

Fact Sheet



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

Permit Number: **R30-07100008-2023**
Application Received: **September 9, 2022**
Plant Identification Number: **07100008**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Seneca Compressor Station**
Mailing Address: **1700 MacCorkle Ave, SE, Charleston, WV 25314**

Physical Location: Seneca Rocks, Pendleton County, West Virginia
UTM Coordinates: 639.5 km Easting • 4,301.10 km Northing • Zone 17
Directions: Traveling US Route 33 East from Elkins, turn left at the intersection with State Route 28 (Seneca Rocks). Proceed approximately 2 miles to the station which is located on the left.

Facility Description

The Seneca 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 one (1) 13,750 hp, two (2) 7,491 hp, one (1) 1,557 hp, one (1) 15,432 hp, and one (1) 10,613 hp natural gas fired turbine engines, one (1) emergency generator, two (2) fuel gas heaters, one (1) process heater, fifty nine (59) catalytic space heaters and fourteen (14) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2022 Actual Emissions
Carbon Monoxide (CO)	371.97	57.70
Nitrogen Oxides (NO _x)	314.52	42.58
Particulate Matter (PM _{2.5})	19.34	2.25
Particulate Matter (PM ₁₀)	19.34	2.36
Total Particulate Matter (TSP)	19.34	3.04
Sulfur Dioxide (SO ₂)	1.01	0.33
Volatile Organic Compounds (VOC)	42.75	11.33
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2022 Actual Emissions
Benzene	0.03	< 0.01
Acrolein	0.02	< 0.01
Toluene	0.26	0.04
Ethylbenzene	0.06	0.01
Xylene	0.13	0.02
n-Hexane	0.07	0.02
Formaldehyde	1.51	0.34
Acetaldehyde	0.09	0.01
Total HAPs	2.17	0.44

Title V Program Applicability Basis

This facility has the potential to emit 314.52 tons/yr of NO_x and 371.97 tons/yr 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 particulate matter emissions from indirect heat exchangers.
--------------------	--------	--

	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary sources
	45CSR16	Emission standards for New Stationary Sources pursuant to 40 C.F.R. Part 60
	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. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	40 C.F.R. 60 Subpart JJJJ	NSPS for Stationary Spark Ignition IC Engines
	40 C.F.R. Part 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines
	40 C.F.R. 63 Subpart ZZZZ	NESHAPs MACT for Stationary RICEs
State Only:	45CSR4	No objectionable odors.

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>)
R13-2715F	4/26/2016	

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 is the fourth renewal of the Title V permit. The following changes to the Title V permit were made as part of this renewal:

- ❖ 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".
- ❖ Conditions 5.1.3.b(2) and (3) were removed because these sections of 40 CFR §60.4243(d) have been deleted.
- ❖ Condition 5.5.2 - This condition was updated because of changes to the regulation.
- ❖ Section 7: Columbia Gas requested that Section 7 (40 CFR 60 Subpart OOOOa LDAR Requirements) of the Title V permit be removed. This section was deleted because 40 C.F.R. 60, Subpart OOOOa LDAR Requirements are not applicable to this site according to 40 C.F.R §60.5365a due to construction of the Combustion Turbine/Compressor (Emission Point ID- E09) commencing on March 3, 2015 (prior to applicability date of September 18, 2015). The Subpart OOOOa LDAR requirements were added during the previous permit renewal when the Combustion Turbine/Compressor’s installation date (2017) was used to determine the applicability of the LDAR requirements instead of the construction date. The permittee has demonstrated to the WV Division of Air Quality that construction commenced on the Combustion Turbine/Compressor (Emission Point ID- E09) prior to the September 18, 2015, applicability date of 40 CFR 60 Subpart OOOOa. Therefore, the facility is not subject to the leak detection and repair requirements of this regulation and Section 7 was removed from this permit.

