

COMMONWEALTH OF PENNSYLVANIA
Department of Environmental Protection
Southwest Regional Office
January 30, 2006

SUBJECT: Final Issuance of Title V Operating Permit
Dominion Transmission Incorporated
South Bend Station
South Bend Township
Armstrong County

OFFICIAL FILE COPY

TO: Air Quality Permit File #03-00180

THROUGH: Barbara Hatch, P.E.
Facilities Permitting Chief
Air Quality

FROM: Nicholas J. Waryanka, P.E.
Air Pollution Control Engineer III
Air Quality

BACKGROUND

Dominion Transmission Inc. (Dominion) is an interstate gas transmission subsidiary for Dominion Energy, Inc. and operates facilities in Pennsylvania for the production, storage, and transmission of natural gas. Operation of the equipment at South Bend Compressor Station (South Bend) results in the emission of various air contaminants. As a result of the levels of NO_x emitted, Valley is a major stationary source as defined in Title I, Part D of the Clean Air Act Amendments. As such, the facility is subject to the Title V permitting requirements adopted at 25 Pa. Code, Chapter 127, Subchapter G.

South Bend's original Title V permit expired on January 28, 2004. Dominion submitted a renewal application on July 22, 2003 in accordance with Section B, Condition #004 of the permit which requires a renewal application be submitted at least six months prior to permit expiration. After receiving the copies of the municipal notification letters missing from the initial renewal submission, the application was deemed administratively complete on April 20, 2004. An application shield, as described in 25 Pa. Code §125.505(e), was granted at that time.

REGULATORY ANALYSIS

There are no new regulatory requirements which apply to this facility. Three NESHAPs standards have been recently promulgated which potentially could apply to Valley. These include: 1) Subpart HHH, Natural Gas Transmission and Storage, 2) Subpart HH, Oil & Natural Gas Production and 3) Subpart ZZZZ, Reciprocating Internal Combustion Engines. Because the South Bend Station is not a major source for HAPs however, none of these standards are applicable.

The Compliance Assurance Monitoring requirements of 40 CFR Part 64 do not apply to the South Bend Station. There are no sources equipped with control devices at this facility.

ORIGINAL PERMIT REVISIONS

The application was an initial submission. The company proposed several changes to the original Title V permit. One such change was the Tax ID, owner and contact information identified on the first page. Some other minor changes to reporting, monitoring and permit condition wording were proposed. They are as follows:

- Revision of fuel sampling conditions for verifying compliance with opacity and particulate emission requirements. Dominion proposes using AP-42 emission factors or other means as an alternative.
- Several source rated heat input capacities were revised.
- Requested that the ozone season be defined in the permit as May through September instead of April to October. This was a RACT permit condition however so no changes can be made until RACT Operating Permit #03-000-180 is revised and subsequently re-SIPed.
- Removal of equations for converting ppm emission rates to mass rates in favor of using language suggesting usage of the methods prescribed in the Department's Source Testing Manual.
- Revise due date for submission of annual compliance certifications to March 1.
- Request permission to have records "be made immediately available" as opposed to keeping written records on site.

SOURCE/EMISSION INFORMATION

Source wise, several changes were made:

- A new boiler now designated #032 was installed and replaces #031 which has been taken out of service.
- The dehy engine, Source #110, is no longer in service. An inspection performed on December 21, 2005 by Jim Hughes, Air Quality Specialist, confirmed that this source has been removed. The Title V renewal application had incorrectly designated this source as Aux Gen #2. As such, it has been removed from the draft version of the permit.
- Source #111, Air Compressor #1, has been removed.
- Source #114, Dehydrator #1, is now known as Heater #1 and is used a heater for the salt bath gas regeneration process.
- Stack designations have been updated in accordance with the changes discussed above.
- Another source has been added to the permit, #116 – Parts Washer, at Dominion’s request. This source is subject to certain sections of 25 Pa. Code Section 129.63.
- Additional items have been included in the list of trivial activities.
- Dominion has submitted comments on the draft Title V renewal operating permit. This comments have been addressed in a separate “Comments and Response” document which can be found in the Title V permit file. Some revisions to the draft permit have been made in accordance with Dominion’s remarks.

CONCLUSIONS AND RECOMMENDATIONS

I have completed my review of Dominion’s Title V permit renewal application for their South Bend Station. Dominion has met the regulatory requirements associated with this application submittal. The attached final permit reflects terms and conditions as described in Dominion’s permit application. It is my recommendation to issue a Title V permit for this facility.