

# Fact Sheet



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

Permit Number: **R30-06900107-2018**  
Application Received: **February 7, 2018**  
Plant Identification Number: **069-00107**  
Permittee: **Appalachia Midstream Services, L.L.C.**  
Facility Name: **Battle Run Compressor Station**  
Mailing Address: **100 Teletech Drive, Suite 2; Moundsville, WV 26041-2352**

*Revised: N/A*

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Physical Location:	Valley Grove, Ohio County, West Virginia
UTM Coordinates:	536.535 km Easting • 4,436.030 km Northing • Zone 17
Directions:	Heading east in I-70 from Wheeling, take exit 11. Turn left onto Dallas Pike and go 0.1 miles. Turn right onto Alexander Rd and go 0.2 miles. Turn left onto Windmill Truckers road and go 0.3 miles. The facility is straight ahead.

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### Facility Description

This facility is a natural gas compressor station (SIC Code: 1389). This facility uses twelve (12) 1,380 hp Compressor engines, one (1) 605 hp generator, three (3) 55 mmscfd dehydrators, three (3) 1.0 MMBTU/hr reboilers, two (2) heat treater burners, and ten (10) storage tanks. Control devices include oxidation catalysts, Non-Selective Catalytic Reduction (NSCR), condensers, vapor recovery units, and carbon canisters.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2017 Actual Emissions</b>
Carbon Monoxide (CO)	88.76	1.19
Nitrogen Oxides (NO <sub>x</sub> )	87.72	58.16
Particulate Matter (PM <sub>2.5</sub> )	6.43	5.81
Particulate Matter (PM <sub>10</sub> )	6.43	5.81
Total Particulate Matter (TSP)	6.43	5.81
Sulfur Dioxide (SO <sub>2</sub> )	0.37	0.36
Volatile Organic Compounds (VOC)	213.31	160.44

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2017 Actual Emissions</b>
Acetaldehyde	1.06	0.96
Acrolein	0.67	0.59
Benzene	1.36	0.20
Butadiene, 1,3	0.05	0.03
Ethylbenzene	0.47	0.12
Formaldehyde	6.42	1.63
n-Hexane	6.73	3.90
Methanol	0.36	0.29
Polycyclic Organic Matter (POM)	0.04	0.04
Toluene	1.69	0.21
2,2,4-Trimethylpentane (TMP)	0.47	0.17
Xylene	0.95	0.16
Other HAPs	0.04	0.04
Total HAPs	20.30	8.32

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

### Title V Program Applicability Basis

This facility has the potential to emit 213.31 TPY of VOCs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Appalachia Midstream Services, L.L.C. 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 air pollution.
	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR permits
	45SR16	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 60, Subpart OOOO	Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (8/23/11 – 9/18/2015).
	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 63, Subpart HH	NESHAP for Oil and Natural Gas Production.
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	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>
R13-2916B	May 15, 2018	

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**

**Compliance Assurance Monitoring (CAM)**

This rule does apply to the dehydrators (EUDHY-1, EHDHY-2, and EUDHY-03) because they are:

- Pollutant-specific emission units (PSEUs) at a major source that is required to obtain a Title V operating permit;
- Subject to an emissions limitation or standard;
- Use a control device to achieve compliance with any such emission limitation or standard; and
- The potential pre-control device emissions of the applicable regulated air pollutant are  $\geq 100\%$  of the amount required to be classified as a major source (40CFR§64.2).

However, only large PSEUs (i.e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are  $\geq$  Major Source Threshold Levels) need to submit a CAM plan with the initial Title V application. At this facility, the post control emissions are below Major Source Threshold Levels, and a CAM plan application is not due until the Title V renewal, as specified in 40CFR§64.5(b).

The remainder of the equipment is not subject to CAM. The engines are subject to 40CFR60, Subpart JJJJ and are, therefore, exempt per 40CFR§64.2(b)(1)(i). The remaining equipment either doesn't have a control device, or it is not subject to an emission limit or standard.

**Section 3.0: Facility-Wide Requirements**

In addition to boilerplate Title V permit language, the following conditions were added from either state rules or R13-2916B, or citations from this permit were added to Title V boilerplate language:

Permit Condition	Summary of Condition	Regulatory Citation	R13-2916B Condition
3.1.9.	Minor source of HAPs	N/A	4.1.2.
3.1.10.	Operation and maintenance of air pollution control equipment	45CSR§13-5.11.	4.1.3. and 11.1.2.
3.1.11.	Only equipment in Table 1.0 can be operated	N/A	4.1.5.
3.1.12.	No fugitive emissions beyond property lines	45CSR§17-3.1.	N/A
3.4.1.	Records of monitoring information	N/A	4.1.1.
3.4.4.	Record of malfunctions of air pollution control equipment	N/A	4.1.4. and 11.3.3.

