

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 August 25, 2021.

Permit Number: **R30-03900047-2021**
Application Received: **June 5, 2023**
Plant Identification Number: **03-54-039-00047**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Lanham Compressor Station**
Mailing Address: **1700 MacCorkle Avenue SE, Charleston, WV 25314**

Permit Action Number: *MM01* Revised: *October 15, 2024*

Physical Location:	Rocky Fork, Kanawha County, West Virginia
UTM Coordinates:	438.0 km Easting • 4258.8 km Northing • Zone 17
Directions:	Traveling on I-64 W, take exit for State Route 622N towards Cross Lanes and follow it for 3.6 miles. Turn left at the traffic light to stay on State Route 622N/Rocky Fork Road/Sissonville and continue 4.5 miles. Turn left onto Kellys Creek Road and the facility is located immediately on the left.

Facility Description

The Lanham compressor station compresses natural gas for pipeline transmission. The facility operates under SIC code 4922. This facility uses one (1) heating system boiler, one (1) natural gas line heater, eight (8) reciprocating engines/ integral compressors, one (1) reciprocating engine/air compressor and two (2) reciprocating engines/generators.

This minor modification incorporates the revisions made with the Class II Administrative Amendment Permit R13-3397A. The revision consists of the installation and operation of 40 catalytic heaters with a total design capacity of 2.88 MMBtu/hr.

Emissions Summary

This modification results in the following emission changes:

Change in Facility-Wide Potential Emissions (tons per year)

Regulated Pollutant	Change in Potential Emissions
Carbon Monoxide (CO)	+ 1.04
Nitrogen Oxides (NO _x)	+ 1.24
Particulate Matter (PM _{2.5})	+ 0.09
Particulate Matter (PM ₁₀)	+ 0.09
Total Particulate Matter (TSP)	+ 0.09
Sulfur Dioxide (SO ₂)	+ 0.01
Volatile Organic Compounds (VOCs)	+ 0.07

PM₁₀ is a component of TSP.

Hazardous Air Pollutants (HAPs)	Change in Potential Emissions
Formaldehyde	0.00
Other HAPs	+ 0.02
Total HAPs	+ 0.02

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 165.11 TPY of CO, 1842.53 TPY of NO_x, 23.94 TPY of Formaldehyde, and 34.90 TPY of Total HAPs. Due to this facility's potential to emit over 100 tons per year of a 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:	45CSR13	Permits for construction, modification, relocation and operations of stationary sources of air pollutants.
	45CSR30	Operating permit requirement.

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
R13-3397A	July 24, 2023

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

This minor modification incorporates the revisions made with Class II Administrative Update Permit R13-3397A to add 40 catalytic heaters with a total maximum design heat input of 2.88 MMBtu/hr.

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

Changes associated with minor modification MM01:

- **Table of Contents** – Under the description for section 4.0, SH1 was added.
- **Condition 1.1.** – The Emission Units table was updated to add the catalytic heaters SH1.
- **Condition 1.2** – The active R13 permit was updated to R13-3397A.
- **Condition 4.0** – The Title block was revised for clarification and to include SH1.
- **Conditions 4.1.1. and 4.1.2.** – The citation of these conditions were revised to add clarification that they are applicable to BL3 and H2.
- **Condition 4.1.5.** – This condition was added for the catalytic heaters' requirements from permit R13-3397A.

Title V Boilerplate changes:

- **Condition 2.1.3.** – This condition was updated to delete the word “such” which was removed from 45CSR30 effective March 31, 2023. The reference was changed from 45CSR§30-2.12 to 45CSR§30-2.39. because the definition of “Secretary” was renumbered in a previous version of 45CSR30.

- **Condition 2.11.4** – The citation was changed from “45CSR§30-2.39” to “45CSR§30-2.40”.
- **Conditions 2.17., 3.5.7. and 3.5.8.a.1.** – These conditions were deleted and replaced with “Reserved” because the emergency provisions under 45CSR§30-5.7 were removed from 45CSR30 effective March 31, 2023.
- **Condition 2.22.1** – “45CSR38” was removed from the citation because this rule has been repealed.
- **Condition 3.5.3.** – This condition was updated to include the current EPA mailing address.
- **Condition 3.5.4.** – This condition was updated because the requirement to submit a certified emissions statement was removed from 45CSR30 effective March 31, 2023.
- **Condition 3.5.8.a.2.** – This condition was updated to replace the word “telefax” with “email” according to the change in 45CSR30 effective March 31, 2023.

Changes as a Result of Updated Regulation Language:

- **Conditions 5.1.8. and 5.4.4.** – These conditions were updated to reflect changes in 40 C.F.R. 63 Subpart ZZZZ.

Non-Applicability Determinations

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

45CSR2	<i>Control of Particulate Matter Air Pollution from the Combustion of Fuel in Indirect Heat Exchangers:</i> The catalytic heaters (SH1) are not indirect heat exchangers and therefore not subject to Rule 2.
45CSR10	<i>Control of Air Pollution from the Emission of Sulfur Oxides:</i> The catalytic heaters (SH1) are not indirect heat exchangers and therefore not subject to Rule 10.
40 C.F.R. Part 63 Subpart DDDDD	<i>National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters:</i> The catalytic heaters (SH1) do not transfer heat indirectly to a process material or to a heat transfer material for use in a process unit. Therefore, these units are not subject to Subpart DDDDD.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not Applicable.
Ending Date: Not Applicable.

Point of Contact

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

Dan Roberts
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41902
Daniel.p.roberts@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)

No comments received from EPA or Columbia Gas Transmission, LLC.

The proposed permit was amended to include the following Title V Boilerplate changes which were adopted during the comment period:

Title V Boilerplate changes:

- **Conditions 3.1.6. and 3.3.1.** – The citation was revised to refer to the current version of the WV Code.
- **Condition 3.3.1.b.** – This condition was updated to include the following additional language: “If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit shall be revised in accordance with 45CSR§30-6.4 or 45CSR§30-6.5 as applicable.”

The proposed Fact Sheet was also amended. In the section Legal and Factual Basis for Permit Conditions under applicable Federal and State rules, the list item for WV Code was changed from WV Code § 22-5-4 (a) (14) to WV Code § 22-5-4 (a) (15).