# **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 May 11, 2020.

Permit Number: R30-01700162-2020 Application Received: June 09, 2022 Plant Identification Number: 03-54-017-00162 Permittee: Columbia Gas Transmission, LLC

Facility Name: Sherwood Compressor Station

Mailing Address: 1700 MacCorkle Avenue SE, Charleston, WV 25314

Permit Action Number: MM01 Revised: November 9, 2022

Physical Location: Sherwood, Doddridge County, West Virginia

UTM Coordinates: 523.0 km Easting • 4,346.7 km Northing • Zone 17

Directions: From the town of Smithburg, head southwest on Smithbury Street towards

Smithton Road and make a left. In approximately 0.5 miles, keep left to continue to County Route 50/22. In approximately 0.2 miles, turn left onto US-50 W, then left onto Snowbird Road. At the end of Snowbird Road, turn right onto Route 18. The station will be on the right in approximately

0.5 miles.

#### **Facility Description**

The Sherwood Compressor Station is a natural gas transmission compressor station. Pipeline transmission of natural gas requires that the gas be compressed. The Sherwood Compressor Station receives natural gas via pipeline from an upstream compressor station, compresses it using natural gas fired turbines, and transmits it via pipeline to a downstream station.

## **Emissions Summary**

This modification results in the following emission changes:

# **Change in Facility-Wide Potential Emissions (tons per year)**

Regulated Pollutant	Change in Potential Emissions
Carbon Monoxide (CO)	+ 0.16
Nitrogen Oxides (NO <sub>X</sub> )	+ 0.19
Particulate Matter (PM <sub>2.5</sub> )	+ < 0.01
Particulate Matter (PM <sub>10</sub> )	+ < 0.01
Total Particulate Matter (TSP)	+ < 0.01
Sulfur Dioxide (SO <sub>2</sub> )	+ < 0.01
Volatile Organic Compounds (VOCs)	+ 0.01

 $PM_{10}$  is a component of TSP.

Hazardous Air Pollutants (HAPs)	Change in Potential Emissions
Formaldehyde	+ < 0.01
Other HAPs	0.00
Total HAPs	+ < 0.01

#### **Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit 238.65 tpy of Carbon Monoxide and 102.08 tpy of Nitrogen Oxides. 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: 45CSR13 New Source Review – Modification. 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:

Permit or	Date of
Consent Order Number	Issuance
R13-3313B	September 07, 2022

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**

This minor modification incorporates the revisions made with the Class II Administrative Update Permit R13-3313B. The revisions include updating the design capacities of two process heaters (Emission Unit IDs: HTR1 and HTR2) used at the compressor station.

The following changes have been made to the Title V operating permit for this modification:

- A. The Permittee Mailing Address has been updated to the address listed in the application for this revision.
- B. Section 1.0. Emission Units and Active R13, R14, and R19 Permits
  - a. The design capacity of process heaters HTR1 and HTR2 have been updated to 1.50 mmBtu/hr and 0.80 mmBtu/hr, respectively.
  - b. R13-3313B was issued on September 07, 2022. The revisions associated with this permit have been included in this Title V permit modification. Section 1.2. has been updated with the current permit.
- C. Section 2.0. General Conditions
  - a. The authority of Condition 2.11.4. has been updated to 45CSR§30-2.40. due to a change in 45CSR30.
  - b. The authority of Condition 2.22.1. has been updated to 45CSR§30-5.3.e.3.B. due to the repeal of Rule 45CSR38 by Senate Bill No. 163.
- D. Section 3.0. Facility-Wide Requirements
  - a. The authority of Condition 3.1.9. has been updated to reference Condition 4.1.5. of R13-3313B due to changes in the numbering of the conditions in R13-3313B.
  - b. With the issuance of R13-3313B, Condition 4.1.7. was removed from the R13 Permit. This condition required the permittee to conduct a noise survey, which was completed in July 2019 and reported to the DAQ in August 2021. Condition 4.1.7. was the authority for Condition 3.1.10. of the Title V operating permit. For these reasons, Condition 3.1.10. of R30-01700162-2020 has been removed in this permit revision.

- 1. Due to the above change, Condition 3.1.11. of R30-01700162-2020 has been renumbered as Condition 3.1.10. for this permit revision.
- c. Condition 3.5.3. has been updated to show changes that have been made to the U.S. EPA address.
- E. Section 6.0. Heaters
  - a. The maximum design heat inputs for HTR1 and HTR2 have been updated in Condition 6.1.1.
- F. Section 7.0. 40 C.F.R. 60 Subpart OOOOa Requirements
  - a. With the issuance of R13-3313B, Condition 4.1.5. was removed from the R13 Permit. This condition required the permittee to calculate the potential VOC emissions from the Condensate Storage Tank A1. 40 C.F.R. §60.5410a(h) and Condition 4.1.5. of R13-3313 were the authority for Condition 7.2.1. of the Title V operating permit. As such, the requirements of Condition 7.2.1. of R30-01700162-2020 have been removed in this permit revision and replaced with "None".

## **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: Not Applicable. Ending Date: Not Applicable.

#### **Point of Contact**

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

Sarah Barron
West Virginia Department of Environmental Protection
Division of Air Quality
601 57<sup>th</sup> Street SE
Charleston, WV 25304
304/926-0499 ext. 41915
sarah.k.barron@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.