

Fact Sheet



For Draft/Proposed Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 13, 2022.

Permit Number: **R30-10300006-2022**
Application Received: **September 18, 2024**
Plant Identification Number: **03-54-103-00006**
Permittee: **Eastern Gas Transmission and Storage, Inc.**
Facility Name: **Hastings Compressor Station**
Mailing Address: **925 White Oaks Blvd., Bridgeport, WV 26330**

Permit Action Number: *SM01* Revised: *Draft/proposed*

Physical Location: Pine Grove, Wetzel County, West Virginia
UTM Coordinates: 528.09 km Easting • 4377.66 km Northing • Zone 17
Directions: From Clarksburg take Route 20 North approximately 37 miles to Hastings Station on left side of the road

Facility Description

Hastings Compressor Station is a natural gas 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. This facility (compressor station) includes three adjacent facilities covered by this Title V permit. The facilities and their associated equipment are as follows:

- 1) Hastings Station - production facility (underlying permit R13-3249C):
 - two (2) 500 HP Cooper GMXE-6 engines (EN01 and EN02),
 - one (1) 7.5 mmscf/day glycol dehydration unit (DEHY01) with flare (DEHY1),
 - one (1) 0.55 MMBtu/hr dehydration unit reboiler (RBR02),
 - one (1) natural gas fired auxiliary generator rated at 128HP for emergency use (AUX06),

one (1) 722 bhp Ajax DPC-2804-LE reciprocating compressor engine (EN06) (will replace EN01 & EN02),
four (4) aboveground storage tanks (TK2, TK3, TK6, TK7),
one (1) 10.0 MMBtu/hr natural gas heater* (HTR01) (Carnegie Warehouse, Gate Site 427/XS 2239). **This heater will be replaced with the 12.48 MMBtu/hr natural gas heater (H1) as described in this modification.*

2) Mockingbird Hill Station - transmission facility (Underlying permits R13-2555C and R14-0033):

two (2) 87 HP Capstone Microturbines (AUX02 and AUX03),
one (1) 80 HP Capstone Microturbine (AUX04),
one (1) 8,175 HP Solar Taurus 60 Turbine (TUR02),
one (1) 1.25 MMBtu/hr natural gas boiler (BLR02),
three (3) aboveground storage tanks (TK1 – TK3).

(expansion site permitted under R14-0033 in 2018, but planned for future installation):
two (2) Solar Titan 130 Combustion Turbines / Compressors 21,765 HP each (CT-01 and CT-02),
one (1) 755 HP natural gas-fired Auxiliary Emergency Generator (EG-01),
one (1) 8.72 MMBtu/hr natural gas-fired boiler (WH-1),
two (2) aboveground storage tanks (pipeline fluids Tank TK4, hydrocarbon Tank TK5).

3) Lewis Wetzel Station - transmission facility (underlying permit - R13-2870A):

one (1) 3,550 HP Caterpillar Model G3612TA Compressor Engine (EN03),
one (1) 530 HP Cummins Model KTA19G Auxiliary Generator (AUX05),
one (1) 4.5 MMBtu/hr natural gas fired boiler (BLR05),
six (6) above ground storage tanks (TK1 – TK6).

Emissions Summary

This modification results in the following emission changes:

Regulated Pollutants	Change in PTE (tpy)	New PTE (tpy)
CO	+0.92	136.04
NO _x	+1.10	265.69
PM _{2.5}	+0.06	13.57
PM ₁₀	+0.06	13.57
PM	-0.24	15.23
VOC	+0.06	60.86
Total HAPS	+0.02	14.88

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 265.69 tons/year of NO_x and 136.04 tons/year of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Eastern Gas Transmission and Storage, Inc.'s Hastings Compressor 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.

The modification to 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
45CSR10	Control of Sulfur Dioxide Emissions from Indirect Heat Exchangers.
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60
45CSR30	Requirements For Operating Permits
40 C.F.R 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

State Only:

NA

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

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-3692	December 9, 2024	

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 significant modification (SM01) is for the replacement of an existing 10 MMBtu/hr natural gas fired pipeline heater with a 12.48 MMBtu/hr natural gas fired pipeline heater as permitted under R13-3692.

