COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Piedmont Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Columbia Gas Transmission Corporation
Prince George County, Virginia
Permit No. PRO-51009

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, Columbia Gas Transmission Corporation has applied for a Title V Operating Permit for its Prince George County facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date:

Air Permit Manager:_____ Date:

Regional Permit Manager:_____ Date:

FACILITY INFORMATION

Permittee
Columbia Gas Transmission Corporation
P.O. Box 1273
Charleston, WV 25325-1273

Facility
Petersburg Compressor Station
0.75 miles west of US Highway 460 on Route 603

County Plant ID No.: 149-0062

SOURCE DESCRIPTION

SIC Code: 4922 - Natural Gas Transmission

Petersburg Station is a natural gas pipeline compressor station. Natural gas is received via gas pipelines from an upstream compressor station, compressed, and pumped into outlet pipelines for transmission to a downstream station. The natural gas is compressed using four reciprocating engines and one turbine. Auxiliary equipment at the facility includes an emergency generator, an air compressor, and one boiler.

The facility is a Title V major source of nitrogen oxides (NOx) and carbon monoxide. This source is located in an attainment area for all pollutants, and is a PSD major source. The facility was previously permitted under a minor NSR Permit issued on February 19, 1991 and amended on August 4, 1993, August 21, 1998 and October 29, 2008.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was conducted on January 18, 2007. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
15201	EO1	Cooper-Bessemer Model GMV-6-TFH Reciprocating Engine	7.4×10^6 Btu, 6,160 scf/hr and 800 BHP	NA			2/19/91 amended on 10/29/08
15202	EO2	Cooper-Bessemer Model GMV-6-TFH Reciprocating Engine	7.4×10^6 Btu, 6,160 scf/hr and 800 BHP	NA			2/19/91 amended on 10/29/08
15203	EO3	Cooper-Bessemer Model GMVA-6 Reciprocating Engine	7.4×10^6 Btu, 6,160 scf/hr and 800 BHP	NA			2/19/91 amended on 10/29/08
15204	EO4	Solar Saturn Model T1001S Turbine	16.6×10^6 Btu, 13,161 scf/hr and 1,185 HP	NA			2/19/91 amended on 10/29/08
15205	EO5	Waukesha Model L-7042G Reciprocating Engine	7.4×10^6 Btu, 5,840 scf/hr and 800 HP	Engelhard Corporation Model 40334 Catalytic Converter with a minimum control efficiency of 80%.		NOx	2/19/91 amended on 10/29/08
152G1	G1	Waukesha Model VSF11GSI Emergency Generator	2.0×10^6 Btu, 1,600 scf/hr and 219 HP	NA			2/19/91 amended on 10/29/08

*The Size/Rated capacity and PCD efficiency is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY

A copy of the 2007 annual emissions summary from the CEDS database is attached. Emissions are summarized in the following tables.

	2007 Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO_2	PM_{10}	NO_x
15201 - Cooper-Bessemer Model GMV-6-TFH Reciprocating Engine	0.92	3.21	0.01	0.34	25.18
15202 - Cooper-Bessemer Model GMV-6-TFH Reciprocating Engine	0.96	3.38	0.01	0.35	26.50
15203 - Cooper-Bessemer Model GMVA-6 Reciprocating Engine	0.76	2.66	0.01	0.28	20.83
15204 - Solar Saturn T1001S turbine	0.52	1.45	0.00	0.01	0.84
15205 - Waukesha Model L-7042G Reciprocating Engine	0.00	0.09	0.00	0.00	0.05
152G1 - Waukesha Model VSF11GSI Emergency Generator	0.22	1.29	0.00	0.02	0.86
TOTAL	**3.38**	**12.1**	**0.03**	**0.99**	**74.26**

Pollutant	2007 Hazardous Air Pollutant Emission in Tons/Yr
None	

EMISSION UNIT APPLICABLE REQUIREMENTS - (Units 15201, 15202, 15203, 15204, 15205, and 152G1)

The applicable requirements apply to four natural gas fired reciprocating engines, one turbine at the facility and one natural gas fired auxiliary generator. The generator was not included as a significant emissions unit in the Title V permit effective June 22, 1999, but was included as an insignificant source. The generator has applicable NSR permit requirements in the 2/19/91 Permit (amended on 10/29/08). This generator was permitted before the agency policy of assuming 500 hours of operation for emergency generators was issued. Therefore, the generator must be included as a significant emission unit with applicable requirements.

The following Virginia Administrative Codes and the following conditions from the new source review permit dated 2/19/91 and amended on 10/29/08 form the basis for the Title V permit conditions.

