



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

Permit Number: **R30-02100002-2015** Application Received: **May 05, 2015** Plant Identification Number: **03-54-02100002** Permittee: **Dominion Transmission, Inc.** Facility Name: **Jones Compressor Station** Mailing Address: 925 White Oaks Blvd. Bridgeport, WV 26330

Revised: N/A

Physical Location: UTM Coordinates: Directions: Lockney, Gilmer County, West Virginia 502.87 km Easting • 4300.26 km Northing • Zone 17 Interstate 79 to Burnsville Exit 79. Take Rt. 5 west. Go 15.1 miles to junction of Rt.33/119. Turn left and go 1.1 miles to Glenville stoplight. Continue through on Rt.33/119 south for 13 miles to Jones Compressor Station on left.

# **Facility Description**

Jones Compressor Station is a natural gas facility covered by Standard Industrial Classification (SIC) Code 4922. 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, one (1) 112.2-hp gas fired emergency generator, one (1) 7.0 mmcf/day dehydration unit with flare, and seven (7) storage tanks of various sizes.

Plantwide Emissions Summary [Tons per Year]			
<b>Regulated Pollutants</b>	Potential Emissions	2013 Actual Emissions	
Carbon Monoxide (CO)	42.06	15.54	
Nitrogen Oxides (NO <sub>X</sub> )	259.41	177.08	
Particulate Matter (PM <sub>2.5</sub> )	0.3	0.026	
Particulate Matter (PM <sub>10</sub> )	0.5	0.33	
Total Particulate Matter (TSP)	0.97	0.69	
Sulfur Dioxide (SO <sub>2</sub> )	0.03	0.02	
Volatile Organic Compounds (VOC)	63.91	33.21	

PM<sub>2.5</sub> and PM10 are a components of TSP.

Hazardous Air Pollutants	Potential Emissions	2013 Actual Emissions
Acetaldehyde	0.37	0.21
Acrolein	0.37	0.21
Benzene	0.27	0.10
Ethylbenzene	0.57	0.07
Formaldehyde	1.78	1.02
Hexane	0.24	0.04
Toluene	0.71	0.19
Xylene	1.69	0.68

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

# **Title V Program Applicability Basis**

This facility has the potential to emit 259.41 tons of  $NO_x$ . 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	Permits For Construction, Modification
	45CSR16	Standards of performance for New
		Stationary Sources.
	45CSR17	Control of fugitive particulate matter
	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 Hazardous Air
		Pollutants
	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 Emissions Standards for Hazardous
		Air Pollutants for Stationary Reciprocating
		Internal Combustion Engines.
	40 C.F.R. Part 64	Compliance Assurance Monitoring.
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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	Date of	Permit Determinations or Amendments That
Consent Order Number	Issuance	Affect the Permit ( <i>if any</i> )
R13-2669B	September 10, 2012	

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 following changes and updates have been made to the Title V permit during this renewal:

The main office mailing address for Dominion Transmission, Inc. was updated.

Section 1.1 Emission Units

- The following tanks have been removed from the facility since the last modification: TK03, TK04, TK05, and TK06.
- The following tanks have been added to the facility since the last modification and have no applicable requirements since they have potential emissions less than 6 tons VOC per year: TK09, TK10, and TK11.

## Section 3.0 Facility-wide Requirements

- Removed Condition 3.2.1 because condition 5.2.4. already covers the visual emission checks for dehydration unit [D1].
- Since conditions 3.1.9, 3.1.10, 3.2.2. and 3.2.3 are source specific requirements of emission unit [D1], they were moved to section 5.0 as conditions 5.1.14, 5.1.15, 5.2.11 and 5.2.12.
- Updated the permit shield, condition 3.7.2.

## Section 5.0 Source Specific Requirements [D1]

• Removed two conditions that were "reserved" and renumbered the remaining conditions accordingly. Also updated cross references to conditions as appropriate.

## Section 6.0 Engines [emission Point ID(s): EN01, EN02]

- The monitoring requirements of 40 C.F.R. §§63.6625(e), (h), & (j) were previously incorporated by reference in condition 6.2.1. The referenced conditions have now been included in their entirety as conditions 6.2.1, 6.2.2, and 6.2.3.
- The recordkeeping requirements of 40 C.F.R. §§63.6655(a), (b), (d) & (e) were previously incorporated by reference in condition 6.4.1. The referenced conditions have now been included in their entirety as conditions 6.4.1, 6.4.2, 6.4.3, and 6.4.4.
- Removed condition 6.5.1. which did not apply to the source. As an existing stationary RICE that is not subject to numerical emission standards, the units have no reporting requirements per 40 C.F.R. §63.6645(a)(5).