Changes to the permit include but are not limited to the following:

Note: COA means citation of authority in the following discussion.

1) Title V Boilerplate changes

- Condition 2.1.3. – Revised to reflect Rule 30 (45CSR30) revisions.
- Condition 2.11.4. – The COA has been corrected.
- Condition 2.17. – Deleted and marked as reserved to reflect Rule 30 revisions.
- Condition 2.22.1. – The COA has been updated to remove 45CSR38 which has been repealed.
- Condition 3.1.6. – Revised the COA to the current version of the WV Code.
- Condition 3.3.1. – Revised the COA to the current version of the WV Code.
- Condition 3.3.1.b. – Added “If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit shall be revised in accordance with 45CSR§30-6.4 or 45CSR§30-6.5 as applicable.”
- Condition 3.5.3. – This condition was revised to update the US EPA mailing address.
- Condition 3.5.4. – Revised as revised in Rule 30.
- Condition 3.5.7. – Deleted and marked as reserved to reflect Rule 30 revisions.
- Condition 3.5.8.a.1. – Deleted and marked as reserved to reflect Rule 30 revisions.
- Condition 3.5.8.a.2. – Revised as revised in Rule 30.

2) Section 1.1. - Emission Units Table:

- Added the new pipeline heater H1 and added “(Note – This heater will be removed within 60 days after initial startup of the heater H1 in accordance with Condition 4.1.2)” to the description for the existing pipeline heater 005-01.

3) Section 1.2. – Added R13-3692 to the table.

4) Section 3.0

- Condition 3.4.1. – Added R13-3692, 4.4.1. to the COA
- Condition 3.7.2. – Added the pipeline heater (H1) to 3.7.2.d., 3.7.2.e. and 3.7.2.f.

5) Section 4.0

- Revised the section title to add “H1” emission point IDs.
- Condition 4.1.1. Added the requirements of permit R13-3692 condition 4.1.1. and deleted the existing 45CSR2 (Rule 2) requirements applicable to HTR01.
 - Added streamlining language to 4.1.1.d. for compliance with the Rule 2 PM allowable limit.

- Added streamlining language to 4.1.1.i. for compliance with the Rule 10 allowable limit. The 45CSR10 (Rule 10) allowable limit is 38.69 lb/hr. The H1 heater PTE is 0.01 lb/hr. Therefore, by ensuring the heater PTE via limiting the amount of fuel consumed, compliance with the Rule 10 allowable limit can be assured.
- Updated the COA.
- Condition 4.1.2. Added the requirements of permit R13-3692 condition 4.1.2. and deleted the existing Rule 10 requirement applicable to HTR01. Also updated the COA.
- Condition 4.1.3. – Revised this condition to include all of the existing applicable requirements for the operation of heater HTR01 until it is removed within 60 days after initial startup of the pipeline heater H1.
- Condition 4.4.1 – The language of this condition has been revised to that of permit R13-3692 condition 4.2.1. and the COA has been revised accordingly. The COA has also been revised to include the applicable citations from 40 CFR 60 subpart Dc, Rule 2, and Rule 2A. Streamlining language has been added that will ensure compliance with the record retention requirement of 40 CFR §60.48c(i).

The existing language has been identified as being applicable to heater HTR01 until the heater is removed in accordance with condition 4.1.2.

- Condition 4.5.1. – Added the requirements of permit R13-3692 condition 4.5.1.
- Condition 4.5.2. – Added notification requirements of 40 CFR §60.48c(a).