Non-Applicability Determinations

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

45CSR4	<i>To Prevent and Control the Discharge of Air Pollutants into the Open Air Which Cause or Contributes to an Objectionable Odor or Odors:</i> This State Rule shall not apply to the following source of objectionable odor until such time as feasible control methods are developed: Internal combustion engines.
45CSR10	<i>To Prevent and Control Air Pollution from the Emission of Sulfur Dioxide - Emissions from Indirect Heat Exchangers.</i> WVDAQ has determined that 45CSR10 does not apply to natural gas fired engines. Also, the requirements for fuel burning units does not apply to HTR1, HTR2, and HTR3 because they have design heat inputs less than 10 mmBtu/hr and are exempt in accordance with 45CSR§10-10.1. The catalytic space heaters are not defined as fuel burning units.
45CSR21	<i>To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds:</i> The facility is not located in a designated VOC County. Therefore, this State Rule does not apply.

45CSR27	<i>To Prevent and Control the Emissions of Toxic Air Pollutants:</i> 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. Part 60 Subpart OOOO	<i>Standards of Performance for Crude Oil and Natural Gas Facilities.</i> The facility does not meet the § 60.5430 definition of a Crude Oil and Natural Gas Production source category. Therefore, 40 C.F.R. Part 60 Subpart OOOO does not apply.
40 CFR 60 Subpart OOOOa	<i>Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015.</i> The permittee has demonstrated to the WV Division of Air Quality that construction commenced on the Combustion Turbine/Compressor (Emission Point ID- E09) prior to the September 18, 2015, applicability date of 40 CFR 60 Subpart OOOOa. Therefore, the facility is not subject to the leak detection and repair requirements of this regulation.
40 C.F.R. Part 60 Subpart K and Ka	<i>Standards of Performance for Petroleum Liquid Storage Vessels.</i> All tanks at the station are below the applicability criteria of 40,000 gallons in capacity as stated in 40CFR§§60.110(a) and 60.110a(a).
40 C.F.R. Part 60 Subpart Kb	<i>Standards of Performance for Volatile Organic Liquid Storage Vessels.</i> All tanks at the station are below the applicability criteria of 75m ³ (19,813 gallons) in capacity as stated in 40CFR§60.110b(a).
40 C.F.R. Part 60 Subpart Dc	<i>Standards of Performance for Steam Generating Units:</i> The fuel gas heaters have a maximum design heat input capacity of less than 10 MMBtu/hr, which is below the applicability threshold defined within 40CFR§60.40c(a).
40 C.F.R. Part 60 Subpart GG	<i>Standards of Performance for Stationary Turbines:</i> The provisions of this subpart are not applicable because the turbines were installed after the applicability dates and are therefore, subject to 40 C.F.R. 60 Subpart KKKK. The only exception is the GE Frame 3 Turbine (ID 03704) which was installed in 1981, but as a relocated unit originally purchased in 1971. Therefore, the unit is not considered a new construction or modification in accordance with the General Provisions, 40CFR§60.14(e)(6).
40 C.F.R. Part 60 Subpart IIII	<i>Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.</i> The compressor station does not have any compression ignition internal combustion engines.
40 C.F.R. Part 63 Subpart HHH	<i>National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities.</i> The compressor station is not subject to Subpart HHH since it is not a major source of HAPs and it does not incorporate dehydration operations.
40 C.F.R. Part 63 Subpart YYYY	National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines does not apply to this station since it does not exceed major source HAP thresholds.
40 C.F.R. Part 63 Subpart DDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters does not apply to this station since it does not exceed major source HAP thresholds.
40 C.F.R. Part 63 Subpart JJJJJ	<i>National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.</i> The facility is not subject to 40 C.F.R. Part 63 Subpart JJJJJ since the fuel gas heaters and process heater are not boilers, but process heaters, which are not regulated under this source category.

40 C.F.R. Part 64	<i>Compliance Assurance Monitoring.</i> The compliance assurance monitoring provisions of Part 64 are not applicable due to there being no add-on controls at this facility per 40CFR§64.2(a)(2).
--------------------------	---

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: June 22, 2023

Ending Date: July 24, 2023

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)

None.