West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

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

Permit Number: **R30-03900670-2020**
Application Received: **August 30, 2019**
Plant Identification Number: **03-054-03900670**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Elk River Compressor Station**
Mailing Address: **1700 MacCorkle Avenue SE, Charleston, WV 25314**

Physical Location:	Clendenin, Kanawha County, West Virginia
UTM Coordinates:	471.8 km Easting • 4,259.9 km Northing • Zone 17
Directions:	From Charleston travel north on I-79 until exit 19. Take exit 19 and take US 119 south to Clendenin. In Clendenin, turn onto SR 4 east for approximately 1.5 miles. The site will be on the right.

Facility Description

This facility is a natural gas compressor station which will increase the pressure of the incoming natural gas. This facility has three compressors to increase the pressure of the natural gas. The compressors are powered by three (3) 15,600-hp Solar Mars 100 turbines. The turbines are equipped with advanced dry-low-NOx combustion controls from SoLoNO$_x$. Other emission units at the facility include: two (2) process heaters; forty-nine (49) catalytic heaters ranging from 0.005 MMBtu/hr to 0.072 MMBtu/hr; a 1,000-gallon wastewater storage tank; and a 10,000-gallon pipeline liquids tank. The facility is equipped with a 880-hp four-stroke lean-burn Waukesha VGF-L36GL natural gas-fired reciprocating internal combustion engine (RICE) to power an emergency generator.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	**Potential Emissions**[1]	**2018 Actual Emissions**
Carbon Monoxide (CO)	243.19	8.11
Nitrogen Oxides (NO_X)	98.42	4.52
Particulate Matter ($PM_{2.5}$)	11.66	0.45
Particulate Matter (PM_{10})	11.66	0.45
Total Particulate Matter (TSP)	11.66	0.45
Sulfur Dioxide (SO_2)	1.26	0.05
Volatile Organic Compounds (VOC)	45.20	0.55
Hazardous Air Pollutants	**Potential Emissions**	**2018 Actual Emissions**
Formaldehyde	1.26	0.05
Other HAPs	0.59	0.03
Total HAPs	1.85	0.08

[1] Potential emissions are from the Engineering Evaluation for permit R13-3294A.

Title V Program Applicability Basis

This facility has the potential to emit 243.19 tpy of carbon monoxide. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Columbia Gas Transmission, LLC's Elk River Compressor Station 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	PM from Fuel Burning Units
	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction/modification permits
	45CSR16	Standards of Performance for New Stationary Sources
	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 Standard for HAPs
	40 C.F.R. 60 Subpart JJJJ	NSPS for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. 60 Subpart KKKK	NSPS for Stationary Combustion Turbines

	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
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63 Subpart ZZZZ	Reciprocating Internal Combustion Engine MACT
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	Prevention and Control of Fugitive PM

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 *(if any)*
R13-3294A	February 12, 2018	

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

1. **45CSR2 – To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.** This rule establishes emission limitations for smoke and particulate matter which are discharged from fuel burning units. The natural gas-fired heaters (HTR1, HTR2, and HTR3) meet the definitions of a Type 'b' "Fuel Burning Unit" in 45CSR§§2-2.10. and 2.10.b. The heaters at this facility are smaller than 10 MMBTU/hr. Therefore, according to 45CSR§2-11.1, the heaters are exempt from sections 4, 5, 6, 8 and 9 of this rule.

2. **45CSR10 – To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.** The purpose of this rule is to prevent and control air pollution from the emission of sulfur oxides. The natural gas-fired heaters (HTR1, HTR2, and HTR3) meet the definitions of a Type 'b' "Fuel Burning Unit" in 45CSR§§10-2.8. and 2.8.b. The heaters at this facility are smaller than 10 MMBTU/hr. Therefore, according to 45CSR§10-10.1, the heaters are exempt from sections 3, 6, 7 and 8 of this rule.

