

Fact Sheet



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

Permit Number: **R30-01700100-2016**
Application Received: **April 7, 2016**
Plant Identification Number: **017-00100**
Permittee: **Dominion Transmission, Inc.**
Facility Name: **Schutte Compressor Station**
Mailing Address: **925 White Oaks Blvd, Bridgeport, WV 26330**

Revised: N/A

Physical Location: Sedalia, Doddridge County, West Virginia
UTM Coordinates: 534.46 km Easting • 4357.67 km Northing • Zone 17
Directions: From the intersection of Rt. 50 and Rt. 98, go west on Rt. 50 for 9.9 miles to Rt. 23 North. Turn right onto Rt. 23 North, travel 19.5 miles on Rt. 23. Just past the Columbia Gas Office turn left onto gravel road and cross small bridge. Continue to station on the right.

Facility Description

Natural Gas Transmission Facility, SIC Code – 4922. The facility is a production gathering station that services a transmission pipeline system to recompress natural gas flowing through a pipeline for transportation. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of two (2) 660 HP natural gas fired reciprocating engines and one (1) 600 HP natural gas fired reciprocating engine, two (2) 192.5 bhp emergency generators, one (1) dehydrator reboiler, one (1) dehydration unit still, one (1) dehydration unit still flare, one (1) pipeline heater and six (6) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2014 Actual Emissions
Carbon Monoxide (CO)	42.94	17.44
Nitrogen Oxides (NO _x)	271.02	78.05
Particulate Matter (PM _{2.5})	2.67	0.95
Particulate Matter (PM ₁₀)	2.67	0.95
Total Particulate Matter (TSP)	3.39	0.95
Sulfur Dioxide (SO ₂)	0.04	0.02
Volatile Organic Compounds (VOC)	134.27	58.22

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2014 Actual Emissions
Acrolein	0.54	0.14
Acetaldehyde	0.54	0.14
Benzene	0.21	0.11
Ethylbenzene	0.11	0.00
Formaldehyde	3.83	0.77
Hexane	0.29	0.18
Xylene	1.28	0.15
Toluene	0.36	0.14

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

Title V Program Applicability Basis

This facility has the potential to emit 271.02 TPY of NO_x and 134.27 TPY of VOCs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Dominion Transmission, Inc. 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	Opacity Requirements for boilers
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur requirements for fuel burned
	45CSR11	Standby plans for emergency episodes.
	45CSR13	New Source Construction
	45CSR16	Standards of Performance for New Stationary Sources
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for HAPs
	40 C.F.R. Part 60, Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities
	40 C.F.R. Part 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
	40 C.F.R. Part 64	Compliance Assurance Monitoring (CAM)
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	Control fugitive particulate matter

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2778	11/03/2008	
G60-C033	06/27/2011	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

Removal of CAM Language

The previous permit for this facility included CAM language for the Dehydration Unit (DEHY01) and the associated Flare Control Device (F1) in conditions 5.2.5-5.2.10, 5.4.12, 5.4.13, and 5.5.5.

The dehydration unit (DEHY01) is a potential PSEU for VOC and HAP emissions because it meets the applicability criteria in 40CFR§64.2(a):

- (1) it has emission limits for VOCs and HAPs(condition 5.1.6),
- (2) it uses a control device (Flare) to achieve compliance with these limits, and
- (3) potential pre-control device emissions of HAPs and VOC are higher than the major source applicability criteria (10 TPY for a single HAP, 25 TPY of aggregated HAPs, and 100 TPY for criteria pollutants).

However, the DEHY01 meets the exemption in 40CFR§64.2(b)(1)(i) for HAP emissions, since the facility is subject to 40 C.F.R. 63 Subpart HH; therefore CAM is not applicable to the DEHY01 for HAPs.

For the VOC emissions of the DEHY01, it was determined during the review of R30-01700100-2011 that the DEHY01 didn't meet any exemption in 40CFR§64.2(b), and met the applicability criteria in 40CFR§64.2(a), therefore it was subject to CAM. The CAM plan was included with the permit at that time (on October 5, 2011).

However, per the company's request, the CAM applicability for the DEHY01 for VOC emissions was re-considered during this permit renewal process. It has been determined that CAM is, in fact, not applicable to the DEHY01 for VOC because it was exempted per 40CFR§64.2(b)(1)(vi) since the Title V permit already specified "a continuous compliance determination method" (condition 5.2.2, underlying R13-2778 condition 6.2.1) included in R30-01700100-2006 (SM01) (issued on January 26, 2009).

Therefore, based on the information above, the DEHY01 was found not to be subject to CAM for VOC, and all the requirements of the CAM plan were removed.

