West Virginia Department of Environmental Protection
Division of Air Quality

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 July 29, 2022.

Permit Number: **R30-05100100-2022 (MM01)**
Application Received: **October 30, 2023**
Plant Identification Number: **03-54-051-00100**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Adaline Compressor Station**
Mailing Address: **1700 MacCorkle Avenue SE, Charleston, WV 25314**

Permit Action Number: *MM01* Revised: *July 2, 2024*

Physical Location:	Cameron, Marshall County, West Virginia
UTM Coordinates:	530.456 km Easting • 4,401.860 km Northing • Zone 17
Directions:	From WV-2 N, travel 4.5 miles and turn right onto Proctor Creek Road. Travel 2.2 miles and take a slight right onto St. Joseph Baker Hill. Travel 2.2 miles and take a sharp left to stay on St. Joseph Baker Hill. Travel 5.2 miles and turn right onto Fish Creek Road. In 5.8 miles, the compressor station is on the left.

Facility Description

The Adaline Compressor Station is a natural gas transmission facility. The compressor station has the capacity to operate twenty-four hours per day, seven days per week, fifty-two weeks per year. The station consists of three 880-HP Clark HRA-8, 2SLB engines; two 2,000-HP Clark TLA-6, 2SLB engines; one 440-HP Waukesha VGF18GL, 4SLB emergency generator; one 1,080-HP Solar Saturn T-1001 turbine; one 1.0-mmBTU/hr natural gas line heater; three 0.55-mmBTU/hr reboiler heaters; three DEG dehydration units rated at 117-mmscf/d each; and one 3.48-mmBTU/hr heating system boiler, all of which are fueled by natural gas.

This minor modification incorporates the revisions made with the Modification Permit R13-2149E. The revisions include the installation and operation of one 3,700-HP Caterpillar G3612, 4SLB engine; one 880-HP Waukesha VGF-L36GL, 4SLB emergency generator; one 1.615-mmBTU/hr line heater; and one 2,000-gallon methanol storage tank. Additionally, the permittee has also requested to reclassify the facility's DEG dehydration units to "small glycol dehydration units" under 40 C.F.R. Part 63 Subpart HHH as well as other administrative changes.

SIC: 4922, NAICS: 486210

Emissions Summary

This minor modification resulted in the following changes in emissions:

Change in Facility-Wide Potential Emissions

Pollutant	Current Potential Emissions (tpy)	Proposed Potential Emissions (tpy)	Change in Potential Emissions (tpy)
Carbon Monoxide	134.87	159.89	+ 25.02
Nitrogen Oxides	842.38	858.25	+ 15.87
Particulate Matter (PM_{10})	13.41	13.86	+ 0.45
Sulfur Dioxide	0.28	0.36	+ 0.08
Volatile Organic Compounds	54.93	40.17	- 14.76
Formaldehyde	14.31	16.38	+ 2.07
Total HAPs	20.97	32.14	+ 11.17

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 159.89 tpy of Carbon Monoxide, 858.25 tpy of Nitrogen Oxides, 16.38 tpy of Formaldehyde, and 32.14 tpy of total Hazardous Air Pollutants. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, 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	To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.
	45CSR13	NSR Permit Requirements.
	45CSR16	Standards of Performance for New Stationary Sources.
	45CSR30	Operating Permit Requirements.
	45CSR34	Emission Standards for Hazardous Air Pollutants.
	40 C.F.R. Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

40 C.F.R. Part 60 Subpart OOOOb	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After December 6, 2022.
40 C.F.R. Part 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities.
40 C.F.R. Part 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
40 C.F.R. Part 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

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
R13-2149E	January 08, 2024

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 Modification Permit R13-2149E. The revisions include the installation and operation of one 3,700-HP compressor engine (08108), one 880-HP emergency engine (081G4), one 2,000-gallon methanol storage tank (A25), and one 1.615-mmBTU/hr line heater (HTR3). The compressor engine 08108 will replace the existing three 880-HP Clark HRA-8 engines (08101, 08102, and 08103) and the 1,080-HP Solar Saturn T-1001 turbine (08107). Additionally, the requirements from 40 C.F.R. Part 63 Subpart HHH have been updated to reflect that the dehydrators (DEG-DEHY1, DEG-DEHY2, and DEG-DEHY3) are considered “small glycol dehydration units” as defined in 40 C.F.R. §63.1271.

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

1. Section 1.0. – Emission Units and Active R13, R14, and R19 Permits

   a. The following equipment have been added to the Emission Units Table:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
HTR3	H3	Line Heater	2024	1.615 mmBTU/hr	None
081G4	G4	Emergency RICE; Waukesha VGF-L36GL; 4-cycle, lean burn	2024	880 HP	None
08108	E08	Compressor RICE; Caterpillar G3612; 4-cycle, lean burn	2024	3,700 HP	OxCat
A25	A25	Methanol Storage Tank	2024	2,000 gal	None

   The new compressor engine, 08108, will replace the three existing 880-HP Clark HRA-8 engines (08101, 08102, and 08103) and the existing 1,080-HP Solar Saturn T-1001 turbine (08107). The existing engines and turbine will remain in operation until construction of 08108 is completed and 08108 is placed in-service. (See paragraph 8.a. of this Fact Sheet and Condition 4.1.4. of R13-2149E.)

   Although the methanol storage tank A25 has been added to the Emission Units Table, the tank is not currently subject to any applicable requirements under this operating permit. Construction of the tank commenced after the applicability dates of 40 C.F.R. Part 60 Subparts K and Ka; and, per §60.110b(a), the tank is not subject to Subpart Kb because it has a capacity of less than 75 cubic meters (19,813 gallons).

   b. The Emission Point ID associated with the dehydrators DEG-DEHY1, DEG-DEHY2, and DEG-DEHY3 was renamed FLLP1. This change was made throughout the permit.

   c. The Emission Unit ID of the dehydrator flare was changed to FLLP1, and the Emission Point ID was changed to FL1. These changes were made throughout the permit.

   d. The table of Active R13, R14, and R19 Permits was updated with R13-2149E which was issued on January 08, 2024.

2. Section 2.0. – General Conditions

   a. In Condition 2.1.3., the reference to 45CSR§30-2.12. has been replaced with 45CSR§30-2.39 which defines “Secretary”.

   b. Section 2.17., which previously contained emergency requirements, has been removed from the permit and replaced with “Reserved” as the requirements for emergencies and affirmative defense were removed from 45CSR30.