## Section 7.0 Engines [emission Point ID(s): EG01]

- Updated condition 7.2.2.(d) language to the current version in 40 CFR §60.4243.
- Added the applicable recordkeeping requirement of 40 C.F.R. § 60.4245(b) as condition 7.4.3.

# **Non-Applicability Determinations**

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

a. 40 C.F.R. 60 Subpart OOOO – This subpart does not apply to the facility since the facility is a gathering facility that has tanks constructed, modified, or reconstructed after August 23, 2011 that have potential emissions less than 6 tons VOC per year.

- b. 40 C.F.R. 63 Subpart HHH This subpart does not apply to the facility since the facility is not a transmission or storage facility and is not a major source of HAPs.
- c. 40 C.F.R. 63 Subpart DDDDD The reboiler (RB01) is not subject to this subpart since it is is not a major source of HAPs.
- d. 40 C.F.R. 63 Subpart JJJJJJ The reboiler (RB01) is not subject to this subpart since it is considered a "process heater," which is excluded from the definition of "boiler".

## **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:	Thursday, September 24, 2015
Ending Date:	Monday, October 26, 2015

## **Point of Contact**

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

Robert Mullins 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. 1243 • Fax: 304/926-0478 Robert.A.Mullins@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)**

#### EPA Comment

Can you check on this: It appears that this facility is an affected facility under 40 CFR 60Subpart OOOO.

I am looking at this language in OOOO, §60.5365 Am I subject to this subpart?:

"(f) The group of all equipment, except compressors, within a process unit is an affected facility.

(1) Addition or replacement of equipment for the purpose of process improvement that is accomplished without a capital expenditure shall not by itself be considered a modification under this subpart.

(2) Equipment associated with a compressor station, dehydration unit, sweetening unit, underground storage vessel, field gas gathering system, or liquefied natural gas unit is covered by §§60.5400, 60.5401, 60.5402, 60.5421, and 60.5422 of this subpart if it is located at an onshore natural gas processing plant. Equipment not located at the onshore natural gas processing plant site is exempt from the provisions of §§60.5400, 60.5401, 60.5402, 60.5421, and 60.5422 of this subpart."

#### Response

Based on the definitions of Natural Gas Transmission and Processing Unit; Dominion Jones is part of a natural gas transmission segment.

#### §60.5430 What definitions apply to this subpart?

Natural gas transmission means the pipelines used for the long distance transport of natural gas (excluding processing). Specific equipment used in natural gas transmission includes the land, mains, valves, meters, boosters, regulators, storage vessels, dehydrators, compressors, and their driving units and appurtenances, and equipment used for transporting gas from a production plant, delivery point of purchased gas, gathering system, storage area, or other wholesale source of gas to one or more distribution area(s).

Process unit means components assembled for the extraction of natural gas liquids from field gas, the fractionation of the liquids into natural gas products, or other operations associated with the processing of natural gas products. A process unit can operate independently if supplied with sufficient feed or raw materials and sufficient storage facilities for the products.

Transmission facilities are subject to 40 CFR 60 Subpart OOOO if per §60.5365(e):

(e) Each storage vessel affected facility, which is a single storage vessel located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment, and has the potential for VOC emissions equal to or greater than 6 tpy as determined according to this section by October 15, 2013 for Group 1 storage vessels and by April 15, 2014, or 30 days after startup (whichever is later) for Group 2 storage vessels, except as provided in paragraphs (e)(1) through (4) of this section. The potential for VOC emissions must be calculated using a generally accepted model or calculation methodology, based on the maximum average daily throughput determined for a 30-day period of production prior to the applicable emission determination deadline specified in this section. The determination may take into account requirements under a legally and practically enforceable limit in an operating permit or other requirement established under a Federal, State, local or tribal authority.

This subpart does not apply to the facility since the facility is a gathering facility that has tanks constructed, modified, or reconstructed after August 23, 2011 that have potential emissions less than 6 tons VOC per year.

Only 4 tanks TK08, TK09, 10, and TK11 were constructed after August 23, 2011 and thus potentially subject to 40 C.F.R. 60 Subpart OOOO. Of the 4 tanks "potentially" subject to NSPS OOOO 3 tanks (TK08, TK10, and TK11), do not meet the definition of "storage vessel" as they do not contain "an accumulation of crude oil, condensate, intermediate hydrocarbon liquids, or produced water." Tank TK11's potential VOC emissions are 0.025 tons/yr.