

Fact Sheet



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

Permit Number: **R30-04900052-2022**

Application Received: **April 28, 2022**

Plant Identification Number: **03-54-049-00052**

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

Facility Name: **Curtisville #50 Compressor Station**

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

Physical Location: Mannington, Marion County, West Virginia
UTM Coordinates: 549.65 km Easting • 4377.15 km Northing • Zone 17
Directions: Interstate 79 North to the Downtown Fairmont Exit (Number 137). Bear to the right on the off ramp and merge into the left lane prior to the stop light. Make left at stop light and stay on Route 310 for 3 stop lights. Make a right turn onto the bridge at 3rd light. Go up the hill at a stop light after crossing the bridge. Go through the 2nd stop light. Make a left at the next stop light. Bear to the right hand lane for two stop lights and make a right onto Route 250 North. Stay on Route 250N to Mannington. In Mannington turn left onto High Street and then turn left onto Buffalo Road and continue on this road. Turn left onto Curtisville Pike (State Route 7) and make a right onto Lylac Road. The station will be on the right after approximately 0.2 miles.

Facility Description

The Curtisville Compressor Station #50 is a natural gas transmission facility covered by NAICS 486210 and SIC 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of one (1) 1100-hp natural gas internal combustion reciprocating engine, one (1) 44-hp emergency generator, one (1) 125-hp electric generator, one (1) heating boiler, one (1) TEG dehydrator, one (1) TEG dehydration reboiler, one (1) enclosed combustor, and four (4) tanks of various sizes. The Curtisville #50 Compressor Station is used to compress storage gas.

Emissions Summary

| Plantwide Emissions Summary [Tons per Year] | | |
|--|----------------------------|------------------------------|
| Regulated Pollutants | Potential Emissions | 2021 Actual Emissions |
| Carbon Monoxide (CO) | 24.06 | 4.18 |
| Nitrogen Oxides (NO _x) | 133.43 | 34.15 |
| Particulate Matter (PM _{2.5}) | 2.23 | 0.41 |
| Particulate Matter (PM ₁₀) | 2.23 | 0.41 |
| Total Particulate Matter (TSP) | 2.23 | 0.52 |
| Sulfur Dioxide (SO ₂) | 0.05 | 0.01 |
| Volatile Organic Compounds (VOC) | 7.47 | 1.61 |

PM₁₀ is a component of TSP.

| Hazardous Air Pollutants | Potential Emissions | 2021 Actual Emissions |
|---------------------------------|----------------------------|------------------------------|
| Formaldehyde | 2.24 | 0.59 |
| Totals HAPs | 3.94 | 0.65 |

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

Title V Program Applicability Basis

This facility has the potential to emit 133.43 tpy of NO_x. 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 | To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers. |
| | 45CSR6 | Open burning prohibited. |
| | 45CSR10 | To Prevent And Control Air Pollution from The Emission Of Sulfur Oxides. |
| | 45CSR11 | Standby plans for emergency episodes. |
| | 45CSR13 | Construction Permits. |
| | 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 | Standards of Performance for Stationary Spark Ignition Internal Combustion Engines |
| | 40 C.F.R. Part 61 | Asbestos inspection and removal. |
| | 40 C.F.R. Part 63, Subpart ZZZZ | National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. |
| | 40 C.F.R. Part 64 | Compliance Assurance Monitoring. |
| | 40 C.F.R. Part 82, Subpart F | Ozone depleting substances |
| State Only: | 45CSR4 | No objectionable odors. |
| | 45CSR17 | To Prevent And Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage And Other Sources Of 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>) |
|--------------------------------|-------------------|--|
| G60-C084 | February 11, 2016 | |
| R13-3441 | April 26, 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 is the fourth Title V renewal for this facility. There have been no changes to the facility other than the issuance of R30-04900052-2017(MM01) on September 30, 2019.

3.0 Facility-Wide Requirements

- Added conditions 4.1.2 and 4.2.4 from the general permit G60-C as Title V conditions 3.1.11 and 3.4.5. Added the general permit G60-C citation to Title V condition 3.4.1.