3. Section 3.0. – Facility-Wide Requirements

   a. Condition 3.4.1. contains the recordkeeping requirements for monitoring information. The authority of this condition has been updated to show that it is applicable to the emission units 081G4, 08108, and HTR3.

b. 45CSR§30-8 has been revised and no longer requires the submission of certified emissions statements. Condition 3.5.4. has been updated accordingly.

c. The requirements of Conditions 3.5.7. and 3.5.8.a.1. have been removed from the operating permit, and the conditions have been marked as "Reserved." due to the removal of the sections of 45CSR30 that related to emergencies and affirmative defense.

d. Due to revisions in 45CSR§30-5.1.c.3.C.2., "telefax" has been updated to "email" in Condition 3.5.8.a.2.

e. The Permit Shield in Condition 3.7.2. has been updated as follows:

i. The heater HTR3 is subject to 45CSR10 but does not have any applicable requirements under the rule. (See paragraph 4.b.ii. of this Fact Sheet.) Therefore, HTR3 has been added to the permit shield for 45CSR10 in Condition 3.7.2.a.

ii. The heater HTR3 is a small industrial steam generating unit with a maximum design heat input capacity less than 10 mmBTU/hr. Therefore, 40 C.F.R. Part 60 Subpart Dc does not apply to HTR3 per §60.40c(a), and HTR3 has been added to the permit shield for Subpart Dc in Condition 3.7.2.d.

iii. The compressor engine 08108 and the emergency engine 081G4 meet the applicability requirements of 40 C.F.R. §§60.4230(a)(4)(i) and (a)(4)(iv), respectively, and are subject to 40 C.F.R. Part 60 Subpart JJJJ. Therefore, Condition 3.7.2.j. has been updated to specify that Subpart JJJJ is inapplicable to the spark ignition internal combustion engines 08101 to 08105 and 081G3.

iv. 40 C.F.R. Part 60 Subpart OOOOa is applicable to the affected facilities listed in §§60.5365a(a) through (j) for which construction, modification, or reconstruction commenced after September 8, 2015 and on or before December 6, 2022. As the storage tanks A08 to A12 and A25 and the compressors associated with 08101 to 08105, 08107, and 08108 were constructed outside of the applicability dates for Subpart OOOOa, Condition 3.7.2.m. has been updated to specify that Subpart OOOOa is inapplicable to these emission units.

v. Condition 3.7.2.o. has been updated to note that CAM is inapplicable to the engine 08108. Emissions of carbon monoxide, volatile organic compounds, and formaldehyde from 08108 are controlled by an oxidation catalyst (OxCat). However, as 08108 is subject to the standards of 40 C.F.R. Part 60 Subpart JJJJ and 40 C.F.R. Part 63 Subpart ZZZZ, 08108 is exempt from CAM in accordance with 40 C.F.R. §64.2(b)(1)(i).

4. Section 4.0. – Miscellaneous Indirect Natural Gas Heaters and Boilers less than 10 MMBtu/hr

a. With this revision, a new natural gas-fired line heater (Emission Unit ID: HTR3, Emission Point ID: H3) has been added to the operating permit. The maximum design heat input of the heater is limited to 1.615 mmBTU/hr per Condition 6.1.4. of R13-2149E, which has been added to the operating permit as Condition 4.1.5.

b. The heater HTR3 is also subject to the following:

i. **45CSR2** – *To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers*

The heater HTR3 meets the definition of a fuel burning unit as defined in 45CSR§2-2.10. Therefore, the heater is subject to the 10% opacity limit of 45CSR§2-3.1. (Condition 4.1.1. of the operating permit) and to the visible emission checks of 45CSR§2-3.2. (Condition 4.1.2.).

As the heater has a design heat input of less than 10 mmBTU/hr, the permittee is exempt from the weight emission standards of Section 4; the fugitive emissions control standards of Section 5; the registration standards of Section 6; the testing, monitoring, recordkeeping, and reporting requirements of Section 8; and the start-up, shutdown, and malfunction requirements of Section 9 of this rule per 45CSR§2-11.1.

ii. **45CSR10** – *To Prevent and Control Air Pollution from the Emission of Sulfur Oxides*

The heater HTR3 meets the definition of a fuel burning unit as defined in 45CSR§10-2.8. However, per 45CSR§10-10.1., fuel burning units with a heat input of less than 10 mmBTU/hr are exempt from the weight emission standards of Section 3; the registration requirements of Section 6; the permit requirements of Section 7; and the testing, monitoring, recordkeeping, and reporting requirements of Section 8. Furthermore, Section 4 is inapplicable because the heater is not part of a manufacturing process, and Section 5 is inapplicable because the unit does not combust a refinery or other process gas stream. Therefore, although HTR3 is subject to 45CSR10, the heater currently has no applicable requirements under this rule.

iii. The heater is also subject to 40 C.F.R. Part 63 Subpart DDDDD. These applicable requirements are included in Section 6.0. of the operating permit.

5. Section 5.0. – 40 C.F.R. 63, Subpart ZZZZ MACT Requirements

a. The following two new RICEs will be constructed at the compressor station:

i. The engine 081G4 (Waukesha VGF-L36GL) is a 4-stroke lean burn (4SLB) emergency stationary RICE with a site rating of 880 HP. As construction of 081G4 commenced after December 19, 2002, 081G4 is considered a new stationary RICE under Subpart ZZZZ per 40 C.F.R. §63.6590(a)(2)(i).

a. To be considered an emergency stationary RICE under Subpart ZZZZ, 081G4 must meet the definition found in 40 C.F.R. §63.6675 and, therefore, must comply with §63.6640(f). If the engine is not operated in the manner specified in the definition, then 081G4 will not be considered an emergency engine under Subpart ZZZZ and must meet all applicable requirements for non-emergency engines.

b. Provided the above emergency engine requirements are met, the engine 081G4 is subject to limited requirements under Subpart ZZZZ via 40 C.F.R. §§63.6590(b)(1) and (b)(1)(i). Therefore, the engine does not have to meet any further requirements of Part 63 Subparts A or ZZZZ, except for the initial notification requirements found in 40 C.F.R. §63.6645(f).

