

# 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 April 17, 2023.

Permit Number: **R30-08300019-2023**

Application Received: **July 2, 2024**

Plant Identification Number: **03-54-083-00019**

Permittee: **Columbia Gas Transmission, LLC**

Facility Name: **Files Creek Compressor Station**

Mailing Address: **1700 MacCorkle Avenue SE, Charleston, WV 25314**

Permit Action Number: *MM02*    Revised: *October 21, 2024*

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Physical Location: Beverly, Randolph County, West Virginia  
UTM Coordinates: 601.1 km Easting • 4,297.3 km Northing • Zone 17  
Directions: From I-79N, take Exit 99 to merge onto US-119N/US-33E towards Buckhannon. After traveling approximately 43 miles, take a slight right onto WV-92S. Continue for approximately 9 miles and turn left onto Kings Run Road. Continue for approximately 2.1 miles and turn left onto Files Creek Road. After approximately 0.3 miles, turn left onto Delta Road 9. In approximately 0.4 miles, the Files Creek Compressor Station is located on the right.

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### Facility Description

The Files Creek Compressor Station is a natural gas transmission facility. The Title V permit currently includes four Solar Taurus 70 Turbines (009T1 – 009T4), one emergency generator (009G4), three fuel gas heaters (HTR2, HTR4, and HTR5), and catalytic heaters (HTR3 and HTR6) as well as various glycol, lube oil, and waste oil tanks (A15 – A18 and B13).

SIC: 4922, NAICS: 486210

This minor modification incorporates the revisions made with the Class I Administrative Update R13-3164F. The changes include revising the Carbon Monoxide performance testing schedule for the turbines as well as other administrative changes. No physical changes will be made to the facility due to this modification.

### Emissions Summary

The facility-wide potential emissions will not change due to this modification.

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 261.79 tpy of Carbon Monoxide. 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 Requirements.
	45CSR30	Operating Permit Requirements.

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
R13-3164F	July 9, 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

This minor modification incorporates the revisions made with the Class I Administrative Update R13-3164F. The changes include revising the Carbon Monoxide performance testing schedule for the turbines as well as other administrative changes. No physical changes will be made to the facility due to this modification.

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

1. The address for the facility’s physical location has been corrected to “2517 Files Creek Road, Beverly, WV 26253”.
2. Section 1.0. – Emission Units and Active R13, R14, and R19 Permits
  - a. For the heaters HTR3 and HTR6, the number of catalytic heaters has been removed from the emission unit descriptions, and the design capacity has been updated to the aggregate total maximum design heat input of the catalytic heaters for each unit.
  - b. For the heaters HTR2 and HTR4, the emission unit description has been revised from “Line Heater” to “Fuel Gas Heater”.
  - c. The table of Active R13, R14, and R19 Permits has been updated with R13-3164F which was issued on July 9, 2024.
3. Section 5.0. – Gas Loss Events
  - a. The section heading has been updated from “Blowdowns and Pigging Operations” to “Gas Loss Events”.
  - b. To allow for operational flexibility, the maximum volume of compressor or emergency shutdown blowdowns and the maximum volume of pigging operations have been combined as “gas loss events”. Condition 5.1.1. has been revised to limit the maximum volume of gas loss events to 67,927,000 scf per year, and Condition 5.1.2. has been removed from the operating permit.
  - c. Condition 5.4.2. has been revised to require the permittee to maintain records of gas loss events, including blowdowns and pigging events, and the estimated volume of each event. Condition 5.4.3., which previously contained the recordkeeping requirements for Condition 5.1.2., has been removed from the operating permit.
  - d. The reference to Condition 5.1.2. has been removed from the reporting requirement of Condition 5.5.1.
4. Section 8.0. – 45CSR13, Permit R13-3164 Requirements
  - a. In Condition 8.1.10., the emission unit descriptions in the table of the maximum design heat input for the heaters have been updated as follows:
    - i. The descriptions of HTR2 and HTR4 have each been revised to “Fuel Gas Heater”.
    - ii. The number of catalytic heaters has been removed from the descriptions for HTR3 and HTR6.
  - b. In Condition 8.3.1., the schedule for the CO performance testing of the turbines has been revised in accordance with Condition 5.2.2. of R13-3164F. Performance tests to demonstrate compliance with the CO emissions limits in Conditions 8.1.2. through 8.1.4. of the operating permit must be conducted as requested by the Secretary and as outlined in Condition 3.3.1. of the operating permit.

### **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.

Ending Date: Not applicable.

## **Point of Contact**

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

Sarah Barron  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
304/414-1915  
sarah.k.barron@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.

1. The citation of Condition 3.1.6. was revised to refer to the current version of the WV Code.
2. The citation of Condition 3.3.1. was revised to refer to the current version of the WV Code.
3. The following has been added to Condition 3.3.1.b.: "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."