

# Fact Sheet



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

Permit Number: **R30-02100002-2021**  
Application Received: **June 19, 2020**  
Plant Identification Number: **03-54-02100002**  
Permittee: **Eastern Gas Transmission and Storage, Inc.**  
Facility Name: **Jones Compressor Station**  
Mailing Address: 925 White Oaks Blvd.  
Bridgeport, WV 26330

*Revised: N/A*

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Physical Location:	Lockney, Gilmer County, West Virginia
UTM Coordinates:	502.87 km Easting • 4300.26 km Northing • Zone 17
Directions:	Interstate 79 to Burnsville Exit 79. Take Rt. 5 west. Go 15.1 miles to junction of Rt.33/119. Turn left and go 1.1 miles to Glenville stoplight. Continue through on Rt.33/119 south for 13 miles to Jones Compressor Station on left.

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### Facility Description

Jones 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. The station consists of two (2) 660-hp natural gas fired reciprocating engines, one (1) 112.2-hp gas fired emergency generator, one (1) 7.0 mmcf/day dehydration unit with flare, and seven (7) storage tanks of various sizes.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2019 Actual Emissions</b>
Carbon Monoxide (CO)	42.06	11.65
Nitrogen Oxides (NO <sub>x</sub> )	259.41	125.84
Particulate Matter (PM <sub>2.5</sub> )	0.3	0.01
Particulate Matter (PM <sub>10</sub> )	0.5	0.16
Total Particulate Matter (TSP)	0.97	0.17
Sulfur Dioxide (SO <sub>2</sub> )	0.03	0.01
Volatile Organic Compounds (VOC)	63.91	18.68

*PM<sub>2.5</sub> and PM<sub>10</sub> are a components of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2019 Actual Emissions</b>
Acetaldehyde	0.37	0.12
Acrolein	0.37	0.12
Benzene	0.27	0.06
Ethylbenzene	0.57	0.01
Formaldehyde	1.78	0.58
Hexane	0.24	0.06
Toluene	0.71	0.08
Xylene	1.69	0.08

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

### Title V Program Applicability Basis

This facility has the potential to emit 259.41 tons per year of NO<sub>x</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Eastern Gas Transmission and Storage, Inc. 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	Opacity Requirements for boilers
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur requirements for fuel burned

	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits For Construction, Modification
	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 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.
	40 C.F.R. Part 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
	40 C.F.R. Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	Control 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> )
R13-2669B	September 10, 2012	

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 changes and updates have been made to the Title V permit during this renewal:

The name of the company was changed to Eastern Gas Transmission and Storage, Inc.

### Section 3.0 Facility-wide Requirements

- Permit conditions 3.5.3, 3.5.5, and 3.5.6 were updated to match the most recent boilerplate.
- “State-Enforceable only” was added to the citation for permit condition 3.1.9.

### Section 5.0 Source-Specific Requirements [D1]

- Permit conditions 5.1.3.b and 5.2.4 were included in the CAM plan for Dehydration unit (D1) at the recommendation of USEPA.

### **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 OOOO** –The facility is a gathering facility that has tanks constructed, modified, or reconstructed after August 23, 2011, and on or before September 18, 2015, but this subpart does not apply since the tanks have potential emissions less than 6 tons of VOC per year.
- b. **40 C.F.R. 63 Subpart HHH** – This subpart does not apply to the facility since the facility is not a transmission or storage facility and is not a major source of HAPs.
- c. **40 C.F.R. 63 Subpart DDDDD** – The reboiler (RB01) is not subject to this subpart since it is not a major source of HAPs.
- d. **40 C.F.R. 63 Subpart JJJJJ** – The reboiler (RB01) is not subject to this subpart since it is considered a “process heater,” which is excluded from the definition of “boiler”.
- e. **45 CSR 10** – Compressor engines (EN01 and EN02) have been excluded from the applicability of SO<sub>2</sub> and H<sub>2</sub>S limits. WVDEP determined that 45 CSR 10 is not applicable to compressor engines.
- f. **40 CFR 60 Subpart JJJJ** – The compressor engines (EN01 and EN02) are not subject to this subpart since they were installed in 1965.
- g. **40 CFR 60 Subpart OOOOa** – This subpart does not apply to the facility since the facility is a gathering facility that has tanks constructed, modified, or reconstructed after August 23, 2011 that are below 6 tons VOC/yr.

### **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 25, 2021  
Ending Date: April 26, 2021

### **Point of Contact**

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

Nikki Moats  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 41282  
Nikki.B.Moats@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)**

In the draft/proposed permit, it was determined the Dehydration unit (D1) was not subject to the requirements of 40 CFR 64 (CAM) because the Title V permit already specified “a continuous compliance determination method” (conditions 5.1.3.c and 5.2.2) by monitoring for the presence or absence of the flare pilot flame using a thermocouple; therefore, the CAM requirements and citations were removed. The DAQ received comments on this permit from the USEPA on April 22, 2021 regarding the removal of the CAM plan from the permit, and requesting it be reinstated into the permit with additional CAM monitoring added in permit conditions 5.1.3.b and 5.2.4.

The comments provided by USEPA are as follows:

WVDEP conducted an evaluation for the continued applicability of CAM as part of the Title V operating permit renewal. The CAM regulations are found at 40 CFR Part 64. WVDEP determined that Conditions 5.1.3.c and 5.2.2 in the draft Title V permit constitute a continuous compliance determination method, as defined in 40 CFR Part 64.1 and that Jones Compressor is exempt from CAM per 40 CFR Part 64.2(b)(1)(vi).

EPA Comment:

The definition of *Continuous compliance determination method* at 40 CFR Part 64.1 means a method, specified by the applicable standard or an applicable permit condition, which: (1) Is used to determine compliance with an emission limitation or standard on a continuous basis, consistent with the averaging period established for the emission limitation or standard; and (2) Provides data either in units of the standard or correlated directly with the compliance limit.

1. EPA does not believe that monitoring flame presence in the flare whenever emissions are being vented to the flare constitutes a continuous compliance determination method that ensures compliance with the VOC emission limit on a continuous basis; therefore, Jones Compressor is not exempt from CAM. CAM requirements should be included in the renewed Title V Operating Permit for Jones Compressor.
2. The prior CAM Plan for the facility contained in Permit No. R30-02100002-2015 had monitoring for the presence of a flame in the flare as the required monitoring for CAM. While flame presence is an indicator of operation of the flare, it isn't the best indicator of emission control performance for the control device. The monitoring design criteria for CAM found at 40 CFR Part 64.3(a)(1) identifies indicators of performance may include, but are not limited to, direct or predicted emissions such as visible emissions or opacity. EPA

recommends that Condition Nos' 5.1.3.b and 5.2.4 from Permit No. R30-02100002-2015 be included as CAM Plan conditions in the renewed Title V Operating Permit.

In response to these comments, the CAM plan for monitoring the flare pilot flame was added back into the permit, and the additional CAM requirements for monitoring visible emissions from the flare (conditions 5.1.3.b and 5.2.4) were added as well.