

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-09900013-2022**  
Application Received: **May 26, 2022**  
Plant Identification Number: **099-00013**  
Permittee: **Columbia Gas Transmission, LLC**  
Facility Name: **Ceredo Compressor Station**  
Mailing Address: **1700 MacCorkle Avenue, SE, Charleston, WV 25314**

*Revised: N/A*

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Physical Location: Walkers Branch Road, Wayne County, West Virginia  
UTM Coordinates: 366.1 km Easting • 4247.7 km Northing • Zone 17  
Directions: Traveling I-64 West from Charleston, take the Kenova-Ceredo exit.  
Turn left onto Route 52. Make a left onto Airport Road. Turn right onto  
Walkers Branch Road at the Pilgrim Glass Plant, travel 2 miles, the  
station is on the left.

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### Facility Description

The Ceredo Station is a natural gas transmission facility covered by Standard Industrial Code (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of six (6) 2800-hp and one (1) 2700-hp natural gas fired reciprocating compressor engines, one (1) 30,399-hp compressor turbine, and numerous storage tanks of various sizes. On-site support equipment includes one (1) 738 hp and one (1) 1,175 hp emergency generators, one (1) 6.276 MMBtu/hr boiler, and one (1) 0.375 MMBtu/hr and one (1) 0.60 MMBtu/hr line heaters.

## Emissions Summary

| <b>Plantwide Emissions Summary [Tons per Year]</b> |                            |                              |
|----------------------------------------------------|----------------------------|------------------------------|
| <b>Regulated Pollutants</b>                        | <b>Potential Emissions</b> | <b>2020 Actual Emissions</b> |
| Carbon Monoxide (CO)                               | 310.41                     | 40.86                        |
| Nitrogen Oxides (NO <sub>x</sub> )                 | 3,582.71                   | 403.14                       |
| Particulate Matter (PM <sub>2.5</sub> )            | 41.03                      | 5.06                         |
| Particulate Matter (PM <sub>10</sub> )             | 41.03                      | 5.06                         |
| Total Particulate Matter (TSP)                     | 41.03                      | 5.06                         |
| Sulfur Dioxide (SO <sub>2</sub> )                  | 1.23                       | 0.19                         |
| Volatile Organic Compounds (VOC)                   | 107.30                     | 15.87                        |

*PM<sub>10</sub> is a component of TSP.*

| <b>Hazardous Air Pollutants</b> | <b>Potential Emissions</b> | <b>2020 Actual Emissions</b> |
|---------------------------------|----------------------------|------------------------------|
| Benzene                         | 1.39                       | NA                           |
| Toluene                         | 0.81                       | NA                           |
| Ethylbenzene                    | 0.11                       | NA                           |
| Xylene                          | 0.19                       | NA                           |
| n-Hexane                        | 0.38                       | NA                           |
| Formaldehyde                    | 40.11                      | 4.45                         |
| Acetaldehyde                    | 5.58                       | NA                           |
| Other HAPs                      | 9.43                       | NA                           |
| Total HAPs                      | 58.00                      | NA                           |

*Some of the above HAPs may be counted as PM or VOCs.*

### Title V Program Applicability Basis

This facility has the potential to emit 310.41 tons per year of Carbon Monoxide (CO), 3,582.71 tons per year of Nitrogen Oxides (NO<sub>x</sub>), 107.30 tons per year of Volatile Organic Compounds (VOC), 40.11 tons per year of Formaldehyde, and 58.00 tons per year of total 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.

This facility has been found to be subject to the following applicable rules:

|                    |                                                   |                                                                                                                                                                                             |
|--------------------|---------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Federal and State: | 45CSR2<br>45CSR6<br>45CSR11<br>45CSR13<br>45CSR16 | PM limits for Indirect Heat Exchangers<br>Open burning prohibited.<br>Standby plans for emergency episodes.<br>Construction permits<br>Standards of Performance for New Stationary Sources. |
|                    | WV Code § 22-5-4 (a) (14)                         | The Secretary can request any pertinent information such as annual emission inventory reporting.                                                                                            |
|                    | 45CSR30                                           | Operating permit requirement.                                                                                                                                                               |
|                    | 45CSR34                                           | Emission Standards for HAPs                                                                                                                                                                 |
|                    | 40 C.F.R. 60, Subpart JJJJ                        | Standards of Performance for Stationary Spark Ignition Internal Combustion Engines                                                                                                          |
|                    | 40 C.F.R. 60, Subpart KKKK                        | Standards of Performance for Stationary Combustion Turbines                                                                                                                                 |
|                    | 40 C.F.R. Part 61                                 | Asbestos inspection and removal                                                                                                                                                             |
|                    | 40 C.F.R. 63, Subpart ZZZZ                        | National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines                                                                          |
|                    | 40 C.F.R. 63, Subpart DDDDD                       | National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters                                           |
|                    | 40 C.F.R. Part 82, Subpart F                      | Ozone depleting substances                                                                                                                                                                  |
| State Only:        | 45CSR4<br>45CSR17                                 | No objectionable odors.<br>Prevent And Control Particulate Matter Air Pollution From Materials Handling, Preparation, Storage And Other Sources Of Fugitive Particulate Matter              |

