

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 8, 2023.

Permit Number: **R30-07100008-2023**
Application Received: **June 28, 2024**
Plant Identification Number: **03-54-071-00008**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Seneca Compressor Station**
Mailing Address: **1700 MacCorkle Ave, SE, Charleston, WV 25314**

Permit Action Number: *MM02* Revised: *October 28, 2024*

Physical Location:	Seneca Rocks, Pendleton County, West Virginia
UTM Coordinates:	639.5 km Easting • 4,301.10 km Northing • Zone 17
Directions:	Traveling US Route 33 East from Elkins, turn left at the intersection with State Route 28 (Seneca Rocks). Proceed approximately 2 miles to the station which is located on the left.

Facility Description

The Seneca Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of one (1) 13,750 hp, two (2) 7,491 hp, one (1) 1,557 hp, one (1) 15,432 hp, and one (1) 10,613 hp natural gas fired turbine engines, one (1) emergency generator, two (2) fuel gas heaters, one (1) process heater, catalytic space heaters and fourteen (14) storage tanks of various sizes.

Emissions Summary

There are no changes in emissions resulting from this modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 314.52 tons/yr of NO_x and 371.97 tons/yr of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Columbia Gas Transmission, LLC's Seneca 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.

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 Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR30	Requirements For Operating Permits

State Only: NA

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>)
R13-2715H	July 2, 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

The revisions made in association with this minor modification incorporate the revisions made in R13-2715H Class I Administrative Update which revises the turbine CO testing requirement and makes other minor administrative changes. The revisions to the Title V permit include the following:

Note: COA means Citation of Authority

- 1) **Section 1.1. - Emission Units Table** – In the Emission Unit Description column, revised the description of Emission Units 03705, 03706, 03707, and 03708 by removing “-7800S, -7800S, -1400 and -15000S” respectively. Also removed the number of space heaters in the descriptions for 037SH1 and 037SH2.
- 2) **Section 1.2. - Active R13, R14, and R19 Permits Table** - Updated R13-2715G to R13-2715H and updated the date of issue.
- 3) **Section 4.0.**

As described in the changes to the emission units table, the additional turbine descriptions of “-7800S, -7800S, -1400 and -15000S” have been removed from permit conditions 4.1.1., 4.1.2., 4.1.4., 4.1.6. and 4.1.8. Also, permit R13-2715H deleted two permit conditions and renumbered the existing conditions. Therefore, where appropriate, the COAs in several of the Title V permit conditions in this section have been revised. No further discussion will be made concerning these revisions. Other specific revisions include the following:

- Condition 4.1.3. – These requirements have been deleted in R13-2715H and therefore have been deleted from the Title V permit and replaced with “Reserved.”
- Condition 4.1.7. – These requirements have been deleted in R13-2715H and therefore have been deleted from the Title V permit and replaced with “Reserved.”
- Condition 4.1.9. - Added “RICE” to the description of Generator G3.
- Condition 4.1.12. – Revised as revised in R13-2715H
- Condition 4.3.1. – Revised as revised in R13-2715H
- Condition 4.4.3. – These requirements have been deleted in R13-2715H and therefore have been deleted from the Title V permit and replaced with “Reserved.”
- Condition 4.4.6. – Except for the revised COA, the revisions to this condition were not part of the R13-2715H revisions or the minor modification application. The revisions are to correct typographical errors by revising “PT” to “P_T” and “Px” to “P_x” as they appear in R13-2715H.
- Condition 4.5.2. – These requirements have been deleted in R13-2715H and therefore have been deleted from the Title V permit and replaced with “Reserved.”

4) **Section 5.0.**

- Condition 5.1.1. – Added “RICE” to the description of Generator G3 and revised the COA.
- Condition 5.2.1. – Revised the COA.

5) **Section 6.0.**

- Conditions 6.1.1. and 6.1.2. – Added “100” to the description of the Solar Mars Turbine (E08) and revised the COAs.
- Conditions 6.1.5. and 6.2.1. – Revised the COAs.

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:

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/414-1910
frederick.tipane@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)

The following boilerplate changes have been made to the permit. These changes to the boilerplate became effective September 23, 2024.

- **Condition 3.1.6.** – Revised the COA to refer to the current version of the WV Code.
- **Condition 3.3.1.** – Revised the COA to refer to the current version of the WV Code.
- **Condition 3.3.1.b.** – Added “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.”