

Fact Sheet



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

Permit Number: **R30-00900138-2023**
Application Received: **March 1, 2022**
Plant Identification Number: **03-54-009-00138**
Permittee: **Appalachia Midstream Services, L.L.C.**
Facility Name: **Mountaineer Compressor Station**
Mailing Address: **100 Teletech Drive, Suite 2, Moundsville, WV 26041**

Physical Location: Wellsburg, Brooke County, West Virginia
UTM Coordinates: 540.414 km Easting • 4,454.812 km Northing • Zone 17
Directions: *From Main St. in Wellsburg:* 1) Head east on 10th St ~0.7 mi; 2) Continue onto Washington Pike (WV-27) ~5.8 mi; 3) Turn right onto Bealls Ridge Rd (WV-88) ~1.0 mi; 4) Turn left onto McAdoo Ridge Rd (CR-24) ~0.1 mi; 5) Destination is on the right.
From Main St in Bethany: 1) Head north on Bealls Ridge Rd (WV-88) 4.1 mi; 2) Turn right onto McAdoo Ridge Rd (CR-24) ~0.1 mi; 3) Destination is on the right.

Facility Description

The Appalachia Midstream Services, L.L.C., Mountaineer Compressor Station is covered by Standard Industrial Classification (SIC) 1389. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day, fifty-two (52) weeks per year. The facility compresses and dehydrates up to 200 MMscf of locally produced natural gas per day. Additionally, raw field condensate is received at the site, stabilized, and then sent off site via tanker trucks or pipeline. The primary equipment includes: four (4) natural gas compressors, and one (1) natural gas dehydrator, with flash tank, regenerator/still and reboiler. The auxiliary equipment includes: one (1) microturbine generator, two (2) units for pigging operations, and eight (8) storage tanks for stabilized condensate and produced water.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]			
Regulated Pollutants	Potential Emissions	2021 Actual Emissions	
		From the Fact Sheet for the Draft Permit (October 21, 2022)	Corrected¹
Carbon Monoxide (CO)	73.98	11.19	11.07
Nitrogen Oxides (NO _x)	108.32	47.57	47.58
Particulate Matter (PM _{2.5})	7.82	4.67	4.68
Particulate Matter (PM ₁₀)	7.82	4.67	4.68
Total Particulate Matter (TSP)	7.82	4.67	4.68
Sulfur Dioxide (SO ₂)	0.75	0.31	0.31
Volatile Organic Compounds (VOC)	158.20	57.38	55.51

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2021 Actual Emissions	
		From the Fact Sheet for the Draft Permit (October 21, 2022)	Corrected¹
Acetaldehyde	2.75	1.84	1.84
Acrolein	1.69	1.13	1.13
Benzene*	0.34	0.59	0.17
Butadiene, 1,3	0.09	0.06	0.06
Ethylbenzene	0.61	0.05	0.04
Formaldehyde	4.24	1.12	1.12
Hexane	2.24	1.05	1.31
Methanol	0.96	0.55	0.55
Polycyclic Organic Matter (POM/PAH)	0.13	0.08	0.08
Toluene	1.32	0.41	0.26
TMP, 2,2,4 (i-octane)	0.54	0.06	0.06
Xylenes	3.88	1.46	0.54
Other/Trace HAPs	0.11	N/A	N/A
Total HAPs	18.90	8.40	7.16

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

¹The gas analysis Appalachia Midstream Services, L.L.C. used to prepare the emissions inventory submitted to WV DAQ's Emissions Inventory Section for their 2021 actual emissions was found to be inaccurate, particularly for HAP components. They ultimately identified an issue with gas chromatograph runs that were done during the time period of Mountaineer's 2021 sample. They were able to later re-process the chromatographs and submitted corrections to the WV DAQ's Emissions Inventory Section for their 2021 actual emissions.

Title V Program Applicability Basis

This facility has the potential to emit 108.32 tpy of NO_x and 158.20 tpy of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Appalachia Midstream Services, L.L.C. 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	To Prevent And Control Particulate Air Pollution from Combustion Of Fuel In Indirect Heat Exchangers.
	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Admin. Updates, Temporary Permits, General Permits, Permission to Commence Construction and Procedures for Evaluation.
	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 60, Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced after September 18, 2015.
	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 for Oil and Natural Gas Production Facilities.
	40 C.F.R. Part 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines.
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	To Prevent And Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage And Other Sources Of 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>)
R13-3482	March 17, 2020	

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 following are the state rule and federal regulation determinations and justifications for this initial Title V permit:

1. 45CSR2 (Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers)

The purpose of 45CSR2 is to establish emission limitations for smoke and particulate matter which are discharged from fuel burning units. 45CSR2 states that any fuel burning unit that has a heat input under ten (10) million B.T.U.'s per hour is exempt from sections 4 (weight emission standard), 5 (control of fugitive particulate matter), 6 (registration), 8 (testing, monitoring, recordkeeping, reporting) and 9 (startups, shutdowns, malfunctions). However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date.

