

Fact Sheet



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

Permit Number: **R30-00900116-2019**
Application Received: **February 7, 2018**
Plant Identification Number: **03-54-009-00116**
Permittee: **Appalachia Midstream Services, LLC**
Facility Name: **Buffalo Compressor Station**
Mailing Address: **100 Teletech Drive, Suite 2, Moundsville, WV 26041-2352**

Revised: NA

Physical Location: Moundsville, Brooke County, West Virginia
UTM Coordinates: 540.71 km Easting • 4449.70 km Northing • Zone 17
Directions: From Bethany, WV: Head east on Bethany Pike / WV-67 ~2.8 mi then
turn left onto access road to site ~0.3 mi.

Facility Description

The Appalachia Midstream Services, LLC, Buffalo Compressor Station is covered by Standard Industrial Classification (SIC) 1389. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day, fifty-two (52) weeks per year. The facility compresses and dehydrates up to 165 MMscf of locally produced natural gas. The primary equipment includes: twelve (12) natural gas compressors, and two (2) natural gas dehydrators, each with flash tank, regenerator/still and reboiler. The auxiliary equipment includes: one (1) electricity generator, two (2) heater treaters, and ten (10) storage tanks.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2017 Actual Emissions
Carbon Monoxide (CO)	82.87	16.63
Nitrogen Oxides (NO _x)	83.98	52.67
Particulate Matter (PM _{2.5})	6.24	5.29
Particulate Matter (PM ₁₀)	6.24	5.29
Total Particulate Matter (TSP)	6.24	5.29
Sulfur Dioxide (SO ₂)	0.38	0.32
Volatile Organic Compounds (VOC)	201.21	125.86

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2017 Actual Emissions
Acetaldehyde	1.00	0.85
Acrolein	0.62	0.52
Benzene	1.06	0.13
Butadiene, 1,3-	0.03	0.03
Ethylbenzene	0.45	0.05
Formaldehyde (HCHO)	8.83	2.12
n-Hexane	5.95	3.05
Methanol (MeOH)	0.30	0.25
Polycyclic Organic Matter (POM)	0.04	0.04
Toluene	1.26	0.14
2,2,4-Trimethylpentane (TMP)	0.45	0.11
Xylenes	0.84	0.09
Other/Trace HAP*	0.04	0.03

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

*Other/Trace HAPs include: Carbon Tetrachloride, Chlorobenzene, Chloroform, Dichloropropene, 1,3-Dichloropropene, Ethylene Dibromide, Methylene Chloride, Phenol, Propylene Oxide, Styrene, 1,1,2,2-Tetrachloroethane, 1,1,2-Trichloroethane, and Vinyl Chloride

Title V Program Applicability Basis

This facility has the potential to emit 201.21 tpy of VOCs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant Appalachia Midstream Services, LLC's Buffalo Compressor Station 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	Control Of Air Pollution From Combustion Of Refuse.
45CSR11	Standby Plans For Emergency Episodes.
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
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 60, Subpart OOOO	Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced after August 23, 2011, and on or before September 18, 2015
40 C.F.R. Part 61	Asbestos inspection and removal
40 C.F.R. Part 63, Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities
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 82, Subpart F	Ozone depleting substances

State Only:

45CSR4	No objectionable odors.
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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 (if any)
R13-3048B	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

Permit R13-3048B was issued on May 15, 2018. The previous permit, R13-3048A did not, but should have included compressor rod packing VOC potential emissions, emergency shutdown testing VOC potential emissions and engine crankcase VOC potential emissions. Also, the application for R13-3048B contained more conservative parameters and assumptions than the original application for estimating VOC potential emissions for the dehydrators, compressor blowdowns and the piping and equipment leak emissions. The 701 hp emergency generator included in permit R13-3048A was not installed and therefore not included in R13-3048B. With the net increase in VOC potential emissions, the Buffalo Compressor Station is a major source for a criteria pollutant and is required to have a Title V operating permit.

The following are the state rule and federal regulation determinations and justifications:

1. 45CSR2 - To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.

45CSR2 applies to fuel burning units, defined as equipment burning fuel "for the primary purpose of producing heat or power by indirect heat transfer". The reboilers, and heater treaters are fuel burning units each with a design heat input under 10 million BTU/hr. Section 11.1 states that any fuel burning unit(s) having a heat input under ten (10) million B.T.U.'s per hour will be exempt from sections 4, 5, 6, 8 and 9. The reboilers, and heater treaters are subject to the 10 percent opacity limits required by section 3.1 of this rule. Compliance with the visible emission requirements shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 at the request of the Director.