ii. The engine 08108 (Caterpillar G3612) is a 4SLB natural gas compressor engine with a site rating of 3,700 HP. The engine is equipped with an oxidation catalyst control device (OxCat). As construction of 08108 commenced after December 19, 2002, 08108 is also considered a new stationary RICE under Subpart ZZZZ per 40 C.F.R. §63.6590(a)(2)(i).

a. 08108 is a non-emergency engine located at a major source of HAPs. Therefore, the engine is subject to the emission limitations of Table 2a to Subpart ZZZZ and the operating limitations of Table 2b to Subpart ZZZZ. Compliance with these limitations is demonstrated through the monitoring, performance testing, recordkeeping, and reporting requirements summarized in the table below.

b. Section 5.0. of R30-05100100-2022 currently contains several Subpart ZZZZ requirements which are applicable to the facility's existing emergency engine 081G3. As a result of this permit modification, several Subpart ZZZZ requirements from Section 9.0. of the NSR permit for the engines 081G4 and 08108 were added to Section 5.0. All the applicable requirements from Subpart ZZZZ are summarized in the following table.

Title V Condition	R13-2149E Condition	Engine	Description	Regulatory Citation
5.1.1.	N/A	081G3	Requirements from Table 2c for existing emergency stationary SI RICEs with a site rating less than or equal to 500 HP located at a major source of HAPs.	45CSR34 40 C.F.R. §63.6602 Table 2c to Subpart ZZZZ, Item 6.
5.1.2.	N/A	081G4	New emergency RICEs with a site rating greater than 500 HP at a major source of HAPs are subject to limited requirements under Subpart ZZZZ.	45CSR34 40 C.F.R. §§63.6590(b), (b)(1), and (b)(1)(i)
5.1.3.	9.1.2.	08108	Emission limits of Table 2a and operating limits of Table 2b for new 4SLB stationary RICEs with a site rating greater than or equal to 250 HP at a major source of HAPs.	45CSR13 45CSR34 40 C.F.R. §63.6600(b) Table 2a to Subpart ZZZZ, Item 2. Table 2b to Subpart ZZZZ, Item 1.
5.1.4.a.	N/A	081G3	Compliance date for existing stationary SI RICE with a site rating less than or equal to 500 HP located at a major source of HAPs.	45CSR34 40 C.F.R. §63.6595(a)(1)
5.1.4.b.	9.1.1.	08108	The new RICE must be in compliance with the applicable emission limitations and operating limitations of Subpart ZZZZ upon startup. NOTE: The NSR permit condition contains the date by which an existing SI RICE at an area source of HAPs must be in compliance with the applicable provisions of Subpart ZZZZ per 40 C.F.R. §63.6595(a)(1). This requirement is inapplicable to 08108 which is considered a new RICE with a site rating of more than 500 HP located at a major source of HAPs under Subpart ZZZZ.	45CSR13 45CSR34 40 C.F.R. §63.6595(a)(3)
5.1.5.	9.1.7.	081G3 081G4 08108	The engines must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions.	45CSR13 45CSR34 40 C.F.R. §§63.6605(a) and (b)
5.1.6.	N/A	081G3 081G4	Operation requirements that must be met for a stationary RICE to be considered an emergency RICE under Subpart ZZZZ. References to emergency demand response have been vacated and were removed from the condition.	45CSR34 40 C.F.R. §63.6640(f)
5.1.7.	N/A	081G3 081G4 08108	The permittee shall comply with the applicable General Provisions listed in Table 8 to Subpart ZZZZ of Part 63.	45CSR34 40 C.F.R. §63.6665 Table 8 to Subpart ZZZZ

Title V Condition	R13-2149E Condition	Engine	Description	Regulatory Citation
5.2.1.	N/A	08108	Monitoring requirements if a continuous parameter monitoring system must be installed as specified in Table 5 to Subpart ZZZZ of Part 63.	45CSR34 40 C.F.R. §63.6625(b)
5.2.2.	N/A	081G3	The existing emergency RICE must be operated and maintained according to the manufacturer's emission-related written instructions or according to the permittee's maintenance plan.	45CSR34 40 C.F.R. §§63.6625(e) and (e)(2)
5.2.3.	N/A	081G3	For the existing emergency RICE, the permittee must install a non-resettable hour meter.	45CSR34 40 C.F.R. §63.6625(f)
5.2.4.	9.1.5.	081G3 08108	The permittee must minimize the engine's time spent at idle.	45CSR13 45CSR34 40 C.F.R. §63.6625(h)
5.2.5.	N/A	081G3	An oil analysis program may be utilized in order to extend the oil change requirement of the engine 081G3.	45CSR34 40 C.F.R. §63.6625(j)
5.2.6.	9.1.6.	08108	The permittee must demonstrate initial compliance with each applicable emission limitation and operating limitation according to Table 5 to Subpart ZZZZ of Part 63.	45CSR13 45CSR34 40 C.F.R. §§63.6630(a) to (c) Table 5 to Subpart ZZZZ, Items 1. and 9.
5.2.7.	9.1.8.	08108	Requirements to monitor and collect data to demonstrate continuous compliance with the emission and operating limitations.	45CSR13 45CSR34 40 C.F.R. §63.6635
5.2.8.	9.1.9.(a)	08108	Requirements to demonstrate continuous compliance with the applicable emission limitations.	45CSR13 45CSR34 40 C.F.R. §63.6640(a) Table 6 to Subpart ZZZZ, Items 1. and 7.
5.3.1.	9.1.3.	08108	An initial performance test must be conducted within 180 days of startup, per §63.6595.	45CSR13 45CSR34 40 C.F.R. §63.6610(a)
5.3.2.	9.1.4.	08108	Subsequent performance tests must be conducted semiannually, in accordance with Table 3 to Subpart ZZZZ.	45CSR13 45CSR34 40 C.F.R. §63.6615
5.3.3.	N/A	08108	Requirements and procedures for performance tests.	45CSR34 40 C.F.R. §§63.6620(a), (b), (b)(2), (d), (e), and (i) Table 3 to Subpart ZZZZ, Items 1. and 3. Table 4 to Subpart ZZZZ, Items 1. and 3.