NSPS Subpart JJJJ

Section 8.0. was revised to include the applicable requirements from NSPS Subpart JJJJ and applicable requirements from G60-C and G60-C033. NSPS Subpart JJJJ, G60-C, and G60-C033 requirements have been included as follows:

Condition	Condition Summary	NSR Citation	Other Citations
8.1.1	Emission limitations	45CSR13, General Permit Registration G60-C033, and G60-C, 5.1.2.	N/A
8.1.3	Emission Standards for Stationary Emergency Engines >25 HP	45CSR13, General Permit Registration G60-C033 and G60-C, 8.2.5	45CSR16, 40 CFR §60.4233(e) and Table 1 to Subpart JJJJ of Part 60
8.1.4	Emissions standards apply for life of engine.	45CSR13, General Permit Registration G60-C033 and G60-C, 8.2.9	45CSR16, 40 CFR §60.4234
8.2.1	Non-resettable hour meter	45CSR13, General Permit Registration G60-C033 and G60-C, 8.3.8	45CSR16, 40 CFR §60.4237(b)
8.2.2	Demonstrating compliance with condition 8.1.3	45CSR13, General Permit Registration G60-C033 and G60-C, 8.4.1.a and 8.4.2.a	45CSR16, 40 CFR §§60.4243(b)(1) and (a)(1)
8.2.3	Emergency engine operation	45CSR13, General Permit Registration G60-C033 and G60-C, 8.4.4	45CSR16, 40 CFR §60.4243(d)
8.2.4	Using propane as fuel	45CSR13, General Permit Registration G60-C033 and G60-C, 8.4.5	45CSR16, 40 CFR §60.4243(e)
8.2.5	Initial performance testing for non-certified engines	45CSR13, General Permit Registration G60-C033 and G60-C, 8.4.6	45CSR16, 40 CFR §60.4243(f)
8.2.6	Use of AFR controller	45CSR13, General Permit Registration G60-C033, and G60-C, 8.4.7.	45CSR16, 40 CFR §60.4243(g)
8.2.7	Requirements for Use of Catalytic Reduction Devices	45CSR13, General Permit Registration G60-C033 and G60-C, 5.1.4.a., c., and d.	N/A
8.4.1	Records of notifications, maintenance, and manufacturers documentation	45CSR13, General Permit Registration G60-C033 and G60-C, 8.6.1.a	45CSR16, 40 CFR §60.4245(a)
8.4.2	Records of the hours of operation recorded through the non-resettable hour meter	45CSR13, General Permit Registration, G60-C033 and G60-C, 8.6.1.b	45CSR16, 40 CFR §60.4245(b)
8.4.3	Records of the amount and type of fuel consumed in each engine and the hours of operation of each engine	45CSR13, General Permit Registration G60-C033 and G60-C, 5.4.1.	N/A
8.5.1	Annual reporting	N/A	45CSR16, 40 CFR §60.4245(e)

Additional Permit Changes

The following additional significant changes were made with this modification:

- Tank TK05 was removed from the emission units table.
- Control devices 1C, 2C, and 3C were added to the emission units table.
- Conditions 3.1.9, 3.1.10, 3.2.1, and 3.2.2 in the previous Title V permit were moved to Section 5.0 and renumbered as conditions 5.1.12, 5.1.13, 5.2.5, and 5.2.6 at the request of the permittee.
- Appendix A (Class II General Permit G60-C Registration G60-C033) and B (Class II General Permit G60-C) from the previous permit renewal are no longer attached. With this renewal, applicable portions of these documents are now referenced within the permit.

Non-Applicability Determinations

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

- a. 45 CSR 10 – Compressor engines (EN01 through EN03) have been excluded from the applicability of SO₂ and H₂S limits since 45CSR10 is not applicable to compressor engines.
- b. 40 CFR 60 Subpart JJJJ – The compressor engines (EN01 and EN02) are not subject to this subpart since they were installed in 1985, before the applicability date.
- c. 40 CFR 60 Subpart OOOO – This subpart does not apply to the facility since the facility is a gathering facility that does not have gas wells, centrifugal compressors, reciprocating compressors, tanks, and/or pneumatic controllers constructed, modified, or reconstructed after August 23, 2011.
- d. 40 CFR 63 Subpart HHH – This subpart does not apply to the facility since the facility is not a transmission or storage station and is not a major source of HAPs.
- e. 40 CFR 63 Subpart DDDDD – The reboiler (RBR01) and pipeline heater #1 (HTR01) are not subject to this subpart since the facility is not major source of HAPs.
- f. 40 CFR 63 Subpart JJJJJ – The reboiler (RBR01) and pipeline heater #1 (HTR01) are not subject to this subpart since they are considered process heaters, which are excluded from the definition of “boiler” in 40 CFR §63.11237.
- g. 40 CFR 64 – The dehy unit (DEHY01) is not subject to CAM since HAP emissions from the unit are subject to 40 C.F.R. 63, Subpart HH, which has provisions for compliance monitoring established after 1990 (exemption per 40 CFR §64.2(b)(1)(i)). In addition, since the R13-2778 permit specifies a “continuous compliance determination method” for VOC emissions (e.g. continuously monitoring the flare using a thermocouple to detect the presence of a flame) which was included in the Title V permit, CAM does not apply (exemption per 40 CFR §64.2(b)(1)(vi)).

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: Tuesday, July 5, 2016
Ending Date: Thursday, August 4, 2016

Point of Contact

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

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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.