

# Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Reopening for Cause and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on September 15, 2020.

Permit Number: **R30-01300017-2020**  
Application Received: **September 21, 2020**  
Plant Identification Number: **013-00017**  
Permittee: **Columbia Gas Transmission, LLC**  
Facility Name: **White Oak Compressor Station**  
Mailing Address: **1700 MacCorkle Avenue, SE**  
**Charleston, WV 25314**

Permit Action Number: *RE01*      Revised: *December 2, 2020*

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Physical Location:	Brohard, Calhoun County, West Virginia
UTM Coordinates:	Easting: 487.7 km      Northing: 4,321.4 km      Zone: 17
Directions:	From the town of Brohard, head southeast on Brohard Rd. toward Dutchman Run and turn right to stay on Brohard Rd. Continue on Co. Route 5/3. In approximately 1 mile, turn left on to Co. Route 21/3. The Station will be on the right in approximately 1.6 miles.

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### Facility Description

This facility is a natural gas transmission compressor station. Pipeline transmission of natural gas requires that the gas be compressed. The White Oak Compressor Station will receive natural gas via pipeline from an upstream compressor station, compress it using natural gas fired turbines and transmit it via pipeline to a downstream station. The two (2) Solar Titan 130E turbines each have an output of 20,912 hp at 32 °F. The facility will also consist of one (1) 1,175 hp Waukesha natural gas fired emergency generator, one (1) process heater rated at 1.41 million British Thermal Units per hour (MMBTU/hr), and forty (40) catalytic heaters, each rated at 0.072 MMBTU/hr. Additionally, there will be one (1) 2,000 gallon condensate storage tank.

## Emissions Summary

There are no changes in potential or actual emissions associated with this permitting action.

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 212.31 tons per year 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.

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

Federal and State:

45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60
45CSR30	Operating permit requirement.
40 C.F.R. 60 Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015

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> )
R13-3315	November 14, 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

Pursuant to 45CSR§30-6.6.a.4., the Division of Air Quality has reopened the Title V operating permit for Columbia Gas Transmission, LLC's White Oak Compressor Station to incorporate the 40 CFR 60 Subpart OOOOa leak detection and repair (LDAR) requirements for this natural gas transmission station. These requirements were included in White Oak's draft/proposed permit in Section 7.0 but were not included in the final permit issued on September 15, 2020. This was because on September 14, 2020 a final rule was published in the Federal Register which excluded the natural gas transmission and storage segment from the 40 CFR 60 Subpart OOOOa affected source category. However, on September 17, 2020, the U.S. Court of Appeals for the D.C. Circuit issued an administrative stay pending review of the September 14, 2020 Subpart OOOOa rule changes. As a result of the administrative stay, the transmission and storage segment is still included in the Subpart OOOOa affected source category and the LDAR requirements still apply to the White Oak Compressor Station. These requirements have been added to Section 7.0 of the Title V permit as described below.

### Section 7.0: 40CFR60, Subpart OOOOa Requirements

The following affected sources which commenced construction, modification or reconstruction after September 18, 2015 are potentially subject to the applicable provisions of this Subpart OOOOa. Each affected source and their relevance to this facility are discussed below:

- a. Each well affected facility, which is a single natural gas well.

*There are no wells at this facility. Therefore, all requirements regarding gas well affected facilities under 40 CFR 60 Subpart OOOOa would not apply.*

- b. Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

*There are no centrifugal compressors with wet seals at the White Oak Compressor Station. Therefore, all requirements regarding centrifugal compressors under 40 CFR 60 Subpart OOOOa would not apply.*

- c. Each reciprocating compressor affected facility, which is a single reciprocating compressor. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

*There are no reciprocating compressors at the White Oak Compressor Station.*

- d. Pneumatic Controllers

- Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 scfh and not located at a natural gas processing plant.
- Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller and is located at a natural gas processing plant.

*All pneumatic controllers that have a continuous bleed at the facility will be air driven. Therefore, there are no applicable pneumatic controllers which commenced construction after September 18, 2015. Therefore, all requirements regarding pneumatic controllers under 40 CFR 60 Subpart OOOOa would not apply.*

- e. Each storage vessel affected facility, which is a single storage vessel, with the potential for VOC emissions equal to or greater than 6 tpy as determined according to §60.5364a(e).

40CFR60 Subpart OOOOa defines a storage vessel as a unit that is constructed primarily of non-earthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provides structural support and is designed to contain an accumulation of liquids or other materials. The following are not considered storage vessels:

- Vessels that are skid-mounted or permanently attached to something that is mobile (such as trucks, railcars, barges or ships), and are intended to be located at a site for less than 180 consecutive days. If the source does not keep or are not able to produce records, as required by §60.5420a(c)(5)(iv), showing that the vessel has been located at a site for less than 180 consecutive days, the vessel described herein is considered to be a storage vessel from the date the original vessel was first located at the site.
- Process vessels such as surge control vessels, bottoms receivers or knockout vessels.
- Pressure vessels designed to operate in excess of 204.9 kilopascals and without emissions to the atmosphere.

