

# Fact Sheet



## 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 April 10, 2018.

Permit Number: **R30-09700009-2018**  
Application Received: **March 27, 2020**  
Plant Identification Number: **03-54-097-00009**  
Permittee: **Columbia Gas Transmission, LLC**  
Facility Name: **Cleveland Compressor Station**  
Mailing Address: **1700 MacCorkle Avenue, SE  
Charleston, WV 25314**

Permit Action Number: *SM01*      Revised: *September 9, 2020*

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Physical Location:                      Kanawha Head, Upshur County, West Virginia  
UTM Coordinates:                      555.40 km Easting • 4,289.22 km Northing • Zone 17  
Directions:                                Take I-79 to exit 67. Turn right on US-19N and travel 21 miles. Turn right onto WV-4 N and travel 7.3 miles. Turn right onto WV-20 S and travel approximately 9 miles to the station

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### Facility Description

The purpose of this significant modification is to include requirements for installation of one (1) fuel gas heater (HTR7) within the facility. The installation of fuel gas heater (HTR7) was approved under R13-2394C.

### Emissions Summary

The PTE changes due to this modification are as follows:

Regulated Pollutant	Potential Emissions (TPY)
NO <sub>x</sub>	0.29
CO	0.24
PM <sub>2.5</sub>	0.02
PM <sub>10</sub>	0.02
SO <sub>2</sub>	0.01
VOC	0.02
Total HAPs	0.01

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 992.72 tons/yr NO<sub>x</sub>, 195.37 tons/yr of CO, 17.65 tons/yr of formaldehyde and 25.47 tons/yr of aggregated HAPs. 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:	45CSR2	To prevent and control particulate air pollution from combustion of fuel in indirect heat exchangers.
	45CSR13	Construction permit requirement.
	45CSR30	Operating permit requirement.
	45CSR34	Emission standards for hazardous air pollutants
	40C.F.R.63 Subpart DDDDD	National emission standards for hazardous air pollutants for major sources: industrial, commercial, and institutional boilers and process heaters.
State Only:	N/A	

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 associated with this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2394C	June 16, 2020	

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 purpose of this modification is to include the applicable requirements for the installation of a new fuel gas heater (HTR7), which was approved under permit R13-2394C.

- Section 1.0
  - The new fuel gas heater (HTR7) was added to Table 1.1. The names of the condensate (pipeline liquids) storage tanks were updated from TK01, TK02, and TK03 to A27, A30, and A31 respectively to stay consistent with the new naming in R13-2394C. The installation dates were changed to stay consistent with R13-2394C for all three tanks as well, and A31's design capacity was changed from 2000 to 1000 gal. Table 1.2 was updated as R13-2394C supersedes and replaces R13-2394B.
  - The permittee's mailing address was updated to match the significant modification application.
- Section 2.0
  - No updates to section 2.0
- Section 3.0
  - EPA contact information was updated in section 3.5.3.
  - Sections 3.7.2.a. and 3.7.2.d. were updated to include the new fuel gas heater (HTR7) because it also has a design capacity less than 10 mmBtu/hr.
  - Section 3.7.2.j. was updated with the new name for the liquid storage vessels (A27, A30, and A31).
- Section 4.0
  - Condition 4.1.7. was added due to the installation of the new fuel gas heater (HTR7), which has 45CSR2, 45CSR13, and 40 C.F.R. 63 subpart DDDDD requirements.
    - 45CSR2
      - The individual heat input of HTR7 is below 10 MMBTU/hr; therefore, the unit is exempt from all of 45CSR2 except 45CSR§2-3.1.

- 45CSR13 Requirements
  - NO<sub>x</sub> emitted to the atmosphere shall not exceed 0.29 tons per year on a rolling yearly total basis, and CO emitted to the atmosphere shall not exceed 0.24 tons per year on a rolling yearly basis.
- 40 C.F.R. 63 subpart DDDDD requirements
  - Since the new fuel gas heater is less than 5 MMBTU/hr and is a new affected source (gas 1 subcategory), it is not subject to Subpart DDDDD emissions limits, but it is subject to tune-ups every five (5) years.
    - This makes it subject to 40 CFR §§63.7540(a)(10), (12), and (13), §63.7510(g), §63.7515(d), §63.7540(a)(10)(vi), §63.7555(a)(1), and §§63.7550(b), (b)(1), (b)(5), (c)(1), (c)(5)(i) through (iii), (xiv), (xvii), and h(3).
- Section 5.0
  - No updates to section 5.0
- Section 6.0
  - Numbering was changed within the citation of condition 6.1.3. to be consistent with the numbering change in R13-2394C.
- Section 7.0
  - No updates to section 7.0

### **Non-Applicability Determinations**

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

N/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: July 24, 2020  
Ending Date: August 24, 2020

### **Point of Contact**

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

Nikki Moats  
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. 41282  
Nikki.B.Moats@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.