6) REGULATORY APPLICABILITY

- 45CSR2 - The pipeline heater H1 is natural gas-fired with a design heat input of 12.48 MMBtu/hr. It is defined as a “Type ‘b’” fuel burning unit subject to this rule. The heater is subject to the following requirements:
 - Opacity Limit of 10% (45CSR§2-3.1.)
 - PM allowable weight emission standard of the product of 0.09 and the total design heat input. The PM allowable limit equates to 1.12 lb/hr (45CSR§2-4.1.2.). The heater PM potential to emit is 0.02 lb/hr. This PTE is the PM limit in permit R13-3692. Therefore, by meeting the 0.02 lb/hr PM limit in condition 4.1.1.d. of R13-3692, compliance with the Rule 2 allowable limit will be assured. Streamlining language has been included in condition 4.1.1.d. of the Title V permit.
 - Pursuant to 45CSR§2-8.4.2., since the heater combusts only natural gas, it is exempt from the Testing and Monitoring requirements of §8.1.1. (i.e., for opacity and the PM lb/hr limits) and monitoring requirements of §8.2. (i.e., for opacity). Since the heater is exempt from §8.2., it is not required to have a monitoring plan set forth in §8.2.1. and therefore, the recordkeeping requirements of §8.3.1. and §8.3.2. are not applicable.
- 45CSR10 - The pipeline heater H1 is natural gas-fired with a design heat input of 12.48 MMBtu/hr. It is defined as a “Type ‘b’” fuel burning unit subject to this rule. The facility is located in Wetzel County WV and therefore is located in “Priority II Region” as defined in Table 45-10A of Rule 10. The heater is subject to the following requirements:
 - SO₂ allowable weight emission standard of the product of 3.1. and the total design heat input. The SO₂ allowable limit equates to 38.69 lb/hr (45CSR§10-3.1.5.). The heater SO₂ potential to emit is 0.01 lb/hr. Permit R13-3692 does not contain an SO₂ limit but does contain a requirement ensuring the maximum heat input of 12.48 MMBtu/hr by limiting the flow rate of

the natural gas to the heater. Therefore, by meeting the flow rate limit in R13-3692 condition 4.1.1.i., the PTE of 0.01 lb/hr will be met and compliance with the Rule 10 allowable limit will be assured. Streamlining language has been included in the Title V permit in condition 4.1.1.i.

- Pursuant to 45CSR§10-10.3., since the heater combusts only natural gas, it is exempt from the Testing, Monitoring, Recordkeeping and Reporting requirements of Section 8 of Rule 10.
- 40 CFR 60 Subpart Dc – The pipeline heater H1 is defined as a steam generating unit, construction commenced after June 9, 1989, and it has a maximum design heat input capacity of less than 100 MMBtu/hr but greater than 10 MMBtu/hr. Therefore, H1 is subject to this subpart pursuant to 40 CFR §60.40c(a). Since the heater only combusts natural gas and this subpart does not contain emission standards for natural gas-fired steam generator units, the only requirements applicable to the heater are the notification requirements of 40 CFR §60.48c(a) and the recordkeeping requirements of 40 CFR §§60.48c(g) and (i).
 - The applicable requirements of §60.48c(a) have been included in condition 4.5.2.
 - The applicable requirements of §60.48c(g) have been included in condition 4.4.1.
 - The applicable requirements of §60.48c(i) have been streamlined with the requirements of condition 3.4.2. via the requirements in condition 4.4.1. The streamlining language has been added in condition 4.4.1.

Non-Applicability Determinations

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

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|------------------------------------|---|
| 40 CFR 63
Subpart DDDDD | <i>National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters</i> – The facility is not a major source of HAP emissions and therefore this subpart is not applicable. |
| 40 CFR 63
Subpart JJJJJ | <i>National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources</i> – The pipeline heater H1 is defined as a “Process Heater” pursuant to 40 CFR §63.11237. Process heaters are explicitly excluded from the definition of a “boiler” pursuant to §63.11237 and are not affected sources under Subpart JJJJJ. Therefore, this subpart is not applicable to the pipeline heater H1. |
| 40 CFR Part 64 | <i>Compliance Assurance Monitoring</i> – The new heater is not equipped with add on control devices and does not meet the applicability requirements of §64.2(a)(2) or (a)(3). |

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: March 5, 2025
Ending Date: April 4, 2025

Point of Contact

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

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/414-1910
frederick.tipane@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.