West Virginia Department of Environmental Protection Division of Air Quality





For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-01700003-2025** Application Received: **November 1, 2024** Plant Identification Number: **017-00003** Permittee: **Eastern Gas Transmission and Storage, Inc.** Facility Name: **L. L. Tonkin Compressor Station** Mailing Address: **925 White Oaks Blvd., Bridgeport, WV 26330**

Physical Location: UTM Coordinates: Directions: West Union, Doddridge County, West Virginia
518.82 km Easting • 4351.18 km Northing • Zone 17
Take Route 50 east from Parkersburg. After approximately 45 miles take
West Union Exit, Route 18 North. Go approximately 3.5 miles – L. L.
Tonkin station is on the left.

Facility Description

The L. L. Tonkin Compressor Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) 4922.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]				
Regulated Pollutants	Potential Emissions	2023 Actual Emissions		
Carbon Monoxide (CO)	119.8	33.42		
Nitrogen Oxides (NO _X)	60.4	36.50		
Particulate Matter (PM _{2.5})	10.6	8.09		
Particulate Matter (PM ₁₀)	10.6	8.09		
Total Particulate Matter (TSP)	10.6	8.09		
Sulfur Dioxide (SO ₂)	0.7	0.37		
Volatile Organic Compounds (VOC)	18.5	11.61		

 PM_{10} is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2023 Actual Emissions
Acetaldehyde	0.06	0.02
Acrolein	0.02	<0.01
Benzene	0.01	<0.01
Ethylbenzene	0.02	0.01
Formaldehyde	2.33	1.12
Hexane	0.02	0.01
Toluene	0.10	0.05
Xylene	0.05	0.03
Total HAPs	2.61	1.26

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

Title V Program Applicability Basis

This facility has the potential to emit 119.8 TPY of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Eastern Gas Transmission and Storage, Inc. 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 from Combustion
		of Fuel in Indirect Heat Exchangers.
	45CSR6	Open burning prohibited.

	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR permits.
	45CSR16	Standards of Performance for New Stationary
		Sources Pursuant to 40 C.F.R. Part 60
	WV Code § 22-5-4 (a) (15)	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. 60 Subpart GG	Turbine NSPS.
	40 C.F.R. 60 Subpart JJJJ	SI RICE NSPS.
	40 C.F.R. 60 Subpart OOOOa	Crude Oil and Natural Gas NSPS.
	40 C.F.R. 60 Subpart KKKK	Stationary Combustion Turbines NSPS.
	40 C.F.R. Part 61, Subpart M	Asbestos inspection and removal.
	40 C.F.R. 63 Subpart ZZZZ	RICE MACT
	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	Date of	Permit Determinations or Amendments That
Consent Order Number	Issuance	Affect the Permit (<i>if any</i>)
R13-1077B	February 9, 2017	

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

There were no changes at the facility since the previous Title V permit renewal was issued except for the removal of the 0.52 MMBtu/hr Peerless Boiler G-14691-WS-I (Emission Point ID BLR01, Emission Unit ID 004-01, installed in 1989). The following changes were made to the permit during this renewal process:

- 1. Company's name was changed from "Dominion Energy Transmission, Inc." to "Eastern Gas Transmission and Storage, Inc." throughout the permit.
- 2. Emission Units Table 1.1 Boiler BLR01 was removed from the facility, therefore it was removed from the Table.

- 3. Boilerplate revised in conditions 2.1.3, 2.11.4, 2.17, 2.22.1, 3.1.6, 3.3.1, 3.3.1.b, 3.5.3, 3.5.4, 3.5.7, 3.5.8.a.1, and 3.5.8.a.2.
- 4. Section 3.0 Boiler BLR01 was removed from conditions 3.7.2 (d) and 3.7.2 (e) because it was removed from the facility.
- 5. Section 4.0 Emission Unit ID "004-01" (Boiler BLR01) was removed from the section name and from the condition 4.1.4 because the boiler was removed from the facility.
- 6. Section 5.0 language in conditions 5.1.1(c), 5.4.1(a)(3), 5.5.1 and 5.5.2 was revised in accordance with the latest version of 40 C.F.R. 60 Subpart JJJJ. Condition 5.1.1 has underlying permit R13-1077B condition 4.1.4, and it has not been revised yet, but since the 40 C.F.R. 60 Subpart JJJJ was revised, the language in condition 5.1.1 was changed as well during this permit renewal.
- 7. Section 6.0 language in conditions 6.1.1, 6.1.3, 6.4.1 and 6.5.1 was revised in accordance with the latest version of 40 C.F.R. 60 Subpart OOOOa.

Non-Applicability Determinations

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

- 1. 40 C.F.R. 60 Subpart OOOO This subpart does not apply to the facility since the facility is a transmission facility that has tanks with potential emissions below 6 tons VOC/yr and additionally those tanks have not been constructed, modified, or reconstructed after August 23, 2011 and on or before September 18, 2015.
- 2. 40 C.F.R. 63 Subpart HH This subpart does not apply to the facility since the facility is not a natural gas production facility.
- 3. 40 C.F.R. 63 Subpart HHH This subpart does not apply to the facility since the facility is not a major source of HAPs.
- 4. 40 C.F.R. 63 Subpart DDDDD The boiler (BLR02) is not subject to this subpart since the facility is not a major source of HAPs.
- 5. 40 C.F.R. 63 Subpart JJJJJJ The boiler (BLR02) is not subject to this subpart since it is considered "gas-fired boiler" (i.e. burn only natural gas) and is exempt based on 40 C.F.R. §63.11195(e).
- 6. 40 C.F.R. 64 Potential pre-control device emissions from the pollutant-specific emission units are below the major source thresholds. Therefore, according to 40 C.F.R. §64.2(a), CAM is not applicable to any pollutant-specific emission units at this facility.

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:February 21, 2025Ending Date:March 24, 2025

Point of Contact

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

Natalya V. Chertkovsky-Veselova West Virginia Department of Environmental Protection Division of Air Quality 601 57th Street SE Charleston, WV 25304 304/926-0499 ext. 41250 natalya.v.chertkovsky@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)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.