2. 45CSR13 - Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation

The applicable requirements of Permit R13-3048B have been incorporated into the Title V permit. The requirements that pertained to initial notifications, reporting and or testing have been satisfied and therefore not included in the Title V permit. Also, some conditions of R13-3048B have been determined not to be applicable requirements and therefore not included in the Title V permit. The following conditions of R13-3048B have not been included in the Title V permit: 6.1.1., 6.1.2., 6.3.1., 6.3.2., 6.4.1.a. and b.1., 6.6.1.a.3, b. and c., 7.1.2., 7.2.1., 7.3.2., 7.3.3., 7.4.2.5., 7.4.3.4. and 8.1.1.

Condition 7.3.3. contains "affirmative defense" language taken from 40 CFR 60 Subpart OOOO. The revised version of Subpart OOOO no longer contains this language. Therefore, this permit condition has not been included in the Title V permit.

R13-3048B contains requirements from 40 CFR 60 Subpart OOOO in Section 7 for pneumatic controllers. All of the pneumatic controllers at the Buffalo station are air driven and therefore not subject to Subpart OOOO. Hence, said requirements of Section 7 in R13-3048B have not been included in the Title V permit. (*see Item 6.d. below*)

Section 11 of R13-3048B contains the specific requirements for the storage tanks. The emission point identifications are shown as EPTK-1 – EPTK8, EPWTK-1 – EPWTK-2. EPWTK-1 and EPWTK-2 are misidentified and should be EPWTK-9 and EPWTK-10. The Title V permit (Section 9) uses the correct identifications of EPWTK-9 and EPWTK-10.

Also, throughout Section 11 of R13-3048B, the tanks are referred to as TK-1 -TK-8 and WTK-1 - WTK-2. To matches the ID s in the “Emission Units” tables of both the Title V permit and permit R13-3048B, the emission unit IDs in the Title V permit have been labeled as EUTK-1 – EUTK-8 and EUWTK-9 and EUWTK-10.

Condition 11.1.3. shows the “Maximum Annual Throughput” for storage tanks TK-1 - TK-8 as 1,2500,000 gal/yr. This is a typographical error and should be 1, 250,000 gal/yr. This error has been corrected in condition 9.1.3. of the Title V permit.

3. 45CSR16 - Standard of Performance for New Stationary Sources

This rule establishes and adopts standards of performance for new stationary sources promulgated by the U.S. EPA pursuant to section 111(b) of the federal Clean Air Act, as amended.

The facility is subject to 40 CFR 60 Subpart JJJJ and Subpart OOOO. See below.

4. 45CSR34 - Emission Standards for Hazardous Air Pollutants

This rule establishes and adopts a program of national emission standards for hazardous air pollutants and other regulatory requirements promulgated by the U.S. EPA pursuant to 40 CFR Part 61, 63 and section 112 of the federal Clean Air Act, as amended.

The facility is subject to 40 CFR 63 Subpart ZZZZ and Subpart HH. See below.

5. 40CFR60 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (6) of 40 CFR §60.4230. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

Engines EUCE-1 through EUCE-12 are Caterpillar G3516B Compressor Engines that are 4-stroke, lean burn, spark ignition RICE, manufactured after July 1, 2007. They are non-emergency engines rated at 1380 HP each and are fueled by natural gas. All of the engines are equipped with oxidation catalysts which have control efficiencies of 85% for CO emissions, 85% for formaldehyde emissions, and 80% for VOC emissions. The engines must meet the emissions limits of 40 CFR §60.4233(e). Each engine will demonstrate compliance with the emission standards set forth in this Subpart JJJJ with the installed catalyst.

Buffalo Compressor Station will demonstrate compliance with this subpart for the non-certified engines in accordance with §60.4243(b)(2)(ii), which requires the facility to keep a maintenance plan and records of conducted maintenance and to maintain and operate the engines in a manner

consistent with good air pollution control practices for minimizing emissions. Additionally, Buffalo Compressor Station has conducted the initial performance tests and is required to conduct subsequent compliance testing every 8,760 hours or three years, whichever comes first to demonstrate compliance with the emissions standards. Testing will be conducted in accordance with §60.4244.

Records of all notifications submitted to comply with this subpart, maintenance conducted on the engines, and performance testing will be maintained in accordance with §60.4245(a). Initial notifications have been submitted. Performance testing results will be reported as required in §60.4245(d).

6. 40CFR60 Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution

40 CFR 60 Subpart OOOO establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO₂) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011 and on or before September 18, 2015. The following affected sources which commenced construction, modification or reconstruction after August 23, 2011 and on or before September 18, 2015 are subject to the applicable provisions of this subpart:

- a. Each gas well affected facility, which is a single natural gas well.

