meet applicable requirements in Tables 1 through 3, and 11 through 13 to this subpart. Within Table 1, none of the items are applicable to gas 1 fuel subcategory units. Table 2 does not apply since the unit is new. Within Table 3, the requirement in item 1 to <b>conduct a tune-up every 5 years is applicable</b> since the unit is less than 5 MMBtu/hr and is designed to burn gas 1 fuel. Refer to permit condition 6.1.1. Table 3, item 4, to conduct a one-time energy assessment is not applicable since the unit is new. Table 3, items 5 and 6, are not applicable since the unit is not subject to emission limits in Tables 1 or 2 or 11 through 13 of this subpart. Tables 11 through 13 are not applicable since the unit is not subject to Subpart DDDDD emission limits and construction did not commence between any of the dates specified in the table headings.</p> <p>§63.7500(a)(3) – This section is the <b>applicable general duty requirement</b>, which has been set forth as permit condition 6.1.2.</p> <p>§63.7500(e) – This section specifies the frequency of tune-ups for gas 1 fuel subcategory units of various design heat inputs and that they must be conducted as specified in §63.7540. Since the affected source is less than 5 MMBtu/hr and is a gas 1 fuel subcategory, the tune-up must be conducted every 5 years as specified in §63.7540. This language is already included in the requirements under §63.7500(a)(1); therefore, §63.7500(e) has been cited with permit condition 6.1.1.</p> |

| Section                          | Condition | Discussion   |
|----------------------------------|-----------|--|
|                                  |           | §63.7500(f) – This section states that the standards apply at all times the affected unit is operating, except during periods of startup and shutdown during which time the permittee must comply with items 5 and 6 of Table 3 to this subpart. This requirement applies to Subpart DDDDD emission limitations and operating limitations, and do not apply to a tune-up conducted every 5 years. This distinction is substantiated by the language in 63.7505(a), which states that “emission and operating limits apply to you at all times the affected unit is operating except for the periods noted in §63.7500(f).” Further, items 5 and 6 of Table 3 are not applicable for reasons discussed above. Therefore, §63.7500(f) is not included in the renewal permit.   |
| §63.7505(a)                      | 6.1.1.    | This general requirement to comply with the work practice standards has been cited in the permit condition embodying those standards.  |
| §63.7510(g)                      | 6.1.3.    | This section pertains to initial compliance demonstration, which has passed. However, the last statement is an ongoing requirement to complete the applicable 5-year tune-up as specified in §63.7515(d). Therefore, this section has been cited with the condition written for §63.7515(d).   |
| §63.7515(d)                      | 6.1.3.    | This requirement to complete the tune-up no later than 61 months after the previous one has been included as the second bullet statement in the permit condition.  |
| §63.7530(f)                      | None      | This is a requirement to submit the Notification of Compliance Status (NOCS) report. Since this requirement has been fulfilled, and is not ongoing, it has been excluded from the renewal permit.  |
| §§63.7540(a), (a)(12), (a)(13)   | 6.1.3.    | These sections specify the requirements for the 5-year tune-up. Non-applicable language has been excluded for precision. The requirement in §63.7540(a)(10)(vi)(C) has been excluded since the unit is not physically capable of using more than one type of fuel. The requirement in §63.7540(a)(13) to conduct a missed tune-up within 30 days of startup has been included as the first bullet statement of the permit condition.   |
| §§63.7545(a), (c), (e), (f), (h) | None      | <p>§63.7545(a) – This section requires the permittee to submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that are applicable by the dates specified. None of these sections are applicable and have been excluded from the renewal permit for the reasons discussed below.</p> <ul style="list-style-type: none"> <li>• §63.7(b) – This section for a <i>Notification of Performance Test</i> is not applicable since the emission units are not subject to Subpart DDDDD performance testing.</li> <li>• §63.7(c) – This section for a <i>Quality Assurance Program</i> is not applicable since the emission units are not subject to Subpart DDDDD performance testing.</li> <li>• §63.8(e) – This section is not applicable since the units are not subject to Subpart DDDDD CMS requirements.</li> </ul> |

