

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10900018-2022**
Application Received: **August 5, 2021**
Plant Identification Number: **03-54-109-00018**
Permittee: **Eastern Gas Transmission and Storage, Inc.**
Facility Name: **Oscar Nelson Compressor Station**
Mailing Address: **925 White Oaks Blvd, Bridgeport, WV 26330**

Physical Location:	Marianna, Wyoming County, West Virginia
UTM Coordinates:	445.76 km Easting • 4161.72 km Northing • Zone 17
Directions:	Take Interstate 77 South to the Mabscott/MacArthur exit. Turn south on State Route 16 and travel approximately 16 miles to Maben in Wyoming County. Turn right onto State Route 97 West and go 20.2 miles to Marianna. Turn Left at Phillips Coal Road off of Route 97 (Just before Turkey Creek Road). Go across the bridge crossing the Guyandotte River. Turn right at the end of the bridge and go 0.5 miles to the station.

Facility Description

Natural Gas Compressor Station, SIC Code – 4922. The facility is a production gathering station that services a transmission pipeline system to recompress natural gas flowing through a pipeline for transportation. It has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of six (6) 880 HP natural gas fired reciprocating engines, one (1) dehydrator reboiler, one (1) dehydration unit with flare, one (1) auxiliary generator, and five (5) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions
Carbon Monoxide (CO)	155.76	27.30
Nitrogen Oxides (NO _x)	1,518.78	256.62
Particulate Matter (PM _{2.5})	7.47	0.03
Particulate Matter (PM ₁₀)	7.47	0.28
Total Particulate Matter (TSP)	9.42	0.54
Sulfur Dioxide (SO ₂)	0.12	0.02
Volatile Organic Compounds (VOC)	124.91	21.81

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2020 Actual Emissions
Acetaldehyde	1.51	0.02
Acrolein	1.51	0.01
Benzene	0.54	0.05
Ethylbenzene	0.48	<0.01
Formaldehyde	7.24	1.26
Hexane	0.12	0.01
Toluene	0.75	0.02
Xylene	0.63	0.01
Total HAPs	12.78	1.39

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 155.76 TPY of CO, 1,518.78 TPY of NO_x, and 124.91 TPY of VOCs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Eastern Gas Transmission and Storage, Inc. 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	To Prevent And Control Particulate Air Pollution from Combustion Of Fuel In Indirect Heat Exchangers.
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	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction permits.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.
	40 C.F.R. Part 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	To Prevent And Control Fugitive Particulate Matter.

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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2626D	December 13, 2013	

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 is the fourth Title V renewal for this facility. There have been no changes to this facility since the last Title V Renewal.

1.1 Emission Units

- The old 2,700 gallon tank TK10 was replaced in 2018 with a new 4,200 gallon tank serving the same function. This storage vessel does not have the potential to emit 6 tpy or more of VOC and is therefore not an affected storage vessel under 40 C.F.R. 60 Subpart OOOOa.

3.0 Facility-Wide Requirements

- Updated to the most recent boiler-plate language. Non-boiler plate conditions did not change since there have been no changes to the underlying R13 permit (R13-2626D), 45CSR17 or the Emergency Operating Scenario.

4.0 Source-Specific Requirements [emission unit ID(s): REB1]

- There have been no changes to the underlying R13 permit (R13-2626D) and 45CSR2. Therefore, there were no changes made to this section.

5.0 Source-Specific Requirements [emission unit ID(s): DEHY1 and F2]

- There have been no changes to the underlying R13 permit (R13-2626D) nor any changes to the applicable requirements of 45CSR6, 40 C.F.R. 63 Subpart A, and 40 C.F.R. 63 Subpart HH.
- Conditions 5.1.10 and 5.2.5 from the previous Title V permit were not included in this permit. 45CSR§10-4.1 sets an in-stack sulfur dioxide concentration limit of 2,000 parts per million by volume, but 45CSR§10-4.1.e. exempts facilities from this limit if the potential to emit SO₂ is less than 500 lbs/year. Oscar Nelson Compressor station is exempt from 45CSR§10-4.1; reported facility-wide PTE of SO₂ is 240 lbs/year. (Note: 5.1.10. has an underlying R13 condition that is still in R13-2626D.)
- Conditions 5.1.11 and 5.2.6 from the previous Title V permit were not included in this permit. Pipeline-quality natural gas cannot contain more than 20 grains total sulfur per 100 cubic feet of gas, which is much less than 50 grains H₂S per 100 cubic feet of gas required under 45CSR§10-5.1. Therefore, Oscar Nelson Compressor station is not subject to 45CSR§10-5.1.

6.0 Source-Specific Requirements [emission unit ID(s): EN01, EN02, EN03, EN04, EN05, EN06 and AUX01]

- There have been no changes to the applicable requirements of 40 C.F.R. 63 Subpart ZZZZ for EN01, EN02, EN03, EN04, EN05, and EN06. There were minimal changes to the applicable requirements of 40 C.F.R. 63 Subpart ZZZZ for AUX01. These included removal of the vacated sections 40 C.F.R. §§63.6640 (f)(2)(ii) and (iii); and addition of requirements from 40 C.F.R. §63.6650(h).

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. 40 C.F.R. 60 Subpart JJJJ. The compressor engines (EN01 through EN06) are not subject to this subpart since they were manufactured pre 1947, before the applicability date.
- b. 40 C.F.R. 60 Subpart OOOO. This subpart does not apply to the facility since the facility is a gathering facility that does not have gas wells, centrifugal compressors, reciprocating compressors, and/or pneumatic controllers constructed, modified, or reconstructed after August 23, 2011, and on or before September 18, 2015.
- c. 40 C.F.R. 60 Subpart OOOOa. This facility has no equipment with applicable requirements under Subpart OOOOa. This subpart applies to equipment installed after September 18, 2015. Tank TK10, installed after this applicability date, does not meet the applicability requirements in 40 C.F.R. §63.5365a(e).
- d. 40 C.F.R. 63 Subpart HHH. This subpart does not apply to the facility since the facility is not a transmission or storage station and is not a major source of HAPs.
- e. 40 C.F.R. 63 Subpart DDDDD. The reboiler (REB1) is not subject to this subpart since the facility is not a major source of HAPs.
- f. 40 C.F.R. 63 Subpart JJJJJ. The reboiler (REB1) is not subject to this subpart since it is considered a

“process heater,” which is excluded from the definition of boiler in §63.11237.

- g. 40 C.F.R. 64. The facility does not have any pollutant specific emissions units (PSEU) that satisfied all of the applicability criteria requirements of 40 CFR §64.2(a). There have been no changes to any equipment at the facility since the last renewal that have resulted in a source satisfying the applicability requirements of 40 CFR §64.2(a) and becoming subject to CAM.

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: February 17, 2022

Ending Date: March 21, 2022

Point of Contact

All written comments should be addressed to the following individual and office:

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41286
Robert.A.Mullins@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)

Not applicable.