

# 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 17, 2023.

Permit Number: **R30-08300019-2023**  
Application Received: **November 09, 2023**  
Plant Identification Number: **03-54-083-00019**  
Permittee: **Columbia Gas Transmission, LLC**  
Facility Name: **Files Creek Compressor Station**  
Mailing Address: **1700 MacCorkle Avenue SE, Charleston, WV 25314**

Permit Action Number: *MM01*    Revised: *February 06, 2024*

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Physical Location: Beverly, Randolph County, West Virginia  
UTM Coordinates: 601.1 km Easting • 4,297.3 km Northing • Zone 17  
Directions: From I-79N, take Exit 99 to merge onto US-119N/US-33E towards Buckhannon. After traveling approximately 43 miles, take a slight right onto WV-92S. Continue for approximately 9 miles and turn left onto Kings Run Road. Continue for approximately 2.1 miles and turn left onto Files Creek Road. After approximately 0.3 miles, turn left onto Delta Road 9. In approximately 0.4 miles, the Files Creek Compressor Station is located on the right.

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### Facility Description

The Files Creek Compressor Station is a natural gas transmission facility. The Title V permit currently includes four Solar Taurus 70 Turbines (009T1 – 009T4), one emergency generator (009G4), two line heaters (HTR2 and HTR4), one fuel gas heater (HTR5), and 107 catalytic heaters (HTR3 and HTR6) as well as various glycol, lube oil, and waste oil tanks (A15 – A18 and B13).

This minor modification incorporates the revisions made with the Class I Administrative Update R13-3164E. With this revision application, the permittee requested that several administrative changes be made to the NSR permit as well as the Title V operating permit. No physical or process changes have been made to the facility as a result of this minor modification.

### **Emissions Summary**

The facility-wide potential emissions will not change due to this modification.

### **Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit 261.79 tpy of Carbon Monoxide. 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:	45CSR13	NSR Permit Requirements.
	45CSR30	Operating Permit Requirements.

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:

<b>Permit or Consent Order Number</b>	<b>Date of Issuance</b>
R13-3164E	November 14, 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 incorporates the revisions made with the Class I Administrative Update R13-3164E. With this revision application, the permittee requested that several administrative changes be made to the NSR permit as well as the Title V operating permit. There have been no physical changes or process changes made to the facility with this application.

The following changes have been made to the Title V operating permit for this modification:

1. The facility's physical address has been updated to 2157 Files Creek Road, Beverly, WV 26253.
2. The Emission Unit IDs and Emission Point IDs of five tanks were updated in R13-3164E. These tanks were previously included in the Title V permit under R30-08300019-2012 (SM02) but were removed with the issuance of R30-08300019-2018. The tanks are not currently subject to any applicable requirements, however, as the tanks are included in R13-3164E, the tanks have been added to the Emission Units Table of Section 1.0. as follows:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity
A15	A15	Used Lube Oil Tank	2015	1,000 gallons
A16	A16	Used Oil Tank	2015	1,000 gallons
A17	A17	New Glycol Tank	2015	1,000 gallons
A18	A18	Used Glycol Tank	2015	1,000 gallons
B13	B13	Oil/Water Tank	2015	1,000 gallons

3. The table of Active R13, R14, and R19 Permits in Section 1.2. has been updated with R13-3164E which was issued on November 14, 2023.
4. Condition 4.1.4. of R13-3164D was removed from the NSR permit with the issuance of R13-3164E. Therefore, Condition 8.1.7. has been removed from the operating permit, and the authority of Condition 8.1.11. has been updated accordingly.
5. The hours of operation requirement in Condition 8.1.8. has been updated to specify that the emergency generator 009G4's operating hours limitation only applies to periods of non-emergencies.

Additionally, the reference to Condition 6.1.3. of the NSR permit has been removed from the authority of Condition 8.1.8. of the operating permit. Condition 6.1.3. of R13-3164D was removed from the NSR permit with the issuance of R13-3164E as the compliance demonstration requirement is already included in Condition 6.1.1.

6. Per the permittee's request, the description of the emergency generator 009G4 has been updated from VGF36GL to VGF-L36GL in Conditions 8.1.8. and 8.1.9.

### 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.

Ending Date: Not applicable.

### **Point of Contact**

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

Sarah Barron  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
304/926-0499 ext. 41915  
sarah.k.barron@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.