Fact Sheet

For Draft/Proposed Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 10, 2018.

Permit Number: **R30-09700009-2018 (SM02)**
Application Received: **June 16, 2022**
Plant Identification Number: **03-54-097-00009**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Cleveland Compressor Station**
Mailing Address: **1700 MacCorkle Avenue, SE, Charleston, WV 25314**

Permit Action Number: **SM02** Revised: **Draft/Proposed**

Physical Location: Kanawha Head, Upshur County, West Virginia
UTM Coordinates: 555.40 km Easting • 4,289.22 km Northing • Zone 17
Directions: Take I-79 to exit 67. Turn right on US-19N and travel 21 miles. Turn right onto WV-4 N and travel 7.3 miles. Turn right onto WV-20 S and travel approximately 9 miles to the station.

Facility Description
The Cleveland 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, fifty-two (52) weeks per year. The station has two (2) 10,381-hp turbine engines, two (2) 14,766-hp turbine engines, one (1) 880-hp reciprocating engine/emergency generator, one (1) 0.5 mmBtu/hr line heater, one (1) 1.0 mmBtu/hr fuel gas heater, one (1) 0.68 mmBtu/hr fuel gas heater, one (1) 2,000 gallon pipeline liquids tank, two (2) 1,000 gallon pipeline liquids tanks, and various other insignificant storage vessels.
This significant modification is for the removal of four (4) 2,000 hp Cooper Bessemer GMWA reciprocating engine/integral compressors (06007 - 06010) as removed in the recently issued permit R13-2394D.

The four (4) Cooper Bessemer GMWA RICE (06007 - 06010) have been decommissioned, disconnected, and no longer represent active emission sources on site. As a result of these changes, the Cleveland Compressor Station has been reclassified as an area source of hazardous air pollutants (HAPs) with a potential to emit of 2.06 tons per year. With the HAP emissions reduction, the facility seeks to affirm that the they no longer meet the applicability requirements of 40CFR63 Subparts YYYYY and DDDDD and requested a permit shield for non-applicability to these subparts.

This significant modification is also to remove the requirements of 40 CFR 60 Subpart OOOOa and add this subpart to the non-applicable requirements permit shield in condition 3.7.2.

**Emissions Summary**

This modification results in the following emission changes:

<table>
<thead>
<tr>
<th>Regulated Pollutants</th>
<th>Change in Potential Emissions (tpy)</th>
<th>Potential Emissions After Modification (tpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>-39.24</td>
<td>156.12</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOx)</td>
<td>-886.51</td>
<td>106.19</td>
</tr>
<tr>
<td>Particulate Matter (PM2.5)</td>
<td>-14.22</td>
<td>12.36</td>
</tr>
<tr>
<td>Particulate Matter (PM10)</td>
<td>-14.22</td>
<td>12.36</td>
</tr>
<tr>
<td>Particulate Matter (TSP)</td>
<td>-14.22</td>
<td>12.36</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO2)</td>
<td>-0.21</td>
<td>1.33</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>-35.32</td>
<td>43.65</td>
</tr>
<tr>
<td><strong>Hazardous Air Pollutants HAPs</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>-16.25</td>
<td>1.4</td>
</tr>
<tr>
<td>Combined Miscellaneous HAPs</td>
<td>-7.16</td>
<td>0.66</td>
</tr>
<tr>
<td><strong>Total HAPs</strong></td>
<td>-23.41</td>
<td>2.06</td>
</tr>
</tbody>
</table>

**Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit 106.19 tons/yr NOx, 156.12 tons/yr of CO. Due to this facility’s potential to emit over 100 tons per year of criteria pollutant, Columbia Gas Transmission, LLC’s Cleveland 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.

The modification to this facility has been found to be subject to the following applicable rules:

**Federal and State:**

45CSR13 Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR30 Operating permit requirement.

State Only: N/A

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

The active permits/consent orders affected by this modification are as follows:

<table>
<thead>
<tr>
<th>Permit or Consent Order Number</th>
<th>Date of Issuance</th>
<th>Permit Determinations or Amendments That Affect the Permit (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>R13-2394D</td>
<td>August 8, 2022</td>
<td></td>
</tr>
</tbody>
</table>

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

Below are the revisions made to R30-09700009-2018 (SM02) and a regulatory discussion in association with this modification:

1) Page 1 - Updated the facility location.

2) Page 2 - Deleted “7.0 Collection of Fugitive Emissions Facility-Wide Pursuant to 40 CFR §60.5397a” from the table of contents.

3) Title V Boilerplate changes

   ➢ Condition 2.11.4. – The citation of authority has been updated.

   ➢ Condition 2.22.1. – 45CSR38 has been repealed and therefore it has been removed from the citation of authority.

