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

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on May 8, 2017.

Permit Number: R30-10300009-2017
Application Received: August 21, 2015
Plant Identification Number: 03-54-10300009
Permittee: Eastern Gas Transmission and Storage, Inc.
Facility Name: Hastings Extraction Plant
Mailing Address: 925 White Oaks Blvd., Bridgeport, WV 26330

Facility Description
Hastings Extraction Plant is a natural gas liquids extraction facility. Propane and heavier components of natural gas are removed through a turbo-expander cryogenic process. The heavier hydrocarbons are fractionated into the products propane, iso-butane, n-butane, and natural gasoline.

The SIC code for this facility is 1321.

This significant modification is based on permit R13-2468E. The R13-2468E application was submitted per the Consent Order CO-R13-E-2015-13 (Order for Compliance, item 2), and was a part of the “Frac Efficiency Upgrade” project. The modification incorporates the compliance plans of Consent Orders CO-R13-E-2015-13 and CO-R13,30-E-2018-08. It includes installation in 2012 of a closed vent system with a vapor recovery unit (VRU-1) for product
recovery (vapor condensing and pumping to Hastings Extraction Process (HEP) for fractionation) during NGL Railcar Loading Operations and to control VOCs, and an addition of the existing 2,936-gal Knockout Tank (V-2195) at Hastings Electric Compressor Station (HECS).

The Consent Order CO-R13-E-2015-13 was issued on June 26, 2015, to resolve the compliance issue of the company failing to obtain a permit for the expansion of the Galmish Loadout Facility. Later the company self-reported violations of CO-R13-E-2015-13 for venting 250 tons VOCs to the atmosphere that were collected by the vapor recovery system at the Galmish Loadout Facility through an unmonitored bypass device, and which resulted in issuance of Consent Order CO-R13, 30-E-2018-08 on August 16, 2018. The Consent Order CO-R13-E-2015-13 was terminated on August 18, 2021, upon the issuance of the permit R13-2468E, because requirements contained in the Order were completed. The Consent Order CO-R13, 30-E-2018-08 was closed on January 7, 2021, upon completion of the requirements contained in the Order.

**Emissions Summary**

This modification results in the following emission changes:

<table>
<thead>
<tr>
<th>Regulated Pollutants</th>
<th>Facility PTE before modification, TPY</th>
<th>Facility PTE after modification, TPY</th>
<th>PTE change, TPY</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>83.03</td>
<td>83.03</td>
<td>0</td>
</tr>
<tr>
<td>CO</td>
<td>50.85</td>
<td>50.85</td>
<td>0</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>560.63</td>
<td>560.63</td>
<td>0</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>5.49</td>
<td>5.49</td>
<td>0</td>
</tr>
<tr>
<td>TSP</td>
<td>5.49</td>
<td>5.49</td>
<td>0</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO$_2$)</td>
<td>7.22</td>
<td>7.23</td>
<td>0.01</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>1.44</td>
<td>4.74</td>
<td>3.3</td>
</tr>
</tbody>
</table>

**Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit 560.63 TPY of VOCs. 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.

The modification to this facility has been found to be subject to the following applicable rules:

- Federal and State: 45CSR13 Pre-construction permit
- 45CSR16 Standards of Performance for New Stationary Sources Pursuant to 40 CFR 60
- 45CSR30 Operating permit requirement.
- 40 C.F.R. Part 60, VV$^1$ Equipment Leaks of VOC in the Synthetic

$^1$Requirements incorporated by reference in 40 CFR 60, Subpart KKK.
Eastern Gas Transmission and Storage, Inc
Hastings Extraction Plant

Organic Chemicals Manufacturing Industry
Equipment Leaks of VOC from Onshore Natural Gas Processing Plants

State Only: N/A

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
The active permits/consent orders affected by this modification are as follows:

<table>
<thead>
<tr>
<th>Permit or Consent Order Number</th>
<th>Date of Issuance</th>
<th>Permit Determinations or Amendments That Affect the Permit (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>R13-2468E</td>
<td>August 18, 2021</td>
<td>[Condition 5.2.1 was added to monitor heater HTR3 fuel consumption based on R13-2468E, condition 5.2.4.]</td>
</tr>
</tbody>
</table>

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

1. The company changed its name from “Dominion Transmission, Inc.” to “Eastern Gas and Storage, Inc.,” therefore, the name was changed on page 1.

