COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Transcontinental Gas Pipe Line Corporation
945 Transco Road - Pittsylvania County, Virginia
Permit No. SCRO30864

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Transcontinental Gas Pipe Line Corporation has applied for a Title V Operating Permit for its Pittsylvania County facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: September 30, 2008

Air Permit Manager: _____ Date: September 30, 2008

Regional Director: _____ Date: September 30, 2008

FACILITY INFORMATION

Permittee
Transcontinental Gas Pipe Line Corporation
P. O. Box 1396
Houston, Texas 77251-1396

Facility
Transcontinental Gas Pipe Line Corporation
Compressor Station No. 165
945 Transco Road
Chatham, Virginia 24531
in Pittsylvania County

State-County-Plant ID No. 51-143-0120

SOURCE DESCRIPTION

SIC Code 4922 – NAICS Code – 486210. Transcontinental Gas Pipe Line Corporation (Transco) is an interstate natural gas transmission company. Transco's compressor stations are used to compress and move the gas along the system. Compression is made possible through the application of natural gas-fired, spark ignited, internal combustion, reciprocating compressor engines (SRICE). Compressor Station No. 165 is a remotely operated (dispatched) natural gas transmission compressor station that consists of eleven (11) 2-cycle, spark ignited, lean burn, (2SLB) compressor (Ref. M/L 1-11); and three (3) 4-cycle, rich burn (4SRB) electric generator (Ref. AUX 1-2) and air compressor (Ref. A/C 1) SRICE.

The facility is a Title V major source of NOx, CO, VOC, and hazardous air pollutant (HAP) emissions. This source is located in an attainment area for all pollutants and is a PSD major source. Transco's Compressor Station No. 165 was constructed in the early 1960s. The stationary natural gas-fired SRICE are in a source category subject to the provisions of 9 VAC 5 Chapter 40 and 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT). See MACT ZZZZ section for details.

Transco's Station #165 is required to meet the 82% NOx reduction mandated by EPA's NOx SIP Call Phase II Regulation for large SRICE. The Clark 2SLB TCV-10 (Ref. M/L 11) at Compressor Station #165 has been identified as a large SRICE. Transco has elected to meet the NOx reductions by adding high pressure fuel injection (HPFi™), which also may involve one or more of the following: changes to the piston crown and cylinder heads, improved turbochargers and intercoolers, improved instrumentation, and improved control systems to the affected SRICE. The other ten (10) 2SLB Clark TLA-6 (Ref. M/L 1-10), two (2) 4-cycle rich burn (4SRB) Ingersol-Rand PSVG-6 (Ref. AUX 1-2), and one (1) 4SRB Waukesha F-817G (Ref. A/C 1) SRICE are not classified as "large" engines and are not affected facilities for EPA's NOx SIP Call Phase II Regulation. The January 24,

2007 State Operating Permit (SOP) is a source specific State Implementation Plan (SIP) Revision to make the NOx reduction provisions of the EPA's NOx SIP Call Phase II state and federally enforceable.

Compressor Station #165 has liquid storage vessels that are in a source category subject to the provisions of 40 CFR 63 Subpart EEEE (OLD MACT), the NESHAP for Organic Liquids Distribution (Non-Gasoline). See Facility-wide Permit Conditions section for details.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was conducted on November 19, 2007. The facility was deemed to be in compliance with the Title V permit dated November 26, 2003, as amended on July 26, 2004 and the SOP dated January 24, 2007.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at Compressor Station No. 165 consist of the following: ten (10) Clark TLA-6, 2 cycle, lean burn, spark ignited (2SLB), natural gas-fired internal combustion (IC) engines, each rated at 17.2 Million BTU/Hr (2,100 hp power output); one (1) Clark TCV-10 2SLB natural gas-fired IC engine rated at 27.84 Million BTU/Hr (3,400 hp power output); two (2) Ingersol Rand PSVG-6, 4 cycle, spark ignited, rich burn (4SRB) natural gas-fired IC engine-powered electric generators, each rated at 5.5 Million Btu/hr (408HP); and one (1) Waukesha F-817G 2SLB IC natural gas-fired IC engine-powered air compressor rated at 1.0 Million Btu/hr (105 HP). There are no add-on air pollution control devices for any spark ignited reciprocating, internal combustion engines (SRICE)

