

# Fact Sheet



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

Permit Number: **R30-01700100-2021**  
Application Received: **February 19, 2021**  
Plant Identification Number: **017-00100**  
Permittee: **Eastern Gas Transmission and Storage, Inc.**  
Facility Name: **Schutte Compressor Station**  
Mailing Address: **925 White Oaks Blvd; Bridgeport, WV 26330**

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Physical Location: Sedalia, Doddridge County, West Virginia  
UTM Coordinates: 534.46 km Easting • 4357.67 km Northing • Zone 17  
Directions: From the intersection of Rt. 50 and Rt. 98, go west on Rt. 50 for 9.9 miles to Rt. 23 North. Turn right onto Rt. 23 North, travel 19.5 miles on Rt. 23. Just past the Columbia Gas Office turn left onto gravel road and cross small bridge. Continue to station on the right.

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### Facility Description

Natural Gas Transmission Facility, 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. 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 and one (1) 600 HP natural gas fired reciprocating engine, two (2) 192.5 bhp emergency generators, one (1) dehydrator reboiler, one (1) dehydration unit still, one (1) dehydration unit still flare, one (1) pipeline heater and six (6) storage tanks of various sizes.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2020 Actual Emissions</b>
Carbon Monoxide (CO)	57.91	3.31
Nitrogen Oxides (NO <sub>x</sub> )	271.02	1.92
Particulate Matter (PM <sub>2.5</sub> )	2.67	1.19
Particulate Matter (PM <sub>10</sub> )	2.67	1.19
Total Particulate Matter (TSP)	3.39	1.19
Sulfur Dioxide (SO <sub>2</sub> )	0.04	0.02
Volatile Organic Compounds (VOC)	154.59	40.32

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2020 Actual Emissions</b>
Acrolein	0.54	0.09
Acetaldehyde	0.54	0.09
Benzene	0.21	0.04
Ethylbenzene	0.11	0.01
Formaldehyde	3.83	0.60
Hexane	0.29	0.06
Xylene	1.28	0.07
Toluene	0.36	0.05
Total HAPs	7.16	1.01

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

### Title V Program Applicability Basis

This facility has the potential to emit 271.02 TPY of NO<sub>x</sub> and 154.59 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 45CSR6 45CSR11 45CSR13 45CSR16	Opacity Requirements for boilers Open burning prohibited. Standby plans for emergency episodes. New Source Construction 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 45CSR34	Operating permit requirement. Emission Standards for HAPs
	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	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities
	40 C.F.R. Part 63, Subpart ZZZZ	National Emission 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 45CSR17	No objectionable odors. 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> )
R13-2778	11/03/2008	
G60-C033	06/27/2011	

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**

1. Emission Units Table 1.1 – to correct a mistake in the 2016 Title V permit renewal, control devices (1C and 2C) were moved from engines EN01 and EN02 to emergency generators EG01 and EG02 (respectively).

2. Section 3.0 – additional citations from General Permit G60-C and from permit R13-2778 were included for conditions 3.1.10, 3.1.11, 3.4.1 and 3.4.4. Also, added applicable requirements 4.2.2 and 4.2.4 as Title V conditions 3.4.5 and 3.4.6.
3. Condition 4.2.1 – added opacity monitoring requirement 45CSR§2-3.2 applicable to the Reboiler RBR01 and Pipeline Heater HTR01 to demonstrate compliance with the (10) percent opacity limit in condition 4.1.1 (45CSR§2-3.1).
4. Section 5.0 changes:  
  
Conditions 5.1.12 (45CSR§10- 4.1) and 5.2.5 (monitoring) - were removed from the permit for the following reason: 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 for SO<sub>2</sub> is less than 500 lbs/year. Schutte Compressor Station’s facility-wide PTE for SO<sub>2</sub> is 0.04 TPY or 80 lbs/yr, therefore it is exempt from the 45CSR§10-4.1.  
  
Conditions 5.1.13 (45CSR§10-5.1) and 5.2.6 (monitoring) - were not included in this permit for the following reason: Pipeline-Quality natural gas cannot contain more than 20 grains total sulfur per 100 cubic feet of gas, which is less than 50 grains H<sub>2</sub>S per 100 cubic feet of gas. Therefore, Schutte Compressor Station is not subject to 45CSR§10-5.1.
5. Condition 6.5.2.c – additional language from 40 C.F.R.§60.4245(d) regarding performance test reports was included.
6. Section 8.0 changes:  
  
Condition 8.1.1 – General Permit G60-C requirement 5.1.1 applicable to emergency generators EG01 and EG02 was added under condition 8.1.1.a (former requirement 8.1.1 was re-numbered to 8.1.1.b).  
  
Condition 8.1.2 – General Permit G60-C applicable requirement 5.1.3 regarding Maximum Fuel Consumption Limitation was added under condition 8.1.2 (remaining conditions in Section 8.1 were re-numbered).  
  
Condition 8.2.3.2 – vacated sections of the 40 C.F.R. 60 Subpart JJJJ (§ 60.4243(d)(2)(ii) and (d)(2)(iii)) were removed from this requirement.  
  
Condition 8.2.8 - General Permit G60-C applicable requirement 5.2.1 for Catalytic Oxidizer Control Devices was added.  
  
Condition 8.5.1 – 40 C.F.R. 60 Subpart JJJJ reporting requirement (40 C.F.R. §60.4245(e)) for the emergency generators EG01 and EG02 was updated according to the latest version of the rule (June 29, 2021).

### **Non-Applicability Determinations**

1. The following requirements has been determined not to be applicable to the subject facility and has been included in the Permit Shield (condition 3.7.2) due to the following:
  - a. 45CSR10 – Compressor engines (EN01 through EN03) have been excluded from the applicability of SO<sub>2</sub> and H<sub>2</sub>S limits since 45CSR10 is not applicable to compressor engines.
  - b. 40 C.F.R. 60 Subpart JJJJ – The compressor engines (EN01 and EN02) are not subject to this subpart since they were installed in 1985, 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 gas wells, centrifugal compressors, reciprocating compressors, tanks, and/or pneumatic controllers constructed, modified, or reconstructed after August 23, 2011 and on or before September 18, 2015.
  - d. 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. 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 (RBR01) and pipeline heater #1 (HTR01) are 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 (RBR01) and pipeline heater #1 (HTR01) are not subject to this subpart since they are considered process heaters, which are excluded from the definition of “boiler” in 40 C.F.R. §63.11237.
2. 40 C.F.R. 64 (CAM Rule) – this is the fourth Title V permit renewal for the Schutte Compressor Station. During this renewal no Pollutant Specific Emissions Units (PSEUs) were added to the facility, therefore CAM remains not applicable.

### **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: November 10, 2021  
Ending Date: December 10, 2021

### **Point of Contact**

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

Natalya V. Chertkovsky-Veselova  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
304/926-0499 ext. 41250  
natalya.v.chertkovsky@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.