

# 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 July 29, 2022.

Permit Number: **R30-05100100-2022**  
Application Received: **August 8, 2024**  
Plant Identification Number: **03-54-051-00100**  
Permittee: **Columbia Gas Transmission, LLC**  
Facility Name: **Adaline Compressor Station**  
Mailing Address: **1700 MacCorkle Avenue SE, Charleston, WV 25314**

Permit Action Number: *MM02*      Revised: *October 28, 2024*

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Physical Location:	Cameron, Marshall County, West Virginia
UTM Coordinates:	530.456 km Easting • 4,401.860 km Northing • Zone 17
Directions:	From WV-2 N, travel 4.5 miles and turn right onto Proctor Creek Road. Travel 2.2 miles and take a slight right onto St. Joseph Baker Hill. Travel 2.2 miles and take a sharp left to stay on St. Joseph Baker Hill. Travel 5.2 miles and turn right onto Fish Creek Road. In 5.8 miles, the compressor station is on the left.

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### Facility Description

The Adaline Compressor Station is a natural gas transmission facility. The compressor station has the capacity to operate twenty-four hours per day, seven days per week, fifty-two weeks per year. The station consists of three 880-HP Clark HRA-8, 2SLB engines; two 2,000-HP Clark TLA-6, 2SLB engines; one 440-HP Waukesha VGF18GL, 4SLB emergency generator; one 880-HP Waukesha VGF-L36GL, 4SLB emergency engine; one 1,080-HP Solar Saturn T-1001 turbine; one 3,700-HP Caterpillar G3612, 4SLB engine; one 1.0-mmBTU/hr natural gas line heater; one 1.615-mmBTU/hr line heater; three 0.55-mmBTU/hr reboiler heaters; three DEG dehydration units rated at 117-mmscf/d each; and one 3.48-mmBTU/hr heating system boiler, all of which are fueled by natural gas. The facility also has five pipeline liquids tanks and one methanol storage tank.

In R30-05100100-2022 (MM01), the compressor engine 08108 was added to the operating permit, and the reciprocating compressor requirements of 40 C.F.R. Part 60 Subpart OOOOb were included as Section 10.0. With this minor modification application, the permittee has reported that construction of the engine and associated compressor commenced within the applicability dates of Subpart OOOOa. Therefore, the Subpart OOOOb requirements for reciprocating compressors have been replaced with the applicable requirements of Subpart OOOOa.

SIC: 4922, NAICS: 486210

### Emissions Summary

The facility-wide potential emissions will not change due to this modification.

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 159.89 tpy of Carbon Monoxide, 858.25 tpy of Nitrogen Oxides, 16.38 tpy of Formaldehyde, and 32.14 tpy of Hazardous Air Pollutants. 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	Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, Permission to Commence Construction, and Procedures for Evaluation.
	45CSR16	Standards of Performance for New Stationary Sources.
	45CSR30	Requirements for Operating Permits.
	40 C.F.R. Part 60 Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After September 18, 2015 and On or Before December 6, 2022.

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
Not Applicable	

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 minor modification permit R30-05100100-2022 (MM01) (issued: July 2, 2024) incorporated the revisions made with the Modification Permit R13-2149E (issued: January 8, 2024). The changes made to the permits included the installation and operation of one 3,700-HP compressor engine (08108) to replace three existing 880-HP compressor engines (08101 to 08103) and one 1,080-HP turbine (08107).

Following the issuance of R13-2149E and during the writing of the Title V minor modification, an amended 40 C.F.R. Part 60 Subpart OOOOa and a new 40 C.F.R. Part 60 Subpart OOOOb were published in the Federal Register on March 8, 2024 with an effective date of May 7, 2024. The Subpart OOOOa amendments established that the rule was applicable to affected facilities which commenced construction after September 18, 2015 and on or before December 6, 2022. The standards of Subpart OOOOb were applicable to affected facilities which commenced construction after December 6, 2022.