**Section 4.0: Engines, Generator, Compressor Rod Packing [emission point ID(s): EPCE-1—EPCE-12, EPGEN-2, EPCRPF]**

This section contains requirements from R13-2916B for the engines, compressor, and rod packing. These conditions, which are summarized in table below, are derived solely from NSR permit requirements:

Permit Condition	Summary of Condition	R13-2916B Condition
4.1.1.	Emission limits for EPCE-1—EPCE-12	5.1.1.
4.1.2.	Emission limits for EUGEN-2	5.1.2.
4.1.3.	Emission limits for EUCRP	5.1.3.
4.1.4.	Periods of startup and shutdown	5.1.4.
4.1.5.	Requirements for use of oxidation catalyst reduction devices	5.1.5.
4.2.1.	Maintenance of oxidation catalyst control devices	5.2.1.
4.4.1.	Records of all catalytic reduction device maintenance	5.4.1.

**Section 5.0: 40CFR60 Subpart JJJJ Requirements [emission point ID(s): EPCE-1—EPCE-12, EPGEN-2]**

This subpart applies to these engines because each engine has a power rating greater than 500 HP and each engine was manufactured on or after 07/01/07, as stated in 40CFR§60.4230(a)(4)(i). Requirements include NO<sub>x</sub>, CO, and VOC emission limits (40CFR§60.4233(e)); operating limits (40CFR§60.4243); performance testing (40CFR§60.4244); and notification and recordkeeping (40CFR§60.4245). These engines are EPA-certified.

Compliance with the NO<sub>x</sub>, CO, and VOC emissions limits in 40CFR60, Subpart JJJJ is ensured by compliance with the more stringent requirements in conditions 4.1.1. and 4.1.2.

The requirements of this section are summarized below:

Permit Condition	Summary of Condition	Regulatory Citation	R13-2916B Condition
5.1.1.	Compliance with 40CFR63, Subpart ZZZZ	45CSR34; 40 C.F.R. § 63.6590(c)	8.1.2.
5.1.2.	Emission standards	45CSR16; 40CFR§60.4233(e)	6.2.1.
5.1.3.	Comply with emissions standards over life of engine	45CSR16; 40CFR§60.4234	6.2.2.
5.1.4.	After July 1, 2009, no installation of engines that do not meet the requirements in 40CFR§60.4233	45CSR16; 40CFR§60.4236(b)	6.3.1.
5.1.5.	Condition 5.1.4. does not apply to modified, reconstructed, or relocated engines	45CSR16; 40CFR§60.4236(e)	6.3.2.
5.2.1.	Compliance demonstration: certified engines.	45CSR16; 40CFR§§60.4243(a)(1), (a)(2)(iii), and (b)(1)	6.4.1.
5.2.2.	Emergency use of propane fuel.	45CSR16; 40CFR§60.4243(e)	6.4.2.
5.2.3.	AFR controller	45CSR16; 40CFR§60.4243(g)	6.4.3.
5.3.1.a.	Performance testing within 10% of 100% peak	45CSR16; 40CFR§60.4244(a)	6.5.1.
5.3.1.b.	No performance tests during periods of startup, shutdown, or malfunction	45CSR16; 40CFR§60.4244(b)	
5.3.1.c.	Three runs for each performance test	45CSR16; 40CFR§60.4244(c)	
5.3.1.d.	Calculation of NO <sub>x</sub> emission rate	45CSR16; 40CFR§60.4244(d)	

Permit Condition	Summary of Condition	Regulatory Citation	R13-2916B Condition
5.3.1.e.	Calculation of CO emission rate	45CSR16; 40CFR§60.4244(e)	
5.3.1.f.	Calculation of VOC emission rate (excluding formaldehyde)	45CSR16; 40CFR§60.4244(f)	
5.3.1.g.	Calculating corrected VOC emissions	45CSR16; 40CFR§60.4244(g)	
5.4.1.	Records of notifications, maintenance, and manufacturer documentation	45CSR16; 40CFR§60.4245(a)	6.6.1.a.
5.5.1.	Initial notification	45CSR16; 40CFR§60.4245(c)	6.6.1.c.
5.5.2.	Submit copies of each performance test	45CSR16; 40CFR§60.4245(d)	6.6.1.d.