Limitations

III.A.1 (9 VAC 5-80-110 and Specific Condition 3 of 2/19/91 Permit amended 10/29/08)

The Waukesha Model L-7042G Reciprocating Engine (15205) shall be controlled by a catalytic converter providing a minimum control efficiency of 80%.

III.A.2 (9 VAC 5-80-110 and Specific Condition 2 of 2/19/91 Permit amended 10/29/08)

The Waukesha VSF11GSI Reciprocating Engine (152G1) shall be controlled by low NOx combustion.

III.A.3 (9 VAC 5-80-110 and Specific Condition 12 of 2/19/91 Permit amended 10/29/08)

The approved fuel for the compressor stations is natural gas only.

III.A.4 (9 VAC 5-80-110 and Specific Condition 4 of 2/19/91 Permit amended 10/29/08)

The sulfur content of the fuel shall not be in excess of 0.01 percent by weight.

III.A.5 (9 VAC 5-80-110 and Specific Condition 6 of 2/19/91 Permit amended 10/29/08)

Each engine shall not operate in excess of the following consumption limitations:

Unit	Make & Model	Annual (scf/yr)
15201	Cooper Bessemer GMV-6-THF	54,000,000
15202	Cooper Bessemer GMV-6-THF	54,000,000
15203	Cooper Bessemer GMVA-6	54,000,000
15204	Solar Saturn T1001S	115,000,000
15205	Waukesha L-7042G	51,000,000
152G1	Waukesha VSF11GSI	14,000,000

A letter from Columbia Gas dated March 17, 1999 states that during wintertime operation and during minor fluctuations in equipment operating conditions, the hourly fuel consumptions may be slightly (10-15%) higher than those listed in this original permit condition. The hourly fuel consumption rates are for informational purposes. Hourly emission rates are based on the maximum rated horsepower of the engines.

III.A.6 (9 VAC 5-80-110 and Specific Condition 7, 8, 9 and 10 of 2/19/91 Permit amended 10/29/08)

Emissions from each engine shall not exceed the following limits:

Make and Model		SO2		NOx			CO		VOC	
		lbs/hr	tpy	ppmvd@15% O2 & ISO ambient conditions	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
15201	Cooper Bessemer GMV-6-THF	---	---	---	19.4	85.0	2.5`	10.8	0.7	3.1
15202	Cooper Bessemer GMV-6-THF	---	---	---	19.4	85.0	2.5	10.8	0.7	3.1
15203	Cooper-Bessemer GMVA-6	---	---	---	19.4	85.0	2.5	10.8	0.7	3.1
15204	Solar Saturn T1001S	0.1	0.5	73.7	4.0	17.4	6.9	30.2	2.5	10.8
15205	Waukesha L-7042G	---	---	---	3.5	15.5	5.3	23.2	0.9	3.9
152G1	Waukesha VSF11GSI	---	---	---	3.9	16.9	14.7	64.5	0.1	0.4

Emission Limit Determination: The following demonstrates the equations used to determine the emission limitations. This demonstration includes the emission factors and the maximum capacities of the equipment. The results of the calculations show that the emissions are limited by throughput. Therefore, as along as the throughput conditions are not violated, the source should not exceed the emissions limitations.

15201, 15202, & 15203:

Given: All engines burn only pipeline quality natural gas.
The rating for each engine is 800 HP.
Emission factor source: manufacturer's guaranteed performance.

Equations: lbs/hr = (rated capacity)x(emission factor)x(453 gr/1 lb)
tons/yr = (lbs/hr listed above)x(8760 hrs/yr)(1 ton/2000 lbs)

Factors: NO_x = 11 grams/BHP-hr
CO = 1.4 grams/BHP-hr
VOC = 0.4 grams/BHP-hr

NO_x Emissions:

11 grams NOx/BHP-hr(800 BHP)(1 lb/453 gr) = **19.4 lbs NO_x/hr**
19.4 lbs/hr (8760 hr/yr)(1 ton/2000 lbs) = **85.0 tons NO_x/yr**

CO Emissions:
1.4 grams CO/BHP-hr(800 BHP)(1 lb/453 gr) = **2.5 lbs CO/hr**
2.5 lbs/hr (8760 hr/yr)(1 ton/2000 lbs) = **10.8 tons CO/yr**

VOC Emissions:

0.4 grams VOC/BHP-hr(800 BHP)(1 lb/453 gr) = **0.7 lbs VOC/hr**
0.7 lbs/hr (8760 hr/yr)(1 ton/2000 lbs) = **3.1 tons VOC/yr**

15204:

Given: The turbine burns only pipeline quality natural gas.
Contractually the pipeline quality natural gas must contain less than 0.01% sulfur by weight.
The rating for the turbine is 1185 HP and 13161 ft^3 natural gas/hr.
Emission factor source: manufacturer=s guaranteed performance for VOC, NO_x, and CO. For SO_2, the emissions limit is a mass balance.
Density of natural gas = 0.044 lbs/ft^3

Equations: lbs/hr = (rated capacity)x(emission factor)x(453 gr/1 lb)
(VOC, NO_x,& CO) tons/yr = (lbs/hr listed above)x(8760 hrs/yr)(1 ton/2000 lbs)

(SO_2) lbs/hr = (rated fuel input)x(fuel density)x(wt%S)x(64 lb/lbmoleSO_2/32 lb/lb mole S)
tons/yr = (lbs/hr listed above)x(8760 hrs/yr)(1 ton/2000 lbs)

Factors: NO_x = 1.52 grams/BHP-hr
CO = 2.64 grams/BHP-hr
VOC = 0.95 grams/BHP-hr

NO_x Emissions:

1.52 grams NOx/BHP-hr(1185 BHP)(1 lb/453 gr) = **4.0 lbs NO_x/hr**
4.0 lbs/hr (8760 hr/yr)(1 ton/2000 lbs) = **17.4 tons NO_x/yr**

CO Emissions:

2.64 grams CO/BHP-hr(1185 BHP)(1 lb/453 gr) = **6.9 lbs CO/hr**
6.9 lbs/hr (8760 hr/yr)(1 ton/2000 lbs) = **30.2 tons CO/yr**

VOC Emissions:

0.95 grams VOC/BHP-hr(1185 BHP)(1 lb/453 gr) = **2.5 lbs VOC/hr**
2.5 lbs/hr (8760 hr/yr)(1 ton/2000 lbs) = **10.8 tons VOC/yr**

SO_2 Emissions:

13161 ft^3/hr(0.044 lb/ft^3)(.0001 lb S/lb)(64 lb/lbmole SO_2/32 lb/lbmole S) = **0.1 lbs SO_2/hr**
0.1 lbs SO_2/hr(8760 hrs/yr)(1 ton/2000 lbs) = **0.5 tons SO_2/yr**

15205:

Given: The engine burns only pipeline quality natural gas.
The rating for the engine is 800 HP.
Emission factor source: manufacturer's guaranteed performance.
Catalytic converter has 80% control efficiency for NO_x.

Equations: lbs/hr = (rated capacity)x(emission factor)x(453 gr/1 lb)(1-Control Efficiency)

tons/yr = (lbs/hr listed above)x(8760 hrs/yr)(1 ton/2000 lbs)

Factors: NO_x = 10.0 grams/BHP-hr
CO = 3.0 grams/BHP-hr
VOC = 0.5 grams/BHP-hr

For this demonstration, the NOx emissions are assumed to be reduced by 80% from the catalytic converter.

NO_x Emissions:
10 grams NOx/BHP-hr(800 BHP)(1 lb/453 gr)(1-.8) = **3.5 lbs NO_x/hr**
3.5 lbs/hr (8760 hr/yr)(1 ton/2000 lbs) = **15.5 tons NO_x/yr**

CO Emissions:
3.0 grams CO/BHP-hr(800 BHP)(1 lb/453 gr) = **5.3 lbs CO/hr**
5.3 lbs/hr (8760 hr/yr)(1 ton/2000 lbs) = **23.2 tons CO/yr**

VOC Emissions:
0.5 grams VOC/BHP-hr(800 BHP)(1 lb/453 gr) = **0.9 lbs VOC/hr**
0.9 lbs/hr (8760 hr/yr)(1 ton/2000 lbs) = **3.9 tons VOC/yr**

III.A.7 (9 VAC 5-80-110 and Specific Condition 11 of 2/19/91 Permit amended 10/29/08)

The visible emissions from each unit/stack shall not exceed 5 percent opacity.

Conditions III.A.1, 2 and 3 were included in the Title V permit in order to make equipment maintenance a federally enforceable in lieu of periodic monitoring for opacity. The "EPA Draft Final Periodic Monitoring Guidance" dated May 11, 1998 specifically gives the example of turbines burning pipeline natural gas only, and states that federally enforceable requirements for equipment maintenance can satisfy the requirement for periodic monitoring of compliance with the opacity standard. Only 15204 is a turbine; however, this idea is extrapolated in this Title V permit to reciprocating engines since they burn only pipeline natural gas. Also, no violations of the opacity standard were noted in any source inspection reports.

