

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 5, 2023.

Permit Number: **R30-10300010-2023**
Application Received: **August 2, 2023**
Plant Identification Number: **03-54-10300010**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Smithfield Compressor Station**
Mailing Address: **1700 MacCorkle Avenue, S.E., Charleston, WV 25314**

Permit Action Number: *MM01* Revised: *November 28, 2023*

Physical Location: Smithfield, Wetzel County, West Virginia
UTM Coordinates: 539.68 km Easting • 4,370.03 km Northing • Zone 17
Directions: Traveling north of U.S. Route 19 from Clarksburg to the intersection with State Route 20, turn left onto Route 20. Proceed west on Route 20 for approximately 1.8 miles past the town of Folsom to the station, which is on the left side of the road and visible.

Facility Description

Columbia Gas Transmission, LLC, Smithfield Compressor Station is a natural gas transmission facility covered by a Standard Industrial Classification (SIC) of 4922 and a North American Industrial Classification System (NAICS) of 486210. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of one (1) 3.4 MMBtu/hr heating system boiler, three (3) indirect-fired line heaters, two (2) 1,500 HP natural gas fired reciprocating engines, one (1) 6,736 HP compressor turbine, one (1) 4,433 HP combustion turbine, one (1) 440 HP natural gas fired reciprocating engine with generator for emergency use only, and numerous storage tanks of various sizes.

This minor modification (MM01) includes removal of permit conditions that are not applicable and clarification on the hours of operation limit for the emergency generator RICE.

Emissions Summary

There is no change in emissions because of this modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 561.96 tons of Nitrogen Oxides (NO_x) per year and 163.74 tons of Carbon Monoxide (CO) per year. 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 permits.
	45CSR30	Operating permit requirement.
State Only:	None	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2064I	August 3, 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 (MM01) incorporates changes from R13-2064I. Changes associated with this modification are as follows:

- The citation of condition 8.3.2 was revised because of the renumbering of conditions in R13-2064I.
- Conditions 9.1.13. and 9.4.5. were removed because the facility is not subject to 40 CFR 60 Subpart OOOOa. WV Code §22-1-3a states that in the absence of a federal rule, the adoption of a state rule shall not be construed to be more stringent than a federal rule, unless the absence of a federal rule

is the result of a specific federal exemption. Smithfield is not subject to the federal rule governing LDAR on fugitive emissions components, therefore, permit conditions 9.1.13 and 9.4.5 are construed as more stringent.

- Condition 9.2.1. was removed because the turbines are not indirect heat exchangers subject to an opacity limit.
- In condition 9.1.11, “for non-emergency use” was added after the 500 hours per year limit for clarification.

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:

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41283
Beena.j.modi@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

None