**Section 6.0: 40CFR60, Subpart OOOO Requirements [emission point ID(s): EPCE-1—EPCE-12, Pneumatic Controllers]**

This subpart applies to each reciprocating compressor driven by a CAT G3516B engine (EPCE-1—EPCE-12) because this facility is identified within the natural gas production segment and the compressors commenced construction after 08/23/11, as specified in 40CFR §60.5360 and §60.5365(c). Requirements include replacing rod packing systems on a specified schedule, as specified in 40CFR§60.5385(a), and notification, monitoring, recordkeeping and reporting, as specified in 40CFR§60.5410(c), §60.5415(c), §60.5420(c)(3), §60.5420(b)(1) and §60.5420(b)(4). This facility is also subject to pneumatic control requirements, as specified in 40CFR§§60.5390(a), (c), (d), (e), and (f).

This rule does not apply to the stabilized condensate (SC) storage tanks (EPTK-1-8) nor to the produced water (PW) storage tanks (EPWTK-1-2) because each tank does not have the potential to emit 6 TPY or more of VOC.

The applicable requirements are summarized below:

Permit Condition	Summary of Condition	Regulatory Citation	R13-2916B Condition
6.1.1.	Reciprocating compressors: replacement of rod packing; initial and continuous compliance	45CSR16; 40CFR§60.5385	7.1.1.
6.1.2.	Pneumatic controllers	45CSR16; 40CFR§§60.5390(a), (c), (d), (e), (f)	7.1.2.
6.2.1.a.	Initial compliance: reciprocating compressors	45CSR16; 40CFR§§60.5410(c) and (d)	7.2.1.
6.2.1.b.	Initial compliance: pneumatic controllers		
6.3.1.	Continuous compliance: reciprocating compressors	45CSR16; 40CFR§§60.5415(c)(1)–(3)	7.3.1.
6.3.2.	Continuous compliance: pneumatic controllers	45CSR16; 40CFR§60.5415(d)	7.3.2.
6.4.1.	Recordkeeping requirements	45CSR16; 40CFR§§60.5420(c)(3) and (c)(4)	7.4.3.
6.5.1.	Notifications	45CSR16; 40CFR§60.5420(a)	7.4.1.
6.5.2.	Reporting requirements	45CSR16; 40CFR§§60.5420(b)(1), (4), (5)	7.4.2.

**Section 7.0: Hazardous Air Pollutant Requirements Natural Gas Dehydration Units Not Subject to MACT Standards and being controlled by Condenser and Recycling the Dehydration Unit Back to Flame Zone of Reboiler [emission point ID(s): (EUDHY-1, EUDHY-2, & EUDHY-3)]**

40 CFR63, Subpart HH does apply to this facility; however, because the facility is an area source of HAP emissions, and the actual average emissions of benzene from each glycol dehydration unit process vent to the atmosphere is below 0.90 megagram per year (1.0 tpy), the dehydration units are exempt. The only requirement is to maintain records of the actual average benzene emissions per year, as specified in 40CFR§63.774(d)(1)(ii).

This rule does not apply to storage vessels (tanks), compressors, or ancillary equipment because the subject facility is an area source of HAP emissions, as stated in 40CFR§63.760(b)(2).

The applicable requirements are summarized below:

Permit Condition	Summary of Condition	Regulatory Citation	R13-2916B Condition
7.1.1.	Maximum wet natural gas throughput	N/A	9.1.1.
7.1.2.	Venting to a BTEX condenser	N/A	9.1.2.
7.1.3.	Dehydration unit design and operation	N/A	9.1.3.
7.1.4.	VOC, Benzene, and HAP emission limits	N/A	9.1.4.
7.2.1.	Monitor throughput of wet natural gas to dehydration units and keep records	N/A	9.2.1.
7.2.2.	Monitor temperature of the outlet stream of each BTEX Condenser and keep records	N/A	9.2.2.
7.3.1.	Records of HAP PTE calculations	N/A	9.3.1.
7.3.2.	Demonstrate compliance with the HAP emissions thresholds using GLYCalc	N/A	9.3.2.
7.3.3.	Determining benzene emissions using GLYCalc	45CSR34; 40CFR§63.772(b)(2)(i)	9.3.3.
7.4.1.	Document and maintain records of monitoring and testing	N/A	9.4.1.
7.4.2.	Records of HAP PTE calculations	N/A	9.4.2.
7.4.3.	Records of dry natural gas throughput	N/A	9.4.3.
7.4.4.	Records of actual average benzene emissions	45CSR34; 40CFR§63.764(e) and §63.774(d)(1)(ii)	9.4.4.
7.4.5.	Maintain records for 5 years and keep them readily available	N/A	9.4.5.
7.5.1.	Submission of test protocol	N/A	9.5.1.