III.A.8 (9 VAC 5-80-110 and Specific Condition 13 of 2/19/91 Permit amended 10/29/08)

The minimum stack height requirements are as follows:

Unit Id	Make and Model	Minimum Stack Height
15201	Cooper Bessemer GMV-6-THF	35 feet
15202	Cooper Bessemer GMV-6-THF	35 feet
15203	Cooper Bessemer GMVA-6	35 feet
15204	Solar Saturn T1000S	30 feet
15205	Waukesha L-7042G	20 feet

152G1	Waukesha VSF11GSI	35 feet

IIII.A.9 (9 VAC 5-80-110 and General Condition 9 of 2/19/91 Permit amended 10/29/08)

The permit includes a condition for maintaining records of all required training, operating procedures, and maintenance schedules. The procedures should include all manufacturers' recommendations, at a minimum.

Periodic Monitoring

The monitoring requirements from NSR permit have been modified to meet updated NSPS GG requirements.

III.B.1 (9 VAC 5-80-110 and Specific Condition 14 of 2/19/91 Permit amended 10/29/08)

a. Sulfur monitoring;

i. The sulfur content of the fuel must be determined using total sulfur methods ASTM D1072-80, 90 (Reapproved 1994); D3246-81, 92, 96; D4468-85 (Reapproved 2000); or D6667-01 (incorporated by reference in §60.17 and described in §60.335(b)(10). Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than 0.4 weight percent (4000 ppmw), the sulfur content of the fuel must be determined using the total sulfur methods ASTM D4084-82, 94, D5504-01, D6228-98, or Gas Processors Association Standard 2377-86 (all of which are incorporated by reference in §60.17).

ii. Should any sulfur analysis as required in item a.(i) above indicate noncompliance, the owner or operator shall notify the Director, Piedmont Region of such excess emissions and this semi-annual schedule shall be re-examined by the Department. Sulfur monitoring shall be conducted weekly during the interim period when this semi-annual schedule is being re-examined.

b. The owner or operator may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbines, if the gaseous fuel is demonstrated to meet the definition of natural gas in §60.331(u), regardless of whether an existing custom schedule approved by the administrator for subpart GG requires such monitoring. The owner or operator shall use one of the following sources of information to make the required demonstration:

i. The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or.

ii. Representative fuel sampling data indicating that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf as specified in Appendix D of 40 CFR Part 75 Section 2.3.1.4 or 2.3.2.4.

III.B.2 (5 VAC 5-80-110)
The periodic monitoring requirements for the catalytic converter controlling NOx emissions from unit 15205 was included to provide a reasonable assurance of compliance with the control requirements and emission limits associated with unit 15205. The catalytic converter is required to meet 80% reduction in emissions as specified in Condition III.A.1. The permittee suggested weekly monitoring for the size and specifications of the converter.

CAM Applicability

The facility was reviewed for applicability to the **C**ompliance **A**ssurance **M**onitoring Program (CAM). CAM applies to specific emission units at the facility that emit one or more regulated air pollutants, has uncontrolled emissions (PTE) above major source thresholds including any federally enforceable permit condition such throughput (but not including add on controls) for one or more pollutant, is subject to one or more emission limitations, and uses an add-on device to achieve the emission limitations.

As mentioned, unit 15205 uses a catalytic converter to reduce NOx emissions by 80% and achieve an emission limitation. However, the uncontrolled emissions (PTE) of NOx is less than the major source threshold. The following is the calculation previously shown demonstrating how the NOx emission limitation was determined for unit 15205:

Controlled NO_x Emissions:

10 grams NOx/BHP-hr(800 BHP)(1 lb/453 gr)(1-.8) = **3.5 lbs NO_x/hr**
3.5 lbs/hr (8760 hr/yr)(1 ton/2000 lbs) = **15.5 tons NO_x/yr**

The controlled emission calculation includes the 80% reduction efficiency of the catalytic converter. Below is the emission calculation without the catalytic converter:

Uncontrolled NO_x Emissions:

10 grams NOx/BHP-hr(800 BHP)(1 lb/453 gr) = **17.7 lbs NO_x/hr**
3.5 lbs/hr (8760 hr/yr)(1 ton/2000 lbs) = **77.4 tons NO_x/yr**

As demonstrated in the above calculation, the uncontrolled NOx emissions of 77.4 tons/yr is less than the major source threshold of 100 tons/year, and therefore **this emission unit is not subject to CAM**.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

IIII.C.1 (9 VAC 5-50-50, 9 VAC 5-80-110 and Specific Condition 15 of 2/19/91 Permit amended 10/29/08)

The permit requires records to be kept of all emissions data and operating parameters necessary to demonstrate compliance with the permit limits. These records include: hours of operation, throughput, sulfur analyses, measurements of temperature differential at the inlet and outlet of the catalytic converter, malfunction or shutdown of the catalytic converter, results of catalyst tests, malfunctions of equipment, operating procedures, maintenance schedules, and service records, and DEQ approved emission factors and equations to calculate facility emissions.