There are no gas wells at this facility. Therefore, all requirements regarding gas well affected facilities under 40 CFR 60 Subpart OOOO do not apply.

- b. Centrifugal compressors located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment.

There are no centrifugal compressors at the Buffalo Compressor Station. Therefore, all requirements regarding centrifugal compressors under 40 CFR 60 Subpart OOOO do not apply.

- c. Reciprocating compressors located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment.

There are reciprocating compressors located at the Buffalo Compressor Station that were constructed after August 23, 2011 and on or before September 18, 2015. Therefore, the requirements regarding reciprocating compressors under 40 CFR 60 Subpart OOOO do apply. There are no cover and closed vent systems for the reciprocating compressors. The facility will be required to perform the following:

- Replace the reciprocating compressor rod packing at least every 26,000 hours of operation or 36 months.
- Submit the appropriate start up notifications.
- Maintain records of hours of operation since last rod packing replacement, records of the date and time of each rod packing replacement, and records of deviations in cases where the reciprocating compressor was not operated in compliance.

- d. Pneumatic Controllers

- *There are pneumatic controllers located at the Buffalo Compressor Station. However, they are all air driven with control air supplied by an electric air compressor located at the site. Since they are not gas driven pneumatic controllers, they are not affected facilities subject to the requirements regarding pneumatic controllers under 40 CFR 60 Subpart OOOO.*
- e. Each storage vessel affected facility, which is a single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment.

The storage vessels at the site are not subject to the requirements of this rule because they have the potential to emit less than 6 tpy of VOC from each tank. The storage vessels are controlled by a vapor recovery unit to reduce the VOC potential emissions below 6 tpy.

- f. The group of all equipment, except compressors, within a process unit is an affected facility.
- Addition or replacement of equipment for the purpose of process improvement that is accomplished without a capital expenditure shall not by itself be considered a modification under this subpart.
 - Equipment associated with a compressor station, dehydration unit, sweetening unit, underground storage vessel, field gas gathering system, or liquefied natural gas unit is covered by §§60.5400, 60.5401, 60.5402, 60.5421 and 60.5422 of this subpart if it is located at an onshore natural gas processing plant. Equipment not located at the onshore natural gas processing plant site is exempt from the provisions of §§60.5400, 60.5401, 60.5402, 60.5421 and 60.5422 of this subpart.
 - The equipment within a process unit of an affected facility located at onshore natural gas processing plants and described in paragraph (f) of this section are exempt from this subpart if they are subject to and controlled according to subparts VVa, GGG or GGGa of this part.

The Buffalo Compressor Station is not a natural gas processing plant. Therefore, Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants do not apply.

- g. Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.

The Buffalo Compressor Station is not a natural gas processing plant nor are there any sweetening units at the Buffalo Compressor Station. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOO do not apply.

7. 40CFR63 Subpart HH - National Emissions Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities

This subpart applies to the owners and operators of the emission points, specified in paragraph (b) of 40 CFR §63.760 that are located at oil and natural gas production facilities that meet the specified criteria in paragraphs 40 CFR §§63.760(a)(1) and either (a)(2) or (a)(3) of §63.760. The Buffalo Compressor Station is subject to this subpart. 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 < 0.90 megagram per year (1.0 tpy), the

dehydration units (DHY-01 and DHY-02) are exempt. The only requirement is to maintain records of the actual average benzene emissions per year as specified in 40 CFR §63.774(d)(1).

Since the facility is an area source of HAP emissions, pursuant to 40 CFR §63.760(b)(2), the affected source for this subpart includes each triethylene glycol (TEG) dehydration unit. Therefore, this rule does not apply to storage vessels (tanks), compressors, or ancillary equipment.

8. 40CFR63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

The twelve CAT G3516B compressor engines (EUCE-1 through EUCE-12) at the Buffalo Compressor Station are classified as new spark ignition engines located at an area source of HAP emissions. Pursuant to 40 CFR §63.6590(c)(1). The engines must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for these engines under this Subpart.

Non-Applicability Determinations

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

1. 45 CSR 10 - To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.

This rule potentially applies to fuel burning units, including glycol dehydration unit reboilers and fuel gas heaters. Per 45CSR§10-10.1, units rated less than 10 MMBtu/hr are exempt from the SO₂ emission limitations and testing, monitoring, recordkeeping, and reporting requirements of this rule. The reboilers and heater treaters at the station are each rated less than 10 MMBtu/hr and as such are exempt from this rule.