**Section 8.0: Reboilers and Heat Treaters [emission unit ID(s): EURBL-1, EURBL-2, EURBL-3, EUHT-1, EUHT-2]**

This section contains NSR permit requirements for the reboilers and heat treaters. This section also contains visible emissions requirements from 45CSR2.

45CSR2 states that any fuel burning unit that has a heat input under ten (10) million B.T.U.'s per hour is exempt from sections 4 (weight emission standard), 5 (control of fugitive particulate matter), 6 (registration), 8 (testing, monitoring, recordkeeping, reporting) and 9 (startups, shutdowns, malfunctions). The individual heat input of the reboilers and heater treaters are below 10 MMBTU/hr. Therefore, these units are exempt from the aforementioned sections of 45CSR2. Since the reboilers and heaters are below 10 MMBTU/hr, there are also no applicable requirements from 45CSR10.

The requirements in this section are summarized below:

Permit Condition	Summary of Condition	Regulatory Citation	R13-2916B Condition
8.1.1.	Maximum design heat input	N/A	10.1.1.
8.1.2.	10% opacity limit	45CSR§2-3.1.	10.1.2.
8.2.1.	Method 9 emissions observations	N/A	10.2.1.
8.3.1.	Method 9 observations or COMS	45CSR§2-3.2.	10.3.1
8.4.1.	Records of Method 9 observations	N/A	10.4.1.
8.5.1.	Deviation reporting	N/A	10.5.1.

**Section 9.0: Storage Tanks [emission point ID(s): EPTK-1—EPTK-8, EPWTK-1, EPWTK-2]**

This section contains NSR requirements for the storage tanks as summarized below:

Permit Condition	Summary of Condition	Regulatory Citation	R13-2916B Condition
9.1.1.	Route VOC and HAP emissions to a vapor recovery system	N/A	11.1.1.
9.1.2.	Annual throughput to storage tanks	N/A	11.1.3.
9.1.3.	Design and operation of vapor recovery system	45CSR§13-5.11	11.1.4.
9.1.4.	Closed vent requirements	45CSR§13-5.11	11.1.5.
9.2.1.	Monthly monitoring of throughput	N/A	11.2.1.
9.2.2.	Monitoring of vapor recovery system	N/A	11.2.2.
9.2.3.	Closed vent system compliance demonstration	45CSR§13-5.11	11.2.3.
9.4.1.	Maintain records for 5 years and keep them readily available	N/A	11.3.1.
9.4.2.	Record of maintenance of Vapor Recovery Unit	N/A	11.3.2.
9.4.3.	Records of throughput	N/A	11.3.4.
9.4.4.	Maintain a copy of all process design records, maintenance records, and downtime associated with the vapor recovery system	N/A	11.3.5.
9.4.5.	Closed vent monitoring records	45CSR§13-5.11	11.3.6.
9.5.1.	Deviation reporting	N/A	11.4.1.
9.5.2.	Reporting of vapor recovery unit downtime	N/A	11.4.2.

**Section 10.0: Truck Loading [emission point ID(s): EPLOAD-1, EPLOAD-2]**

This section contains NSR requirements for the truck loading as summarized below:

Permit Condition	Summary of Condition	R13-2916B Condition
10.1.1.	Stabilized condensate loading limit	12.1.1.
10.1.2.	Produced water loading limit	12.1.2.
10.1.3.	Operate in accordance with submitted plans; VOC emissions; control efficiency	12.1.3.
10.1.4.	Carbon canister operation	12.1.4.
10.1.5.	No truck loading if carbon canister is spent	12.1.5.
10.1.6.	Replacement of carbon in carbon canister	12.1.6.
10.1.7.	Keep fresh replacements for carbon canister	12.1.7.
10.2.1.	Daily monitoring of condensate truck loading and produced water truck loading	12.2.1.
10.2.2.	Monitor carbon canister replacements	12.2.2.
10.4.1.	Records of condensate truck loading and produced water truck loading	12.3.1.
10.4.2.	Records of saturation indicator examination	12.3.2.
10.4.3.	Records of carbon canister replacement	12.3.3.