Title V Condition	R13-2149E Condition	Engine	Description	Regulatory Citation
5.4.1.	9.1.11.	08108	Recordkeeping requirements to demonstrate compliance with applicable emission or operating limitations.	45CSR13 45CSR34 40 C.F.R. §§63.6655(a), (b), and (d) Table 6 to Subpart ZZZZ, Items 1. and 7.
5.4.2.	N/A	081G3	The permittee must keep records of maintenance conducted on existing stationary emergency RICEs.	45CSR34 40 C.F.R. §§63.6655(e) and (e)(2)
5.4.3.	N/A	081G3	The permittee must keep records of the hours of operation of the engine recorded through the non-resettable hour meter for the existing emergency RICE.	45CSR34 40 C.F.R. §§63.6655(f) and (f)(1)
5.4.4.	N/A	081G3 08108	Format and retention of 40 C.F.R. Part 63 Subpart ZZZZ records.	45CSR34 40 C.F.R. §63.6660
5.5.1.	9.1.9.(b), (d), and (e)	081G3 08108	Reporting requirements for deviations from Subpart ZZZZ.	45CSR13 45CSR34 40 C.F.R. §§63.6640(b), (d), and (e)
5.5.2.	9.1.10.(a), (c), (g), and (h)	08108	Notifications that must be submitted for a new 4SLB stationary RICE with a site rating of greater than or equal to 250 HP located at a major source of HAP emissions.	45CSR13 45CSR34 40 C.F.R. §§63.6645(a), (a)(4), (c), (g), and (h)
5.5.3.	9.1.10.(f)	081G4	Initial notification requirements for RICEs subject to limited requirements under 40 C.F.R. Part 63 Subpart ZZZZ.	45CSR34 40 C.F.R. §63.6645(f)
5.5.4.	9.1.12.	08108	Requirements for compliance reports for new non-emergency stationary RICE with a site rating greater than 500 HP located at a major source of HAPs. Reporting requirements for deviations from applicable requirements under Subpart ZZZZ.	45CSR13 45CSR34 40 C.F.R. §§63.6650(a) through (f) Table 7 to Subpart ZZZZ, Item 1.

c. Condition 5.5.3. of R30-05100100-2022 contained the conditional requirement of 40 C.F.R. §63.6650(h), which requires the permittee to submit an annual report if an emergency stationary RICE with a site rating of more than 100 brake HP operates for the purpose specified in 40 C.F.R. §63.6640(f)(4)(ii). However, §63.6640(f)(4) is only applicable to emergency stationary RICE located at area sources of HAPs. As the Adaline Compressor Station is a major source of HAPs, §63.6640(f)(4) and §63.6650(h) are inapplicable to the emergency engines 081G3 and 081G4, and the requirements of §63.6650(h) have been removed from the operating permit.

6. Section 6.0. – 40 C.F.R. 63, Subpart DDDDD MACT Requirements

a. Per §63.7490(a), affected sources under 40 C.F.R. Part 63 Subpart DDDDD include existing and new industrial, commercial, or institutional boilers and process heaters that are located at a major source of

HAPs. At the Adaline Compressor Station, the existing boiler BLR4, the existing process heater HTR2, and the new process heater HTR3 are subject to Subpart DDDDD.

i. The existing boiler BLR4 and the existing process heater HTR2 are in the subcategory of units designed to burn gas 1 fuels and each have a maximum design heat input of less than 5 mmBTU/hr. The Subpart DDDDD requirements that apply to BLR4 and HTR2 are included in Section 6.0. of the current operating permit.

ii. The line heater HTR3 is a new process heater in the subcategory of units designed to burn gas 1 fuels and has a maximum design heat input of less than 5 mmBTU/hr. Similarly to BLR4 and HTR2, HTR3 is subject to the work practice standards of Item 1 in Table 3 to Subpart DDDDD of Part 63 and the requirement to conduct a tune-up every five years. Compliance with these work practice standards is demonstrated through recordkeeping and reporting requirements.

b. The requirements from Subpart DDDDD that apply to the boiler and process heaters were included in R13-2149E under Section 11.0.

c. With this revision, Section 6.0. of the operating permit has been updated. The following table summarizes the Subpart DDDDD requirements that apply to the boiler and process heaters.

Title V Condition	R13-2149E Condition	Description	Regulatory Citation
6.1.1.	11.1.1.	The boiler and process heaters will only burn natural gas.	45CSR13
6.1.2.a.	N/A	Compliance date for the new process heater HTR3.	45CSR34 40 C.F.R. §63.7495(a)
6.1.2.b.	N/A	Compliance date for the existing boiler BLR4 and the existing process heater HTR2.	45CSR34 40 C.F.R. §63.7495(b)
6.1.3.	11.1.2. 11.1.3.	New or existing boilers or process heaters, with a heat input capacity of less than or equal to 5 mmBTU/hr and in the subcategory of units designed to burn gas 1, are subject to the work practice standard to conduct a 5-year tune-up as specified in §63.7540.	45CSR13 45CSR34 40 C.F.R. §§63.7500(a), 63.7500(e), 63.7505(a), 63.7540(a)(10)(i) through (vi), 63.7540(a)(12) Table 3 to Subpart DDDDD of Part 63, Item 1.
6.1.4.	11.2.1.	Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up.	45CSR13 45CSR34 40 C.F.R. §§63.7510(g) and 63.7515(d)
6.1.5.	11.1.5.	If the affected source is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.	45CSR13 45CSR34 40 C.F.R. §§63.7515(g) and 63.7540(a)(13)
6.1.6.	N/A	The affected source must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions.	45CSR34 40 C.F.R. §63.7500(a)(3)
6.4.1.	11.3.1.	Maintain records of each notification, report, performance test, fuel analyses, or other compliance demonstrations required.	45CSR34 40 C.F.R. §§63.7555(a)(1) and (a)(2)

