

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 11, 2020.

Permit Number: **R30-01700162-2020**
Application Received: **June 19, 2023 (MM02) and June 27, 2024 (MM03)**
Plant Identification Number: **03-54-017-00162**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Sherwood Compressor Station**
Mailing Address: **1700 MacCorkle Avenue SE, Charleston, WV 25314**

Permit Action Number: *MM02 and MM03*

Revised: *September 3, 2024*

Physical Location: Sherwood, Doddridge County, West Virginia
UTM Coordinates: 523.0 km Easting • 4,346.7 km Northing • Zone 17
Directions: From the town of Smithburg, head southwest on Smithbury Street towards Smithton Road and make a left. In approximately 0.5 miles, keep left to continue to County Route 50/22. In approximately 0.2 miles, turn left onto US-50 W, then left onto Snowbird Road. At the end of Snowbird Road, turn right onto Route 18. The station will be on the right in approximately 0.5 miles.

Facility Description

The Sherwood Compressor Station is a natural gas transmission compressor station. Pipeline transmission of natural gas requires that the gas be compressed. The Sherwood Compressor Station receives natural gas via pipeline from an upstream compressor station, compresses it using natural gas fired turbines, and transmits it via pipeline to a downstream station.

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)	+ 1.55
Nitrogen Oxides (NO _x)	0.00
Particulate Matter (PM _{2.5})	0.00
Particulate Matter (PM ₁₀)	0.00
Total Particulate Matter (TSP)	0.00
Sulfur Dioxide (SO ₂)	0.00
Volatile Organic Compounds (VOCs)	+ 0.59

PM₁₀ is a component of TSP.

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

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 240.20 tpy of Carbon Monoxide and 102.08 tpy of Nitrogen Oxides. Due to this facility's potential to emit over 100 tons per year of a 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	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
R13-3313D	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

This minor modification incorporates the revisions made with Class II Administrative Update Permit R13-3313C and Class I Administrative Update Permit R13-3313D. Permit R13-3313C updated the emission factors for CO and VOCs for the emergency generator RICE G1 based on the update manufacturer's emissions guarantee, which resulted in an increase in emissions, and made some other minor administrative changes. Permit R13-3313D updated the CO testing requirement schedule for the turbines and made some other minor administrative changes.

The following changes have been made to the Title V operating permit for these modifications:

Changes requested in the minor modification MM02 application:

- **Condition 1.1.** – The Emission Units table was updated to add RICE to the Emission Unit Description for G1, change the installation dates from 2017 to 2019 and combine the maximum design heat input for the 40 catalytic heaters SH1 as 2.88 MMBTU/hr (total).
- **Condition 3.1.9.** – This condition was removed and replaced with “Reserved.”
- **Condition 3.7.2.b.** – This condition was revised to change the equipment installation date from 2017 to 2019.
- **Condition 5.1.1.** – This condition was revised to add the clarification language “during periods of non-emergencies.”
- **Condition 5.1.2.** – This condition was revised to list the updated CO and VOC emissions in the table.
- **Condition 6.1.2.** – Clarification was added to indicate that this condition applies only to HTR1 and HTR2.

Changes requested in the minor modification MM03 application:

- **Condition 1.1.** – The Emission Units table was revised to change the Emission Unit Descriptions for T1, T2, T3, T4, HTR3 and A1.

- **Condition 4.1.5.** – This condition was removed and replaced with “Reserved” because the turbines are permitted to operate 8,760 hours per year, which makes a limit on natural gas usage unnecessary.
- **Conditions 4.1.6., 4.1.7. and 4.1.8.** – The reference citations were revised because they were renumbered in NSR permit R13-3313D.
- **Condition 4.3.2.** – This condition was revised to change the CO compliance testing schedule to “as requested by the Secretary and outlined in Section 3.3.”
- **Condition 4.4.1.** – This condition was revised to change the reference phrase “4.1.2 - 4.1.5” to “4.1.2 - 4.1.4”.
- **Condition 5.0.** – This condition was revised to add the term RICE.
- **Condition 6.1.1.** – This condition was revised to delete the number 40 from the Emission Unit Description for HTR3.

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.
- **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 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.

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:

Dan Roberts
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41915
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)

To correct a typo in the proposed permit, the reference citation of permit condition 6.1.1. was revised to delete the clarification note "(HTR1 & HTR2 Only)" and then add it to the reference citation of permit condition 6.1.2. instead. In an email dated August 14, 2024, Gwendolyn Supplee and Joseph Whapham of the EPA were notified of this change.