

# Fact Sheet



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

Permit Number: **R30-09100013-2021**

Application Received: **August 14, 2020**

Plant Identification Number: **091-00013**

Permittee: **Equitrans, L.P.**

Facility Name: **Comet #43 Compressor Station**

Mailing Address: **2200 Energy Drive Canonsburg, PA 15317**

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Physical Location: Near Bridgeport, Taylor County, West Virginia  
UTM Coordinates: 572.56 km Easting • 4352.11 km Northing • Zone 17  
Directions: From Interstate 79, take exit 124 for WV-279/Jerry Dove Dr toward US-50 E (0.4 mi). Turn left at CR-707 E/FBI Center Rd/WV-279 E and continue to follow WV-279 E (2.9 mi). Turn left at US-50 (3.2 mi). Turn left at CR-3/Meadland Rd (0.3 mi). Comet Station is on left.

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### Facility Description

The Comet #43 Compressor Station is a natural gas transmission facility covered under Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate twenty-four (24) hours per day, seven (7) days per week. The station consists of one (1) 600-hp natural gas fired reciprocating internal combustion engine (RICE), two (2) 300-hp and two (2) 330-hp natural gas fired RICE, one (1) 275 hp emergency electric generator, one (1) 2.34 MMBtu/hr heating boiler, one (1) 0.03 MMBtu/hr hot water heater, one (1) 0.08 MMBtu/hr radiant heater, two (2) 15-hp electric driven compressors, six (6) tanks of various sizes and piping and components.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2020 Actual Emissions</b>
Carbon Monoxide (CO)	32.98	3.74
Nitrogen Oxides (NO <sub>x</sub> )	248.10	27.11
Particulate Matter (PM <sub>2.5</sub> )	3.84	0.44
Particulate Matter (PM <sub>10</sub> )	3.84	0.44
Total Particulate Matter (TSP)	3.84	0.44
Sulfur Dioxide (SO <sub>2</sub> )	0.05	0.01
Volatile Organic Compounds (VOC)	11.40	1.06

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

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2020 Actual Emissions</b>
Formaldehyde	4.29	0.46
Acrolein	0.610	Not reported
Acetaldehyde	0.603	Not reported
Methanol	0.194	Not reported
Benzene	0.151	0.02
Other HAPs	0.382	0.03
Total HAPs	6.24	0.51

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

### Title V Program Applicability Basis

This facility has the potential to emit 248.10 TPY of NO<sub>x</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Equitrans, L.P. 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	Control particulate matter.
	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.

	45CSR13	Permits for construction, modification, relocation and operations of stationary sources of air pollution
	45CSR16	Standards of performance for 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	Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart ZZZZ	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.

**Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
N/A	N/A	N/A

\* General Permit registration G60-C097 was approved November 30, 2017 for the replacement of the existing 1995 Cummins 275 hp emergency generator G-001 with a proposed 2015 Kohler 155 hp emergency generator G-002. Equitrans, L.P. commented on the pre-draft permit and stated that the replacement had never occurred and that G-001 was still on site. Equitrans, L.P. sent a letter to the DAQ requesting for G60-C097 to be declared inactive and revised the Title V renewal application. In a letter dated July 8, 2021, the DAQ acknowledged that G60-C097 was now inactive.

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 is a renewal of the Title V permit which was issued on February 18, 2016. The permittee has added a 0.08 MMBtu/hr small natural gas fired radiant heater, but this is an insignificant unit and was not

included in the Emission Units Table of the Title V permit. Substantial changes to the most recent version of the Title V Permit consist of the following:

1) **Title V Boilerplate changes**

➤ **Conditions 3.5.3., 3.5.5. and 3.5.6.** - These conditions were revised to require electronic submittal of the Title V compliance certifications (annual and semi-annual), self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols to the WV DAQ.

2) **On May 1, 2015, the U.S. Court of Appeals for the District of Columbia Circuit issued a decision vacating paragraphs 40 CFR 63.6640(f)(2)(ii)-(iii). Guidance regarding the impact of the vacatur is available here:**  
<https://www3.epa.gov/ttn/atw/icengines/docs/RICEVacaturGuidance041516.pdf>.

➤ **Conditions 5.1.7.b.2. and 3.** - These conditions were deleted.

➤ **Condition 5.4.4.** – Deleted the reference to §63.6640(f)(2)(ii) or (iii).

➤ **Condition 5.5.1.** – Deleted the applicable language and reference to §63.6640(f)(2)(ii) or (iii).

➤ **Condition 5.5.1.** – Deleted the applicable language and references to §63.6640(f)(2)(ii) or (iii).