The individual heat input of the reboiler (11E) is below 10 MMBTU/hr. Therefore, this unit is exempt from the aforementioned sections of 45CSR2.

Appalachia Midstream Services (AMS) is subject to the opacity requirements in 45CSR2, which is 10% opacity based on a six minute block average.

2. 45CSR6 (To Prevent and Control Air Pollution from the Combustion of Refuse)

The purpose of this rule is to prevent and control air pollution from combustion of refuse.

AMS has one (1) thermal oxidizer (T-Ox) and two (2) flares (FLR-01 - 02) at the facility. These units are subject to section 4, emission standards for incinerators. These units have negligible hourly particulate matter emissions. Therefore, these units should demonstrate compliance with 45CSR§6-4.1.

The opacity requirements of 45CSR§§6-4.3 and 4.4 for Thermal Oxidizer (T-Ox) have been streamlined into the no visible emissions requirement of condition 5.1.2.f. under which compliance is shown via the testing specified in condition 5.3.1.

Flares FLR-01 and FLR-02 are subject to the opacity requirements of 45CSR§§6-4.3 and 4.4 which have been streamlined into the no visible emissions requirements of conditions 7.1.6.v and 8.1.5.v. Compliance of which is demonstrated via the testing required under conditions 7.3.1 and 8.3.1.

3. 45CSR10 (To Prevent and Control Air Pollution from the Emissions of Sulfur Oxides)

The purpose of 45CSR10 is to establish emission limitations for sulfur dioxide which are discharged from fuel burning units. 45CSR10 states that any fuel burning unit that has a heat input under ten (10) million B.T.U.'s per hour is exempt from sections 3 (weight emission standard), 6 (registration), 7 (permits), and 8 (testing, monitoring, recordkeeping, reporting). However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date.

The individual heat input of the reboiler (11E) is below 10 MMBTU/hr. Therefore, this unit is exempt from the aforementioned sections of 45CSR10.

4. 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)

The applicable requirements of Permit R13-3482 have been incorporated into the Title V permit. The following conditions that pertained to initial notifications, reporting and or testing have been satisfied and therefore not included in the Title V permit: 11.2.1, 12.2.1, 12.2.2, and 13.1.1.

The underlying R13 permit appears to have a typo in R13 permit condition 8.1.6.viii (closed vent system) which references condition 8.1.8 (emission limits for the flare) instead of 8.1.7 (closed vent systems). This reference was corrected in the Title V permit.

The underlying R13 permit appears to have a typo in R13 permit condition 8.4.2. (pilot flame recordkeeping) which references 8.2.2. (closed-vent system monitoring) instead of 8.2.1 (pilot flame monitoring). This reference was corrected in the Title V permit.

The underlying R13 permit appears to have a typo in R13 permit conditions 8.4.5.iii and 9.4.6.iii which reference parts that have been designated as “unsafe to inspect” in conditions 8.2.2.(d) and 9.2.2.(d) when they should reference 8.2.2.(c) and 9.2.2.(c). These references were corrected in the Title V permit.

R13 Permit Condition 10.4.2 is for stationary SI internal combustion engines that must comply with the emission standards specified in 40 C.F.R. §60.4233(f). 40 C.F.R. §60.4233(f) specifies emissions standards for any modified or reconstructed stationary SI ICE. Engines (CE-01 – CE-04) have not been modified or reconstructed, thus R13 permit condition 10.4.2 is not applicable to the engines and has not been included in the Title V permit.

R13 Permit Condition 10.4.4 is for stationary SI internal combustion engines with maximum engine power greater than or equal to 500 HP that are manufactured after July 1, 2007 and before July 1, 2008, and must comply with the emission standards specified in 40 C.F.R. §60.4233(b) or (c). Engines (CE-01 – CE-04) were not manufactured between July 1, 2007 and July 1, 2008 and are not subject to the emission standards specified in 40 C.F.R. §60.4233(b) or (c); therefore, R13 permit condition 10.4.4 has not been included in the Title V permit.

