

# Fact Sheet



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

Permit Number: **R30-08300019-2023**  
Application Received: **June 30, 2022**  
Plant Identification Number: **03-54-08300019**  
Permittee: **Columbia Gas Transmission, LLC**  
Facility Name: **Files Creek Compressor Station**  
Mailing Address: **1700 MacCorkle Avenue SE, Charleston, WV 25314**

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|                    |   |
|--------------------|---|
| 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. |

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### Facility Description

The Files Creek Compressor Station is a natural gas transmission facility. The Title V permit currently includes four (4) Solar Taurus 70 Turbines (009T1 – 009T4), one (1) emergency generator (009G4), 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).

**Emissions Summary**

| <b>Plantwide Emissions Summary [Tons per Year]</b> |                            |                              |
|--|----------------------------|------------------------------|
| <b>Regulated Pollutants</b>                        | <b>Potential Emissions</b> | <b>2021 Actual Emissions</b> |
| Carbon Monoxide (CO)                               | 261.79                     | 48.25                        |
| Nitrogen Oxides (NO <sub>x</sub> )                 | 92.53                      | 40.13                        |
| Particulate Matter (PM <sub>2.5</sub> )            | 18.94                      | 2.63                         |
| Particulate Matter (PM <sub>10</sub> )             | 18.94                      | 2.63                         |
| Total Particulate Matter (TSP)                     | 18.94                      | 2.63                         |
| Sulfur Dioxide (SO <sub>2</sub> )                  | 1.10                       | 0.39                         |
| Volatile Organic Compounds (VOC)                   | 95.52                      | 10.08                        |

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

| <b>Hazardous Air Pollutants</b> | <b>Potential Emissions</b> | <b>2021 Actual Emissions</b> |
|---------------------------------|----------------------------|------------------------------|
| Toluene                         | 0.20                       | 0.03                         |
| Formaldehyde                    | 1.17                       | 0.39                         |
| Xylene                          | 0.10                       | 0.01                         |
| Hexane                          | 0.03                       | 0.02                         |
| Benzene                         | 0.02                       | <0.01                        |
| Ethylbenzene                    | 0.05                       | 0.01                         |
| Other HAPs                      | 0.82                       | 0.01                         |
| Total HAPs                      | 2.39                       | 0.47                         |

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

**Title V Program Applicability Basis**

This facility has the potential to emit 261.79 tpy of CO. 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.

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

|                    |        |   |
|--------------------|--------|---|
| Federal and State: | 45CSR2 | Control of PM from Indirect Heat Exchangers |
|                    | 45CSR6 | Open burning prohibited.                    |

|             |                              |  |
|-------------|------------------------------|--|
|             | 45CSR11                      | Standby plans for emergency episodes.  |
|             | 45CSR13                      | Permits for Construction/Modification  |
|             | WV Code § 22-5-4 (a) (14)    | The Secretary can request any pertinent information such as annual emission inventory reporting. |
|             | 45CSR16                      | New Source Performance Standards   |
|             | 45CSR30                      | Operating permit requirement.  |
|             | 45CSR34                      | Emission standards for HAPs  |
|             | 40 C.F.R. 60 Subpart JJJJ    | Spark Ignition Internal Combustion Engines NSPS  |
|             | 40 C.F.R. 60 Subpart KKKK    | Turbine NSPS   |
|             | 40 C.F.R. Part 61            | Asbestos inspection and removal  |
|             | 40 C.F.R. 63 Subpart ZZZZ    | RICE MACT  |
|             | 40 C.F.R. Part 82, Subpart F | Ozone depleting substances   |
| State Only: | 45CSR4                       | No objectionable odors.  |
|             | 45CSR17                      | Particulate Fugitive   |

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 Consent Order Number | Date of Issuance | Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> ) |
|--------------------------------|------------------|--|
| R13-3164D                      | August 9, 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**

The following changes have been made as a part of this renewal:

- **Section 5.0**
  - Old section 5.0 regarding 40 C.F.R. 63 Subpart ZZZZ has been removed. This facility is now an area source for HAPs that is showing compliance with Subpart ZZZZ by showing compliance with 40 C.F.R. 60 Subpart JJJJ (40 C.F.R. §63.6590(c))
- **Section 6.0**
  - Updated the requirements of condition 6.1.7 due to changes in the regulation which removed emergency demand response provisions

- Condition 6.1.9 was added because the facility is now showing compliance with 40 C.F.R. 63 Subpart ZZZZ by showing compliance with 40 C.F.R. 60 Subpart JJJJ.
- Added reporting requirements from §40 C.F.R. 60.424(e) as condition 6.5.1

