

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: **January 31, 2023**
Plant Identification Number: **03500003**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Ripley Compressor Station**
Mailing Address: **1700 MacCorkle Avenue, SE**
Charleston, WV 25314

Permit Action Number: *MM01* Revised: *August 15, 2023*

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.

This minor modification (MM01) incorporates changes from R13-3546A. Changes associated with this modification include changes to the dehydration unit reboiler (RB-1) and flare (FLLP-1) maximum design

heat inputs (MDHI). The flare MDHI will increase from 4.0 MMBtu/hr to 5.0 MMBtu/hr. The reboiler MDHI will decrease from 4.0 MMBtu/hr to 1.5 MMBtu/hr. Tank A14 is no longer operational and is being removed and the volume of Tank A28 is being changed from 10,000 gallons to 11,200 gallons to reflect as-built changes.

Emissions Summary

This modification results in the following emission changes:

Pollutant	Change in Potential Emissions (+ or -), TPY
NOx	-0.78
CO	0.46
VOC	-0.06
SO ₂	-0.01
PM	0.01
Formaldehyde	-<0.01
Benzene	-<0.01
Ethylbenzene	-<0.01
Total HAPs	-0.03

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 NOx. 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers To Prevent and Control Particulate Air Pollution from Combustion of Refuse NSR Permits Operating permit requirement.
	45CSR6	
	45CSR13	
	45CSR30	

State Only: None

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 (if any)
R13- 3546A	April 4, 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

- ❖ This minor modification includes the following changes from R13-3546A:
 - There are no changes in the process description at this facility outside of the following equipment sizing changes to reflect the facility as-built. The Emission Units Table, conditions 7.1.2, 7.1.3, 8.1.1 and 9.1.7 were updated due to these changes.
 - Increased Flare (FLLP-1) MDHI from 4.0 mmBtu/hr to 5.0 mmBtu/hr.
 - Decreased Reboiler (RB1) MDHI From 4.0 mmBtu/hr to 1.5 mmBtu/hr.
 - Increased Tank (A28) volume from 10,000 gallons to 11,200 gallons.
 - The following equipment will be removed from the facility:
 - Tank A14 was removed from the facility. Therefore, Tank A14 was removed from the Emission Units Table and conditions 9.1.1, 9.1.2 and 9.2.1 were updated due to this change.
 - Emission Unit ID- 062G3 description was updated from F18GL to VGF-F18GL per company's request.
- ❖ Title V Boilerplate changes:
 - **Condition 2.1.3** - The section of Rule 30 that defines Secretary changed in a previous version of Rule 30 and we failed to update this condition. Also, in the recently revised Rule 30, the word "such" was removed.
 - **Condition 2.11.4.** – The reference notation was changed from 45CSR§30-2.39 to 45CSR§30-2.40 because this definition was renumbered in 45CSR30.
 - **Condition 2.22.1.** - The reference notation was changed to delete 45CSR38 because it has been repealed.
 - **Condition 3.5.3.** - The EPA contact information and address were updated.
 - **Conditions 2.17, 3.5.7, and 3.5.8.a.1** - The section for Emergency was removed and replaced with Reserved in condition 2.17. Section 5.7 of Rule 30 which pertained to emergencies and affirmative defense was removed in the revised Rule 30.
 - **Condition 3.5.4** - Under the revised Rule 30, certified emissions statements are no longer required to be submitted. Facilities have been submitting their emissions data in SLEIS and paying fees based on their SLEIS submittal, so this requirement was no longer needed.
 - **Condition 3.5.8.a.2** - Under the revised Rule 30, "telefax" was replaced with "email".

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: N/A

Ending Date: N/A

Point of Contact

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

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41283
Beena.j.modi@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.