

Fact Sheet



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

Permit Number: **R30-03900051-2022**
Application Received: **December 9, 2021**
Plant Identification Number: **03-54-039-00051**
Permittee: **Eastern Gas Transmission and Storage, Inc.**
Facility Name: **Cornwell Station**
Mailing Address: **925 White Oaks Blvd., Bridgeport, WV 26330**

Physical Location: Clendenin, Kanawha County, West Virginia
UTM Coordinates: 476.19 km Easting • 4,259.58 km Northing • Zone 17
Directions: From I-79, take exit 10 to WV State Route 4, then take Route 4 north to Clendenin, cross Elk River on Queen Shoals Road (Route 1). Turn left onto River Haven Road (Route 1/6) and proceed 2.5 miles to station.

Facility Description

Cornwell Station is a compressor facility that services a natural gas pipeline system. The compressor engines (EN07-EN19) at the facility receive natural gas flowing through a valve on the pipeline and recompresses the natural gas in order to further transport the natural gas through the pipeline system. Prior to exiting the facility through the pipeline, the compressed natural gas is processed by the dehydration unit (DEHY01). The dehydration unit removes moisture and impurities from the gas stream.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions
Carbon Monoxide (CO)	515.04	93.98
Nitrogen Oxides (NO _x)	3,301.00	272.92
Particulate Matter (PM _{2.5})	17.12	0.01
Particulate Matter (PM ₁₀)	17.12	0.99
Total Particulate Matter (TSP)	23.17	0.99
Sulfur Dioxide (SO ₂)	0.39	0.06
Volatile Organic Compounds (VOC)	451.61	87.48

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2020 Actual Emissions
Acetaldehyde	4.82	0.78
Acrolein	4.29	0.70
Benzene	1.35	0.31
Ethylbenzene	0.05	0.01
Formaldehyde	32.57	4.42
Hexane	0.66	0.11
Toluene	1.39	0.16
Xylenes	1.18	0.07
Total HAPs	46.31	6.55

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

Title V Program Applicability Basis

This facility has the potential to emit 515 tons per year of CO, 3,301 tons per year of NO_x, 452 tons per year of VOCs, and 33 tons per year of Formaldehyde. Due to this facility's potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP and over 25 tons per year of aggregate HAPs, Eastern Gas Transmission and Storage, Inc.'s Cornwell Station 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 WV Code § 22-5-4 (a) (14) 45CSR30 45CSR34 40 CFR Part 60, Subpart JJJJ 40 CFR Part 60, Subpart OOOO 40 CFR Part 61 40 CFR Part 82, Subpart F 40 CFR Part 63, Subpart HH 40 CFR Part 63, Subpart ZZZZ	PM emissions Open burning prohibited. Standby plans for emergency episodes. Construction Permits Performance Standards for New Stationary Sources The Secretary can request any pertinent information such as annual emission inventory reporting. Requirements for Operating Permits Emission Standards for HAPs NSPS for Internal Combustion Engines NSPS for Natural Gas Production, Transmission, and Distribution Asbestos inspection and removal Ozone depleting substances Natural Gas Production MACT Reciprocating Internal Combustion Engines MACT
State Only:	45CSR4 45CSR17	No objectionable odors. Particulate fugitive.

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>)
R13-2175D	April 30, 2012	N/A
R13-2346E	May 2, 2017	N/A

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 a renewal of Title V Operating Permit R30-03900051-2017, which was issued on June 12, 2017. Significant Modification Permit R30-03900051-2017 (SM01) was issued on August 23, 2021. Substantial changes consist of the following:

- 1) **Section 1.0** - In the table in Subsection 1.1. Emission Units, Natural Gas-fired Dehydration Unit Reboiler RBR01 was added because it had been inadvertently omitted during one of the previous permit renewal or modification application reviews.

Also, formerly permitted Horizontal Aboveground Ice Chek Tanks TK25 (230 gallons) and TK26 (130 gallons) were removed because they were replaced with a new Horizontal Aboveground Ice Chek Tank TK27 (330 gallons) that was installed in 2019.

- 2) **Title V Boilerplate changes**

- **Condition 2.11.4.** – The reference notation was changed from 45CSR§30-2.39 to 45CSR§30-2.40 because this definition was renumbered in 45CSR30.
- **Condition 2.22.1.** - The reference notation was changed to delete 45CSR38 because it has been repealed.
- **Condition 3.5.3.** - The EPA contact information and address were updated.

