

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 12, 2022.

Permit Number: **R30-09900013-2022**
Application Received: **January 30th, 2023 (MM02) and May 12th, 2023 (MM03)**
Plant Identification Number: **03-54-099-00013**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Ceredo Compressor Station**
Mailing Address: **1664 Walkers Branch Road, Huntington, WV 25704**

Permit Action Number: MM02 and MM03 Revised: 08/29/2023

Physical Location:	Ceredo, Wayne County, West Virginia
UTM Coordinates:	366.1 km Easting • 4247.7 km Northing • Zone 17
Directions:	Traveling I-64 West from Charleston, take the Kenova-Ceredo exit. Turn left onto Route 52. Make a left onto Airport Road. Turn right onto Walkers Branch Road at the Pilgrim Glass Plant, travel 2 miles, the station is on the left.

Facility Description

The Ceredo Station is a natural gas transmission facility covered by Standard Industrial Code (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of six (6) 2800-hp and one (1) 2700-hp natural gas fired reciprocating compressor engines, one (1) 30,399-hp compressor turbine, numerous storage tanks of various sizes, and forty (40) Catalytic Heaters. On-site support equipment includes one (1) 812 hp and one (1) 1,175 hp emergency generators, one (1) 6.276 MMBtu/hr boiler, and one (1) 0.375 MMBtu/hr and one (1) 0.60 MMBtu/hr line heaters.

Emissions Summary

This modification results in the following emission changes:

Pollutant	PTE Change (tpy)
Carbon monoxide (CO)	1.04
Nitrogen Oxides (NO _x)	1.24
Volatile Organic Compounds (VOCs)	0.07
Particulate Matter (PM ₁₀)	0.09
Sulfur Dioxide (SO ₂)	<0.01
Total HAPs	0.02

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 311.45 tons per year of Carbon Monoxide (CO), 3,583.95 tons per year of Nitrogen Oxides (NO_x), 107.33 tons per year of Volatile Organic Compounds (VOCs), 40.1 tons per year of Formaldehyde, and 58.01 tons per year of total 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, LLC 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	Construction permit requirement.
	45CSR30	Operating permit requirement.
	45CSR2	To Prevent and Control Particulate Air Pollution From Combustion of Fuel in Indirect Heat Exchangers
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:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-1856E	March 23, 2023	
R13-1856F	May 17, 2023	

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

The purpose of MM02 is to add forty (40) Catalytic Heaters, identified as SH1 to the permit and the Equipment Table. The changes under this modification were approved under R13-1856E.

The purpose of MM03 is to modify the conditions added in R13-1856E and remove the 40 C.F.R. 63 Subpart DDDDD requirement of condition 4.1.5.e because it does not apply to SH1. The changes under this modification were approved under R13-1856F.

These two modifications required the changes below to the Title V Permit:

- **Section 1.0**
 - The Emission Unit Description of Emission Unit ID 00507 was updated to reflect the correct engine model.
 - The forty (40) Catalytic Heaters were added to the Emission Units Table under Emission unit ID SH1.
- **Sections 2.0 and 3.0**
 - The Title V Boilerplate was updated for conditions 2.1.3, 2.17, 3.5.4, 3.5.7, 3.5.8.a.1, and 3.5.8.a.2.
 - The R13-1856F citation was updated for Title V condition 3.1.12.
- **Section 4.0**
 - The requirements from R13-1856E and F and 45CSR2 for the forty (40) Catalytic Heaters (SH1), were added as condition 4.1.12.
- **Section 5.0**
 - The R13-1856F citation was updated for Title V condition 5.3.1.
- **Section 6.0**
 - The R13-1856F citations were updated for Title V conditions 6.1.2 and 6.3.1.

Non-Applicability Determinations

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

- a. According to 45CSR§2-11.1 the boiler and heaters are exempt from the weight emission standards and MRR (monitoring, recordkeeping and reporting) because they are less than 10 mmBtu/hr.

- b. 45CSR10; To Prevent and Control Air Pollution from the Emission of Sulfur Oxides: 45CSR10 is not applicable to the facility boiler and heaters because they are less than 10 mmBtu/hr.
- c. 45CSR21; To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds: All storage tanks at Ceredo station are below 40,000 gallons in capacity, hence 45CSR§21-28 is not applicable. Ceredo station is not engaged in the extraction or fractionation of natural gas, hence, 45CSR§21-29 is not applicable.
- d. 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.”
- e. 40 C.F.R. 60 Subpart Dc; Standards of Performance for Steam Generating Units: The boiler and heaters at this facility are less than 10 mmBtu/hr; hence, Subpart Dc is not applicable.
- f. 40 C.F.R. 60 Subparts K, Ka; Standards of Performance for Storage Vessels for Petroleum Liquids: All tanks at Ceredo station are below 40,000 gallons in capacity.
- g. 40 C.F.R. 60 Subpart Kb; Standards of Performance for Volatile Organic Liquid Storage Vessels: All tanks at Ceredo station are below 75m³ in capacity.
- h. 40 C.F.R. 60 Subpart KKK; Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant: Ceredo 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.
- i. 40 C.F.R. 60 Subpart IIII; Standards of Performance for Stationary Compression Ignition Internal Combustion Engines: There are no compression ignition engines at this facility.
- j. 40 C.F.R. 60 Subpart OOOO; Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution: Storage vessel requirements do not apply since all tanks commenced construction prior to August 23, 2011.
- k. 40 C.F.R. 63 Subpart HHH; National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities: The facility does not have a glycol dehydration unit and is therefore not subject to the requirements of this subpart.
- l. 40 C.F.R. 63 Subpart YYYYY; Turbine MACT: The Solar Titan 250 (E10) is subject to 40 C.F.R. 63 Subpart YYYYY. Per 40 C.F.R. §63.6095(d), there is a stay of standards for lean premix stationary combustion turbines until EPA takes final action to require compliance with this subpart. The only requirement for the unit is the initial notification requirement of 40 C.F.R. §63.6145, which was satisfied by the preconstruction permit application.
- m. 40 C.F.R. 64 – None of the emission units have any add-on controls; therefore, in accordance with 40 C.F.R § 64.2(a), CAM is not applicable to this facility.

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: Not Applicable for Minor Modifications
Ending Date: N/A

Point of Contact

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

Nikki B. Moats
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41282
Nikki.b.moats@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.