### **Non-Applicability Determinations**

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

- a. **45CSR10 – To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.** WVDAQ has determined that this rule does not apply to natural gas-fired reciprocating internal combustion engines. The turbines (009T1, 009T2, 009T3, and 009T4) do not meet the definitions of either fuel burning unit, or source operation, in 45CSR§§10-2.8. and 2.19, respectively. Consequently, this rule does not apply to the turbines. Each of the heaters HTR2, HTR3, HTR4, HTR5, and HTR6, are less than 10 MMBtu/hr design heat input. Therefore, they are exempt from the mass rate limit and other testing and MRR requirements in rule sections 3 and 6 through 8 due to the heat input being less than 10 MMBtu/hr in accordance with 45CSR§10-10.1. Additionally, none of the heaters are a source operation as defined in 45CSR§10-2.19.; therefore, 45CSR§10-4.1. is not applicable.
- b. **45CSR21 – To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds.** This facility is not located in one of the affected counties listed in 45CSR§21-1.1.; therefore, 45CSR21 is not applicable to this facility.
- c. **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.”
- d. **40 C.F.R. 60 Subpart Dc – Standards of Performance for Steam Generating Units.** The line heaters HTR2 and HTR4 at this facility are less than 10 MMBtu/hr design heat capacity, which is below the applicability criteria stated in 40 C.F.R. §60.40c(a).
- e. **40 C.F.R. 60 Subparts K, Ka – Standards of Performance for Storage Vessels for Petroleum Liquids.** All tanks at Files Creek station are below 40,000 gallons in capacity (§60.110(a) and §60.110a(a)).
- f. **40 C.F.R. 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.** 40 C.F.R. §60.110b(a) states, “Except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m<sup>3</sup>) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.” All tanks at Files Creek station are below 75 m<sup>3</sup> in capacity. Since the vessels do not meet applicability criterion at 40 C.F.R. §60.110b(a), this regulation does not apply to these tanks.
- g. **40 C.F.R. 60Subpart KKK – Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant.** Files Creek 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.

- h. **40 C.F.R. 60 Subpart GG – Standards of Performance for Stationary Gas Turbines.** As provided in 40 C.F.R. §60.4305(b), the provisions of Subpart GG are not applicable because the stationary combustion turbines (009T1, 009T2, 009T3, and 009T4) are subject to 40 C.F.R. 60 Subpart KKKK.
- i. **40 C.F.R. 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.** None of the engines at the facility are compression ignition type; therefore, this regulation does not apply.
- j. **40 C.F.R. 60 Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015.** The Storage Vessel requirements defined for transmission sources were evaluated for liquids storage vessels C09, C10, C11, C12, and C13 and were found not to be applicable because emissions are below the 6 tpy VOC threshold in accordance with 40 C.F.R. §60.5365(e). The turbines 009T1 and 009T2 were constructed in 2015, but their compressors are not subject to the wet seal centrifugal compressor requirements in §60.5365(b) because their compressors are dry seal type per technical correspondence received from the permittee on February 9, 2018.
- k. **40 C.F.R. 63 Subpart HHH – National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities.** The Transmission Station is not subject to Subpart HHH since there are no affected dehydration units utilized at this site.
- l. **40 C.F.R. Part 64 – Compliance Assurance Monitoring (CAM).** The turbines (009T1, 009T2, 009T3, and 009T4) utilize low-NO<sub>x</sub> combustion controls; however, the use of combustion or other process design features or characteristics are not included in the definition of *Control device* in 40 C.F.R. §64.1. Moreover, the preamble to 40 C.F.R. Part 64 specifically states that low-NO<sub>x</sub> burner technology is not included in the definition of *Control device* for the final rule. Since a *Control device* is not utilized for the turbines, they do not meet the applicability criterion in §64.2(a)(2) and therefore CAM is not applicable to the turbines.
- m. **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.
- n. **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.
- o. **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.

None.

### **Comment Period**

Beginning Date: February 28, 2023

Ending Date: March 30, 2023

### **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 57<sup>th</sup> Street SE  
Charleston, WV 25304  
nikki.b.moats@wv.gov  
304/926-0499 ext. 41282

### **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)**

During the comment period, 45CSR30 was updated, and this required the following changes to the Title V Boilerplate:

- Condition 2.1.3 – The section in Rule 30 that defines Secretary has been updated. Additionally, the word “such” has been removed.
- Conditions 2.17, 3.5.7, and 3.5.8.a.1 – Section 5.7 of 45CSR30 which pertained to emergencies and affirmative defense was removed in the revised 45CSR30.
- Condition 3.5.4 – Under the revised Rule 30, certified emissions statements are no longer required to be submitted. Facilities have been submitting emissions data in SLEIS and paying fees based on their SLEIS submittal, so this requirement was no longer needed.
- 3.5.8.a.2 – Under the revised Rule 30, “telefax” was replaced with email.