

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 May 24, 2022.

Permit Number: **R30-09900014-2022(MM01)**
Application Received: **March 29, 2023**
Plant Identification Number: **03-54-099-00014**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Kenova Compressor Station**
Mailing Address: **1700 MacCorkle Avenue, SE, Charleston, WV 25314**

Permit Action Number: *MM01* Revised: *October 4, 2023*

Physical Location: Kenova, Wayne County, West Virginia
UTM Coordinates: 360.9 km Easting • 4248.0 km Northing • Zone 17
Directions: Traveling I-64 West from Charleston, take the Kenova-Ceredo exit for US Route 52. follow US 52 South approximately 2 miles to Route 1 intersection. The Station is located on Route 1 near the intersection of Route 1 and Route 52.

Facility Description

The Kenova Station is a natural gas transmission and oil and gas production facility covered by Standard Industrial Code (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of four (4) 2000-hp and four (4) 1100-hp natural gas fired reciprocating compressor engines, four (4) 4000-hp electric compressors, a wastewater evaporation injection system, and numerous storage tanks of various sizes. On-site support equipment includes one (1) 530-hp emergency generator, one (1) 6.3 MMBtu/hr heating system boiler and one (1) 1.5 MMBtu/hr line heater. The facility also has a 1,000 gallon mercaptan tank.

This modification is to incorporate the changes made in R13-2251F which dealt with the installation of four (4) electric motor driven reciprocating compressors and other administrative changes.

Emissions Summary

This modification results in the following emission changes:

Pollutant	R13-2251E Facility-Wide PTE (tpy)	R13-2251F Facility-Wide PTE (tpy)	Change in PTE (tpy)
CO	232.40	232.42	+0.02
NO _x	1,341.62	1,341.63	+0.01
PM ₁₀	13.50	13.50	0.00
SO ₂	0.23	0.23	0.00
VOCs	37.88	41.32	+3.44
Formaldehyde	8.36	8.36	0.00
Total HAPs	18.26	18.30	+0.04

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 232.42 tons per year of CO and 1,341.63 tons per year of NO_x. 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
	45CSR16	Standards of Performance for New Stationary Sources
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	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 63 Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines.

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>)
R13-2251F	June 12, 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

The following changes were made to the Title V permit during this modification:

Updates to Permit Boiler Plate Language.

- Updated condition 2.1.3 - The section of Rule 30 that defines Secretary changed in a previous version. Also, in the recently revised Rule 30, the word "such" was removed.
- Revised the citation in condition 2.11.4. This section was renumbered in a previous version of Rule 30.
- Removed 45CSR38 from the citation for condition 2.22.1 because 45CSR38 was repealed.
- Revised US EPA's contact information in condition 3.5.3.
- Removed and reserved conditions 2.17, 3.5.7, and 3.5.8.a.1 - The section for Emergency was removed and replaced with Reserved in condition 2.17. Section 5.7 of Rule 30 which pertained to emergencies and affirmative defense was removed in the revised Rule 30.
- In condition 3.5.8.a.2, "telefax" was replaced with "email" to incorporate changes in the revised Rule 30.

- Updated condition 3.5.4 - Under the revised Rule 30, certified emissions statements are no longer required to be submitted. Facilities have been submitting their emissions data in SLEIS and paying fees based on their SLEIS submittal, so this requirement was no longer needed.

Changes due to the issuance of R13-2251F.

- Added four (4) Siemens Electric Compressors to the Emission Units table as Emission Units C10, C11, C12, and C13.
- Removed and reserved condition 3.1.11 since the underlying R13 condition was removed with the issuance of R13-2251F.
- In condition 5.1.2 the emergency generator's (020G3) horsepower was corrected.
- In condition 5.1.3 the emergency generator's (020G3) horsepower and emission limits were corrected.
- Removed old Section 6.0. The mercaptan tank (A24) is not an emission unit because it is a pressurized vessel and therefore the associated section for the mercaptan tank was removed in R13-2251F. Note: The mercaptan tank (A24) remains in the emission units table Section 1.1. for reference.
- Added a new Section 6.0 to incorporate the 40 C.F.R. 60 Subpart OOOOa requirements for the new electric reciprocating compressors (C10, C11, C12, and C13). 40 C.F.R. 60 Subpart OOOOa was deleted from the Permit Shield, condition 3.7.2.m. The permittee is complying with 40 C.F.R. 60 Subpart OOOOa by replacing the reciprocating compressor rod packing as specified in 40 C.F.R. §60.5385a(a)(1) and (2).
- Added Section 7.0 - 40 C.F.R. 60 Subpart OOOOa Requirements, LDAR [Emission Point ID(s): Fugitives] since, with the addition of the compressors, there are fugitive components at the facility subject to the 40 C.F.R. 60 Subpart OOOOa LDAR requirements.

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 for minor modifications.
Ending Date: N/A

Point of Contact

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

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41286
Robert.A.Mullins@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)

On September 26, 2023 WVDAQ received an email from Columbia Gas Transmission, LLC citing some errors in the proposed minor modification for this permit. These errors were as follows:

- Conditions 6.4.3 -6.4.6, which are requirements for compressor engines that utilize a closed vent system or cover, are not applicable to the Electric Compressors (C10, C11, C12, and C13) since these units do not have closed vent systems or covers.

Response: Conditions 6.4.3 - 6.4.6 were removed from the final minor modification.

- The incorrect version of 40 C.F.R. 60 Subpart OOOOa was used in drafting the proposed language of Section 7.0.

Response: The proposed minor modification used the most recent 40 C.F.R. 60 Subpart OOOOa version dated 11/16/2020. This failed to account for the fact that on June 30, 2021, a joint resolution of Congress that disapproved the final rule titled "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Review", 85 FR 57018 (September 14, 2020), was signed into law. Due to this resolution, sources in the transmission and storage segments of the natural gas industry that are subject to Subpart OOOOa must meet the methane and VOC requirements of 81 FR 35898 (June 3, 2016) and as amended at 83 FR 10638 (March 12, 2018).

This resulted in the language of Conditions 7.1.1, 7.1.1.c.8, 7.1.1.d, 7.1.1.f, 7.1.1.g, 7.1.1.h, 7.1.3, 7.4.1, and 7.5.1 needing to be changed to correspond to that of 81 FR 35898 (June 3, 2016) and as amended at 83 FR 10638 (March 12, 2018).