EMISSIONS INVENTORY

A copy of the 2007 annual emission update is attached. Emissions are summarized in the following table:

2007 Actual Emissions

	2007Pollutant Emission in Tons/Year					
Emission Unit	**VOC**	**CO**	**SO_2**	**PM_{10}**	**NO_x**	**Formaldehyde**
Transco Station #165	171.3	387.8	0.3	18.8	1,720.5	26.5

Source of emissions data: 2007 CEDS Pollutant Emissions Report, See Attachment 1

FUEL BURNING EMISSION UNIT APPLICABLE REQUIREMENTS – (Ref. M/L 1-11, AUX 1-2, A/C 1)

Limitations

9 VAC 5 Chapter 40 Requirements

The eleven Clark 2SLB (Ref. M/L 1-11) engines were constructed prior to March 17, 1972, have not been subsequently modified and are subject to the provisions of Article 4 of 9 VAC 5 Chapter 40 (9 VAC 5-40-240 et seq.). Ten of the 2SLB SRICE (Ref. M/L 1-10) have the potential to emit at least 322 ton/yr of NOx each, and one of the 2SLB SRICE (M/L 11) has the potential to emit 84 ton/yr of NOx; all of which exceed the 5 ton/yr Insignificant Emission Unit exemption in 9 VAC 5-80-1720.B.1. These SRICE are significant emission units (see permit application revised spreadsheet dated 4/10/08).

The two 408 HP Ingersoll Rand and the 105 HP Waukesha F-817G 2SLB 4SRB SRICE were constructed prior to March 17, 1972 and are subject to the provisions of 9 VAC 5 Chapter 40. Both 408 HP Ingersoll-Rand 4SRB SRICE supply mechanical power for the two electric generators providing lighting and electrical control for the facility. The potential NOx emissions from each Ingersoll-Rand has been calculated to be 54.7 tons/yr, which exceeds the 5 ton/yr Insignificant Emission Unit exemption in 9 VAC 5-80-1720.B.1. These SRICE are significant emission units (see permit application revised spreadsheet dated 4/10/08). The 105 HP Waukesha 4SRB SRICE has the potential to emit 9.9 ton/yr of NOx, which exceeds the 5 ton/yr Insignificant Emission Unit exemption in 9 VAC 5-80-1720.B.1. The Waukesha 4SRB SRICE (Ref. A/C 1) is a significant emission unit (see permit application revised spreadsheet dated 4/10/08).

All SRICE are subject to the SO_2 emission limit of 2.64K per 9 VAC 5-40-280 (B). The SO_2 emission rate from the SRICE (Ref. M/L1-M/L11, A/C 1) is a function of the sulfur content of the fuel. The maximum SO_2 emissions have been established as 5.88×10^{-4} lb/MMBtu[1], based on an assumed fuel sulfur content of 2,000 gr/10^6 scf. This emission rate is in compliance with the 2.64 lb/MM Btu limit per 9 VAC 5-40-280. The use of natural gas in these SRICE meets the SO_2 emission standards

The SRICE are subject to the15 gr/100 ft^3 H_2S emission limit per 9 VAC 5-40-290. The H_2S emission rate from each SRICE (Ref. M/L1-M/L11, A/C 1) is a function of the sulfur content of the fuel. The maximum H_2S emission has been calculated using the SO_2 emission factor from AP42, Section 3.2, the estimated fuel consumption (18.0 MMBtu/hr) at 920 Btu/ft^3 and exhaust gas volume of a Clark TLA-6 2SLB engine (18,552 acfm) to be:

$$H_2S = 0.\frac{588 \times 10^{-4} \text{ lb/MM Btu} \times 17.2 \text{ x MM Btu/hr} \times 100 \times 7{,}000 \text{ gr/lb} \times (34/64)}{60 \text{ min/hr} \times 18{,}552 \text{ ft}^3_{exh}/\text{min}} = 0.00338 \text{ gr/100 ft}^3_{exh}$$

The expected H_2S emission rate from each SRICE (Ref. M/L1-M/L11, A/C 1) is 0.00338 gr/100 ft^3_{exh} which is in compliance with the 15 gr/100 ft^3 limit per 9 VAC 5-40-290. The use of natural gas in these SRICE meets the H_2S emission standards. These SRICE engines were designed to be fueled by pipeline quality natural gas, and a change in fuel may require a permit to modify and operate.