3. **45CSR13, Permit No. R13-3294A**. The NSR permit R13-3294 was issued to the permittee to construct the Elk River Compressor Station. The permit has undergone one revision. The underlying permit actions have been summarized in the following NSR Permit Historical Summary:

NSR Permit Historical Summary

Permit	Date of Issuance	Application Type	Permit Purpose & Description
R13-3294	11/29/2016	Construction	Installation and operation of three (3) 15,600-hp turbines; one (1) 880-hp natural gas-fired emergency generator engine; one (1) 0.4 MMBtu/hr fuel gas heater; one (1) 0.25 MMBtu/hr fuel gas heater; eight (8) 0.005 MMBtu/hr catalytic heaters; twenty-seven (27) 0.072 MMBtu/hr catalytic heaters; and fourteen (14) 0.03 MMBtu/hr catalytic heaters.
R13-3294A	2/12/2018	Class I Administrative Update	To increase the MDHI of heater HTR1 from 0.4 MMBtu/hr to 0.5 MMBtu/hr and include emissions from pipeline liquids tank (PL Tank).

Since R13-3294A is the current underlying permit, it has been incorporated into the initial Title V operating permit as described in Table R13-3294A below.

Table R13-3294A

R13-3294A	Title V	Discussion
1.0	1.1.	The permitted emission units have been incorporated into the operating permit.
General Requirements		
4.1.1.	3.4.1.	The record of monitoring requirement has been cited with the same facility-wide operating permit condition.
4.1.2.	3.1.9.	The operation and maintenance of air pollution control equipment requirement has been written in the operating permit. The underlying permit's citation has been changed from 45CSR§13-5.11. to 45CSR§13-5.10. as a result of removing section 5.8 of 45CSR13, effective June 1, 2017.
4.1.3.	3.4.4.	The record of malfunctions of air pollution control equipment requirement has been written in the operating permit.
4.1.4.	7.1.1.	The GHG reduction requirement.
Turbines		
5.1.1.	4.1.1.	The requirement has been written in the operating permit.
5.1.2.	4.1.2.	The requirement has been written in the operating permit.
5.1.3.	4.1.3.	The requirement has been written in the operating permit.
5.1.4.	4.1.4.	The requirement has been written in the operating permit.
5.1.5.	4.1.5.	The requirement has been written in the operating permit.
5.1.6.	4.1.6.	The requirement has been written in the operating permit.
5.1.7.	4.1.1.	This requirement is essentially the same as the requirement in 5.1.1. Requirement 5.1.7. further specifies the requirement to minimize emissions at all times including during startup, shutdown, and malfunction. This additional language has been added in permit condition 4.1.1. and the underlying requirement 5.1.7. has been added to the citation of authority. Requirement 5.1.7. includes NSPS Subpart KKKK citations 40 C.F.R. §§60.4333(a) and 60.4365(a). The requirements of the former citation are included in this NSR permit requirement. However, the source of information required by the latter citation is for an exemption from monitoring the total sulfur content of the fuel combusted in the turbine. No such requirement is contained in requirement 5.1.7.; therefore, §60.4365(a) has been excluded from the citation of authority.