- 3) **Section 4.0** – The title was revised to add “emission point ID:” in order to match the current permit boilerplate language.

- 4) **Section 5.0** – The title was revised to add “emission point ID:” in order to match the current permit boilerplate language.

- **Condition 5.4.5.** – The reference notation was revised and 63.774(d)(1)(ii) was added.

- 5) **Section 6.0** – The title was revised to add “emission point ID:” in order to match the current permit boilerplate language.

- 6) **Section 7.0** – The title was revised to add “emission point ID:” in order to match the current permit boilerplate language.

- **Conditions 7.1.2., 7.1.3., 7.1.4, 7.1.5, 7.1.6., 7.1.8., 7.2.1., 7.2.2., 7.2.3., 7.3.1. and 7.4.1.** – The reference notations format were changed from “45CSR13 – R13-2175” to “45CSR13, R13-2175” to be consistent and match the rest of the permit.
- **Condition 7.2.1.** – The reference notation was revised to delete (b)(1) since it is not applicable.
- **Condition 7.3.1.g.** – Equation 5 was changed from $C_{icorr} = RF_1 \times C_{imeas}$ to $C_{icorr} = RF_1 \times C_{imeas}$ to correct a typo.
- **Subsection 7.4.** – The title was renamed from “Notification, Reporting, and Recordkeeping” to “Recordkeeping Requirements” in order to match the current permit boilerplate language. The reporting requirements have been moved to new Subsection 7.5. Reporting Requirements.
- **Condition 7.4.1.** – The language and reference notation were revised to be more clear. Under item a., the language was changed from “paragraphs a.1. through 4.” to “paragraphs a.1. through 3.” The reference notation was expanded from (a) to (a)(1), (a)(2), (a)(4) to be more specific.

- **Old Condition 7.4.4.** – This condition was moved to the new Section 7.5. Reporting Requirements because it contains reporting requirements.
- **Old Condition 7.4.5.** – This condition was renumbered from 7.4.5. to 7.4.4. (see above). Also, in the second paragraph, the word compressors was changed to compressor to correct a typo.
- **New Subsection 7.5. Reporting Requirements** – This new subsection was created in order to match the current permit boilerplate language. Old Condition 7.4.4. was moved here and renumbered as 7.5.1.

Non-Applicability Determinations

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

- a. 45 CSR 10 – Compressor engines (EN07 – EN19) have been excluded from the applicability of SO₂ and H₂S limits. WVDAQ determined that 45CSR10 is not applicable to compressor engines.
- b. 40 CFR 60 Subpart JJJJ – The compressor engines (EN07, EN08, EN10 – EN19) and auxiliary generator (AUX04) are not subject to this subpart since they were manufactured before the applicability date.
- c. 40 CFR 60 Subpart OOOOa – This subpart does not apply to the facility since the facility does not have gas wells, centrifugal compressors, reciprocating compressors, and/or pneumatic controllers constructed, modified, or reconstructed after September 18, 2015. In addition, there has been no increase in compression horsepower at the facility.
- d. 40 CFR 63 Subpart HHH – This subpart does not apply to the facility since the dehydration unit is located on the production section of the facility, which is not subject to this rule.
- e. 40 CFR 63 Subpart DDDDD – The reboiler (RBR01) is not subject to this subpart since the production facility is not a major source of HAPs.
- f. 40 CFR 63 Subpart JJJJJ – The reboiler (RBR01) is not subject to this subpart since it is considered a “process heater,” which is excluded from the definition of “boiler” in 40 CFR §63.11237.
- g. 40 CFR 64 – The facility does not have any pollutant specific emission units (PSEU) that satisfy all the applicability criteria requirements of 40 C.F.R. §64.2(a). There have been no changes to any equipment at the facility since the previous renewal was issued, so CAM remains non-applicable to the emission units 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 22, 2022
Ending Date: November 21, 2022

Point of Contact

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

Dan Roberts
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41902
Daniel.p.roberts@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)

On October 11, 2022, Gwendolyn Supplee of the EPA sent an email which stated the following: “EPA has reviewed the WV Draft/Proposed Title V Renewal for Cranberry Pipeline Corporation; Danville Station and we do not have any comments. Please forward the final permit once it has been issued by WVDEP.”

No comments were received from the company or the public.