

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on May 24, 2021.

Permit Number: **R30-05100157-2021(MM02)**
Application Received: **October 17, 2022**
Plant Identification Number: **03-54-051-00157**
Permittee: **Williams Ohio Valley Midstream LLC**
Facility Name: **Oak Grove Gas Plant**
Mailing Address: **100 Teletech Drive; Suite 2; Moundsville, WV 26041**

Permit Action Number: *MM02* Revised: *March 7, 2023*

Physical Location: Moundsville, Marshall County, West Virginia
UTM Coordinates: 526.25 km Easting • 4,413.81 km Northing • Zone 17
Directions: From Lafayette Ave in Moundsville, head East onto 12th St ~ 1.1 miles.
Continue onto Fork Ridge Rd ~5.4 miles. Site entrance is on the left.

Facility Description

This natural gas processing facility is designed to process 755 million standard cubic feet per day (MMscf/day) of incoming natural gas. The facility will receive natural gas from upstream production wells and send it to one (1) of three (3) cryogenic process trains (TXP-1, TXP-2, and TXP-3) where ethane (C₂H₆), propane (C₃H₈), and natural gas liquids (NGLs) are removed leaving residue gas. The residue gas is sent to a natural gas transmission pipeline or can be used as fuel gas on site. The ethane, propane, and NGLs are sent to the deethanizer where ethane is removed. This facility operates under SIC Code 1321.

This modification is based on the permit R13-3070E, and covers the following changes:

- An increase in the number of process piping components at the facility and the resulting VOC/HAP fugitive emissions.

- Correction of the rating of the existing Olympian G150LG2 standby generator engine from 224 bhp to 230 bhp.

Emissions Summary

This modification results in the following emission changes:

Pollutant	R13-3070E PTE Change for Oak Grove (Tons/Year)	Oak Grove Revised PTE (Tons/Year)	Francis Compressor Station PTE (Tons/Year)	Facility-Wide PTE (Tons/Year)
NO _x	+0.01	120.38	6.66	127.05
CO	+0.01	190.90	3.89	194.79
VOC	+0.70	111.37	23.11	134.48
PM ₁₀	+0.01	10.68	0.49	11.18
SO ₂	+<0.01	0.76	0.03	0.79
Total HAPs	+0.06	19.24	2.68	21.91

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 127.05 TPY NO_x, 194.79 TPY CO, and 134.48 TPY VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Williams Ohio Valley Midstream LLC 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:	45CSR13	NSR Permit
	45CSR16	Standards of Performance for New Stationary Sources.
	45CSR30	Operating permit requirement.
	40 C.F.R. 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. 60 Subpart OOOO	Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015

State Only: None.

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>)
R13-3070E	November 22, 2022	

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 revisions were made as part of this modification:

1. Emission Units Table 1.1. - Corrected the design capacity of the standby generator GEN-1 from 224 hp to 230 hp. The correction of the GEN-1 design capacity did not change the 40 C.F.R. 60 subpart JJJ requirements included in section 6.0.
2. Updated the citations for boilerplate conditions 2.11.4 and 2.22.1.
3. Updated the US EPA address in condition 3.5.3.
4. Modified the design capacity and fuel usage limits of GEN-1 in condition 6.1.1.
5. Modified the emission limits of GEN-1 in condition 6.1.2.
6. Modified the design capacity of GEN-1 in condition 6.1.3

Note: The only change due to the increase in the number of process piping components at the facility is a change in the facility's PTE. The applicable requirements for those components are already in the permit.

Non-Applicability Determinations

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

None.

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: Not Applicable for minor modifications.
Ending Date: N/A

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)

Not applicable.