Title V Condition	R13-2149E Condition	Description	Regulatory Citation
6.4.2.	11.3.2.	Format and Retention of 40 C.F.R. Part 63 Subpart DDDDD records.	45CSR13 45CSR34 40 C.F.R. §§63.7560(a) through (c)
6.5.1.	N/A	The permittee must report deviations from the work practice standards.	45CSR34 40 C.F.R. §63.7540(b)
6.5.2.	11.4.3.	Compliance report requirements.	45CSR13 45CSR34 40 C.F.R. §§63.7550(a); (b); (c)(1); (c)(5)(i) through (iii), (xiv), and (xvi); and (h)(3)
6.5.3.	11.4.1.	Notification requirements.	45CSR13 45CSR34 40 C.F.R. §§63.7545(a) and (c)
6.5.4.	11.4.2.	The permittee must submit a Notification of Compliance Status to demonstrate initial compliance.	45CSR13 45CSR34 40 C.F.R. §§63.7545(e), (e)(1), and (e)(8)

d. The requirement of 40 C.F.R. §63.7540(a)(11) was added to R13-2149E as Condition 11.1.4. §63.7540(a)(11) requires biennial tune-ups to be conducted on boilers and process heaters with a heat input capacity below 10 mmBTU/hr. However, this requirement also contains an exception for affected facilities that meet the specifications of §63.7540(a)(12). This exception includes boilers and process heaters with a heat input capacity of less than 5 mmBTU/hr that are included in the subcategory for units designed to burn gas 1. As all the affected facilities located at the Adaline Compressor Station meet these specifications, the boiler BLR4 and the process heaters HTR2 and HTR3 are subject to the requirements to conduct a tune-up every five years, rather than biennially. Therefore, §63.7540(a)(11) has not been included in the operating permit.

7. Section 7.0. – 40 C.F.R. 63, Subpart HHH MACT Requirements

a. Subpart HHH applies to owners and operators of natural gas transmission and storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user and that are major sources of HAPs. At the Adaline Compressor Station, the affected sources under this subpart are the three existing glycol dehydration units DEG-DEHY1, DEG-DEHY2, and DEG-DEHY3. Emissions from these units are controlled by the flare FLLP1. With this revision application, the permittee has requested to reclassify these units as small glycol dehydration units under Subpart HHH.

Under the current Title V permit R30-05100100-2022, the dehydration units are classified as "large glycol dehydration units". Subpart HHH defines a large glycol dehydration unit as a glycol dehydration unit with an actual annual average natural gas flowrate equal to or greater than 283.0 thousand standard cubic meters per day and actual annual average benzene emissions equal to or greater than 0.90 Mg/yr, determined according to §63.1282(a). A glycol dehydration unit complying with the 0.9 Mg/yr control option under §63.1275(b)(1)(ii) is considered to be a large dehydrator. However, a small glycol dehydration unit is defined as a glycol dehydration unit, located at a major source, with an actual annual average natural gas

flowrate less than 283.0 thousand standard cubic meters per day or actual annual average benzene emissions less than 0.90 Mg/yr (1 tpy), determined according to §63.1282(a).

Based on the most recent gas analysis and GRI-GlyCalc version 4.0 analysis, each of the glycol dehydration units DEG-DEHY1, DEG-DEHY2, and DEG-DEHY3 have pre-control device benzene emissions below 1 tpy. Therefore, DEH-DEHY1, DEG-DEHY2, and DEG-DEHY3 qualify as small glycol dehydration units. Because construction of the dehydration units commenced before August 23, 2011, the dehydration units are existing small glycol dehydration units under Subpart HHH per §§63.1270(b) and (b)(2).

The permittee must limit BTEX emissions from each of the small glycol dehydration units to the limit determined using Equation 1 of §63.1275(b)(1)(iii) and must demonstrate compliance with the limit according to the alternatives specified in paragraphs (b)(1)(iii)(A) through (D) of this requirement. Emissions from the dehydration units are currently controlled by the flare FLLP1. In an email received March 15, 2024, the permittee reported that the pre-control device emissions from each dehydration unit are below the BTEX emission limit. Therefore, the BTEX limit will be met through §63.1275(b)(1)(iii)(D), and the alternative requirements of §§63.1275(b)(1)(iii)(A) through (C) and §63.1275(c)(3) have not been included in the operating permit.

b. As the glycol dehydration units have been reclassified as small glycol dehydration units and the permittee has elected to demonstrate compliance through §63.1275(b)(1)(iii)(D), the following Subpart HHH requirements are inapplicable and have been removed from the operating permit:

   i. §63.1270(d)(1) contains the date by which the permittee was to achieve compliance with Subpart HHH for a large glycol dehydration unit.

   ii. §63.1274(g) requires the permittee to repair leaks as specified under Subpart HHH. The permittee is not subject to any requirements for the repair of leaks under Subpart HHH, and, therefore, this requirement has been removed.

   iii. §63.1275(b)(1)(ii) contains the process vent standards for large glycol dehydration units and was previously included in the operating permit as Condition 7.1.5. This condition required the permittee to connect the process vent to a control device(s) through a closed vent system and to limit the outlet benzene emissions to less than 0.90 Mg/yr. This requirement has been replaced with §§63.1275(b)(1), 63.1275(b)(1)(iii), and 63.1275(b)(1)(iii)(D) which require the permittee to limit BTEX emissions from each of the small glycol dehydration units.

   iv. §63.1275(b)(2) allows one or more safety devices that vent directly to the atmosphere to be used on the air emission control equipment installed to comply with §63.1275(b)(1). Since the flare is not required for the dehydration units to comply with the applicable BTEX emission limit of §63.1275(b)(1)(iii), this provision has been removed from the operating permit.

   v. §63.1275(c) contains alternative requirements to §63.1275(b) that the permittee may comply with. Under paragraph (c)(3), the control of HAP emissions from a flash tank vent is not required if the permittee demonstrates that the total emissions to the atmosphere from the glycol dehydration unit process vent are reduced to the levels specified in paragraphs (c)(3)(i) through (c)(3)(iv), as applicable. This provision has been removed from the operating permit as the pre-control device emissions from each of the small glycol dehydration units are below the BTEX emissions limit.

   vi. As the control device and closed vent system are not required for the dehydration units to demonstrate compliance with the applicable emissions limit, the closed-vent system requirements of §63.1281(c),

the inspection and monitoring requirements of §63.1283(c), and the recordkeeping requirements of §§63.1284(b)(5) to (b)(8) have been removed from the operating permit.

vii. As the control device and closed vent system are not required for the dehydration units to demonstrate compliance with the applicable emissions limit, the control device requirements of §63.1281(d); the monitoring requirements of §63.1283(d); the performance test requirements of §63.1282(d); and the recordkeeping requirements of §§63.1284(b)(3), (b)(4), and (e) have been removed from the operating permit.

