

Fact Sheet



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

Permit Number: **R30-08300101-2016**
Application Received: **August 10, 2016**
Plant Identification Number: **083-00101**
Permittee: **Energy Corporation of America**
Facility Name: **Ellamore Compressor Station**
Mailing Address: **P. O. Box 459, Buckhannon, WV 26201**

Revised: N/A

Physical Location: Ellamore, Randolph County, West Virginia
UTM Coordinates: 536.40 km Easting • 4306.30 km Northing • Zone 17
Directions: Proceed east from the town of Ellamore on County Route 151 for approximately 3 miles to the station which is located on the left side of the road and visible.

Facility Description

The Ellamore Station is a natural gas production facility covered by NAICS 211111 and SIC 1311. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of one (1) 600-hp and one (1) 800-hp natural gas fired reciprocating engines, one (1) 120-hp generator, one (1) heating system boiler, one (1) dehydrator reboiler, one (1) glycol regenerator, one (1) glycol absorber, one (1) liquids knockout system, and two (2) 1,000 gallon storage tanks, and one (1) 630 gallon storage tank.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2015 Actual Emissions
Carbon Monoxide (CO)	149.48	82.97
Nitrogen Oxides (NO _x)	158.30	79.13
Particulate Matter (PM _{2.5})	1.31	0.63
Particulate Matter (PM ₁₀)	1.31	0.63
Total Particulate Matter (TSP)	1.31	0.63
Sulfur Dioxide (SO ₂)	0.05	0.03
Volatile Organic Compounds (VOC)	4.80	2.91

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2015 Actual Emissions
Benzene	0.41	0.02
Ethyl Benzene	0.80	0.04
Formaldehyde	2.07	0.99
n-Hexane	0.42	0.02
Toluene	0.81	0.03
Xylenes	1.12	0.06
Total HAPs	5.64	1.16

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

Title V Program Applicability Basis

This facility has the potential to emit 149.48 TPY of CO and 158.30 TPY of NO_x. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Energy Corporation of America 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	To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.
	45CSR6	Open burning prohibited.
	45CSR10	Emissions of sulfur oxides.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR permits.
	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 HAPs
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 CFR 63, Subpart HH	Oil and Gas Production NESHAP
	40 CFR 63, Subpart ZZZZ	RICE
	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.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2347	October 21, 1999	

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

Emission Units and NSR Permits

There have been no equipment changes nor any NSR permit changes since the previous Title V permit renewal.

Section 4.0: Reciprocating Engines [emission point ID(s): E01, E02, and G1]

This section of the permit includes applicable requirements from 40CFR63, Subpart ZZZZ: “National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE).” 40CFR63, Subpart ZZZZ has been revised since the previous permit renewal, therefore this section of the permit was revised extensively with this permit renewal.

The equipment in this section, which are covered by 40CFR63, Subpart ZZZZ are classified as follows:

- G1 is classified as a non-emergency spark-ignition four-stroke rich burn stationary engine rated below 500 HP located at an area source of HAPs.
- E01 is classified as a non-emergency spark-ignition two-stroke lean burn engine rated over 500 HP located at an area source of HAPs.
- E02 is classified as a non-emergency spark-ignition four-stroke rich burn engine rated at over 500 HP located at an area source of HAPs that is a remote source.

The conditions in this permit section are summarized in the table below. Additionally, this table also includes the regulatory citations for each condition and lists the engines covered by the condition.

Condition Number	Condition Summary	Regulatory Citation	Engines Covered
4.1.1.	Operation and maintenance requirements.	45CSR34; 40 C.F.R. §§63.6603(a), 63.6625(h) and Table 2d of 40CFR63, Subpart ZZZZ	E01, E02, and G1
4.1.2.	Requirements for remote status.	45CSR34; 40 C.F.R. §63.6603(f)	E02
4.1.3.	Continuous compliance.	45CSR34; 40 C.F.R. §§63.6605, 63.6625(e) and 63.6640(a); and Table 6 of 40CFR63, Subpart ZZZZ	E01, E02, and G1
4.1.4.	Compliance with General Provisions in 40CFR §§63.1 through 63.15.	45CSR34; 40 C.F.R. §§63.6665 and 63.6645(a); and Table 8 of 40CFR63, Subpart ZZZZ	E01, E02, and G1
4.2.1.	Oil analysis program.	45CSR34; 40 C.F.R. §63.6625(j)	E01, E02, and G1
4.4.1.	Records of notifications, reports, performance tests, performance evaluations, maintenance, and corrective actions.	45CSR34; 40 C.F.R. §63.6655(a)	E01, E02, and G1
4.4.2.	Records required in Table 6 of 40CFR63, Subpart ZZZZ	45CSR34; 40 C.F.R. §63.6655(d); and Table 6 of 40CFR63, Subpart ZZZZ	E01, E02, and G1
4.5.1.	Report when the permittee did not meet each emission limitation or operating limitation.	45CSR34; 40 C.F.R. §63.6640(b)	E01, E02, and G1
4.5.2.	Report when the permittee did not meet the requirements in Table 8 to 40CFR63, Subpart ZZZZ.	45CSR34; 40 C.F.R. §63.6640(e)	E01, E02, and G1

Section 5.0: Flare and Dehydrator [emission point ID(s): FL1]

There have been no changes to the equipment or permits cited in this condition since the previous Title V permit renewal. There have been some minor changes to reflect the current regulatory language. These changes are as follows:

- A reference to 45CSR34 was added to conditions 5.1.11, 5.1.12, and 5.3.5.
- Condition 5.1.12.e. was revised to specify that this exemption applies to an area source.
- Condition 5.3.5 was revised to reflect current regulatory language, and streamlining language was removed.
- Condition 5.4.8 was added requiring records of actual benzene emissions, as specified in 40CFR§63.774(d)(1)(ii).

Non-Applicability Determinations

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

45CSR21	Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds. Ellamore station is not located in Cabell, Kanawha, Putnam, Wayne, or Wood counties that are affected by 45CSR21.
45CSR27	To Prevent and Control the Emissions of Toxic Air Pollutants. Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment "used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight."
40 C.F.R. 60 Subpart GG	Standards of Performance for Stationary Gas Turbines. There are no turbines at the Ellamore Compressor Station.
40 C.F.R. 60 Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. All tanks storing volatile organic liquids are below 75 m ³ in capacity.
40 C.F.R. 60 Subpart KKK	Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants. Ellamore station is not engaged in the extraction of natural gas from field gas or in the fractionation of mixed natural gas liquids to natural gas products.
40 C.F.R. 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO ₂ Emissions. There are no sweetening units at the Ellamore station.
40 C.F.R. 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines. There are no turbines at the Ellamore Compressor Station.
40 CFR 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities. Ellamore station is not a natural gas storage and transmission facility as defined under 40 C.F.R. §63.1270.
40 CFR 63 Subpart JJJJJ	National Emissions Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers Area Sources. The boilers at this facility burn only natural gas; thus this facility is exempt per 40 CFR §63.11195(e).
40 C.F.R. Part 64	This is the third permit renewal for this facility. At the time of the first and second renewals, CAM was determined not to be applicable to the sources at this facility. No changes have been made at this facility since the first and second renewals that would make this facility subject to CAM.

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: Thursday, September 22, 2016
Ending Date: Monday, October 24, 2016

Point of Contact

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

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Division of Air Quality
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Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478
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.