| Section                         | Condition     | Discussion  |
|---------------------------------|---------------|---|
|                                 |               | <ul style="list-style-type: none"> <li>• §§63.8(f)(4) and (6) – These sections are not applicable since the units are not subject to Subpart DDDDD monitoring requirements.</li> <li>• §§63.9(b) through (h) – These sections are not applicable since either Subpart DDDDD performance testing and monitoring are not required, or the requirements have already been fulfilled and are not ongoing.</li> </ul> <p>§63.7545(c) – This requirement to submit an Initial Notification is no longer applicable; therefore, no permit condition is warranted.</p> <p>§63.7545(e) – This requirement to submit a Notification of Compliance Status (NOCS) report is no longer applicable; therefore, no permit condition is warranted.</p> <p>§63.7545(f) – This requirement to submit a notification if a fuel other than gas 1 is combusted is not applicable since at this time the permittee has no intention to utilize another fuel; therefore, no permit condition is warranted.</p> <p>§63.7545(h) – This requirement to submit a notification if switching fuels or making a physical change that results in applicability of a different fuel subcategory is not applicable since at this time the permittee has no intention to utilize another fuel or make a physical change; therefore, no permit condition is warranted.</p> |
| <p>§§63.7550(a)-(c), (h)(3)</p> | <p>6.5.1.</p> | <p>§63.7550(a) – This section requires the permittee to submit each report in Table 9 that is applicable. In Table 9 there is only one item to submit a Compliance Report, but the item includes four sub-items a. through d.</p> <ul style="list-style-type: none"> <li>• The requirement in Table 9 sub-item a. is to provide the information in §§63.7550(c)(1) through (5) every five (5) years (since 5-year tune-ups are applicable) according to the requirements in §63.7550(b), which is applicable in this case.</li> </ul> <p>§63.7550(c)(1) – This paragraph is <b>applicable</b> since tune-ups are required.</p> <p>§63.7550(c)(2) – This paragraph is <u>not applicable</u> since fuel analysis is not applicable under this subpart.</p> <p>§63.7550(c)(3) – This paragraph is <u>not applicable</u> since emission limits are not applicable under this subpart.</p> <p>§63.7550(c)(4) – This paragraph is <u>not applicable</u> since emission limits are not applicable under this subpart.</p>  |

| Section           | Condition | Discussion  |
|-------------------|-----------|---|
|                   |           | <p>§63.7550(c)(5) – Various elements under this paragraph are <b>applicable</b> as specified in §63.7550(c)(1), which are: (i) through (iii), (xiv), and (xvii).</p> <ul style="list-style-type: none"> <li>• The requirement in Table 9 sub-item b. is to provide a statement that there were no deviations from emission and operating limitations, and any work practice standards for periods of startup and shutdown specified in Table 3 during the reporting period. The emission units are not subject to emission limitations, and as such are not subject to startup/shutdown work practices (items 5 and 6 in Table 3 to Subpart DDDDD). It has been noted that the applicable tune-up work practice is not included in this requirement; therefore, Table 9 sub-item b. is <u>not applicable</u>.</li> <li>• Table 9 sub-item c. is <u>not applicable</u> since it pertains to emission and operating limitations, and startup and shutdown work practices, which are not applicable.</li> <li>• Table 9 sub-item d. is <u>not applicable</u> since the units are not required by this subpart to utilize a CMS.</li> </ul> <p>§63.7550(b) – This section specifies the dates covered by each reporting period and the deadlines for their submittal. Since only the 5-year tune-up is applicable, the language for the permit condition has been modified accordingly.</p> <p>§63.7550(c) – This section specifies the information to be contained in a compliance report, which already has been specified by sub-item a. in Table 9 to this subpart as discussed above.</p> <p>§63.7550(h)(3) – This section is applicable to reports under Table 9 to this subpart; therefore, this section has been set forth in the compliance report permit condition.</p> |
| §§63.7555(a), (h) | 6.4.1.    | <p>§63.7555(a) – This section requires recordkeeping according to §§63.7555(a)(1) and (2). Of these paragraphs, §63.7555(a)(1) remains applicable. However, §63.7555(a)(2) is not applicable since performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in §63.10(b)(2)(viii) are not applicable. The Subpart A paragraph requires records of “All results of performance tests, CMS performance evaluations, and opacity and visible emission observations.” None of these are applicable in this case. For these reasons, §63.7555(a)(2) is not applicable.</p> <p>§63.7555(h) – This section has been excluded from the renewal permit since the unit is designed to burn natural gas only. This was confirmed by the permittee in an e-mail dated February 9, 2018.</p>   |

| Section  | Condition        | Discussion  |
|--|------------------|---|
| §§63.7560(a)-(c)   | 6.4.2.           | This section applies to records of each occurrence, measurement, maintenance, corrective action, report, or record. Since the permittee is subject to some of these items in the tune-up, this recordkeeping section has been included in the renewal permit. |
| §63.7565, Tables 3 (Item # 1), 9 & 10 of 40CFR63 Subpart DDDDD | 6.1.1.<br>6.5.1. | Table 3 is the tune-up requirement in condition 6.1.1.<br>Table 9 is the Compliance Report in condition 6.5.1.<br>Table 10 is the applicability of the general provisions of Subpart DDDDD, which are not typically incorporated into permits as conditions.  |