With the revisions, the reciprocating compressor requirements of Subpart OOOOa were added to Section 10.0. of R13-2149E. However, due to the rule amendments discussed above and the 2024 installation date of the compressor engine 08108, it was thought that the reciprocating compressor commenced construction following the applicability date of Subpart OOOOb, and, therefore, the requirements of Subpart OOOOb were added to the Title V minor modification permit under Section 10.0.

With this minor modification application (R30-05100100-2022 (MM02)), the permittee has reported that the purchase order date of the engine was November 4, 2022. Therefore, in accordance with the definition of "commenced" in 40 C.F.R. §60.2, construction of the engine and associated compressor commenced prior to the applicability date of Subpart OOOOb, and, in accordance with §60.5365a(c), the reciprocating compressor is subject to the requirements of Subpart OOOOa.

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

1. In the Emission Units Table of Section 1.1., the date of the purchase order of the engine (November 4, 2022) was added as the date that construction of the engine commenced.
2. Condition 3.7.2.m. contains the permit shield for Subpart OOOOa. As the reciprocating compressor associated with the engine 08108 commenced construction within the applicability dates of Subpart OOOOa, the associated reciprocating compressor is subject to Subpart OOOOa and the reference to the engine 08108 was removed from the permit shield.
3. The Subpart OOOOb requirements for reciprocating compressors were removed from Section 10.0. of the operating permit and were replaced with the applicable Subpart OOOOa requirements discussed in the following table.

Title V Condition	R13-2149E Condition	Description	Regulatory Citation
10.1.1.	N/A	Affected facilities under Subpart OOOOa must be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions.	45CSR16 40 C.F.R. §60.5370a(b)
10.1.2.	10.1.1.	GHG and VOC standards for reciprocating compressor affected facilities.	45CSR13 45CSR16 40 C.F.R. §60.5385a
10.2.1.	10.2.1.	Initial compliance demonstration requirements. 40 C.F.R. §60.5410a(k) was removed from Subpart OOOOa with the amendments, and, therefore, the reference to paragraph (k) has not been included in Condition 10.2.1.	45CSR13 45CSR16 40 C.F.R. §§60.5410a and 60.5410a(c)
10.2.2.	10.3.1.	Continuous compliance demonstration requirements.	45CSR13 45CSR16 40 C.F.R. §60.5415a(c)
10.4.1.	10.4.3.	Applicable recordkeeping requirements for reciprocating compressors.	45CSR13 45CSR16 40 C.F.R. §§60.5420a(c), (c)(3), (c)(6) through (c)(8), and (c)(17)
10.5.1.	10.4.2. and 10.4.3.	Applicable reporting requirements for the reciprocating compressors.	45CSR13 45CSR16 40 C.F.R. §§60.5420a(b), (b)(1), (b)(4), (b)(11), and (b)(12)

- Conditions 10.1.1.d. and 10.4.3. of R13-2149E require the permittee to maintain the records of 40 C.F.R. §§60.5420a(c)(3), (c)(6) through (c)(9), and (c)(17). The recordkeeping requirements of §60.5420a(c) were updated in the Subpart OOOOa amendments, and (c)(9) was reserved. Therefore, the references to and the requirements of §60.5420a(c)(9) have not been included in the operating permit.
- Condition 10.4.1. of R13-2149E has not been included in the operating permit. This condition requires the permittee to submit the notifications specified in 40 C.F.R. §§60.5420a(a)(1) and (a)(2). However, (a)(1) does not require the notifications of 40 C.F.R. §§60.7(a)(1), (a)(3), and (a)(4) for reciprocating compressors, and the notifications of (a)(2) are applicable to well affected facilities.

**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  
304/414-1915  
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)**

The following boilerplate changes have been made to the permit. These changes to the boilerplate became effective September 23, 2024.

1. The citation of Condition 3.1.6. was revised to refer to the current version of the WV Code.
2. The citation of Condition 3.3.1. was revised to refer to the current version of the WV Code.
3. The following has been added to Condition 3.3.1.b.: “If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit shall be revised in accordance with 45CSR§30-6.4 or 45CSR§30-6.5, as applicable.”