   ➢ Condition 3.5.3. – The US EPA’s contact information has been updated.

4) Condition 1.1. - Emission Units Table

   ➢ The four (4) Cooper-Bessemer GMWA Reciprocating Engine/Integral Compressors (Emission Unit IDs: 06007, 06008, 06009, 06010) have been removed from the table.

5) Condition 1.2. – Updated the R13-2394D information.

6) Condition 3.7.2. – Non-applicable requirements shield
➢ Per request of Columbia Gas, added 40 CFR Part 60 Subpart OOOOa - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015. (see regulatory discussion below)

➢ Per request of Columbia Gas, added 40 CFR Part 63 Subpart YYYY - National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines. (see regulatory discussion below)

➢ Per request of Columbia Gas, added 40 CFR Part 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. (see regulatory discussion below)

7) Section 4.0

➢ The requirements associated with R13-2394D from 40 CFR 63 Subpart DDDDD have been removed as well as the other requirements from 40 CFR 63 Subpart DDDDD. The conditions removed or affected are 4.1.3., 4.1.4., 4.1.5.d, 4.1.6.d., 4.1.7.d., 4.3.1., 4.4.1. – 4.4.3., 4.5.1. and 4.5.2.

   • The citation of authority has been revised in conditions 4.1.5., 4.1.6. and 4.1.7. to remove Subpart DDDDD citations and 45CSR34.

   • Where 4.1.3. and 4.1.4. have been deleted, the subsequent conditions have been renumbered. (i.e., 4.1.5., 4.1.6. and 4.1.7. are now 4.1.3., 4.1.4. and 4.1.5.)

   • Conditions 4.3.1. and 4.5.1. have been marked as “Reserved.”

   • Condition 4.4.4 has been renumbered as 4.4.1.

8) Section 7.0 - It has been determined that the facility is not subject to the requirements of this section since the two (2) combustion turbine engines 06014 and 06015 commenced construction before September 18, 2015. Therefore, this section of the permit has been deleted. (see regulatory discussion below)

Regulatory Discussion

9) 40 CFR Part 60 Subpart OOOOa - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015. During the processing of renewal permit R30-09700009-2018, the requirements for “Collection of Fugitive Emissions Facility-Wide Pursuant to 40 CFR §60.5397a” were added in section 7.0 of the permit. This applicability was based on the installation year of 2017 for the two (2) combustion turbine engine/centrifugal compressors 06014 and 06015. However, these turbine engine/centrifugal compressors were ordered prior to September 18, 2015 and therefore commenced construction prior to the applicability date. Hence, the Subpart OOOOa requirements in Section 7.0 are not applicable to the facility. The facility has requested through this significant modification that these requirements be removed from the permit and that Subpart OOOOa be added to the non-applicable requirements shield in condition 3.7.2. These changes have been made as discussed in Items 6 and 8 above.

10) 40 CFR Part 63 Subpart YYYY – (National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines) This rule applies to stationary combustion turbines located at major sources of HAP emissions. As a result of Permit R13-2394D and the removal of the four (4) Cooper Bessemer GMWA RICE, the existing turbines (06012 - 06015) will no longer be subject to this rule. This determination is based on the Cleveland Compressor Station becoming an area source of HAP emissions. As requested by the facility, the subpart has been added to the non-applicable requirements shield in condition 3.7.2. as discussed in Item 6 above.

11) 40 CFR Part 63 Subpart DDDDD – (National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters) This rule
applies to existing and new applicable units at major sources of HAPs. As a result of Permit R13-2394D and the removal of the four (4) Cooper Bessemer GMWA RICE, the existing line heater (HTR3) and the fuel gas heaters (HTR6, HTR7) will no longer be subject to this rule. This determination is based on the Cleveland Compressor Station becoming an area source of HAP emissions. Therefore, the requirements from this rule in section 4.0 of the permit have been deleted. As requested by the facility, the subpart has been added to the non-applicable requirements shield in condition 3.7.2. These changes have been made as discussed in Items 6 and 7 above.

Non-Applicability Determinations
The following requirements have been determined not to be applicable to the subject facility due to the following:

**40 CFR Part 60 Subpart OOOOa** - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015. All potentially affected sources at this facility commenced construction prior to September 18, 2015.

**40 CFR Part 63 Subpart YYYY** - National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines. The facility is not a major source of HAP emissions and therefore is exempt from this subpart.

**40 CFR Part 63 Subpart DDDDD** - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. The facility is not a major source of HAP emissions and therefore is exempt from this subpart.

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: August 23, 2022
Ending Date: September 22, 2022

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

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41910
frederick.tipane@wv.gov

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

Response to Comments (Statement of Basis)
Not applicable.