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 November 25, 2019.

Permit Number: R30-05100216-2019
Application Received: November 12, 2020
Plant Identification Number: 051-00216
Permittee: Columbia Gas Transmission, LLC
Facility Name: Lone Oak Station
Mailing Address: 1700 MacCorkle Avenue, SE, Charleston, WV 25314

Facility Description
Columbia Gas Transmission, LLC is a transmission compressor station for a natural gas pipeline system. Columbia Gas Transmission, LLC is covered by SIC Code of 4922 and NAICS Code of 486210. The facility consists of four (4) Solar Mars 100 Combustion Turbines, one (1) 1,175-hp Waukesha emergency generator, two (2) process heaters with heat input rating of 1.316 MMBtu/hr each, forty (40) catalytic space heaters (0.072 MMBtu/hr each), one (1) 500 gallon and one (1) 1,000 gallon condensate (pipeline fluids) storage tank and one (1) 1,000 gallon wastewater tank. The facility has the potential to operate twenty-four (24) hours a day for seven (7) days per week and fifty-two (52) weeks per years.
Emissions Summary
This modification results in the following emission changes:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Increase in Potential Emissions (TPY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>0.66</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOx)</td>
<td>0.79</td>
</tr>
<tr>
<td>Particulate Matter (PM2.5)</td>
<td>0.06</td>
</tr>
<tr>
<td>Particulate Matter (PM10)</td>
<td>0.06</td>
</tr>
<tr>
<td>Total Particulate Matter (TSP)</td>
<td>0.06</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO2)</td>
<td>0.00</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>0.04</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>0.00</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Title V Program Applicability Basis
With the proposed changes associated with this modification, this facility maintains the potential to emit of NOx is 128.61 tons per year and potential to emit of CO is 189.30 tons per year. Due to this facility’s potential to emit over 100 tons per year of criteria pollutant, 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:
- 45CSR2  Particulate matter and opacity limits for indirect heat exchangers.
- 45CSR30 Operating permit requirement.
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>R13-3254B</td>
<td>December 17, 2020</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

- Rule 2 (45 CSR 2) - The process heaters (HTR4 and HTR5) are only subject to the 10% opacity requirement of 45 CSR §2-3.1
- HTR1 and HTR3 were replaced with HTR4 and HTR5 in the emission units table and in conditions 4.1.2 and 4.2.3. Previously, R13-3254A did not include recordkeeping for HTR3. This requirement was added to the Title V permit and 45CSR§30-5.1.c was cited. Since R13-3254B includes recordkeeping for both HTR4 and HTR5, 45CSR§30-5.1.c was removed from the citation.

Non-Applicability Determinations

- According to 45 CSR §2-11.1(Any fuel burning unit(s) having a heat input under ten (10) million B.T.U.’s per hour will be exempt from sections 4, 5, 6, 8 and 9). Natural gas units are exempt from the visible emission monitoring plan requirements of this rule due to the nature of burning pipeline quality natural gas. (45CSR§2A-3.1.a).

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:
Procedur 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.