For Final 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 March 14, 2017.

Permit Number: **R30-05100100-2017**
Application Received: **March 8, 2018**
Plant Identification Number: **05100100**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Adaline Compressor Station**
Mailing Address: **1700 MacCorkle Avenue, SE
Charleston, WV 25314**

Permit Action Number: **SM01** Revised: **July 10, 2018**

Physical Location: Cameron, Marshall County, West Virginia
UTM Coordinates: 530.456 km Easting • 4,401.860 km Northing • Zone 17
Directions: Located in Liberty District, Marshall County and south of Cameron, which is 25 miles south of Wheeling on US Rt. 250. From intersection in Cameron, travel west a short distance to a "Y" intersection. Go left, cross bridge, then up a hill on a brick road. Proceed south along this road (Cameron Ridge Road) for approximately 7 miles to station that is on left side of road and partially visible.

Facility Description
The Adaline facility is a natural gas transmission facility covered by Standard Industrial Classification (SIC) Code 4922. The facility has the capacity to operate twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year. The station consists of three (3) 880 hp Clark HRA-8, 2SLB engines, two (2) 2,000 hp Clark TLA-6, 2SLB engines, and one (1) 440 hp Waukesha VGF18GL, 4SLB emergency generator, one (1) 1,080 hp Solar Saturn T-1001 turbine, one (1) 1.0 MM Btu/hr natural gas line heater, three (3) 0.55 MMBtu/hr reboiler heaters, three (3) DEG dehydration units rated at 117 MMscf/d each, and one (1) 3.48 MMBtu/hr heating system boiler, all of which are fueled by natural gas.
This significant modification (SM01) covers changes included in the pre-construction permit modification R13-2149D: a replacement of the existing glycol dehydration units’ (GDU) 2.5 mmBtu/hr flare (FLLP1) with a larger 6.0 mmBtu/hr enclosed flare (FLLP2).

Emissions Summary

The emission changes under this significant modification are as follows:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Annual Emission Increase (tpy)</th>
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</thead>
<tbody>
<tr>
<td>NOₓ</td>
<td>1.05</td>
</tr>
<tr>
<td>CO</td>
<td>4.10</td>
</tr>
<tr>
<td>VOC</td>
<td>17.19</td>
</tr>
<tr>
<td>SO₂</td>
<td>0.01</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>0.12</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>0.01</td>
</tr>
<tr>
<td>Total HAP</td>
<td>0.03</td>
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</table>

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility has the potential to emit 852.81 tons/yr of NOₓ, 141.21 tons/yr of CO and 15.06 tons/yr of Formaldehyde. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant and over 10 tons of an individual HAP, 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: 45CSR6 Open burning prohibited  
                   45CSR13 Permits for construction/modification  
                   45CSR30 Operating permit requirement.  
                   45CSR34 HAPs emissions standards  
                   40 C.F.R. 63, Subpart HHH Natural Gas Transmission MACT

State Only: Not applicable

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

<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>R13-2149D</td>
<td>May 21, 2018</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 B which may be downloaded from DAQ's website.

Determinations and Justifications

1. Emission Units Table 1.1 – revised to remove an old Flare FLLP1, 2.5 MMBtu/hr and to add a new larger enclosed Flare FLLP2, 6 MMBtu/hr.

2. Section 7.0 – the new Flare FLLP2 is subject to the same Part 63 Subpart HHH Natural Gas Transmission MACT requirements as the old Flare FLLP1, therefore no changes were made to this Section (except the Flare ID change and addition of the R13-2149D citation of authority).

3. Section 8.0 – requirements revised in accordance with the permit R13-2149D.

Non-Applicability Determinations

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

None

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: May 25, 2018
Ending Date: June 25, 2018

Point of Contact

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

Natalya V. Chertkovsky-Veselova
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1220 • Fax: 304/926-0478
natalya.v.chertkovsky@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.