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

III.D.1 (9 VAC 5-170-160 and Specific Condition 18 of 2/19/91 Permit amended on 10/29/08)

If any of the sulfur analyses show non-compliance with the sulfur limit, the facility is required to report the excess emissions to the Department.

III.D.2 (9 VAC 5-170-160 and Specific Condition 18 of 2/19/91 Permit amended on 10/29/08)

The facility is required to report any change in fuel supply to the Department.

III.D.3 (9 VAc 5-80-110 and 9 VAC 5-50-50)

The permittee is required to report on a semi-annual basis all deviations from the tested operating parameters where the temperature differential is less than 80% of the temperature differential measured in the most recent compliance test. A testing requirement for the catalytic converter was included in the June 22, 1999 Title V permit (as Condition 12) since the stack test for unit 15205 did not contain inlet and outlet temperature information. The required testing was performed and submitted on January 18, 2000. This testing requirement was therefore removed during the processing of this Title V permit renewal.

Streamlined Requirements

The following conditions in the NSR permit dated 2/19/91 amended 10/29/08 have not been included for the reasons provided:

Condition 1: Condition 3 is an equipment listing. The facility equipment is listed in the Significant Emissions Unit table and the Insignificant emissions unit table.

All General permit conditions from the 2/19/91 Permit amended on 10/29/08 except for General Condition 20 were omitted because they were included in the Title V General Condition section.

General Condition 20 was included as Condition III.A.9 in the Title V because it was not included in the Title V General Conditions.

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

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §§2.1-20.01:2 and §§10.1-1185 of the *Code of Virginia,* and the "Department of Environmental Quality Agency Policy Statement NO. 3-2001".

This general condition cite(s) the Article(s) that follow(s):
Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

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

F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

J. Permit Modification

This general condition cites the sections that follow:
9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
9 VAC 5-80-190. Changes to Permits.
9 VAC 5-80-260. Enforcement.
9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources
9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas

9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:
9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction
9 VAC 5-80-110. Permit Content

Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follow:
40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.
40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.
40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:
9 VAC 5-60-70. Designated Emissions Standards
9 VAC 5-80-110. Permit Content

STATE ONLY APPLICABLE REQUIREMENTS

There are no Virginia Administrative Codes specific requirements only enforceable by the State in the NSR or Title V permits.

FUTURE APPLICABLE REQUIREMENTS

There are no known future applicable requirements the facility will be subject to at this time.

INAPPLICABLE REQUIREMENTS

The MACT standard for Oil and Natural gas Production Facility in 40 CFR Part 63, Subpart HH, and 9 VAC 5 Chapter 50 is not currently applicable. The facility is an area source for hazardous air pollutants, and therefore has no applicable requirements from the MACT.

New Source Performance Standard (NSPS) Requirements for Stationary Gas Turbines in 40 CFR Part 60, Subpart GG, and 9 VAC 5-40-410, are not currently applicable. Turbine 15204 was installed in 1963 - prior to the applicability date for this subpart.

COMPLIANCE PLAN

No compliance plan is required at this time.

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[1]	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
152A1	Air Compressor, natural gas fired	9 VAC 5-80-720 B.1.	NOx, CO, VOC, SO2, PM10, formaldehyde	20 hp
BLR1	Boiler #1, natural gas fired, heating system boiler	9 VAC 5-80-720 C.2.	NOx, CO, VOC, SO2, PM10	1.0 MMBtu/hr
A06	Used Compressor Oil Tank	9 VAC 5-80-720 C.3.	VOC	550 gallons
A07	Used Motor Oil Tank	9 VAC 5-80-720 C.3.	VOC	300 gallons
A08	Lube Oil Tank	9 VAC 5-80-720 C.3.	VOC	550 gallons
A09	Pipeline Liquids Tank	9 VAC 5-80-720 B.2.	VOC	300 gallons
A10	Pipeline Liquids Tank	9 VAC 5-80-720 B.2.	VOC	2,000 gallons
FUG	Fugitive Emissions (Equipment leaks and blowdowns)	9 VAC 5-80-720 B.2.	VOC	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

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit was placed in the *Progress-Index* newspaper of Petersburg on December 23, 2008 for the public notice. The 30-public notice expired on January 23, 2009. No comments were received. The 45-day EPA review was conducted concurrently with the 30-day public notice. The EPA review period ended on January 27, 2009. No comments were received from the EPA.