

Fact Sheet



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

Permit Number: **R30-10300009-2022**
Application Received: **November 8, 2021**
Plant Identification Number: **10300009**
Permittee: **Eastern Gas Transmission and Storage, Inc.**
Facility Name: **Hastings Extraction Plant**
Mailing Address: **925 White Oaks Blvd., Bridgeport, WV 26330**

Physical Location:	Pine Grove, Wetzel County, West Virginia
UTM Coordinates:	528.64 km Easting • 4377.66 km Northing • Zone 17
Directions:	From Clarksburg take Route 20 North approximately 37 miles to Hastings. Facility is on left side of the road.

Facility Description

Hastings Extraction Plant is a natural gas liquids extraction and fractionation facility. Propane and heavier components of natural gas are removed through a turbo-expander cryogenic process. The heavier hydrocarbons are fractionated into the products propane, isobutane, n-butane, and natural gasoline. The SIC code for this facility is 1321.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions*	2021 Actual Emissions
Carbon Monoxide (CO)	40.6	13.18
Nitrogen Oxides (NO _x)	69.89	15.93
Particulate Matter (PM _{2.5})	5.42	1.38
Particulate Matter (PM ₁₀)	5.42	1.38
Total Particulate Matter (TSP)	5.42	1.38
Sulfur Dioxide (SO ₂)	0.38**	0.13
Volatile Organic Compounds (VOC)	558.27	245.1

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2021 Actual Emissions
Acetaldehyde	0.02	< 0.01
Acrolein	0.01	< 0.01
Benzene	0.2	< 0.01
Ethylbenzene	<0.01	< 0.01
Formaldehyde	0.08	0.02
Hexane	3.89	0.45
Toluene	0.3	< 0.01
Xylene	0.12	< 0.01
TOTAL HAPs	4.63***	< 0.53

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

* The previous permit significant modification (SM01) included the removal of the Waukesha Firewater pump engine (EN04) from the Emission Units Table 1.0, but the PTE changes resulting from this removal were not reflected in the facility-wide PTE. Therefore, the following PTE reductions from the removal of EN04 were included in this Emissions Summary Table: -10.25 TPY of CO, -13.14 TPY of NO_x, -0.07 TPY of PM_{2.5}, -0.07 TPY of PM₁₀, -0.07 TPY of TSP, -2.06E-03 TPY of SO₂, and -2.37 TPY of VOC.

** For this renewal the ultra-low sulfur diesel fuel was used to calculate the PTE for SO₂ emissions from the three diesel Firewater pump engines (EN01, EN02 and EN03), since EPA restricted the sulfur content in diesel fuel to 15 ppm sulfur for both nonroad and highway diesel in 2014 (and all diesel available for sale today is ultra-low sulfur). As a result, the facility-wide PTE for SO₂ was significantly reduced compared to the previous permit renewal.

*** According to the previous permit significant modification (SM01) Fact Sheet, the PTE for Total HAPs increased by 3.3 TPY (compared to the previous renewal PTE for HAPs of 1.44 TPY), but this increase didn't reflect the removal of the Waukesha Firewater pump engine (EN04). As a result of the EN04 removal, the PTE for Total HAPs increased by only 3.19 TPY compared to the previous renewal.

Title V Program Applicability Basis

This facility has the potential to emit 558.27 TPY of VOCs. Due to this facility's potential to emit over 100 tons per year of VOCs, 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	Particulate Matter Requirements for boilers
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur Oxide requirements
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Pre-construction permit
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40CFR60
	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	HAPs emissions standards
	40 C.F.R. Part 60, Subpart Dc	Small Industrial-Commercial-Institutional Steam Generating Units
	40 C.F.R. Part 60, Subpart Kb	Volatile Organic Liquid Storage Vessels
	40 C.F.R. Part 60, Subpart IIII	Standards of Performance for Stationary Ignition Internal Combustion Engines
	40 C.F.R. Part 60, Subpart KKK	Equipment leaks of VOC from Onshore Natural Gas Processing Plants
	40 C.F.R. Part 60, Subpart VV ¹	Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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.