R13 Permit Condition 10.6.1.b specifies recordkeeping requirements for emergency stationary ICE. Engines (CE-01 – CE-04) are non-emergency stationary ICE; therefore, this R13 condition does not apply to the engines and has not been included in the Title V permit.

5. 45CSR16 (Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60)

45CSR16 applies to this source by reference of 40 C.F.R. 60, Subparts JJJJ and OOOOa. These requirements are discussed under those rules below.

6. 45CSR34 (Emission Standards for Hazardous Air Pollutants)

45CSR34 applies to this source by reference of 40 C.F.R. 63, Subpart ZZZZ. These requirements are discussed under that rule below.

7. 40 C.F.R. 60 Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (SI ICE))

40 C.F.R. 60 Subpart JJJJ establishes emission standards for applicable SI ICE.

The 5,000 hp Caterpillar G3616LE RICEs (CE-01 – CE-04) were manufactured after the July 1, 2007 date for engines with a maximum rated power capacity greater than or equal to 500 hp. These engines are subject to the following emission limits: NO_x – 1.0 g/hp-hr (11.02 lb/hr); CO – 2.0 g/hp-hr (22.05 lb/hr); and VOC – 0.7 g/hp-hr (7.72 lb/hr). Based on the manufacturer’s specifications for these engines, the emission standards will be met.

These engines are not certified by the manufacturer to meet the emission standards listed in 40 C.F.R. 60 Subpart JJJJ. Therefore, AMS will be required to conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or three (3) years, whichever comes first, to demonstrate compliance.

8. 40 C.F.R. 60 Subpart OOOOa (Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced after September 18, 2015)

EPA published its New Source Performance Standards (NSPS) and air toxics rules for the oil and gas sector on August 16, 2012. EPA published amendments to the Subpart on September 23, 2013 and June 3, 2016. 40CFR60 Subpart OOOOa establishes emission standards and compliance schedules for the control of the pollutant greenhouse gases (GHG). The greenhouse gas standard in this subpart is in the form of a limitation on emissions of methane from affected facilities in the crude oil and natural gas source category that commence construction, modification or reconstruction after September 18, 2015. This subpart also establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO₂) emissions from affected facilities that commence construction, modification or reconstruction after September 18, 2015. The effective date of this rule is August 2, 2016.

- a. Each well affected facility, which is a single natural gas well.

There are no wells at this facility. Therefore, all requirements regarding gas well affected facilities under 40 CFR 60 Subpart OOOOa do not apply.

- b. Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals that is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. For the purposes of this subpart, your centrifugal compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

There are no centrifugal compressors at the Mountaineer Compressor Station. Therefore, all requirements regarding centrifugal compressors under 40 CFR 60 Subpart OOOOa do not apply.

- c. Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. For the purposes of this subpart, your reciprocating compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

There are reciprocating compressors located at the Mountaineer Compressor Station that were constructed after September 18, 2015. Therefore, the requirements regarding reciprocating compressors under 40 CFR 60 Subpart OOOOa will apply. AMS will be required to perform the following:

- Replace the reciprocating compressor rod packing at least every 26,000 hours of operation or 36 months or installation of a rod packing emissions collection system.
- Demonstrate initial compliance by continuously monitoring the number of hours of operation or track the number of months since the last rod packing replacement.
- Submit the appropriate start up notifications.

- Submit the initial annual report for the reciprocating compressors.
- Maintain records of hours of operation since last rod packing replacement, records of the date and time of each rod packing replacement, and records of deviations in cases where the reciprocating compressor was not operated in compliance.

d. Pneumatic Controllers

- Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 scfh which commenced construction after August 23, 2011, and is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not located at a natural gas processing plant.
- Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller which commenced construction after August 23, 2011, and is located at a natural gas processing plant.

All pneumatic controllers at the facility are air driven. Therefore, there are no applicable pneumatic controllers which commenced construction after September 18, 2015. Therefore, all requirements regarding pneumatic controllers under 40 CFR 60 Subpart OOOOa do not apply.

- e. Each storage vessel affected facility, which is a single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment.

