

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 October 3, 2022.

Permit Number: **R30-03500003-2022**
Application Received: **December 5, 2023**
Plant Identification Number: **03-54-035-00003**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Ripley Compressor Station**
Mailing Address: **1700 MacCorkle Avenue, SE, Charleston, WV 25314**

Permit Action Number: *MM02* Revised: *April 16, 2024*

Physical Location:	Ripley, Jackson County, West Virginia
UTM Coordinates:	440.1 km Easting • 4303.4 km Northing • Zone 17
Directions:	Traveling I-77N from Charleston, exit at Ripley onto US Rte. 33 and proceed to the town of Ripley and the intersection with Secondary Rte. 21 (formerly US & State Rte. 21). Turn left onto Rte. 21 and continue approximately 5.5 miles to the station which is on the left.

Facility Description

The Ripley Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of two (2) 2,250-hp natural gas fired reciprocating engines, one (1) natural gas dehydration unit, one (1) enclosed ground flare, one (1) natural gas fired reboiler, one (1) natural gas powered generator engine, one (1) 31 HP air compressor, one (1) heating system boiler, one (1) indirect heater, two (2) natural gas fired process heaters, one (1) pipeline liquids loading rack, one (1) liquids knockout system, one (1) wastewater evaporator and nine (9) storage tanks of various sizes.

Emissions Summary

There are no changes in emissions associated with this modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 176.46 tons/yr of NO_x. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Columbia Gas Transmission, LLC's Ripley Compressor Station 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, And Procedures For Evaluation

45CSR30

Requirements For Operating Permits

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:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13- 3546B	December 13, 2023	

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 revisions made in association with this minor modification incorporate the revisions made in R13-3546B Class I Administrative Update to clarify permit language in several permit conditions, and to remove unnecessary permit requirements. Revisions to the Title V permit include the following:

- 1) **Table of Contents** - Updated the page numbers.
- 2) **Section 1.1. – Emissions Units Table** - Updated the installation date of HTR2 from 1979 to 2018.
- 3) **Section 1.2. - Active R13, R14, and R19 Permits Table** - Updated R13-3546A to R13-3546B and updated the date of issue.
- 4) **Section 6.0.**
 - Condition 6.1.8. – Added “RICE” to the description of the generator as revised in R13-3546B.
 - Condition 6.1.9. – Added “RICE” to the description of the generator and added language to clarify that the 500 hours per year requirement is for periods of non-emergencies as revised in R13-3546B.
- 5) **Section 9.0.**
 - Conditions 9.1.1. - 9.1.4. – Revised the requirements in these conditions as revised in R13-3546B.
 - Condition 9.1.5.- 9.1.8. – Deleted these requirements in conjunction with the revisions in R13-3546B.
 - Condition 9.2.1. – Added “45CSR§30-5.1.c.” to the citation of authority. In permit condition 8.2.1. of R13-3546B, the storage tanks A12, A13, and A27 were removed. However, since there are throughput limits in conditions 9.1.1. and 9.1.3. (*8.1.1. and 8.1.3. of R13-3546B*) for these tanks, the existing monitoring requirements have been retained in the Title V permit to demonstrate compliance with the throughput limits. Therefore, only the citation of authority has been revised.
 - Condition 9.4.1. – Similar to condition 9.2.1. as described above, the revised R13-3546B only included recordkeeping for the throughput limits for storage tanks A26 and A28. The Title V permit has been revised to remove the references to conditions 9.1.5. through 9.1.8. which have been deleted but retains the references to conditions 9.1.1. through 9.1.4. which demonstrate compliance with the throughput limits for all five storage tanks. Also, “45CSR§30-5.1.c.” has been added to the citation of authority.

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 for minor modifications.
Ending Date: N/A

Point of Contact

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

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/414-1910
frederick.tipane@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.