

Fact Sheet



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

Permit Number: **R30-03300014-2021**
Application Received: **January 11, 2021**
Plant Identification Number: **033-00014**
Permittee: **Eastern Gas Transmission and Storage, Inc.**
Facility Name: **Law Compressor Station**
Mailing Address: **925 White Oaks Blvd.**
Bridgeport, WV 26330

Physical Location: Good Hope, Harrison County, West Virginia
UTM Coordinates: 545.88 km Easting • 4335.35 km Northing • Zone 17
Directions: From Clarksburg take Route 19 South thru Good Hope for 11 miles.
Turn right across an iron bridge onto Two Lick Road. Go 1.1 miles then
turn right thru gate. Go 0.3 miles to station at top of hill.

Facility Description

Law Compressor Station is a natural gas gathering facility covered by Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of two (2) 660 HP natural gas fired reciprocating engines, two (2) 192.5 HP emergency generators, one (1) dehydrator reboiler, one (1) dehydration unit with a flare, and seven (7) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions
Carbon Monoxide (CO)	38.62	25.82
Nitrogen Oxides (NO _x)	259.40	173.47
Particulate Matter (PM _{2.5})	1.84	0.30
Particulate Matter (PM ₁₀)	1.84	0.53
Total Particulate Matter (TSP)	2.33	0.53
Sulfur Dioxide (SO ₂)	0.03	0.02
Volatile Organic Compounds (VOC)	100.70	60.73

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2020 Actual Emissions
Acetaldehyde	0.37	0.18
Acrolein	0.37	0.18
Benzene	0.27	0.17
Ethylbenzene	0.11	0.00
Formaldehyde	2.64	1.26
Hexane	0.14	0.15
Toluene	0.48	0.23
Xylene	0.66	0.14

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

Title V Program Applicability Basis

This facility has the potential to emit 259.40 TPY of NO_x and 100.70 tons per year of VOC. 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	Opacity Requirements for boilers
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur requirements for fuel burned

	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR Permits
	45CSR16	Standards of Performance for New Stationary Sources.
	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 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart HH	Oil and natural gas production facilities.
	40 C.F.R. Part 63, Subpart ZZZZ	Reciprocating internal combustion engines.
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	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 (<i>if any</i>)
G60-C041	10/13/2011	
R13-2963A	1/4/2016	

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

The changes to the Title V permit since the last renewal are as follows:

- Conditions 5.1.6 and 5.2.3 from the previous Title V permit were not included in this permit per the company's request. 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. Law Compressor station is exempt from 45CSR§10-4.1; reported facility-wide PTE of SO₂ is 60 lbs/year.

- Conditions 5.1.7 and 5.2.4 from the previous Title V permit were not included in this permit per the company's request. 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. Therefore, Law Compressor station is not subject to 45CSR§10-5.1.
- Per company's email on October 6, 2021, Emission Unit ID- CPR02 was removed from this permit because Emission Unit ID- CPR02 no longer exists at the facility.

Non-Applicability Determinations

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

- a. 45CSR§10-3 – To Prevent and Control Air Pollution from the Emissions of Sulfur Oxides: The flare (F1) is exempt from this section of the rule according to 45CSR§10-2.8; the flare does not meet the definition of a fuel-burning unit in 45CSR§10-2.8.
- b. 40 C.F.R. 60 Subpart JJJJ – The compressor engines (EN01 and EN02) and air compressor (CPR02) are not subject to this subpart since the engines were manufactured in 1973 and the air compressor in 1989, before the applicability date.
- c. 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 tanks, gas wells, centrifugal compressors, reciprocating compressors, and/or pneumatic controllers constructed, modified, or reconstructed after August 23, 2011.
- d. 40 CFR 60, Subpart OOOOa – This facility has no equipment with applicable requirements under Subpart OOOOa. This subpart applies to equipment installed after September 18, 2015. The facility has no affected emissions units that have been installed after the applicable Subpart OOOOa effective date.
- e. 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.
- f. 40 C.F.R. 63 Subpart DDDDD – The reboiler (RBR02) is not subject to this subpart since the facility is not a major source of HAPs.
- g. 40 C.F.R. 63 Subpart JJJJJ – The reboiler (RBR02) is not subject to this subpart since it is considered a "process heater," which is excluded from the definition of "boiler."
- h. 40 CFR Part 64 - Compliance Assurance Monitoring. There have been no changes in this permit since the previous renewal was issued, so CAM remains not applicable to any emission unit listed in the renewal application.

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: October 12, 2021
Ending Date: November 12, 2021

Point of Contact

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

Beena Modi

West Virginia Department of Environmental Protection

Division of Air Quality

601 57th Street SE

Charleston, WV 25304

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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)

None