

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 April 4, 2022.

Permit Number: **R30-00700100-2022**
Application Received: **January 11, 2024**
Plant Identification Number: **03-54-007-00100**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Frametown Compressor Station**
Mailing Address: **1700 MacCorkle Avenue SE, Charleston, WV 25314**

Permit Action Number: *MM01* Revised: *August 14, 2024*

Physical Location: 1598 Wilsie Road, Frametown, Braxton County, West Virginia
UTM Coordinates: 511.970 km Easting • 4,279.227 km Northing • Zone 17
Directions: Travel approximately 0.5 miles north from Frametown on State Route 4 and turn left onto County Route 9. Proceed on CR 9 approximately 1.5 miles to the station which is on the right side of the road.

Facility Description

The Frametown Compressor Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) Code 4922, and North American Industrial Classification System (NAICS) Code 48621. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of one (1) 12,500-hp turbine, one (1) 3,350-hp turbine engine/centrifugal compressor, one (1) 3,550-hp turbine engine/centrifugal compressor, one (1) 16,300-hp turbine, one (1) 925-hp emergency generator RICE, one (1) 0.8 mmBtu/hr fuel gas heater, forty (40) catalytic heaters totaling 2.88

MMBtu/hr combined, multiple storage tanks of various sizes, four (4) pipeline liquids tanks and one (1) pipeline liquids unloading rack.

Emissions Summary

There will be no change in the facility's potential to emit as a result of this minor modification.

Title V Program Applicability Basis

This facility has the potential to emit 188.25 TPY of CO and 252.38 TPY of NO_x. 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:

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| Federal and State: | 45CSR13 | Permits for construction, modification, relocation and operations of stationary sources of air pollutants. |
| | 45CSR30 | Operating permit requirement. |
| 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>) |
|--------------------------------|------------------|--|
| R13-2234C | 1/16/24 | |

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 occurred since the most recent Title V permit was issued:

Changes requested in the minor modification application:

- **Table of Contents, Condition 1.2. and Condition 4.0.** – The current R13 permit number was updated to R13-2234C.
- **Condition 1.1.** – The Emission Unit table was updated to revise several emission unit descriptions and combine the maximum design heat input for the 40 catalytic heaters SH1.
- **Conditions 4.1.3., 4.4.7. and 5.1.1.** – The language was revised to add the word RICE describing Emergency Generator G05 and clarification that the 500 hours of operation per year limit are during periods of non-emergencies only (Condition 4.1.3.).
- **Conditions 4.2.1.** – This condition was revised to change compliance language for Fuel Heater H1 from Method 22 visual emission observations to Method 9 or continuous opacity monitoring systems (COMS) approved by the Secretary in order to be consistent with the requirements used in other permits issued to Columbia Gas Transmission, LLC.

Title V Boilerplate changes:

- **Condition 2.1.3.** – This condition was updated to delete the word “such” which was removed from 45CSR30 effective March 31, 2023. The reference was changed from 45CSR§30-2.12 to 45CSR§30-2.39. because the definition of “Secretary” was renumbered in a previous version of 45CSR30.
- **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.
- **Conditions 2.17., 3.5.7. and 3.5.8.a.1.** – These conditions were deleted and replaced with “Reserved” because the emergency provisions under 45CSR§30-5.7 were removed from 45CSR30 effective March 31, 2023.
- **Condition 2.22.1.** - The reference notation was changed to delete 45CSR38 because it was repealed.
- **Condition 3.5.3.** - The US EPA address was updated.
- **Condition 3.5.4.** – This condition was updated because the requirement to submit a certified emissions statement was removed from 45CSR30 effective March 31, 2023.
- **Condition 3.5.8.a.2.** – This condition was updated to replace the word “telefax” with “email” according to the change in 45CSR30 effective March 31, 2023.

Non-Applicability Determinations

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

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| <p>45CSR4</p> | <p><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.</p> |
| <p>45CSR10</p> | <p><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.</p> |
| <p>45CSR21</p> | <p><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.</p> |
| <p>45CSR27</p> | <p><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.”</p> |
| <p>40 C.F.R. Part 60 Subpart OOOO</p> | <p><i>Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution.</i> The Storage Vessel requirements defined for transmission sources are not applicable to this site because there are no affected source storage vessels constructed or reconstructed after August 23, 2011 and on or before September 18, 2015 as stated in accordance with 40CFR§60.5365(e). No other affected sources were identified at this site.</p> |
| <p>40 C.F.R. Part 60 Subpart OOOOa</p> | <p><i>Standards of Performance for Crude Oil and Natural Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015.</i> The GHG and VOC requirements defined by this NSPS are not applicable to this site because all affected sources, except A09, commenced construction prior to September 18, 2015 in accordance with the applicability criteria defined within [40CFR§60.5365a]. A09 commenced construction after September 18, 2015, and on or before November 16, 2020, but is not considered a storage vessel affected facility because its potential for VOC emissions is not equal to or greater than 6 tons per year (tpy) in accordance with the applicability criteria defined within [40CFR§60.5365a(e)(1)]. Promax software was used to calculate A09’s potential to emit as 0.24 tpy for VOCs. Affected sources evaluated are as follows: Compressors, Equipment Leaks, Pneumatic Controllers, and Storage Vessels.</p> |
| <p>40 C.F.R. Part 60 Subparts K and Ka</p> | <p><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)</p> |
| <p>40 C.F.R. Part 60 Subpart Kb</p> | <p><i>Standards of Performance for Volatile Organic Liquid Storage Vessels.</i> All tanks at the station are below the applicability criteria of 19,813 gallons in capacity as stated in 40CFR§60.110b(a).</p> |
| <p>40 C.F.R. Part 60, Subpart Dc</p> | <p><i>Standards of Performance for Steam Generating Units.</i> The fuel gas heater burner has a maximum design heat input capacity of less than 10 MMBtu/hr, which is below the applicability threshold defined within [40CFR§60.40c(a)]. Additionally, the heater is not a steam generating unit.</p> |
| <p>40 C.F.R. Part 60 Subpart KKK</p> | <p><i>Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant(s).</i> The 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. As a result, the station has no affected sources operating within this source category.</p> |

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| 40 C.F.R. Part 60 Subpart GG | The provisions of this subpart are not applicable to the 04501, 04502, or 04503 turbines at this site because they were installed prior to the October 3, 1977 NSPS applicability date defined within 40CFR§60.330(b). Additionally, no modifications have occurred since the original installation. |
| 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 DDDDD | 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 JJJJJJ | <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 JJJJJJ since the fuel gas heater (045H1) is not a boiler, but a process heater, which is not regulated under this source category. |
| 40 C.F.R. Part 64 | There are no add-on controls, so this is not applicable per 40 CFR§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: Not Applicable
 Ending Date: Not Applicable

Point of Contact

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

Dan Roberts
 West Virginia Department of Environmental Protection
 Division of Air Quality
 601 57th Street SE
 Charleston, WV 25304
 304/926-0499 ext. 41902
 Daniel.p.roberts@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)

No comments were received.