4.0 Engines [emission point ID(s): C-001 and G-002]

- This section only has requirements from 40 C.F.R. 63 Subpart ZZZZ. None of the applicable requirements for Non-Emergency SI 2SLB (C-001) or Non-Emergency SI 4SRB (G-002) have changed since the issuance of the last Title V renewal.

5.0 TEG Dehydration with Enclosed Combustor, TEG Dehydration Reboiler, and Heating Boiler [emission point ID(s): Dehy Combustor, BLR01, BLR03]

- This section has requirements from 45CSR2, 45CSR6, 45CSR10, 45CSR13 (R13-3441), and 40 C.F.R. 64 (CAM). There have been no changes to 45CSR2, 45CSR6, 45CSR10, 40 C.F.R. 64 or the facility's CAM Plan since the last Title V renewal. The requirements of R13-3441 were incorporated into the Title V permit with R30-04900052-2017(MM01).
- Corrected typos made in R30-04900052-2017(MM01) to conditions 5.4.4. and 5.4.5. Condition 5.4.4 previously referenced 5.3.2 when it should have referenced 5.3.1. and condition 5.4.5 referenced conditions 5.1.2 and 5.3.1 when it should have been 5.1.3 and 5.3.2.

6.0 Emergency Engine [emission point ID(s): G-003]

- This section incorporates requirements from General Permit Registration G60-C084, G60-C, and 40 C.F.R. 60 Subpart JJJ. There have been no changes to General Permit Registration G60-C084 and G60-C since the last Title V renewal. There were some minor changes to 40 C.F.R. 60 Subpart JJJ that resulted in conditions 6.1.6 and 6.4.1. being updated to the most recent language.

Non-Applicability Determinations

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

- a. **45CSR21** - Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds. Curtisville #50 station is not located in Cabell, Kanawha, Putnam, Wayne, or Wood counties that are affected by 45CSR21.
- b. **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."
- c. **40 C.F.R. 60 Subpart GG** - Standards of Performance for Stationary Gas Turbines. There are no turbines at the Curtisville #50 Compressor Station.
- d. **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.
- e. **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.
- f. **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 m³ in capacity.

- g. **40 C.F.R. 60 Subpart KKK** - Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants. Curtisville #50 Compressor 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.
- h. **40 C.F.R. 60 Subpart LLL** - Standards of Performance for Onshore Natural Gas Processing: SO₂ Emissions. There are no sweetening units at the Curtisville #50 Compressor Station.
- i. **40 C.F.R. 60 Subpart KKKK** - Standards of Performance for Stationary Combustion Turbines. There are no turbines at the Curtisville #50 Compressor Station.
- j. **40 C.F.R. 60 Subpart OOOO and OOOOa** - Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution, applies to affected facilities that commenced construction, reconstruction, or modification after August 23, 2011 and before September 18, 2015 for OOOO and after September 18, 2015 for OOOOa. The equipment at the Curtisville Station was installed prior to the applicability dates of both rules. Therefore, NSPS OOOO and OOOOa are not applicable.
- k. **40 CFR 63 Subpart HH** - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. The Curtisville #50 Compressor Station is not subject to Subpart HH since Curtisville #50 Compressor Station is not a natural gas production facility.
- l. **40 CFR 63 Subpart HHH** - National Emission Standards for Hazardous Air Pollutants for Oil and Natural Gas Transmission and Storage Facilities. Subpart HHH establishes national emission limitations and operating limitations for HAPs emitted from oil and natural gas transmission and storage facilities located at major sources of HAP emissions. The Curtisville #50 Compressor Station is not a major source of HAPs, therefore, Equitrans is not subject to this rule.
- m. **40 CFR 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 according to 40 C.F.R. §63.7485.
- n. **40 C.F.R. 63 Subpart JJJJJ** - This MACT standard applies to industrial, commercial, and institutional boilers of various sizes and fuel types at area sources. The reboiler and boiler at the Curtisville Station are natural gas-fired and are specifically exempt from this subpart under 40 C.F.R. §63.11195(e). Therefore, no sources at the Curtisville Station are subject to any requirements under 40 CFR 63 Subpart JJJJJ.

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: November 9, 2022

Ending Date: December 9, 2022

Point of Contact

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

Robert A Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41286
Robert.A.Mullins@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.