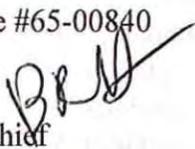


COMMONWEALTH OF PENNSYLVANIA
Department of Environmental Protection
Southwest Regional Office
July 18, 2007

SUBJECT: Review of Renewal Application
Title V Operating Permit
Dominion Transmission Incorporated
South Oakford Compressor Station
Hempfield Township
Westmoreland County

OFFICIAL FILE COPY

TO: Air Quality Permit File #65-00840

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 Oakford Compressor Station (SOCS) results in the emission of various air contaminants. As a result of the levels of NOx emitted, SOCS 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.

SOCS's original Title V permit expired on July 17, 2003. Dominion submitted a renewal application on December 26, 2002 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 February 6, 2003. The facility has continued to operate under the provisions of 25 Pa. Code §127.403(b) which requires submission of a complete application within the specified time frame, payment of applicable permit fees and operation "in conformance with the act, the Clean Air Act and the regulations thereunder."

EMISSIONS AND CONTROL EQUIPMENT

There are eight emission sources in the permit The Title V Permit for the site will include eight (8) sources: two (2) Cooper 6350 horsepower 14W-330 compressor engines, one (1) Waukesha 778 horsepower L-5790-550 auxiliary generator, one (1) Ajax 4.0 MMBTU/HR WGEFD-4000 heating boiler, one glycol dehydration unit, miscellaneous storage tanks between 2,000 and 40,000 gallons, two parts washers and fugitive emissions from facility pumps, valves, flanges, etc. The miscellaneous storage tanks and parts washers are sources that were not included in the original Title V operating permit due to the permittee's oversight.

The following emission sources are included in the permit as insignificant activities:

A-3 Lube Oil Storage Tank; 697 gallons
A-3 Lube Oil Storage Tank; 1,500 gallons
Used Glycol (portable field tank); 165 gallons
Used Glycol (portable field tank); 165 gallons
K-2 Wastewater Storage Tank (not in service); 550 gallons
Reclaimed Oil Storage Tank (not in service); 200 gallons
Reclaimed Glycol Storage Tank (not in service); 550 gallons
Plant Space Heaters
Hot Water Heater; 120,000 Btu/hr

ORIGINAL PERMIT REVISIONS

The company proposed several changes to the original Title V permit regarding reporting, monitoring and permit condition wording. 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. Because this was a RACT permit condition, however so no changes can be made until RACT Operating Permit #65-000-840 is revised and subsequently re-SIPed. Dominion has submitted an application to revise the RACT operating permit which is currently in our office.
- 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.
- Requested change from maintaining daily operating records to monthly records. Because this recordkeeping requirement comes directly from a SIPped RACT Operating Permit, we cannot grant this request until the RACT OP is modified.

REGULATORY ANALYSIS

There are three recently promulgated NESHAPs regulations which potentially apply to this facility, including: 1) Subpart HHH, Natural Gas Transmission and Storage, 2) Subpart HH, Oil & Natural Gas Production and 3) Subpart ZZZZ, Reciprocating Internal Combustion Engines. SOCs is a major source of HAPs due to formaldehyde emissions from the two compressor engines.

SOCS is not subject to Subpart ZZZZ because this regulation does not apply to lean burn engines. Subpart HH pertains to natural gas production so it also is not applicable. Subpart HHH however applies to storage facilities that are major for HAPs such as SOCS. Although the majority of this NESHAPs deals with the glycol dehydration unit and its associated control device (flare), all pertinent requirements of Subpart HHH have been included in this renewal Title V permit including provisions for monitoring, recordkeeping and reporting.

The Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 are potentially applicable to the South Oakford Station. The only source equipped with a control device is Source 105, Glycol Dehydration Unit, which is equipped with a flare. 40 CFR 63.1274(d)(2) of Subpart HHH limits benzene, a HAP, emissions from the dehy unit to 0.90 megagrams (about 1 ton) per year. Without the flare, the source certainly has the potential to emit more than 10 tons of benzene per year. However, 40 CFR 64.2(b)(1)(i), of the CAM rule states that "The requirements of this part shall not apply to ... emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act." Since Subpart HHH was promulgated on July 17, 1999, SOCs is exempt from CAM rule requirements.

CONCLUSIONS AND RECOMMENDATIONS

I have completed my review of Dominion's Title V permit renewal application for their South Oakford Compressor Station. Dominion has met the regulatory requirements associated with this application submittal. The attached draft 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.

11/11/11

The following information was obtained from the records of the
Department of Health and Human Services, Office of the
Inspector General, regarding the activities of the
Department of Health and Human Services, Office of the
Inspector General, during the period from 1/1/11 to 12/31/11.