R13-3294A	Title V	Discussion
5.1.8.	4.1.7.	The requirement has been written in the operating permit.
5.1.9.	4.1.1.	This requirement is essentially the same as the requirement in 5.1.1. Requirement 5.1.9. specifies "pipeline-quality" natural gas as the fuel to be "fired". The language "pipeline-quality" has been added in permit condition 4.1.1. and this underlying requirement 5.1.9. has been added to the citation of authority.
5.2.1.	4.2.1.	The requirement has been written in the operating permit.
5.3.1.	4.3.1.	The requirement has been written in the operating permit.
5.3.2.	4.3.2.	The requirement has been written in the operating permit.
5.4.1.	4.4.1.	The requirement has been written in the operating permit.
5.4.2.	4.4.2.	The requirement has been written in the operating permit. This requirement allows the permittee to elect not to monitor the total sulfur content of the fuel combusted in the turbine.
5.4.3.	4.4.3.	The requirement has been written in the operating permit.
5.4.4.	4.4.4.	The requirement has been written in the operating permit.
5.5.1.	4.5.1.	The requirement has been written in the operating permit. Since there is no Title V boilerplate condition analogous to Condition 2.18. of the underlying permit, additional language has been added to refer to the 30-day notification requirement in the underlying NSR permit.
5.5.2.	4.5.2.	The requirement has been written in the operating permit.
Emergency Generator		
6.1.1.	5.1.1.	The requirement has been written in the operating permit.
6.1.2.	5.1.2.	The requirement has been written in the operating permit.
6.1.3.	5.1.3.	The requirement has been written in the operating permit. Fuel is natural gas only.
6.2.1.	5.1.4.	The requirement has been written in the operating permit.
6.2.2.	5.1.5.	The requirement has been written in the operating permit.
6.3.1.	5.4.1.	The requirement has been written in the operating permit. The reference to 3.4.1. in the underlying permit has been changed to analogous condition 3.4.2. in the Title V permit. The reference to operating limits of Condition 4.1.3.c. of the underlying permit appears to be incorrect. Requirement 4.1.3.c. pertains to records of the duration of malfunctions of air pollution control equipment. Considering that the emergency generator engine G1 is not equipped with a control device, and there are no operating limitations specified in 4.1.3.c., the reference should be to the only operating limitation placed on G1, which is in underlying requirement 6.1.1. (Title V condition 5.1.1.). Therefore, condition 5.4.1. refers to 5.1.1.
6.4.1.	5.1.6.	The requirement has been written in the operating permit.
6.5.1.	5.1.7.	The requirement has been written in the operating permit.
6.5.2.	5.1.8.	The requirement has been written in the operating permit.
6.5.3.	5.4.2.	The requirement has been written in the operating permit. Alternative fuel may be used.
6.6.1.	5.3.1.	The requirement has been written in the operating permit.
6.7.1.a.	5.4.3.	The requirement has been written in the operating permit.
6.7.1.b.	5.4.4.	The requirement has been written in the operating permit.
6.7.1.c.	5.5.1.	The requirement has been written in the operating permit.
6.7.1.d.	5.5.2.	The requirement has been written in the operating permit.
Heaters		
7.1.1.	6.1.1.	The requirement has been written in the operating permit.
7.1.2.	6.1.2.	The requirement has been written in the operating permit.
7.1.3.	6.1.3.	The requirement has been written in the operating permit.
7.2.1.	6.2.1.	The requirement has been written in the operating permit.
7.3.1.	6.3.1.	The requirement has been written in the operating permit.

R13-3294A	Title V	Discussion
7.4.1.	6.4.1.	The requirement has been written in the operating permit.
7.5.1.	6.5.1.	The requirement has been written in the operating permit.

4. **45CSR16 – Standards of Performance for New Stationary Sources.** This rule establishes and adopts standards of performance for new stationary sources promulgated by the United States Environmental Protection Agency pursuant to section 111(b) of the federal Clean Air Act, as amended. This rule codifies general procedures and criteria to implement the standards of performance for new stationary sources set forth in 40 CFR Part 60. The Secretary hereby adopts these standards by reference. The Secretary also adopts associated reference methods, performance specifications and other test methods which are appended to these standards. Therefore, 45CSR16 has been included with each citation of authority based on 40 C.F.R. Part 60 throughout the Title V Operating Permit (e.g., Subparts JJJJ, OOOOa, and KKKK).

5. **45CSR17 – To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.** This rule prohibits fugitive particulate matter to be discharged beyond the property boundary which causes or contributes to statutory air pollution (45CSR§17-3.1.). In the event of a violation of this rule, the Director may require the utilization of a system to minimize fugitive particulate matter per 45CSR§17-3.2. The standard in 45CSR§17-3.1 has been included as permit condition 3.1.10.

6. **45CSR34 – Emission Standards for Hazardous Air Pollutants.** This rule establishes and adopts a program of national emission standards for hazardous air pollutants and other regulatory requirements promulgated by the United States Environmental Protection Agency pursuant to 40 CFR Parts 61, 63 and section 112 of the federal Clean Air Act, as amended. This rule codifies general procedures and criteria to implement emission standards for stationary sources that emit (or have the potential to emit) one or more of the eight substances listed as hazardous air pollutants in 40 CFR § 61.01(a), or one or more of the substances listed as hazardous air pollutants in section 112(b) of the CAA. The Secretary hereby adopts these standards by reference. The Secretary also adopts associated reference methods, performance specifications and other test methods which are appended to these standards. Therefore, 45CSR34 has been included with each citation of authority based on 40 C.F.R. Parts 61 (condition 3.1.3.) and 63 throughout the Title V Operating Permit (i.e., NESHAPs-MACT Subpart ZZZZ).