Visible emissions from the fourteen SRICE (Ref. M/L 1-11, AUX 1-2, A/C 1) exhaust stacks

1 AP42, Section 3.2, Natural Gas-fired Reciprocating Engines (7/2000) for SCC #20200252. Sulfur content found in footnote e of AP42 Table 3.2-1.

(Ref. Nos. 1-14) shall not exceed twenty (20) percent opacity, except during one six-minute period in any one hour in which visible emissions shall not exceeded sixty (60) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A) per 9 VAC 5-40-80.

The fourteen SRICE (Ref. M/L 1-11, AUX 1-2, A/C 1) are not subject to Compliance Assurance Monitoring. See Inapplicable Requirements Section for details. The permittee will keep records of malfunctions, operating procedures, maintenance schedules, and service records.

NOx SIP Call Phase II Regulation and January 24, 2007 Permit Requirements

The NOx SIP Call Rule (63 FR 57356, October 27, 1998 and 69 FR 21604, April 21, 2004), addresses the interstate transport of ozone. It requires twenty-one States and the District of Columbia to eliminate those amounts of NOx emissions that contribute significantly to downwind Nonattainment of the 1-hour ozone standard. Phase II of the Rule requires a 90% reduction for existing electrical cogeneration units with heat input capacity greater than 250 MMBtu/hr and an 82% reduction for large stationary internal combustion engines. The NOx SIP Call and January 24, 2007 Permit requires that the affected SRICE (Ref. M/L 11) reduce the ozone season NOx emissions by 82% from the 1995 ozone season NOx emissions. In the 1995 Ozone Season, the affected SRICE emitted 201.8 tons of NOx, with a 98% growth factor and an 82% reduction, this engine will be allowed to emit 35.25 tons of NOx during the ozone season (162.5 ton/yr reduction). Transco has elected to meet the NOx reduction by adding high pressure fuel injection (HPFi™) to the affected SRICE (Ref. M/L 11), which also involves one or more of the following: changes to the piston crown and cylinder heads, improved turbochargers and intercoolers, improved instrumentation, and improved control systems. Transco has elected to use parametric monitoring, stack testing, annual portable analyzer testing, and tracking hours of operation, in order to calculate NOx emissions and demonstrate compliance to the ozone season NOx emissions limit.

The following table summarizes the Ozone Season NOx emission limits for the affected SRICE:

Emission Unit ID	**Ozone Season Projected NO_x Emission Rate (lb/hr)**	**Ozone Season Projected NO_x Emission Rate (ton/ozone season)**	**Potential Hours/season**
Clark M/L 11	19.20	35.25	3,672
TOTAL		35.25	

These emission limits are applicable only during the Ozone Season (May 1-September 30).

The NOx SIP Call parametric monitoring, periodic monitoring, compliance demonstration, reporting and recordkeeping requirements will be discussed in the pertinent sections of the Statement of Basis.

40 CFR 63, Subpart ZZZZ, RICE MACT Requirements

Compressor Station 165 has fourteen stationary SRICE, with eleven SRICE having a site rating of more than 500 brake horsepower (HP), and is a major source of HAP emissions. The eleven

2SLB-IC engines with a site rating of more than 500 HP (Ref. M/L 1-11), are 2-cycle lean burn, and are considered to be existing stationary SRICE; since construction and reconstruction commenced before December 19, 2002. The three 4SRB-IC engines have a site rating of less than 500 HP (Ref. A/C 1, AUX 1-2) each, and are also considered to be existing, since construction and reconstruction commenced prior to June 12, 2006. Compressor Station 165's SRICE are in a source category subject to the 40 CFR 63 Subpart ZZZZ, the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE MACT). Each group of SRICE will be discussed by MACT subcategory.