40CFR60 Subpart OOOOa defines a storage vessel as a unit that is constructed primarily of non-earthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provides structural support and is designed to contain an accumulation of liquids or other materials. The following are not considered storage vessels:

- Vessels that are skid-mounted or permanently attached to something that is mobile (such as trucks, railcars, barges or ships), and are intended to be located at a site for less than 180 consecutive days. If the source does not keep or are not able to produce records, as required by §60.5420(c)(5)(iv), showing that the vessel has been located at a site for less than 180 consecutive days, the vessel described herein is considered to be a storage vessel since the original vessel was first located at the site.
- Process vessels such as surge control vessels, bottoms receivers or knockout vessels.
- Pressure vessels designed to operate in excess of 204.9 kilopascals and without emissions to the atmosphere.

The potential for VOC emissions must be calculated using a generally accepted model or calculation methodology, based on the maximum average daily throughput for a 30-day period of production prior to the applicable emission determination deadline specified in §60.5365a(e). The determination may take into account requirements under a legally and practically enforceable limit in an operating permit or other requirement established under a federal or state authority. For each storage vessel affected facility that emits more than 6 tpy of VOC, the permittee must reduce VOC emissions by 95% or greater within 60 days of startup.

The condensate storage vessels located at the Mountaineer Compressor Station are controlled by a flare which will reduce the potential to emit to less than 6 tpy of VOC. Therefore, AMS is not required by this section to further reduce VOC emissions by 95%.

- f. The group of all equipment, except compressors, within a process unit is an affected facility.
- Addition or replacement of equipment for the purpose of process improvement that is accomplished without a capital expenditure shall not by itself be considered a modification under this subpart.
 - Equipment associated with a compressor station, dehydration unit, sweetening unit, underground storage vessel, field gas gathering system, or liquefied natural gas unit is covered by §§60.5400a, 60.5401a, 60.5402a, 60.5421a and 60.5422a of this subpart if it is located at an onshore natural gas processing plant. Equipment not located at the onshore natural gas processing plant site is exempt from the provisions of §§60.5400a, 60.5401a, 60.5402a, 60.5421a and 60.5422a of this subpart.
 - The equipment within a process unit of an affected facility located at onshore natural gas processing plants and described in §60.5365a(f) are exempt from this subpart if they are subject to and controlled according to subparts VVa, GGG or GGGa of this part.

The Mountaineer Compressor Station is not a natural gas processing plant. Therefore, Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants do not apply.

- g. Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.
- Each sweetening unit that processes natural gas is an affected facility; and
 - Each sweetening unit that processes natural gas followed by a sulfur recovery unit is an affected facility.
 - Facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H₂S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423a(c) but are not required to comply with §§60.5405a through 60.5407a and §§60.5410a(g) and 60.5415a(g) of this subpart.
 - Sweetening facilities producing acid gas that is completely reinjected into oil-or-gas-bearing geologic strata or that is otherwise not released to the atmosphere are not subject to §§60.5405a through 60.5407a, 60.5410a(g), 60.5415a(g), and 60.5423a of this subpart.

There are no sweetening units at the Mountaineer Compressor Station. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOOa do not apply.

h. Pneumatic Pumps

The pneumatic pump requirements apply only to natural gas processing facilities and well sites. Therefore, all requirements regarding pneumatic pumps under 40 CFR 60 Subpart OOOOa do not apply to the Mountaineer Compressor Station.

i. Collection of fugitive emission components at a well site.

There are no wells at this facility. Therefore, all requirements regarding collection of fugitive emission components at gas well affected facilities under 40 CFR 60 Subpart OOOOa do not apply.

j. Collection of fugitive emission components at a compressor station.

The rule requires quarterly leak monitoring at natural gas compressor stations. In addition to optical gas imaging (OGI), the rule allows owners/operators to use Method 21 with a repair threshold of 500 ppm as an alternative for finding and repairing leaks. Method 21 is an EPA method for determining VOC emissions from process equipment. The method utilizes a portable VOC monitoring instrument.

9. 40 C.F.R. 63 Subpart HH (National Emission Standards for Hazardous Air Pollutants for Oil and Natural Gas Production Facilities)

Subpart HH establishes national emission limitations and operating limitations for HAPs emitted from oil and natural gas production facilities located at major and area sources of HAP emissions. The glycol dehydration unit at the Mountaineer Compressor Station is subject to the area source requirements for glycol dehydration units. However, because the facility is an area source of HAP emissions and the actual average benzene emissions from the glycol dehydration unit is below 0.90 megagram per year (1.0 tons/year) it is exempt from all requirements of Subpart HH except to maintain records of the actual average benzene emissions to demonstrate a continuous exemption status.