3) In Section 1.1 Emission Units, boiler BLR01 was revised from a heating boiler rated at 2.25 MMBtu/hr and installed in 1988 to a Delta Limited Model H9-2339B Heating Boiler Serial No. 1606423688 rated at 2.34 MMBtu/hr and installed in 2017.

### Non-Applicability Determinations

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

**40 C.F.R. 60, Subpart D—Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971.** This subpart does not apply because the boiler does not have a generating capacity in excess of 250 MMBtu/hr as specified in 40 CFR §60.40(a)(1).

**40 C.F.R. 60, Subpart Da—Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978.** This subpart does not apply because the boiler does not have a generating capacity in excess of 250 MMBtu/hr as specified in 40 CFR §60.40Da(a)(1).

**40 C.F.R. 60, Subpart Db—Standards of Performance for Industrial-Commercial-Institutional steam Generating Units.** This subpart does not apply because the boiler does not have a generating capacity in excess of 100 MMBtu/hr as specified in 40 CFR §60.40b(a).

**40 C.F.R. 60, Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional steam Generating Units.** This subpart does not apply because the boiler does not have a generating capacity in excess of 10 MMBtu/hr as specified in 40 CFR §60.40c(a).

**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.** This subpart does not apply to the storage tanks at the facility because the tanks were installed after 1978.

**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.** This subpart does not apply to the storage tanks at the facility because the tanks were installed after 1984.

**40 C.F.R. 60, Subpart Kb—Standard of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.** This subpart does not apply to the storage tanks at the facility because the tanks have a capacity of 4,000 gallons or less, which is below this subpart’s threshold of 75 m<sup>3</sup> (19,813 gallons) as specified in 40 CFR §60.110b(a).

**40 C.F.R. 60, Subpart KKK—Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants.** This subpart does not apply because the operations at this facility do not meet the definition of a processing plant.

**40 C.F.R. 60, Subpart LLL—Standards of Performance for SO<sub>2</sub> Emissions from Onshore Natural Gas Processing:** This subpart applies to “each sweetening unit, and each sweetening unit followed by a sulfur recovery unit” as specified in 40 CFR §60.640(a). This facility does not have a sweetening unit, therefore this subpart does not apply.

**40 C.F.R. 60, Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.** All of the engines at this facility, including the emergency generator, are spark ignition engines, therefore this subpart does not apply.

**40 C.F.R. 60, Subpart JJJJ—Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.** The earliest applicability date in this rule is June 12, 2006. All engines at this facility, including the emergency generator, were installed no later than 1995; this subpart does not apply.

**40 C.F.R. 63, Subpart HH—National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.** This subpart contains requirements for dehydration units, located at natural gas production facilities. This facility does not meet the definition of a natural gas production facility per 40 CFR §63.761 and does not have a dehydration unit, therefore this subpart does not apply.

**40 C.F.R. 63, Subpart HHH—National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities.** This facility is not a major source of HAPs, therefore this subpart does not apply per 40 CFR §63.1270(a).

**40 C.F.R. 63, Subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.** This facility is not a major source of HAPs, therefore this subpart does not apply per 40CFR§63.7485.

**40 C.F.R. 63, Subpart JJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources:** the units at this facility are gas fired, therefore this subpart does not apply, as stated in 40CFR§63.11195(e).

**40 CFR 64—Compliance Assurance Monitoring:** there are no units at this facility that use control devices, therefore CAM does not apply.

### 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: June 29, 2021  
Ending Date: July 29, 2021

### **Point of Contact**

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

Dan Roberts  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
304/926-0499 ext. 41902  
Daniel.p.roberts@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)**

During the comment period, it was discovered that Heating Boiler BLR01 was replaced in 2017. The previously permitted heating boiler was installed in 1988 and was rated for a maximum design heat input of 2.25 MMBtu/hr. The replacement Delta Limited Model H9-2339B heating boiler was installed in 2017 and is rated for a maximum design heat input of 2.34 MMBtu/hr. This replacement resulted in a very small increase in the facility's potential to emit. Since both heating boilers are under 10 MMBtu/hr, there is no change to the applicable requirements. The proposed boiler does not exceed the hourly and annual limits (6 lbs/hr and 10 TPY), nor the daily limits (144 lb/day) specified in the modification definition of the Rule 13 construction permitting program. Based on the emission levels and lack of substantive requirements, the proposed boiler is exempt from R13 permitting. On August 12, 2021, the writer spoke with Gwen Supplee with EPA and discussed this change and she agreed with the proposed documentation and had no comments on the draft/proposed permit.