

Fact Sheet



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

Permit Number: **R30-01700001-2024**

Application Received: **March 17, 2023**

Plant Identification Number: **017-00001**

Permittee: **Equitrans, L.P.**

Facility Name: **West Union Compressor Station #53**

Mailing Address: **550 Eagan Street, Charleston, WV 25301**

Physical Location:	West Union, Doddridge County, West Virginia
UTM Coordinates:	516.0 km Easting • 4,353.0 km Northing • Zone 17
Directions:	From Fairmont, take Interstate 79 south to the Clarksburg exit. Go to the end of ramp to stop sign and turn right onto U.S. Route 50 west. Follow U.S. Route 50 west approximately 25 miles. Make a right turn onto WV Route 18 north. Go approximately 5 miles and West Union station is on the right.

Facility Description

West Union Compressor Station #53 is a natural gas transmission facility covered by NAICS 486210 and SIC 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of three (3) 1080-hp natural gas internal combustion reciprocating engines, one (1) heating boiler, two (2) electric generators, one (1) dehydration unit with one (1) flare and one (1) dehydration unit with a thermal oxidizer, and seven (7) storage tanks 7,500 gallons or less containing oil, ambitrol, triethylene glycol, and pipeline condensates, separately.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2022 Actual Emissions
Carbon Monoxide (CO)	110.87	9.18
Nitrogen Oxides (NO _x)	483.55	23.66
Particulate Matter (PM _{2.5})	0.72	0.02
Particulate Matter (PM ₁₀)	0.72	0.02
Total Particulate Matter (TSP)	0.72	0.02
Sulfur Dioxide (SO ₂)	0.12	0.01
Volatile Organic Compounds (VOC)	17.75	1.71

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2022 Actual Emissions
Formaldehyde (HCHO)	6.02	0.29
Benzene	0.14	< 0.01
Toluene	0.15	< 0.01
Ethylbenzene	< 0.01	< 0.01
Xylene	0.07	< 0.01
n-Hexane	0.26	0.01
Other HAPs	2.05	0.00
Total HAPs	8.69	0.32

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

Title V Program Applicability Basis

This facility has the potential to emit 483.55 tons per year of Nitrogen Oxides and 110.87 tons per year of Carbon Monoxide. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Equitrans, L.P.'s West Union Compressor Station #53 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	PM limits for Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur Dioxide limits.

	45CSR11	Standby plans for emergency episodes.
	45CSR13	New source construction permit.
	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 Pursuant to 40 C.F.R. Part 63
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart HH	Natural gas Production MACT
	40 C.F.R. Part 63, Subpart ZZZZ	RICE MACT
	40 C.F.R. 64	Compliance Assurance monitoring (CAM)
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	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>)
R13-2565A	January 23, 2007	

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 renewal of the Title V permit. The following changes to the Title V permit were made as part of this renewal:

- ❖ There have been no changes to equipment or emission units since the last permit Renewal.
- ❖ 40 C.F.R. 64 – Since the last renewal, there have not been any changes in equipment at this facility that affected 40 CFR 64 Compliance Assurance Monitoring (CAM) applicability. The CAM requirements contained in Title V Sections 5.0 and 6.0 remain unchanged.
- ❖ Title V Boilerplate changes:
 - **Condition 2.1.3** - The section of Rule 30 that defines Secretary changed in a previous version of Rule 30 and we failed to update this condition. Also, in the recently revised Rule 30, the word "such" was removed.

- **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.
 - **Conditions 2.17, 3.5.7, and 3.5.8.a.1** - The section for Emergency was removed and replaced with Reserved in condition 2.17. Section 5.7 of Rule 30 which pertained to emergencies and affirmative defense was removed in the revised Rule 30.
 - **Condition 3.5.4** - Under the revised Rule 30, certified emissions statements are no longer required to be submitted. Facilities have been submitting their emissions data in SLEIS and paying fees based on their SLEIS submittal, so this requirement was no longer needed.
 - **Condition 3.5.8.a.2** - Under the revised Rule 30, "telefax" was replaced with "email".
- ❖ Condition 3.1.9 for fugitive emissions was added as a facility-wide requirement.
- ❖ Added monitoring requirement 4.2.1 and testing requirement 4.3.1. for the indirect heat exchangers BLR, BLR01, and BLR02.

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 Dc – *Boiler NSPS* - The boilers at West Union station are below 10 mmBtu/hr.
- b. 40 C.F.R. 60 Subpart GG – *Standards of Performance for Stationary Gas Turbines* - There are no turbines at West Union Station.
- c. 40 C.F.R. 60 Subparts K, Ka – *Standards of Performance for Storage Vessels for Petroleum Liquids* - All tanks at West Union station are less than 40,000 gallons in capacity.
- d. 40 C.F.R. 60 Subpart Kb - *Standards of Performance for Volatile Organic Liquid Storage Vessels* - All tanks at West Union station are below 75 m³ in capacity.
- e. 40 C.F.R. 60 Subpart KKK – *Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant* - West Union station is not engaged in the extraction of natural gas liquids from field gas or in the fractionation of mixed natural gas liquids to natural gas products.
- f. 40 C.F.R. 60 Subpart LLL – *Standards of Performance for Onshore Natural Gas Processing: SO₂ Emissions* - There are no sweetening units at West Union station.
- g. 40 C.F.R. 60 Subpart IIII – *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* - The engines at West Union Station are not stationary compression ignition (CI) internal combustion engines (ICE).
- h. 40 C.F.R. 60 Subpart JJJJ – *Stationary Spark Ignition Internal Combustion Engines* - This subpart applies to manufacturers, owners, and operators of stationary spark ignition internal

combustion engines (ICE) that have been constructed, reconstructed, or modified after various dates, the earliest of which is June 12, 2006. All of the spark ignition ICE engines at the West Union Station, including emergency generators, were installed prior to 2006 (latest installation date is 1974) and have not been modified or reconstructed, and therefore the requirements of this subpart do not apply.

- i. 40 C.F.R. 60 Subpart OOOO – *Oil and Natural Gas Production, Transmission, and Distribution* - This subpart applies to affected facilities that have been constructed, reconstructed, or modified after August 23, 2011. All emission units at the West Union Station, including tanks, were installed prior to August 23, 2011 and have not been modified or reconstructed, and therefore the requirements of this subpart do not apply.
- j. 40 C.F.R. 63 Subpart DDDDD – *Industrial, Commercial, and Institutional Boilers and Process Heaters* - This MACT standard applies to industrial, commercial, and institutional boilers and process heaters of various sizes and fuel types at major sources of HAP emissions. The West Union Station is an area source of HAP emissions. Therefore, this subpart is not applicable.
- k. 40 C.F.R. 63 Subpart JJJJJ – *Industrial, Commercial, and Institutional Boilers* - This MACT standard applies to industrial, commercial, and institutional boilers at area sources of HAP. All boilers at the West Union Station fire natural gas exclusively. Natural gas fired boilers are exempt from the rule per 40 C.F.R. §63.11195(e). Therefore, this rule is not applicable to boilers at the West Union Station.
- l. 45 CSR 21: *To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds*: The West Union Compressor Station is not located in Cabell, Kanawha, Putnam, Wayne, nor Wood counties.
- m. 45CSR27 – *To Prevent and Control the Emissions of Toxic Air Pollutants*: Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

None

Comment Period

Beginning Date: January 10, 2024

Ending Date: February 9, 2024

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
Phone: 304/926-0499 ext. 41283 • Fax: 304/926-0478
Beena.j.modi@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)

None.