The eleven existing large 2SLB engines (Ref. M/L 1-11), each with a site rating of greater than or equal to 500 HP, are 2-cycle lean burn RICE, and do not have either emission limitations or applicable requirements for Subparts ZZZZ and A per §40 CFR 63.6590(b)(3). No initial notification is necessary for these existing 2SLB SRICE.

The three existing 4SLB SRICE (Ref. AUX 1-2, A/C 1) have a site rating of less than 500 brake HP, each, and are exempt from all provisions of Subparts ZZZZ and A per §40 CFR 63.6590(a)(1)(ii)[2]. No initial notification is necessary for these existing 4SRB SRICE

Monitoring

Station 165 is only staffed one shift per day (day shift) and the facility is remotely operated from Houston, Texas. The Houston dispatcher may operate each compressor SRICE (Ref. M/L 1-11) at any time during the day, without prior notification to the plant personnel. The 4SRB (Ref. A/C 1) SRICE is used to supply compressed air for the pneumatic control of natural gas pipeline control valves and for maintenance activities. The plant operator has the ability to start any of the eleven SRICE (Ref. M/L 1-11), but only at engine idle condition (no load). The 4SRB SRICE (Ref. AUX 1-2, A/C 1) automatically cycle to supply facility electricity and compressed air for pneumatic valve control.

Ozone Season Parametric Monitoring for Affected Engine (Ref. M/L 11)

The Ozone Season parametric monitoring requirements only apply during the period of May 1 to September 30. The monitoring requirements in Conditions III.C and III.D of the NOx SIP Call permit dated January 24, 2007 have been incorporated into the Title V permit. Transco has installed a parametric monitoring system (PMS) to monitor the selected engine performance indicators on the Ozone Season affected engine (Ref. M/L 11). Transco conducted a series of nine NOx stack tests (engine mapping) using a portable analyzer on each affected engine to measure critical engine operating parameters (PMS), in order to map the engine's emissions under various loads and to determine the value of the constants for the equation in Condition IV.C.1 and IV.E.1.b of the Title V permit, respectively. The affected engine's actual air manifold pressure (AMP_{ACT}, inches Hg) is expected to be greater than the critical air manifold pressure (AMP_C, inches Hg). If any one-hour average of AMP_{ACT}

2 MACT Compliance Handbook for Reciprocating Internal Combustion Engines NESHAP, USEPA-ITPID, July 31, 2004. Site rated horsepower is not the aggregate capacity of all RICE at the facility per Step 3 on Page 17. See Attachment 2.

of the affected engine (Ref. M/L 11) is less than the AMP_C for the same engine during the ozone season, the source shall report a deviation from normal operation. If the three (3) hour average AMP_{ACT} of any affected engine (Ref. M/L 11) is less than the AMP_C for the same engine, the source shall take timely corrective action such that the affected engine resumes normal operation. If the three (3) hour average AMP_{ACT} of the affected engine (Ref. M/L 11) is less than the AMP_C for the same engine for three (3) times during any ozone season, the permittee shall repeat the engine mapping testing to re-establish the correlation between operating parameter levels that indicate proper operation of the affected engine and assure compliance with the NOx limit.

Non- Ozone Season Parametric Monitoring for Affected Engine (Ref. M/L 11)

The PMS system is an integral part of the affected SRICE (Ref. M/L 11) operating system and cannot be turned off or bypassed. The PMS system contains adequate monitoring to alert the operator and plant personnel of a problem with the affected 2SLB SRICE that would cause an exceedance of 9 VAC 5 Chapter 40 limitations (opacity). The operator would then take the appropriate corrective action to return the affected SRICE to normal operation. Due to the clean burning characteristics of natural gas and the PMS system, additional periodic monitoring is not required.