### 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.** WVDAQ has determined that this rule does not apply to natural gas-fired reciprocating internal combustion engines. The turbines (009T1, 009T2, 009T3, and 009T4) do not meet the definitions of either fuel burning unit, or source operation, in 45CSR§§10-2.8. and 2.19, respectively. Consequently, this rule does not apply to the turbines. Each of the heaters HTR1, HTR2, HTR3, HTR4, HTR5, and HTR6, are less than 10 MMBtu/hr design heat input. Therefore, they are exempt from the mass rate limit and other testing and MRR requirements in rule sections 3 and 6 through 8 due to the heat input being less than 10 MMBtu/hr in accordance with 45CSR§10-10.1. Additionally, none of the heaters are a source operation as defined in 45CSR§10-2.19.; therefore, 45CSR§10-4.1. is not applicable.
- b. **45CSR21 – To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds.** This facility is not located in one of the affected counties listed in 45CSR§21-1.1.; therefore, 45CSR21 is not applicable to this facility.
- 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 line heaters HTR2 and HTR4 at this facility are less than 10 MMBtu/hr design heat capacity, which is below the applicability criteria stated in 40 C.F.R. §60.40c(a).
- e. **40 C.F.R. 60 Subparts K, Ka – Standards of Performance for Storage Vessels for Petroleum Liquids.** All tanks (except for tank A12) at Files Creek station are below 40,000 gallons in capacity (§60.110(a) and §60.110a(a)). Tank A12 does not store petroleum liquids, hence it is exempt (§60.110(a) and §60.110a(a)).

- f. **40 C.F.R. 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.** 40 C.F.R. §60.110b(a) states, “Except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m<sup>3</sup>) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.” All tanks (except for tank A12) at Files Creek station are below 75 m<sup>3</sup> in capacity. Since the vessels do not meet applicability criterion at 40 C.F.R. §60.110b(a), this regulation does not apply to these tanks. Tank A12 is 55,000 gallons in capacity, which is approx. 208.2 cubic meters, and stores liquid less than 3.5 kPa true vapor pressure. 40 C.F.R. §60.110b(b) states “This subpart does not apply to storage vessels with a capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure less than 15.0 kPa.” Thus, this regulation does not apply to tank A12.
- g. **40 C.F.R. 60Subpart KKK – Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant.** Files Creek 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.
- h. **40 C.F.R. 60 Subpart GG – Standards of Performance for Stationary Gas Turbines.** As provided in 40 C.F.R. §60.4305(b), the provisions of Subpart GG are not applicable because the stationary combustion turbines (009T1, 009T2, 009T3, and 009T4) are subject to 40 C.F.R. 60 Subpart KKKK.
- i. **40 C.F.R. 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.** None of the engines at the facility are compression ignition type; therefore, this regulation does not apply.
- j. **40 C.F.R. 60Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015.** The Storage Vessel requirements defined for transmission sources were evaluated for liquids storage vessels C09, C10, C11, C12, and C13 and were found not to be applicable because emissions are below the 6 tpy VOC threshold in accordance with 40 C.F.R. §60.5365(e). The Reciprocating Engine/Integral Compressors (00907, 00908, 00909, and 00910) at this site are not subject to this regulation due to not commencing construction, modification, or reconstruction after August 23, 2011, and on or before September 18, 2015. The turbines 009T1 and 009T2 were constructed in 2015, but their compressors are not subject to the wet seal centrifugal compressor requirements in §60.5365(b) because their compressors are dry seal type per technical correspondence received from the permittee on February 9, 2018.
- k. **40 C.F.R. 63Subpart HHH – National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities.** The Transmission Station is not subject to Subpart HHH since there are no affected dehydration units utilized at this site.
- l. **40 C.F.R. Part 64 – Compliance Assurance Monitoring (CAM).** The engines and tank (A12) do not have any add-on control; therefore, in accordance with 40 C.F.R §64.2(a)(2), CAM is not applicable to these sources. The turbines (009T1, 009T2, 009T3, and 009T4) utilize low-NO<sub>x</sub> combustion controls; however, the use of combustion or other process design features or characteristics are not included in the definition of *Control device* in 40 C.F.R. §64.1. Moreover, the preamble to 40 C.F.R. Part 64 specifically states that low-NO<sub>x</sub> burner technology is not included in the definition of *Control device* for the final rule. Since a *Control device* is not utilized for the turbines, they do not meet the applicability criterion in §64.2(a)(2) and therefore CAM is not applicable to the turbines.

### **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: March 2, 2018  
Ending Date: April 2, 2018

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

Denton B. McDerment, P.E.  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### **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.

### **Point of Contact**

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

### **Response to Comments (Statement of Basis)**

No comments were received from either the public or U.S. EPA.