

# 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 October 9, 2015.

Permit Number: **R30-05100127-2015**  
Application Received: **09/11/2019**  
Plant Identification Number: **03-54-051-00127**  
Permittee: **Williams Ohio Valley Midstream LLC**  
Facility Name: **Fort Beeler Plant**  
Mailing Address: **2000 Commerce Drive, Pittsburgh, PA 15275**

Permit Action Number: MM02      Revised: 02/24/2020

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Physical Location: Cameron, Marshall County, West Virginia  
UTM Coordinates: 535.00 km Easting • 4,414.35 km Northing • Zone 17  
Directions: From Main Street in Cameron head north on US-250/Waynesburg Pike ~3.7 miles. Turn left to continue on US-250 ~2.5 miles. Turn left onto access road ~0.2 mile. Entrance to site is straight ahead.

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### Facility Description

The purpose of this modification is to add the capability of loading natural gas liquids (NGL) into tanker trucks and revises component leak calculations using updated LDAR control efficiencies as based on 40 C.F.R. 60 Subpart OOOO requirements.

### Emissions Summary

The emissions increases/decreases due to this modification are as follows:

Pollutant	Emission Change (TPY)
VOCs	(19.29)

Pollutant	Emission Change (TPY)
Benzene	0.01
Ethylbenzene	(0.02)
n-Hexane	0.16
Toluene	0.04
2,2,4 – Trimethylpentane	0.03
Xylenes	0.10
Total HAPs	0.33

**Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit 155 TPY of VOCs. 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 requirement
	45CSR30	Operating permit requirement.
	40C.F.R.60 Subpart KKK	Standards of Performance for Equipment leaks of VOC for Onshore Natural Gas plants
	40C.F.R.60 Subpart OOOO	Standards of Performance for Crude Oil and Natural Gas production, transmission, and distribution
	45CSR16	Standards of performance for new stationary sources encompassing 40 C.F.R. 60

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 associated with this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2826L	10/18/2019	

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**

This permit modification adds the equipment required for loading NGL into tanker trunks and revises the component leak calculations using the standards in 40 C.F.R. 60 subpart OOOO. As a result of this change, Truck Loadout (NGLs) was added with an emission point 24E and the PTE for the plant changed as a result of the recalculation.

The updates to the Title V permit as a result of this modification are as follows:

- The Emission Units table was updated with the NGL truck loadout and the updated configuration of pressure vessels.
- Table 1.2 was updated, as R13-2826L supersedes and replaces R13-2826K.
- Conditions pertaining to NGL loading were added to Sections 8.0, 8.1.1, 8.1.2, 8.1.4, and 8.4.1.
- It was decided to leave sections 9 and 10 of the Title V permit unchanged unlike within R13-2826L, because the changes that occurred within the permit application only pertained to the calculation of the facility's PTE and not to the applicable requirements under 40 C.F.R. 60 Subparts OOOO and KKK. There were also no notable changes to 40 C.F.R. 60 subparts OOOO or KKK since the issuance of the permit.
- The condition citations in sections 9 and 10 of the Title V permit changed because R13-2826L combines the OOOO and KKK requirements into one section and incorporates them by reference where the requirements were previously written out.

### **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: N/A

Ending Date: N/A

### **Point of Contact**

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

Nikki B. 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. 1225 • Fax: 304/926-0478  
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)**

Not applicable.