viii. §63.1284(c) contains the recordkeeping requirements for sources that comply with the benzene emission limit specified in §63.1275(b)(1)(ii) which is not applicable to small glycol dehydration units.

ix. §§63.1285(e)(2)(i) through (xiii) contains the information that must be included in the Periodic Reports required under §63.1285(e). As the dehydration units are small glycol dehydration units and as the control device and closed vent system are not required to demonstrate compliance with the applicable emissions limit, the information of paragraphs (e)(2)(i) through (x) and (xii) is no longer applicable, and these provisions have been removed from Condition 7.5.3.

c. The following requirements of Subpart HHH are applicable to the Adaline Compressor Station and have been included in the operating permit:

i. Each of the existing small glycol dehydration units is subject to the BTEX emissions limit as determined in §63.1275(b)(1)(iii). As the actual uncontrolled operation of each dehydration unit meets this BTEX emission limit, compliance will be demonstrated through §63.1275(b)(1)(iii)(D). Under §63.1275(b)(1)(iii)(D), the permittee is required to document operational parameters in accordance with §63.1281(e) and emissions in accordance with §63.1282(a)(3).

1. §63.1282 of Subpart HHH does not contain a paragraph (a)(3). Subpart HH of Part 63, which applies to natural gas production facilities, contains similar requirements to §63.1275(b)(1)(iii) for existing small glycol dehydration units under §63.765(b)(1)(iii). §63.765(b)(1)(iii)(D) also requires the permittee to demonstrate that the BTEX emissions limit is met through uncontrolled operation of the dehydration unit and that the emissions be documented in accordance with the procedures specified in §63.772(b)(2).

§63.1282(a)(2) of Subpart HHH contains a provision, which is similar to §63.772(b)(2), with the procedures that may be used to determine the actual average BTEX emissions. Therefore, the reference to §63.1282(a)(3) appears to be a typo, and the requirements of §63.1282(a)(2) have remained in the operating permit as Condition 7.2.1.

2. §63.1281(e) contains the requirements for process modifications. Paragraph (e)(1) requires the permittee to determine the glycol dehydration unit baseline operations (as defined in §63.1271), paragraph (e)(2) requires the permittee to document the conditions which will be modified to achieve the emission limit, and paragraph (e)(3) contains further requirements to demonstrate compliance with the process modifications. As the BTEX emissions limit of each of the glycol dehydration units DEG-DEHY1, DEG-DEHY2, and DEG-DEHY3 is met through the actual uncontrolled operation of the units, process modifications are not required for the limit to be met. Therefore, §§63.1281(e)(2) and (3) have not been included in the operating permit, as these requirements are applicable if process modifications are necessary for the BTEX limit to be met. The requirement to determine baseline operations under §63.1281(e)(1) is applicable and has been added to the operating permit as Condition 7.2.2.

ii. The permittee is also subject to the following recordkeeping requirements:

1. The general recordkeeping requirements of §§63.1284(b)(1) and (b)(2) have remained in the operating permit as paragraphs (1) and (2), respectively, of Condition 7.4.1.

2. The requirement to maintain records of the glycol dehydration unit baseline operations of §63.1284(b)(9). This requirement was added to Condition 7.4.1. as paragraph (9).

3. The permittee also remains subject to §63.1284(f) which requires the permittee to maintain records of the occurrence and duration of each malfunction of operation as well as any actions taken during periods of malfunction to minimize emissions. Due to other permit revisions, this requirement is now included in the operating permit as Condition 7.4.2.

iii. The permittee remains subject to the following reporting requirements:

1. §63.1274(b), which requires all reports to be submitted to the appropriate address in §63.13, has not been removed from Condition 7.5.1. of the operating permit.

2. Under §63.1285(e), the permittee is required to submit Periodic Reports as specified in §§63.1285(e)(1) and (e)(2)(i) through (xiii). In accordance with §63.1285(b)(6), the Periodic Report must also include information of any malfunctions of an affected source that occurred during the reporting period. Although the information required §§63.1285(e)(2)(i) through (xii) is not applicable to the dehydration units at the Adaline Compressor Station, the reporting requirements for malfunctions remain applicable. Therefore, the requirements of §63.1285(b)(6) have remained in the operating permit as Condition 7.5.2. and the requirements of §§63.1285(e), (e)(1), (e)(2), and (e)(2)(xiii) have remained in the operating permit as Condition 7.5.3.

3. The notification of process change requirements in §63.1285(f) (Condition 7.5.4. of the operating permit) also remain applicable to the facility.

d. The following table summarizes the applicable requirements from Subpart HHH that have remained or been added to the operating permit:

Title V Condition	R13-2149E Condition	Description	Regulatory Citation
7.1.1.	7.1.3.	Affirmative defense.	40 C.F.R. §63.1272(d)
7.1.2.	7.1.3.	Affected sources must be operated and maintained in a manner consistent with safety and good air pollution control practices.	40 C.F.R. §63.1274(h)
7.1.3.	7.1.3. to 7.1.7.	Subpart HHH applicability and major source determination for facilities that transport and store natural gas.	45CSR13 45CSR34 40 C.F.R. §§63.1270(a), (a)(1), (a)(3), and (a)(4)

