West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

For Draft/Proposed 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 17, 2018.

Permit Number: R30-08300019-2018
Application Received: June 14, 2022
Plant Identification Number: 03-54-083-00019
Permittee: Columbia Gas Transmission, LLC
Facility Name: Files Creek Compressor Station
Mailing Address: 1700 MacCorkle Avenue SE, Charleston, WV 25314

Permit Action Number: SM02   Revised: Draft/Proposed

Physical Location: Beverly, Randolph County, West Virginia
UTM Coordinates: 601.1 km Easting • 4,297.3 km Northing • Zone 17
Directions: From I-79 North, take exit 99, to merge onto US-119/US-33E towards Buckhannon. After traveling approximately 43 miles, take a slight right onto WV-92 S. Continue for approximately 9 miles, and turn left onto Kings Run Road. Continue for approximately 2.1 miles and turn left onto Files Creek Road. After approximately 0.3 miles turn left onto Delta Rd 9. The station is located on the right after approximately 0.4 miles.

Facility Description
The Files Creek Compressor Station is a natural gas transmission facility. The Title V permit currently includes one (1) wastewater tank (A12), four (4) Cooper Bessemer GMWA reciprocating internal combustion engines (RICE) (00907–00910), four (4) Solar Taurus 70 Turbines (009T1 – 009T4), one (1) emergency generator (009G4), nine (9) space heaters (HTR1), two (2) line heaters (HTR2, HTR4), one (1)
fuel gas heater (HTR5), 107 catalytic heaters (HTR3, HTR6), along with various glycol, lube oil and waste oil tanks (C09-C13).

This permit application requests removal of the following equipment: one (1) wastewater storage tank (A12), four (4) Cooper Bessemer GMWA RICE (00907-00910) and nine (9) space heaters with a cumulative rating of 0.965 MMBTU/hr (HTR1).

The four (4) Cooper Bessemer GMWA RICE (00907-00910) have been decommissioned, disconnected, and no longer represent active emission sources on site. As a result of these changes, Columbia seeks to reclassify the Files Creek Compressor Station as an area source of hazardous air pollutants (HAPs) with a potential to emit of 1.73 tons per year.

### Emissions Summary

This modification results in the following emission changes:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PTE Change (TPY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO&lt;sub&gt;x&lt;/sub&gt;</td>
<td>-886.93</td>
</tr>
<tr>
<td>CO</td>
<td>-39.59</td>
</tr>
<tr>
<td>VOC</td>
<td>-9.72</td>
</tr>
<tr>
<td>SO&lt;sub&gt;2&lt;/sub&gt;</td>
<td>-0.21</td>
</tr>
<tr>
<td>PM&lt;sub&gt;10&lt;/sub&gt;</td>
<td>-14.25</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>-16.25</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>-23.42</td>
</tr>
</tbody>
</table>

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 261.76 tons/yr of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutants, 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: Construction permit requirement.
- 45CSR30: Operating permit requirement.

**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 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>R13-3164D</td>
<td>August 9, 2022</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**

The modifications to this facility were approved under R13-3164D and require the following changes to the Title V permit:

- Emission Units 00907, 00908, 00909, 00910, and HTR1 were removed from the Emission Units Table.

- Table 1.2 was updated because R13-3164D supersedes and replaces R13-3164C.

- Old Section 6.0 has been removed since the facility is no longer subject to 40 C.F.R. 63 Subpart DDDDD.
  - The NSR permit modification allows this facility to be classified as an area source of HAPs instead of a major source, which makes it no longer subject to Subpart DDDDD requirements.
  - Subpart DDDDD non-applicability determination was added as permit condition 3.7.2.o.

- Blowdown and Pigging Operations were added as the new Section 6.0 since they were added in R13-3164D.

- Conditions 9.1.11 and 9.5.1 were removed because the facility is no longer subject to 40 C.F.R. 63 Subpart YYYY.
  - The NSR permit modification allows this facility to be classified as an area source of HAPs instead of a major source, which makes it no longer subject to Subpart YYYY requirements.
  - Subpart YYYY non-applicability determination was added as permit condition 3.7.2.n

- HTR1 was removed from conditions 3.7.2.a and 9.1.10 since it has been decommissioned and removed.

- 00907, 00908, 00909, and 00910 were removed from conditions 3.7.2.j and 3.7.2.1 since they have been decommissioned and removed.

- Tank A12 was removed from conditions 3.7.2.e, 3.7.2.f, and 3.7.2.1 since it has been decommissioned and removed.

- Section 10.0 was removed as the facility is not subject to 40 C.F.R. 60 Subpart OOOOa.
o Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015. During the processing of renewal permit R30-08300019-2018, the requirements for “Collection of Fugitive Emissions Facility-Wide Pursuant to 40 CFR §60.5397a” were added in section 10.0 of the permit. This applicability was based on the installation year of 2017 for the two (2) Solar Taurus 70 Turbines/centrifugal compressors 009T3 and 009T4. However, these turbine engine/centrifugal compressors were ordered prior to September 18, 2015 and therefore commenced construction prior to the applicability date. Hence, the Subpart OOOOa requirements in Section 10.0 are not applicable to the facility. The facility has requested through this significant modification that these requirements be removed from the permit and that Subpart OOOOa be added to the non-applicable requirements shield in condition 3.7.2.

Non-Applicability Determinations

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

a. 40 CFR 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. All potentially affected sources at this facility commenced construction prior to September 18, 2015.

b. 40 CFR Part 63 Subpart YYYY - National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines. The facility is not a major source of HAP emissions and therefore is exempt from this subpart.

c. 40 CFR Part 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. The facility is not a major source of HAP emissions and therefore is exempt from this subpart.

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: September 9, 2022
Ending Date: October 11, 2022

Point of Contact

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

Nikki B. Moats
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
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)**

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.