Periodic Monitoring for Non-affected SRICE (Ref. M/L 1-10, AUX 1-2, A/C 1)

Monitoring of opacity will require the source to, at least one time per week, observe for the presence of visible emissions from each SRICE (Ref. M/L1-10, AUX 1-2, A/C 1) exhaust stack (Ref. 01-10, 12-14) when these emission units are operating. If visible emissions are observed, the permittee will have the option to take timely corrective action to resume operations without visible emissions or perform a VEE in accordance with 40 CFR 60, Appendix A, Method 9 to assure visible emissions' compliance. If visible emissions inspections conducted during twelve (12) consecutive weeks show no visible emissions for a particular stack, the permittee may reduce the monitoring frequency to once per month for that stack. Anytime the monthly visible emissions inspections show visible emissions, or when requested by DEQ, the monitoring frequency shall be increased to once per week for that stack. The permittee will keep a log of observations, any VEE recordings and any corrective actions. If any emission unit has not operated during the entire period (week/month), this fact shall be noted in the individual log, and the visible emission observation for the idle emission unit will not be required.

Recordkeeping

Annual Ozone Season NOx Emissions Recordkeeping for Affected SRICE (Ref. M/L 11)

Starting in 2007, Transco will submit an annual summary report to the South Central Regional Office documenting the total NOx emissions (in tons) during the ozone season of each year by October 31 from the affected engine (Ref. M/L 11). The report shall include the unit identification number, the manufacturer, and model for the affected engine, and the name and address of the facility where the unit is located.

Annual Non-ozone Season NOx Emissions Recordkeeping for Affected and Non-affected 2SLB and Exempt 4SRB SRICE

The permit requires the Transco to maintain the following records, which include, but are not limited to:

The annual throughput of fuel consumption in each SRICE (Ref. M/L1-11, AUX 1-2, A/C 1), calculated monthly as the sum of each previous consecutive 12 month period.

The equations, emission factors, origin of emission factors, and all supporting documentation for criteria pollutant emissions.

Scheduled and unscheduled maintenance to each SRICE (Ref. M/L1-11, AUX 1-2, A/C 1) and operator training.

Results of all stack tests and performance evaluations.

Copies of all notifications.

Testing

Ozone Season Testing for Affected SRICE (Ref. M/L 11)

The Ozone Season testing requirements only apply during the period of May 1 to September 30. Once per ozone season, starting with the 2008 Ozone Season, the permittee shall test the affected engine (Ref. M/L 11) with the portable analyzer to demonstrate the validity of the PMS and compliance to the Ozone Season NOx emission limits. The affected engine is to be tested as normally operated, which means the engine is not be tuned or otherwise adjusted in any manner which reduces NOx emissions during the testing and then retuned or readjusted to pretest conditions. The source is required to submit a testing protocol to the South Central Regional Office for approval at least 30 days prior the scheduled test. The source is also required to calibrate the portable analyzer in accordance to the provision of 40 CFR 60, Appendix A, Method 7E or approved alternative, and maintain a logbook of the results of the calibration.

Non-ozone Season Testing for All SRICE (Ref. M/L1-11, AUX 1-2, A/C 1)

The use of natural gas in the SRICE (Ref. M/L1-11, AUX 1-2, A/C 1) meets the SO_2 and H_2S emission standards per Article 4 of 9 VAC 5 Chapter 40 and a stack test for SO_2 and H_2S is not required. The SRICE (Ref. M/L1-11, AUX 1-2, A/C 1) are not subject to any other non-ozone season criteria pollutant emission standard(s). The Department and EPA has authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

Ozone Season Reporting for Affected SRICE (Ref. M/L 11)

Transco shall submit an annual summary report to the South Central Regional Office documenting the total NOx emissions (in tons) during the ozone season by October 31 from each affected engine. The report shall include the unit identification number for the affected engine, the manufacturer and model of each affected engine, and the name and address of the facility where the unit is located.

Non-Ozone Season Reporting for All SRICE (Ref. M/L1-11, AUX 1-2, A/C 1)

The Title V permit contains the standard non-ozone season testing, malfunction, and compliance reporting requirements in Section IX of the permit.

Streamlined Requirements

The NOx SIP Call Permit (1/24/07 Permit) notification requirements for CY2007 have been met and have been streamlined out of the Title V Permit.