Title V Condition	R13-2149E Condition	Description	Regulatory Citation
7.1.4.	7.1.3. and 7.1.8.	For each existing small glycol dehydration unit, the permittee must limit BTEX emissions to the limit determined using Equation 1 of §63.1275(b)(1)(iii). The permittee has elected to demonstrate compliance with the alternative specified in §63.1275(b)(1)(iii)(D), which requires the permittee to demonstrate that the emissions limit is met through actual uncontrolled operation of the small glycol dehydration unit.	45CSR13 45CSR34 40 C.F.R. §§63.1275(b)(1), (b)(1)(iii), (b)(1)(iii)(D)
7.2.1.	7.1.3.	Procedures that may be used to determine the actual average BTEX emissions from the glycol dehydration unit.	45CSR13 45CSR34 40 C.F.R. §63.1282(a)(2)
7.2.2.	7.1.3.	The permittee shall determine and record the glycol dehydration unit baseline operations.	45CSR13 45CSR34 40 C.F.R. §63.1281(e)(1)
7.4.1.	7.1.3.	Subpart HHH recordkeeping requirements for the dehydration units.	45CSR13 45CSR34 40 C.F.R. §§63.1284(b)(1), (b)(2), and (b)(9) and 63.1274(c)(3)
7.4.2.	7.1.3.	Recordkeeping requirements for malfunctions of process equipment and air pollution control equipment.	45CSR13 45CSR34 40 C.F.R. §§63.1284(f) and 63.1274(c)(3)
7.5.1.	7.1.3.	General reporting requirement for Part 63 Subpart HH.	45CSR13 45CSR34 40 C.F.R. §63.1274(b)
7.5.2.	7.1.3.	If a malfunction occurs during a reporting period, the periodic report required by Condition 7.5.3. must also include the information specified by this condition.	45CSR13 45CSR34 40 C.F.R. §§63.1285(b)(6) and 63.1274(c)(3)
7.5.3.	7.1.3.	Requirements for Periodic Reports.	45CSR13 45CSR34 40 C.F.R. §§63.1274(c)(3) and 63.1285(b)(5), (e), (e)(1), (e)(2), and (e)(2)(xiii)
7.5.4.	7.1.3.	Requirements for a notification of process change.	45CSR13 45CSR34 40 C.F.R. §§63.1285(f) and 63.1274(c)(3)

8. Section 8.0. – 45CSR13, Permit No. R13-2149 Requirements

   a. The following source-specific requirements from R13-2149E have been added to Section 8.0. of the operating permit:

Title V Condition	R13-2149E Condition	Description
8.1.3.	5.1.3.	Nitrogen oxide, carbon monoxide, and volatile organic compound emission limitations for the compressor RICE 08108.
8.1.4.	5.1.4.	Nitrogen oxide, carbon monoxide, and volatile organic compound emission limitations for the emergency RICE 081G4.
8.1.5.	5.1.5.	The permittee shall comply with the start-up and shutdown requirements of 40 C.F.R. Part 60 Subpart JJJJ and Part 63 Subpart ZZZZ.
8.1.6.	5.1.6.	Requirements for the use of catalytic reduction devices.
8.1.10.	4.1.4.	The permittee shall cease operation of the three 880 hp RICEs 08101, 08102, and 08103 and the 1,080 hp turbine engine T-1001 when the new RICE 08108 is placed in service.
8.2.2.	5.2.1.	Monitoring requirements for catalytic reduction devices.
8.4.6.	5.4.2.	Compliance with the requirements for the use of catalytic reduction devices will be demonstrated by maintaining records of all device maintenance.

   NOTE: Conditions 8.1.3. through 8.1.5. of R30-05100100-2022 have been renumbered to 8.1.7. through 8.1.9., respectively.

   b. The recordkeeping requirement of Condition 8.4.1. was updated to also demonstrate compliance with the emission limits for the engine 08108 (Condition 8.1.3.) and the emission limits for the engine 081G4 (Condition 8.1.4.).

9. Section 9.0. – 40 C.F.R. 60, Subpart JJJJ Requirements

   a. With this permit revision, the Adaline Compressor Station has become subject to the provisions of 40 C.F.R. Part 60 Subpart JJJJ for the emergency engine 081G4 and the compressor engine 08108.

      i. The emergency engine 081G4 (Waukesha VGF-L36GL) is a 4SLB, SI ICE with a maximum engine power greater than 25 HP. As construction of 081G4 commenced after June 12, 2006 and the manufacture date of 081G4 is after January 01, 2009, the engine is subject to Subpart JJJJ via 40 C.F.R. §60.4230(a)(4)(iv). To be considered an emergency stationary ICE under Subpart JJJJ, 081G4 must meet the definition found in §60.4248 and, therefore, must comply with §60.4243(d). Provided the requirements for an emergency engine are met, 081G4 is subject to the emission standards for NO_X, CO, and VOCs that apply to emergency engines with a site rating greater than or equal to 130 HP. 081G4 is not certified to meet the emission standards under Subpart JJJJ. Compliance with these limits is demonstrated through performance testing, recordkeeping, and reporting requirements.

      ii. The compressor engine 08108 (Caterpillar G3612) is a 4SLB, SI ICE with a maximum engine power greater than 1,350 HP. As construction of 08108 commenced after June 12, 2006 and the manufacture date of 08108 is after July 01, 2007, the engine is subject to Subpart JJJJ via 40 C.F.R. §60.4230(a)(4)(i). The engine is equipped with an oxidation catalyst control device (OxCat). 08108 is subject to the emission standards for NO_X, CO, and VOCs that apply to non-emergency SI engines with a maximum engine power greater than or equal to 500 HP and that were manufactured after July

01, 2010. 08108 is not certified to meet the emission standards under Subpart JJJJ. Compliance with these limits is demonstrated through performance testing, recordkeeping, and reporting requirements.

b. The following applicable requirements from 40 C.F.R. Part 60 Subpart JJJJ have been added to the operating permit as Section 9.0.:

Title V Condition	R13-2149E Condition	Description	Regulatory Citation
9.1.1.	8.1.1.	Subpart JJJJ is applicable to the engines 08108 and 081G4.	45CSR13 45CSR16 40 C.F.R. §§60.4230(a), (a)(4), (a)(4)(i), and (a)(4)(iv)
9.1.2.	8.1.2.	Stationary SI ICE may be eligible for exemption from Subpart JJJJ as described in 40 C.F.R. Part 1068 Subpart C.	45CSR13 45CSR16 40 C.F.R. §60.4230(e)
9.1.3.	8.2.1.	Emission standards for NO_X, CO, and VOCs from Subpart JJJJ that apply to 08108 and 081G4.	45CSR13 45CSR16 40 C.F.R. §60.4233(e) Table 1 to Subpart JJJJ of Part 60
9.1.4.	8.2.2.	The engines must be operated and maintained to achieve the emission standards of §60.4233(e) over the entire life of each engine.	45CSR13 45CSR16 40 C.F.R. §60.4234
9.1.5.	N/A	For the emergency engine 081G4, the permittee must install a non-resettable hour meter.	45CSR16 40 C.F.R. §60.4237(a)
9.1.6.	8.3.2.	Requirements for a stationary engine to be considered an emergency ICE under Subpart JJJJ.	45CSR13 45CSR16 40 C.F.R. §60.4243(d)
9.1.7.	N/A	Propane may be used as an alternative fuel during emergency operations for up to 100 hours per year.	45CSR16 40 C.F.R. §60.4243(e)
9.1.8.	N/A	An air-to-fuel ratio controller must be used with the operation of three-way catalysts/non-selective catalytic reduction.	45CSR16 40 C.F.R. §60.4243(g)
9.2.1.	8.3.1.	Compliance demonstration requirements for non-certified stationary SI ICEs. A performance test of each engine must be completed every 8,760 hours or 3 years, whichever comes first.	45CSR13 45CSR16 40 C.F.R. §§60.4243(b), (b)(2), (b)(2)(ii)
9.3.1.	8.4.1.	Procedures for performance tests.	45CSR13 45CSR16 40 C.F.R. §60.4244

