

# 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 Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 26, 2016.

Permit Number: **R30-05100157-2016**

Applications Received: **August 24, 2017 (MM03) and November 9, 2017 (MM04)**

Plant Identification Number: **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: *MM03 and MM04* Revised: *February 6, 2018*

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Physical Location:	Moundsville, Marshall County, West Virginia
UTM Coordinates:	525.9 km Easting • 4,414.1 km Northing • Zone 17
Directions:	From Lafayette Ave in Moundsville, head East onto 12 <sup>th</sup> St ~ 1.1 miles. Continue onto Fork Ridge Rd ~5.4 miles. Site entrance is on the left.

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### Facility Description

This natural gas processing facility is designed to process 600 million standard cubic feet per day (mmscfd) 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 (C<sub>2</sub>H<sub>6</sub>), propane (C<sub>3</sub>H<sub>8</sub>), 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.

The purpose of this modification is to revise the fugitive emissions from piping and component leaks (FUG-G, FUG-L, FUG-M, and FUG-3).

## Emissions Summary

Due to these modifications, potential emissions will decrease as follows:

- VOC potential emissions will decrease by 11.74 TPY.
- Total HAP emissions will decrease by 0.17 TPY.

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 196.55 TPY of CO, 127.92 TPY of NO<sub>x</sub>, and 131.51 TPY of 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	Construction permit
	45CSR16	New Stationary Sources
	45CSR30	Operating permit requirement.
	40CFR, Part 60, Subpart VVa	Standard of Performance for Equipment Leaks
	40CFR, Part 60, Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced after September 18, 2015

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 (if any)
R13-3289B	10/12/17	
R13-3070B	12/5/17	

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 were made with this modification:

- Emission Point 15E was revised in the Emission Units Table as follows:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Original Entry					
FUG-G FUG-L	15E	Piping and Equipment Fugitives (Gas and Liquid Service)	2013	n/a	LDAR
Revised Entry					
FUG-G	15E	Piping and Equipment Fugitives-Gas	2013	n/a	LDAR
FUG-L		Piping and Equipment Fugitives-Light Liquid	2013	n/a	
FUG-M		Piping and Equipment Fugitives-Mix Gas/Liquid	2013	n/a	

- The permit number referenced in conditions 5.1.1 and 9.1.2 was updated to match the underlying 45CSR13 requirement.
- Condition 11.1.4.d was added specifying LDAR control effectiveness and leak definitions for various valves, pumps, and connectors.
- Condition 11.1.4.e (previously condition 11.1.4.d) was revised to require compliance with 40CFR60, Subpart VVa in the event LDAR requirements under 40CFR60, Subpart OOOOa become no longer applicable.

**Non-Applicability Determinations**

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

**40CFR60 Subpart KKK: Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants**-40CFR60 Subpart KKK applies to onshore natural gas processing plants that commenced construction after January 20, 1984 and on or before August 23, 2011. The Oak Grove Natural Gas Processing Facility was constructed after August 23, 2011.

**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: N/A  
 Ending Date: N/A

### **Point of Contact**

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

Rex Compston, P.E.  
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. 1209 • Fax: 304/926-0478  
[Rex.E.Compston@wv.gov](mailto:Rex.E.Compston@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.