10. 40 C.F.R. 63 Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines)

Subpart ZZZZ establishes national emission limitations and operating limitations for HAPs emitted from stationary RICE located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations. The requirements for a new stationary RICE located at an area source of HAPs, is to meet the standards of 40 C.F.R. 60 Subpart JJJJ. These requirements were outlined above under 40 C.F.R. 60 Subpart JJJJ.

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 GG (Standards of Performance for Stationary Gas Turbines).** Subpart GG applies to all stationary gas turbines with a heat input at peak load equal to or greater than 10 million BTU per hour based on the lower heating value of the fuel (§60.330(a)). Since the microturbine generator at the Mountaineer Compressor Station has a heat input rating less than 10 million Btu per hour, Subpart GG does not apply.

- b. **40 C.F.R. 60 Subpart KKKK (Standards of Performance for Stationary Combustion Turbines).** Subpart KKKK applies to all stationary combustion turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005 (40 CFR §60.4305(a)). Since, the Capstone C1000 Microturbine Generator (GT) is comprised of five (5) individual microturbines and each microturbine has a heat input at peak load less than 10.7 gigajoules (10 million Btu) per hour, Subpart KKKK does not apply.
- c. **40 C.F.R. 63 Subpart YYY Y** (National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines). Subpart YYY Y applies to stationary combustion turbines located at major sources of HAP emissions (§63.6080). Because the Mountaineer Compressor Station is not a major source of HAP emissions, this Subpart is not applicable.
- d. **Compliance Assurance Monitoring (CAM)**
This rule does apply to the dehydrator (DFT and DSV) because it is subject to emission limits for VOCs and HAPs, has a control device to achieve compliance with these limits, and the potential pre-control device emissions of VOCs and HAPs exceed 100 TPY and 25 TPY, respectively. However, since the post-control device emissions of VOCs and HAPs are less than the Title V Major Source Thresholds, the dehydrator falls under the category of “Other PSEUs” in 40 C.F.R. §64.5(b).” Therefore, the creation and implementation of a Compliance Assurance Monitoring (CAM) plan is deferred until submission of an application for renewal of the Title V Operating Permit .

This rule does not apply to Compressor Engines (CE-01 through CE-04) because they are subject to 40 C.F.R. 60 Subpart JJJJ and are therefore exempt as specified in 40 C.F.R. §64.2(b)(1)(i).

This rule does not apply to any other pollutant-specific emissions unit (PSEU) at the facility because none have pre-control device potential emissions equal to or greater than the Title V Major Source Thresholds as specified in 40 C.F.R. §64.2(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: October 21, 2022
Ending Date: December 27, 2022 (extended because of the public hearing on December 15, 2022)

Point of Contact

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

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41286
Robert.A.Mullins@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)

Public Comments

Public notice for the Draft Title V Permit was published in *The Brooke County Review* on October 21, 2022. During the public comment period, a request for a public hearing was received and the request was granted by the Director. Notice of the public hearing was published in *The Brooke County Review* and the *Weirton Daily Times* on November 11, 2022. The public hearing was held on December 15, 2022. The written comment period for the Draft Permit was extended to December 27, 2022.

The West Virginia Division of Air Quality (WV DAQ) received written comments during the public comment period (October 21, 2022 through December 27, 2022) and oral comments during the December 15, 2022 public hearing. Comments were received by and/or on behalf of the following individuals, groups, and organizations.

- Regina Lindsey-Lynch and Edward Lynch
- Christopher J. Paull
- Yuri Gorby, FreshWater Accountability Project (FWAP)
- Anais Peterson, Earthworks
- Missi Canterbury

Pursuant to §45-30-6.8.e, all comments received during the public comment period and during the public hearing have been reviewed and are addressed in the Response to Public Comments for R30-00900138-2023 dated February 9, 2023.

EPA Suggestions

During the public comment period, Gwendolyn Supplee and Justin Leary from US EPA Region III (EPA) requested a copy of the manufacturer's guarantee letter and operating specifications for the thermal oxidizer (T-Ox). After review of the manufacturer's guarantee letter, EPA suggested that WV DAQ specify the manufacturer's minimum operating temperature of the thermal oxidizer's combustion chamber in the permit instead of incorporating the temperature by reference. The minimum operating temperature for the thermal oxidizer's combustion chamber was specified in existing condition 5.1.2.c. Conditions 5.2.3, 5.4.9 and 5.4.10 were also added for monitoring and maintaining records of the combustion chamber temperature and residence time and for maintaining a copy of the manufacturer's operating and maintenance specifications.