The potential for VOC emissions must be calculated using a generally accepted model or calculation methodology, based on the maximum average daily throughput for a 30-day period of production prior to the applicable emission determination deadline specified in this subsection. The determination may take into account requirements under a legally and practically enforceable limit in an operating permit or other requirement established under a federal or state authority. For each storage vessel affected facility that emits more than 6 tpy of VOC, the permittee must reduce VOC emissions by 95% or greater within 60 days of startup.

*The storage vessel located at the White Oak Compressor Station emits less than 6 tpy of VOC. Therefore, the facility is not required by this section to further reduce VOC emissions by 95%.*

- f. The group of all equipment, except compressors, within a process unit is an affected facility.
- Addition or replacement of equipment for the purpose of process improvement that is accomplished without a capital expenditure shall not by itself be considered a modification under this subpart.
  - Equipment associated with a compressor station, dehydration unit, sweetening unit, underground storage vessel, field gas gathering system, or liquefied natural gas unit is covered by §§60.5400a, 60.5401a, 60.5402a, 60.5421a and 60.5422a of this subpart if it is located at an onshore natural gas processing plant. Equipment not located at the onshore natural gas processing plant site is exempt from the provisions of §§60.5400a, 60.5401a, 60.5402a, 60.5421a and 60.5422a of this subpart.
  - The equipment within a process unit of an affected facility located at onshore natural gas processing plants and described in paragraph (f) of this section are exempt from this subpart if they are subject to and controlled according to subparts VVa, GGG or GGGa of this part.

*The facility is a compressor station not located at an onshore natural gas processing plant. Therefore, requirements of this section would not apply.*

- g. Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.

- Each sweetening unit that processes natural gas is an affected facility; and
- Each sweetening unit that processes natural gas followed by a sulfur recovery unit is an affected facility.
- Facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H<sub>2</sub>S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423a(c) but are not required to comply with §§60.5405a through 60.5407a and paragraphs 60.5410a(g) and 60.5415a(g) of this subpart.
- Sweetening facilities producing acid gas that is completely reinjected into oil-or-gas-bearing geologic strata or that is otherwise not released to the atmosphere are not subject to §§60.5405a through 60.5407a, 60.5410a(g), 60.5415a(g), and 60.5423a of this subpart.

*There are no sweetening units at the White Oak Compressor Station. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOOa would not apply.*

h. Pneumatic Pumps

*The pneumatic pumps at the facility are air driven. Therefore, all requirements regarding pneumatic pumps under 40 CFR 60 Subpart OOOOa would not apply to the White Oak Compressor Station.*

i. Collection of fugitive emission components at a well site

*The collection of fugitive emissions components is not at a well site.*

j. Collection of fugitive emission components at a compressor station

*The collection of fugitive emissions components at a compressor station, as defined in §60.5430a, is an affected facility. The White Oak Compressor Station has fugitive components at the facility and they conduct Quarterly leak detection and repair (LDAR) surveys to detect and repair leaks. The applicable requirements from 40 CFR 60 Subpart OOOOa for fugitive emission components were added in Section 7.0 of this permit.*

The 40CFR60, Subpart OOOOa requirements applicable to this facility, are summarized in the following table:

<b>Permit Condition</b>	<b>Summary of Permit Condition</b>	<b>Regulatory Citation</b>	<b>R13-3315 Condition</b>
7.1.1.	Reduce GHG and VOC Emissions: Fugitive Emissions Monitoring	45CSR16; 40 C.F.R. §60.5397a	4.1.4.
7.1.2.	Initial Compliance	45CSR16; 40 C.F.R. §60.5410a(j)	N/A
7.1.3.	Continuous Compliance	45CSR16; 40 C.F.R. §60.5415a(h)	N/A
7.2.1.	VOC calculations for A1	45CSR16; 40CFR§60.5410a(h) and §60.5365a(e)	4.1.5.
7.4.1.	Fugitive Emissions Records	45CSR16; 40 C.F.R. §§60.5420a(c)&(c)(15)	N/A
7.5.1.	Annual Reporting	45CSR16; 40 C.F.R. §§60.5420a(b)(1) and (7)	N/A

### **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: October 15, 2020  
Ending Date: November 16, 2020

### **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 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 41283  
[Beena.j.modi@wv.gov](mailto: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.