2. 40 CFR 60 Subparts D, Da, Db, and Dc - Standards of Performance for Fossil-Fuel-Fired Steam Generators, Electric Utility Steam Generating Units; for Industrial-Commercial-Institutional Steam Generating Units; and for Small Industrial-Commercial-Institutional Steam Generating Units.

These subparts apply to steam generating units of various sizes, all greater than 10 MMBtu/hr. The station does not include any steam generating units with a heat input greater than 10 MMBtu/hr, therefore the requirements of these subparts do not apply.

3. 40 CFR 60 Subparts K, Ka, and Kb - 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; for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984; and for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.

These subparts apply to storage tanks of certain sizes constructed, reconstructed, or modified during various time periods. Subpart K applies to storage tanks constructed, reconstructed, or modified prior to 1978 with a storage capacity greater than 151,412 liters (40,000 gallons), Subpart Ka applies to those constructed, reconstructed, or modified prior to 1984 with a storage

capacity greater than 151,412 liters (40,000 gallons), and Subpart Kb applies to volatile organic liquid (VOL) storage tanks constructed, reconstructed, or modified after July 23, 1984 with a capacity equal to or greater than 75m³ (19,813 gallons). There are no tanks at the station with a capacity equal to or greater than 75m³ (19,813 gallons). Therefore, Subparts K, Ka, and Kb do not apply to the storage tanks at the station.

4. 40 CFR 60 Subpart GG - *Standards of Performance for Stationary Gas Turbines.*

Pursuant to 40 CFR §60.330, this subpart is applicable to stationary gas turbines with a heat input at peak load equal to or greater than 10 MMBtu/hr, based on the lower heating value of the fuel fired, which commenced construction, modification, or reconstruction after October 3, 1977. The microturbine at the station has a heat input rating less than 10 MMBtu/hr. Therefore, this subpart is not applicable to the microturbine.

5. 40 CFR 60 Subpart IIII - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*

This subpart applies to manufacturers, owners, and operators of stationary compression ignition internal combustion engines (CI ICE) that have been constructed, reconstructed, or modified after various dates, the earliest of which is July 11, 2005. The compressor engines at the Buffalo Compressor Station are spark-ignition internal combustion engines. Therefore, the requirements of this subpart do not apply.

6. 40 CFR 60 Subpart KKKK - *Standards of Performance for Stationary Combustion Turbines.*

Pursuant to 40 CFR §60.4305, this subpart is applicable to stationary combustion turbines with a heat input at peak load equal to or greater than 10 MMBtu/hr, based on the lower heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005. The microturbine at the station has a heat input rating less than 10 MMBtu/hr. Therefore, this subpart is not applicable to the microturbine.

7. 40 CFR 60 Subpart OOOOa - *Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015.*

This rule does not apply because the facility was constructed prior to September 18, 2015 and has not been modified or reconstructed.

8. 40 CFR 63 Subpart HHH - *National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities*

The Buffalo Station is not a major source of HAP emissions as defined in 40 CFR §63.1271 nor is it a natural gas transmission or storage facility that transports or stores natural gas prior to entering the pipeline to a local distribution company or to a final end user. Therefore, the requirements of this subpart do not apply to the station.

9. 40 CFR §63 Subpart YYYY - *National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines*

The Buffalo Station is not a major source of HAP emissions as defined in 40 CFR §63.6085(b). Therefore, the requirements of this subpart do not apply to the station.

10. 40 CFR 63 Subpart DDDDD - *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*

The Buffalo Station is not a major source of HAP emissions as defined in 40 CFR §63.7575. Therefore, the requirements of this subpart do not apply to the station.

11. 40 CFR 63 Subpart JJJJJ - *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*

Since the reboilers and heater treaters are gas fired, they are not subject to this subpart pursuant to 40 CFR §63.11195(e).

12. 40 CFR Part 64 – *Compliance Assurance Monitoring (CAM)*

There are no “*large pollutant-specific emissions units*” at the Buffalo Compressor Station. Since this is the initial Title V permit for the facility, CAM is not required to be addressed. Pursuant to §64.5(b), for all “*other pollutant-specific emissions units*” (i.e., units with post-control potential emissions less than the major threshold), the owner or operator shall submit the information required under §64.4 as part of an application for a renewal of the Title V permit. Therefore, CAM for the Buffalo Station will be addressed accordingly during the facility's first Title V Operating Permit Renewal.

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, November 23, 2018
Ending Date: Wednesday, December 26, 2018

Point of Contact

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

Frederick Tipane
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Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478
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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.