2. Emission Units Table 1.1 – according to the permit R13-2468E, the Table 1.1 was divided into 3 sections: Galmish Loading Area, Hastings Electric Compressor Station (HECS) and Hastings Extraction Plant (HEP), and Emission Units were moved to the corresponding sections. Also, Vapor Recovery Unit VRU-1 (including the air coolers: Vessels V-3610, V-3630, & V-3650; and recovered Liquid Pumps) and HECS Knockout Tank (V-2195) were added to the Table. In addition, the ID and description of the Emission Unit “LOAD” were revised to “Product Recovery or VS-1” and “Railcar Tanker Transfer Racks, 21 Stations” respectively. Also, Fire-Pump engine EN04 (Emission Unit 001-04) was permanently removed from service, therefore it was removed from this table.

3. Section 5.0 – new monitoring requirement 5.2.1 was added to monitor heater HTR3 fuel consumption (based on R13-2468E, condition 5.2.4).

4. Section 6.0 – Fire-Pump engine EN04 (Emission Unit 001-04) was removed from the plant, therefore, all the references to this engine and all the applicable requirements were removed from this section.
5.  Section 7.0 – requirement 7.5.1 (initial report for Tank TK10 internal floating roof) was removed because it is obsolete. The Tank TK10 was initially filled on December 15, 2017, and the initial report was submitted on December 21, 2017 (within 15 days after initial filling of the Tank).

6.  Section 8.0 – additional language was added to the condition 8.1 to describe what process areas have equipment subject to the requirements of this section; also, per the company’s request additional language was included for clarification to explain that an Alternative Work Practice for LDAR as per 40 CFR Part 60, Subpart A, §60.18(g)-(i) (using a camera instead of Method 21 monitoring requirements) may be used. In addition, more applicable conditions of LDAR were included with the existing requirements 8.1.3.1, 8.1.3.2, 8.1.3.3, 8.1.3.5, 8.4.1. Also, section “8.2 Monitoring Requirements” was added based on underlying conditions of the permit R13-2468E, and a monitoring condition 8.2.2 for the Alternative Work Practice option (40 CFR §60.18(g), (h), (i)) was included per the company’s request.

7.  Section 10.0 – new section was added for Railcar Loading Operations at Galmish Loading Area to include compliance plan of the Consent Order CO-R13-E-2015-13 based on underlying Section 7.0 of the permit R13-2468E.

8.  Section 11.0 - new section was added for the existing 2,936-gal Knock-out Tank V-2195 installed in 2002 at the Hastings Electric Compressor Station based on underlying Section 8.0 of the permit R13-2468E. The Tank receives vented gases and entrained liquids from equipment associated with the electric gas compressors, along with the flash gases and liquids from equipment associated with the Hastings Liquid Collection System, portions of which are located at HECS.

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 Kb – this subpart doesn’t apply to the tank V-2195 for the reasons described below:

<table>
<thead>
<tr>
<th>Tank ID</th>
<th>Content</th>
<th>Year Installed</th>
<th>Design capacity (gal)</th>
<th>Design capacity (m³)</th>
<th>Subpart Kb non-applicability basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>V-2195</td>
<td>Drip Gasoline Liquids and other VOL</td>
<td>2002 (after July 23, 1984)</td>
<td>2,936</td>
<td>11.114</td>
<td>Design capacity &lt; 75 m³ Exempt from Subpart Kb per §60.110b(a)</td>
</tr>
</tbody>
</table>

2.  Section 3.6.1 (Compliance Plan) was deleted because requirements of the Consent Orders CO-R13-E-2015-13 and CO-R13,30-E-2018-08 were completed.

3.  40 C.F.R. 64 (CAM Rule) – in 2012 a closed vent system with a vapor recovery unit (VRU-1) was installed at the NGL Railcar Loading Operations (Emission Unit 006-01) at Galmish for product recovery. The VRU condenses NG vapor to liquid, and liquid is routed from the VRU to the HEP for recovery (fractionation) of the product. In 2015, in the Consent Order CO-R13-E-2015-13 (Findings of Fact, item 26), it was advised to the company to add the VRU to the R13-2468E permit to limit PTE for VOCs. Also, in the CO- R13-E-2015-13 (Order for Compliance, item 4) it was stated that the company “shall operate the VRU at Galmish and route condensed liquids to the HEP for recovery”. Therefore, it is documented that the VRU is primarily installed for the material recovery purposes and meets the definition of "inherent process equipment" in 40 C.F.R. §64.1. Therefore, the VRU is not considered a control device for purposes of CAM applicability, and CAM is not applicable.
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: December 1, 2021
Ending Date: January 3, 2022

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)
Not applicable.