PROCESS EQUIPMENT APPLICABLE REQUIREMENTS – (Ref. FUGS)

Natural gas compressor stations are not one of the 27 sources where fugitive emissions count toward the PSD permitting thresholds. Transco has identified two sources of facility-wide fugitive VOC and HAPs emissions. The first source of fugitive VOC emissions are due to natural gas leaking from piping components (valves, flanges, etc), SRICE crankcase vents, natural gas condensate storage, and compressor packing. The second source of fugitive VOC emission are due to release of natural gas due to pig launching and recovery, and scheduled and emergency pipeline blow downs, which are directly related to pipeline inspection and maintenance. Previous Title V permit applications had not quantified the facility-wide VOC and HAPs emissions from fugitive sources, and the previous Title V permits did not include this activity as either significant or insignificant activities. The fugitive VOC emissions are not subject to any 9 VAC 5 Chapter 40 emissions limitations. In addition to containing VOCs, natural gas contains trace amounts of benzene, toluene, xylene, ethyl benzene, and n-hexane, which are currently regulated HAPs. The HAPs emissions from these fugitive sources are very small (see Title V permit application for details).

Transco has projected the potential VOC emissions from fugitive sources to be 4.77 tons/yr from leaks and 4.36 tons/yr from blowdowns, pig launching, and pig recovery, for a total of 9.1 tons/yr (see Title V application). Fugitive HAPs emissions have been calculated by the source to be approximately 0.11 tons/yr (see Title V application). Fugitive VOC from natural gas compressor stations are not subject to any current 9 VAC 5 Chapter 40 emission limitations. Compressor Station #165 was constructed prior to March 17, 1972 and has not been subsequently modified, and the fugitive emissions are not subject to any current 9 VAC 5 Chapter 50 requirements. The combined fugitive VOC emissions exceed the 5 tons/yr Insignificant Activity exemption level per 9 VAC 5-80-720.B.2, and fugitive emissions are a Significant Emission Unit.

Due to the transient and fugitive nature of the emission points, the absence of particulate matter, and the limited applicable requirements, periodic monitoring is not practical. The Title V permit does not require periodic monitoring for fugitive emissions.

Transco will be required to calculate fugitive VOC emissions on a calendar year basis (January 1-December 31), and to submit the results in the annual Title V emissions statement. In addition, Transco will be required to pay Title V Permit fees on the fugitive VOC emissions. Transco will be required to keep records of the fugitive VOC emissions calculations for five years.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

This general condition cites the sections that follow:
9 VAC 5-80-80. Application
9 VAC 5-80-140. Permit Shield
9 VAC 5-80-150. Action on Permit Applications

In the event that the Title V Permit General Conditions are the same as the January 24, 2007 State Operating Permit General Conditions, the Title V Permit includes both regulatory citations.

STATE ONLY APPLICABLE REQUIREMENTS

None.

FUTURE APPLICABLE REQUIREMENTS

None identified.

INAPPLICABLE REQUIREMENTS

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A.3 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedance during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedance during startup and shut down will be reviewed with enforcement discretion using the requirements of 9

VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

Compressor Station No. 165 is not located at a natural gas production site, does not process, store, or upgrade natural gas (glycol dehydration), or include other affected units per 40 CFR 63.760(d). This compressor station is not subject to the provisions of Subpart HH, National Emission Standards for Hazardous Air Pollutants (NESHAP) From Oil and Natural Gas Production Facilities per 40 CFR 63.760(d). Subpart HH is an inapplicable requirement for Compressor Station 165.

Compressor Station No. 165 meets the definition of "facility" per 40 CFR 63.1271, and is subject to the provisions of Subpart HHH, the NESHAP for Natural Gas Transmission and Storage Facilities. Since this source does not include a glycol dehydration system, there are no applicable 40 CFR 63 Subparts HHH and A requirements per 40 CFR 63.1270(c). Subpart HHH is an inapplicable requirement for Compressor Station 165.