¹Requirements incorporated by reference in 40 CFR 60, Subpart KKK.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2468E	August 18, 2021	

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

Since the previous Title V permit renewal (approved on May 8, 2017), the following changes have taken place:

1. The significant modification (SM01) was issued 01/19/2022 (based on the permit R13-2468E). It incorporated the compliance plans of Consent Orders CO-R13-E-2015-13 and CO-R13,30-E-2018-08. It included installation in 2012 of a closed vent system with a vapor recovery unit (VRU-1) for product recovery (vapor condensing and pumping to Hastings Extraction Process (HEP) for fractionation) during NGL Railcar Loading Operations and to control VOCs, and the addition of the existing 2,936-gal Knockout Tank (V-2195) at Hastings Electric Compressor Station (HECS). The Consent Order CO-R13-E-2015-13 was issued on June 26, 2015, to resolve the compliance issue of the company failing to obtain a permit for the expansion of the Galmish Loadout Facility. Later the company self-reported violations of CO-R13-E-2015-13 for venting 250 tons VOCs to the atmosphere that were collected by the vapor recovery system at the Galmish Loadout Facility through an unmonitored bypass device, and which resulted in issuance of Consent Order CO-R13, 30-E-2018-08 on August 16, 2018. The Consent Order CO-R13-E-2015-13 was terminated on August 18, 2021, upon the issuance of the permit R13-2468E, because requirements contained in the Order were completed. The Consent Order CO-R13, 30-E-2018-08 was closed on January 7, 2021, upon completion of the requirements contained in the Order.
2. Condition 3.5.3 – EPA's address was revised.
3. Condition 3.7.2 – permit shield for 40 C.F.R. 60, Subpart OOOOa was added per company's request. The facility has no equipment with applicable requirements under 40 C.F.R. 60, Subpart OOOOa because there are no affected emissions units that have been installed after September 18, 2015.
4. Condition 6.1.2 – removed vacated sections of 40 C.F.R. 63 Subpart ZZZZ *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* (§63.6640(f)(2)(ii) and (iii)).
5. Condition 6.5.2 – added the reporting requirements of 40 C.F.R. 63 Subpart ZZZZ *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* (§63.6650(h)) applicable to AUX04. These reporting requirements do not apply to AUX02 and AUX03 because they have a site rating of less than 100 brake horsepower.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility and were included in the Permit Shield Section 3.7.2 due to the following:

- a. 45CSR19 - *Nonattainment New Source Review (NSR)* - The facility is located within an area classified as in attainment with respect to the National Ambient Air Quality Standards (NAAQS) for all criteria pollutants.

- b. 40 C.F.R. 60 Subpart JJJJ – The engines (EN01 – EN03) are not subject to this subpart because they are compression ignition engines.
- c. 40 C.F.R. 60 Subpart OOOO – The facility is in the natural gas production, transmission, and distribution segment. The only potentially affected facilities under this rule were constructed, modified, or reconstructed prior to August 23, 2011. None of the newly installed tanks onsite meet the applicability requirements in 40 CFR §60.5365(e). Therefore, this subpart does not apply to the facility.
- d. 40 C.F.R. 60, Subpart OOOOa – This subpart applies to equipment installed after September 18, 2015. This facility has no equipment with applicable requirements under this subpart because there are no affected emissions units that have been installed after September 18, 2015.
- e. 40 C.F.R. 63 Subpart HHH – This subpart does not apply to the facility since the facility is not a major source of HAPs.
- f. 40 C.F.R. 63 Subpart DDDDD – The boilers (BL01 & BL03) are not subject to this subpart since the facility is not a major source of HAPs.
- g. 40 C.F.R. 63 Subpart JJJJJ – The boilers (BL01 & BL03) are not subject to this subpart since they are “gas-fired boilers”, which are excluded per §63.11195.
- h. 40 C.F.R. 64 – the natural gasoline Tank TK10 has a VOC emission limit of 1.4 TPY, and an internal floating roof to reduce VOC emissions by 95%. As per §64.1 “for the purpose of this part, a control device does not include passive control measures that act to prevent pollutants from forming such as the use of seals, lids, or roofs to prevent the release of pollutants”, therefore CAM is not applicable to the gasoline Tank TK10 because the internal floating roof is not defined as a control device under CAM. During this renewal there were no changes to the plant or the process, therefore this CAM applicability determination remains the same.

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: August 31, 2022

Ending Date: September 30, 2022

Point of Contact

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

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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.