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**

| Permit or<br>Consent Order Number | Date of<br>Issuance | Permit Determinations or Amendments That<br>Affect the Permit ( <i>if any</i> ) |
|-----------------------------------|---------------------|---------------------------------------------------------------------------------|
| R13-1856C                         | December 18, 2017   |                                                                                 |

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

R30-09900013-2016 (SM01) was issued on August 28, 2017 to incorporate the changes approved under R13-1856B issued on July 13, 2017. On December 18, 2017, Class I administrative update R13-1856C was issued to reduce the maximum design heat input of HTR 3 from 1.0 to 0.6 MMBtu/hr and to add three (3) de minimis storage tanks. Since the permittee did not submit a modification to the Title V permit for the changes approved under R13-1856C, they will be incorporated into this Title V renewal.

The following changes and updates have been made to the Title V permit during this renewal:

### Section 1.0

- The Emission Units Table was updated to reflect the changes in R13-1856C. The design capacity of HTR3 was changed from 1.0 to 0.60 MMBtu/hr, the 900 gallon oil-water storage tank was added, the 5,000 gallon waste water storage tank was added, and the 5,000 gallon condensate storage tank was added.
- Table 1.2 was updated since R13-1856C supersedes and replaces R13-1856B.

### Section 3.0

- Permit condition 3.1.12 was updated to match the latest version of 40 C.F.R. §60.5397a.
- Permit condition 3.5.3 was updated to match the most recent boilerplate.
- Deleted the last paragraph in condition 3.1.9 since this language is not in R13-1856C.
- Moved condition 3.4.4 to the Limits and Standards section as condition 3.1.13 since it is not a recordkeeping requirement.

### Section 4.0

- Permit condition 4.1.11 was updated to reflect the changes in R13-1856C. Specifically, the MDHI in condition 4.1.11.a was changed from 1.00 to 0.60 MMBtu/hr and the emission limits in Table 4.1.1.c were updated to reflect the new limits in R13-1856C.

### Section 5.0

- Deleted vacated sections 40 C.F.R. §§63.6640(f)(2)(ii) and (iii) from condition 5.1.3 and deleted vacated sections 40 C.F.R. §§60.4243(d)(2)(ii) and (iii) from condition 5.1.8
- Added reporting requirements for G3 and G4 from 40 CFR §60.6650(h) as condition 5.5.2
- Added reporting requirements for G4 from 40 CFR §§60.4245(d) and (e) as conditions 5.5.3 and 5.5.4

## Non-Applicability Determinations

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

According to 45CSR§2-11.1 the boiler and heaters are exempt from the weight emission standards and MRR (monitoring, recordkeeping and reporting) because they are less than 10 mmBtu/hr.

45CSR10; *To Prevent and Control Air Pollution from The Emission of Sulfur Oxides*: 45CSR10 is not applicable to the facility boiler and heaters because they are less than 10 mmBtu/hr.

45CSR21; *To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds*: All storage tanks at Ceredo station are below 40,000 gallons in capacity, hence 45CSR§21-28 is not applicable. Ceredo station is not engaged in the extraction or fractionation of natural gas, hence, 45CSR§21-29 is not applicable.

45CSR27; *To Prevent and Control the Emissions of Toxic Air Pollutants*: Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”

40 C.F.R. 60 Subpart Dc; *Standards of Performance for Steam Generating Units*: The boiler and heaters at this facility are less than 10 mmBtu/hr; hence, Subpart Dc is not applicable.

40 C.F.R. 60 Subparts K,Ka; *Standards of Performance for Storage Vessels for Petroleum Liquids*: All tanks at Ceredo station are below 40,000 gallons in capacity.

40 C.F.R. 60 Subpart Kb; *Standards of Performance for Volatile Organic Liquid Storage Vessels*: All tanks at Ceredo station are below 75m<sup>3</sup> in capacity.

40 C.F.R. 60 Subpart KKK; *Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant*: Ceredo station is not engaged in the extraction or fractionation of natural gas liquids from field gas, the fractionation of mixed natural gas liquids to natural gas products, or both.

40 C.F.R. 60 Subpart IIII; *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*: There are no compression ignition engines at this facility.

40 C.F.R. 60 Subpart OOOO; *Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution*: Storage vessel requirements do not apply since all tanks commenced construction prior to August 23, 2011.

40 C.F.R. 63 Subpart HHH; *National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities*: The facility does not have a glycol dehydration unit and is therefore not subject to the requirements of this subpart.

40 C.F.R. 63 Subpart YYYY; *Turbine MACT*: The Solar Titan 250 (E10) is subject to 40 C.F.R. 63 Subpart YYYY. Per 40 C.F.R. §63.6095(d), there is a stay of standards for lean premix stationary combustion turbines until EPA takes final action to require compliance with this subpart. The only requirement for the unit is the initial notification requirement of 40 C.F.R. §63.6145, which was satisfied by the preconstruction permit application.

40 C.F.R. 64 – None of the emission units have any add-on controls; therefore, in accordance with 40 C.F.R. § 64.2(a), CAM is not applicable to this facility.

### **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: February 23, 2022

Ending Date: March 25, 2022

### **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)**

None.