7. **40 C.F.R. Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.** The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (6) of §60.4230. The permittee owns and operates the 880-hp natural gas-fired emergency generator identified as G1. This emergency generator is subject to the emergency engine requirements in this subpart. This engine is a non-certified engine and is subject to the testing requirements of this subpart.

   45CSR16 has been added to the citation of authority in conditions 5.1.4. through 5.1.8., 5.3.1., 5.4.1. through 5.4.4., 5.5.1., and 5.5.2.

8. **40 C.F.R. Part 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines.** This subpart establishes emission standards and compliance schedules for the control of emissions from stationary combustion turbines that commenced construction, modification or reconstruction after February 18, 2005.

   All of the turbines at this facility were constructed in 2017 and have heat inputs exceeding 10 MMBTU/hr making them subject to this NSPS. The turbines are Solar Taurus 100 Turbines rated at 132.02 MMBtu/hr and 15,427 HP (11.50 MW) each. These turbines are subject to emission limits, testing, reporting, and recordkeeping requirements from 40 C.F.R. Part 60, Subpart KKKK. All

applicable requirements from this subpart were included in R13-3294A which has been incorporated into this Title V permit.

9. **40 C.F.R. 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**. Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations. The facility is an area source of HAP emissions and utilizes the 880-hp natural gas-fired emergency generator identified as G1.

   The engine does not meet the definitions in §63.6675 of residential, commercial, or institutional emergency stationary RICE; therefore, it does not meet the exemption from the regulation in §63.6585(f).

   For an area source of HAP emissions, the date June 12, 2006, determines if a RICE is new or existing regardless of horsepower rating. Since the engine was constructed after this date, it is considered a *New stationary RICE* in accordance with §63.6590(a)(2)(iii).

   Since the facility is a non-major source of HAP, the engine does not meet the criteria in §§63.6590(b)(1) and (2). Further, since the engine is new for this subpart, it does not meet the criteria in §63.6590(b)(3). Therefore, the provisions for *Stationary RICE subject to limited requirements* in §63.6590(b) are not applicable.

   The engine meets the criteria in §63.6590(c)(1) for *Stationary RICE subject to Regulations under 40 CFR Part 60.* Therefore, the engine will meet the requirements of 40 C.F.R. 63 Subpart ZZZZ by meeting the requirements of 40 C.F.R. Part 60 Subpart JJJJ, for spark ignition engines, and no further Subpart ZZZZ requirements are applicable. The applicable requirements of Subpart JJJJ have been incorporated into the operating permit via underlying NSR permit R13-3294A.

10. **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.** 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:

    - 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.

    - 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 Elk River Compressor Station. Therefore, all requirements regarding centrifugal compressors under 40 CFR 60 Subpart OOOOa would not apply.

    - 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 Elk River Compressor Station.

- 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.

- 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 Elk River 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%.

- 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.

- 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_2S) 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 Elk River Compressor Station. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOOa would not apply.

- 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 Elk River Compressor Station.

- Collection of fugitive emission components at a well site

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

- 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 Elk River 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:

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

11. **40 C.F.R. Part 64 – Compliance Assurance Monitoring.** Initial Title V Permit Applications must only include a CAM plan for large Pollutant Specific Emission Units (PSEUs). Since emissions at this facility are below major source thresholds for each PSEU, a CAM plan was not required with this application. CAM will, however, be re-evaluated at this permit's renewal.

Non-Applicability Determinations

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

a. **40 C.F.R. 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.** The heaters are less than 10 MMBtu/hr, therefore, according to 40CFR§60.40c(a), this rule does not apply.

b. **40 C.F.R. 60, Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015.** The equipment at this facility was installed in 2017, which is after the applicability date specified in 40CFR§60.5365, therefore this rule does not apply.

c. **40 C.F.R. 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters**. This subpart establishes national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP (40 C.F.R. §63.7480). The facility is not a major source of HAPs; therefore, this regulation is not applicable to any heater at the facility.

d. **40 C.F.R. 63 Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources**. This subpart is applicable to each industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP). The facility is an area source of HAPs that operates heaters. All the heaters combust natural gas, and as such, are not subject to this regulation as provided in §63.11195(e).

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: April 14, 2020
Ending Date: May 14, 2020

Point of Contact

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

Rex Compston, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41252 • Fax: 304/926-0478
Rex.E.Compston@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