Compressor Station No. 165 has various organic liquid storage tanks which are in a source category subject to the provisions of 40 CFR 63 Subpart EEEE (OLD MACT), the NESHAP for Organic Liquids Distribution (Non-Gasoline). However, this compressor station meets the definition of "facility" per 40 CFR 63.1271 and is exempt from the provisions of the OLD MACT per 40 CFR 63.2334(c)(2). Subpart EEEE is an inapplicable requirement for Compressor Station 165. See Attachment 2 for details.

The eleven 2SLB (Ref. M/L 1-11) and three 4SRB (Ref. AUX 1-2, A/C 1) SRICE do not have add-on NOx pollution control equipment as defined per 40 CFR 64.1 and Compliance Assurance Monitoring (CAM) does not apply per 40 CFR 64.2(a).

The fourteen SRICE were manufactured prior to and have not been modified after June 12, 2006, and are not subject to the provisions of 40 CFR 60 Subpart JJJJ, the New Source Performance Standards (NSPS) for Stationary Spark Ignited Internal Combustion Engines (SI ICE) per 40 CFR 60.4230.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
IA3	11,600-gallon lube oil storage tank (before 1970)	5-80-720 B.2	VOC < 5 tons/yr	NA
IA4	1,400-gallon lube oil storage tank (B Building Settling Tank)	5-80-720 B.2	VOC < 5 tons/yr	NA
IA5	2,000-gallon used oil storage tank	5-80-720 B.2	VOC < 5 tons/yr	NA
IA6	2,000-gallon NG condensate liquids storage tank	5-80-720 B.2 & B.5	VOC < 5 tons/yr & HAP = 1,000 lbs/yr	NA
IA7	800-gallon portable NG condensate liquids storage tank	5-80-720 B.2 & B.5	VOC < 5 tons/yr & HAP = 1,000 lbs/yr	NA
IA8	80-gallon hydraulic oil expansion tank (M/L 11)	5-80-720 C.3	NA	< 1000 gallons
IA9	458-gallon lube oil transfer tank (A Building Settling Tank)	5-80-720 C.3	NA	< 1000 gallons
IA10	242-gallon lube oil day tank (B Building)	5-80-720 C.3	NA	< 1000 gallons
IA11	564-gallon portable diesel storage tank	5-80-720 B.2	VOC < 5 tons/yr	NA
IA12	8,820-gallon waste water storage tank	5-80-720 B.2	VOC < 5 tons/yr	NA
IA13	9,000-gallon ethylene glycol/water surge vessel	5-80-720 B.2 & B.5	VOC< 5 tons/yr & HAP = 1,000 lbs/yr	NA
IA14	2,000-gallon ethylene glycol/water surge vessel	5-80-720 B.2 & B.5	VOC < 5 tons/yr & HAP = 1,000 lbs/yr	NA
IA15	4,297-gallon ethylene glycol/water transfer tank (outside B Building)	5-80-720 B.2 & B.5	VOC < 5 tons/yr & HAP = 1,000 lbs/yr	NA
IA16	2,750-gallon ethylene glycol/water storage tank (outside B Building)	5-80-720 B.2 & B.5	VOC < 5 tons/yr & HAP = 1,000 lbs/yr	NA
IA18	Parts washer	5-80-720	VOC < 5 tons/yr	NA

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
		B.2		
IA19	159-gallon ethylene glycol/water sump	5-80-720 B.2 & B.5	VOC < 5 tons/yr & HAP = 1,000 lbs/yr	NA
IA20	2,000-gallon ethylene glycol/water transfer tank (outside A Building)	5-80-720 B.2 & B.5	VOC < 5 tons/yr & HAP = 1,000 lbs/yr	NA
IA21	661-gallon methanol storage tank	5-80-720 B.2 & B.5	VOC < 5 tons/yr & HAP = 1,000 lbs/yr	NA
IA22	294-gallon jacket water (JW) surge tank (M/L 11)	5-80-720 B.2	VOC < 5 tons/yr	NA
IA23	533-gallon lube oil cooling water surge tank (M/L 11)	5-80-720 B.2	VOC < 5 tons/yr	NA

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

None

PUBLIC PARTICIPATION

The proposed permit will be place on public notice in the Chatham STAR-TRIBUNE from July 10, 2008 to August 11, 2008.