Title V Condition	R13-2149E Condition	Description	Regulatory Citation
9.4.1.	8.5.1.a.	Recordkeeping requirements from 40 C.F.R. Part 60 Subpart JJJJ that are applicable to uncertified engines.	45CSR13 45CSR16 40 C.F.R. §§60.4245(a), (a)(1), (a)(2), and (a)(4)
9.4.2.	8.5.1.b.	The permittee must keep records of the hours of operation of the SI emergency ICE.	45CSR13 45CSR16 40 C.F.R. §60.4245(b)
9.5.1.	8.5.1.c.	Initial notification requirements.	45CSR13 45CSR16 40 C.F.R. §60.4245(c)
9.5.2.	8.5.1.d.	A copy of each performance test must be submitted within 60 days after the test is completed.	45CSR13 45CSR16 40 C.F.R. §60.4245(d)
9.5.3.	N/A	Conditional reporting requirements for emergency stationary RICE operated for the purpose specified in 40 C.F.R. §60.4243(d)(3)(i).	45CSR16 40 C.F.R. §60.4245(e)

10. Section 10.0. – 40 C.F.R. 60, Subpart OOOOb Requirements

a. Section 10.0. of R13-2149E contains the requirements of 40 C.F.R. Part 60 Subpart OOOOa that were previously applicable to the compressor associated with the new engine 08108. However, following the issuance of R13-2149E, an amended Subpart OOOOa and a new Subpart OOOOb were published in the Federal Register. Subpart OOOOa is now applicable to natural gas facilities which commenced construction, modification, or reconstruction after September 18, 2015 and on or before December 6, 2022. Subpart OOOOb is applicable to natural gas facilities which commenced construction, modification, or reconstruction after December 6, 2022.

As construction will commence after the applicability date for Subpart OOOOb, the reciprocating compressor associated with the engine 08108 is an affected facility under Subpart OOOOb, per 40 C.F.R. §60.5365b(c). Therefore, the requirements in Section 10.0. of R13-2149E have not been included in the operating permit and have been replaced with the applicable Subpart OOOOb requirements for reciprocating compressors. The following table summarizes the Subpart OOOOb provisions which have been added to the operating permit:

Title V Condition	R13-2149E Condition	Description	Regulatory Citation
10.1.1.	N/A	Paragraph a. contains the deadlines by which reciprocating compressor affected facilities must be in compliance with Subpart OOOOb. Paragraph b. requires affected facilities to be maintained and operated in a manner consistent with safety and good air pollution control practice.	45CSR16 40 C.F.R. §§60.5370b(a), (a)(1), and (b)
10.1.2.	N/A	GHG and VOC standards for reciprocating compressor affected facilities.	45CSR16 40 C.F.R. §60.5385b

Title V Condition	R13-2149E Condition	Description	Regulatory Citation
10.2.1.	N/A	Initial compliance demonstration requirements.	45CSR16 40 C.F.R. §60.5410b(e)
10.2.2.	N/A	Continuous compliance demonstration requirements.	45CSR16 40 C.F.R. §§60.5415b(f) and (g)
10.3.1.	N/A	Test methods and procedures for reciprocating compressor affected facilities located at a compressor station.	45CSR16 40 C.F.R. §§60.5386b(a), (a)(1), (a)(1)(ii), (a)(2), and (b) through (d)
10.4.1.	N/A	Applicable recordkeeping requirements for the reciprocating compressors.	45CSR16 40 C.F.R. §§60.5420b(c), (c)(5), and (c)(8) through (c)(13)
10.5.1.	N/A	Applicable reporting requirements for the reciprocating compressors.	45CSR16 40 C.F.R. §§60.5420b(b), (b)(1), (b)(6), (b)(11) through (b)(13), and (b)(15)

b. The Subpart OOOOb requirements for fugitive emissions components in 40 C.F.R. §60.5397b are inapplicable to the Adaline Compressor Station. The new 3,700 HP compressor engine (08108) will replace the existing three 880 HP Clark HRA-8 compressor engines (08101, 08102, and 08103) and the 1,080 HP Solar Saturn T-1001 compressor turbine (08107). The existing engines and turbine will be removed from service and from the facility once operation of the new compressor engine begins. Therefore, the existing compressors at the Adaline Compressor Station are being replaced by a compressor with a smaller total horsepower, and, in accordance with §60.5365b(i)(3)(ii), the installation of the replacement compressor is not considered a modification to the compressor station for the purposes of §60.5397b.

c. Per 40 C.F.R. §60.5365b(e), Subpart OOOOb applies to each storage vessel affected facility, which is a tank battery that has the potential for VOC emissions greater than or equal to 6 tpy or the potential for methane emissions greater than or equal to 20 tpy. As the potential VOC emissions and methane emissions from the methanol storage tank A25, as well as the facility's collective storage tanks, do not exceed these limits, the Subpart OOOOb requirements for storage vessel affected facilities are not applicable to the Adaline Compressor Station.

d. The notification requirements of 40 C.F.R. §60.5420b(a) are not currently applicable to the affected facilities located at the Adaline Compressor Station.

   i. Per §60.5420b(a)(1), the notifications of §§60.7(a)(1), (3), and (4) and §60.15(d) are not required for reciprocating compressor affected facilities.

   ii. The notification requirements of §60.5420b(a)(2) are applicable to well affected facilities.

   iii. The notification requirements of §60.5420b(a)(3) are applicable to fugitive emissions components affected facilities.

iv. §60.5420b(a)(4) is applicable to well closure activities.

Therefore, these requirements have not been included in the operating permit.

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:

Sarah Barron
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th 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.