**Section 11.0: Compressor Blowdowns and Pigging Operations [emission point ID(s): EPBD, EPPIG]**

This section contains NSR requirements for compressor blowdowns and pigging operations as summarized below:

Permit Condition	Summary of Condition	R13-2916B Condition
11.1.1.	Maximum yearly number of compressor blowdown	13.1.1.
11.1.2.	Maximum yearly number of wet gas pigging events	13.1.2.
11.1.3.	Maximum yearly number of dry gas pigging events	13.1.3.
11.4.1.	Keep records in accordance with condition 3.4.2.	13.2.1.
11.4.2.	Records of compressor blowdowns and pigging events	13.2.2.
11.5.1.	Reporting of exceedances	13.3.1.

**Non-Applicability Determinations**

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

- a. 40CFR60, Subparts D, Da, Db, and Dc—Steam Generating Units. These rules do not apply because there are no steam generating units (including line heaters) at this facility with a maximum design heat input capacity greater than 1.0 MMBtu/hr, which is well below the applicability thresholds in these rules specified in 40CFR§§60.40(a), 60.40Da(a), 60.40b(a), and 60.40c(a).
- b. 40CFR60, Subparts K, Ka, and Kb—Storage Vessels. These rules do not apply because all tanks were constructed after July 23, 1989 and there are no tanks with capacity of 75 m<sup>3</sup> (471.7 bbl or 19,813 gal) or greater, as specified in 40CFR§60.110b(a), that are used to store volatile organic liquids (VOL) at this subject facility.
- c. 40CFR60, Subpart GG—Stationary Gas Turbines. This rule does not apply because there are no stationary gas turbines at this facility with a heat input at peak load equal to or greater than 10.7 gigajoules (10 million Btu) per hour, based on the lower heating value of the fuel fired. (40CFR§60.330).
- d. 40CFR60, Subpart KKK—Leaks from Natural Gas Processing Plants. This rule does not apply because this facility is not a natural gas processing plant as defined in 40CFR§60.331.

- e. 40CFR60, Subpart LLL—SO<sub>2</sub> Emissions from Onshore Natural Gas Processing Plants. This rule does not apply because there are no gas sweetening operations at this facility, as required in 40CFR§60.640(a).
- f. 40CFR60, Subpart IIII—Stationary Compression Ignition Internal Combustion Engines. This rule does not apply because there are no stationary compression ignition engines at this facility.
- g. 40CFR60, Subpart KKKK—Stationary Combustion Turbines. This rule does not apply because there are no stationary gas turbines at this facility with a heat input at peak load equal to or greater than 10.7 gigajoules (10 million Btu) per hour, based on the higher heating value of the fuel fired, as specified in 40CFR§60.4305(a).
- h. 40CFR60, Subpart OOOOa—Crude Oil and Natural Gas Facilities. This rule does not apply because this facility was constructed prior to September 18, 2015, as specified in 40CFR§60.5360a.
- i. 40CFR63, Subpart HHH—Natural Gas Transmission and Storage Facilities. This rule does not apply because this facility is not a natural gas transmission or storage facility transporting or storing natural gas prior to local distribution and is not a major source of HAP emissions, as specified in §63.1270(a).
- j. 40CFR63, Subpart YYYY—Stationary Combustion Turbines. This rule does not apply because this facility is not a major source of HAP emissions and does not have a stationary combustion turbine, as specified in 40CFR§63.6085.
- k. 40CFR63, Subpart DDDDD—Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. This rule does not apply because this facility is not a major source of HAP emissions, as specified in 40CFR§63.7485.
- l. 40CFR63, Subpart JJJJJ—Industrial, Commercial, and Institutional Boilers and Process Heaters Area Sources. This rule does not apply because all reboilers (EPRBL-1, EPRBL-2, and EPRBL-3) and heater treater burners (EPHT-1 and EPHT-2) at this facility are gas-fired, as exempted in 40CFR§63.11195(e).

#### **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: Friday, August 3, 2018  
Ending Date: Tuesday, September 4, 2018

#### **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.