West Virginia Department of Environmental Protection Division of Air Quality





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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on March 15, 2021.

Permit Number: **R30-05100127-2021** Application Received: **October 29, 2024** Plant Identification Number: **03-54-051-00127** Permittee: **Williams Ohio Valley Midstream LLC** Facility Name: **Fort Beeler Gas Processing Plant** Mailing Address: **100 Teletech Drive, Suite 2, Moundsville, WV 26041**

Permit Action Number: MM03 Revised: July 15, 2025

Directions: From Main Street in Cameron: Head north on US-250/Waynesburg Pike for approximately 3.7 miles; Turn left to continue on US- 250/Waynesburg Pike for approximately 2.5 miles; Turn left onto a gravel access road for approximately 0.2 miles; Entrance to site is straight ahead.	Physical Location: UTM Coordinates: Directions:	250/Waynesburg Pike for approximately 2.5 miles; Turn left onto a gravel access road for approximately 0.2 miles; Entrance to site is
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Facility Description

The Fort Beeler Gas Processing Plant currently receives natural gas from local production wells and processes this gas through cryogenic processes, removing natural gas liquids from the inlet gas. The facility has the capacity to process 520 million standard cubic feet per day (mmscfd) of raw natural gas through one (1) 120 mmscfd cryogenic plant (Plant 1), and two (2) 200 mmscfd cryogenic plants (Plant 2 and 3).

The co-located Groves Dehydration Station utilizes one 5.0 million standard cubic feet per day (mmscfd) triethylene glycol (TEG) dehydrator. The dehydrator is comprised of a contractor/absorber tower (no vented emissions), a flash tank, and a regenerator/still vent. The dehydrator removes water vapor from the

inlet wet gas stream to meet pipeline specifications. Other equipment is: one (1) 0.20 MMBTU/hr glycol (TEG) reboiler (BLR-01) to supply heat for the TEG regenerator/still vent, as well as several comparatively small tanks with insignificant emissions for glycol and methanol storage.

This modification is to replace the existing 225 horsepower Caterpillar G342NA Compressor Engine (Emission Unit ID CE-01) with a smaller 203 horsepower Caterpillar G3306TA compressor engine (Emission Unit ID CE-01).

Emissions Summary

The change in potential emissions associated with the minor modification (MM03) is as follows:

Pollutants	Change in Potential Emissions, TPY
NOx	+0.76
СО	-3.36
VOC	-0.86
РМ	-0.02
SO ₂	0.00
HAPs	0.00

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential-to-emit 156.82 tons/year of Volatile Organic Compounds (VOCs). Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Williams Ohio Valley Midstream LLC 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	New Source Review – Modification.
	45CSR16	Standards of Performance for New
		Stationary Sources.
	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 63, Subpart ZZZZ	National Emissions Standards for Hazardous
		Air Pollutants for Stationary Reciprocating
		Internal Combustion Engines.
	40 C.F.R. Part 60, Subpart OOOO	a Standards of Performance for Crude Oil and
		Natural Gas Facilities for Which
		Construction, Modification or
		Reconstruction Commenced After
		September 18, 2015 and On or Before
		December 6, 2022

State Only:

None

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:

Permit or	Date of	Permit Determinations or Amendments That
Consent Order Number	Issuance	Affect the Permit (<i>if any</i>)
R13-2826Q	December 9, 2024	

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

R13-2826Q Changes

Changes from R13-2826Q have been incorporated in the Title V permit and include the following:

- The Emission Units Table 1.1 was revised to update Emission Unit ID-(CE-01) information (replacement of existing 225 horsepower Caterpillar G342NA compressor engine with a smaller 203 horsepower Caterpillar G3306TA compressor engine).
- Conditions 4.1.1 and 4.1.2 updated the information and limits for the replacement compressor engine.
- Section 4 was updated to include applicable 40 C.F.R. 60 Subpart JJJJ requirements for CE-01 (conditions 4.1.20, 4.1.25, 4.1.26, 4.1.27, 4.3.1, 4.3.2, 4.4.6, and 4.5.5).
- Section 4 was updated to remove CE-01 from 40 C.F.R. 63 Subpart ZZZZ requirements (conditions 4.1.13, 4.1.15, 4.1.16, 4.1.17, 4.2.2, 4.2.3, 4.4.3, 4.4.4, 4.4.5, 4.4.9, 4.5.1, 4.5.2, 4.5.6) and delete conditions 4.1.24 and 4.2.6 which do not apply to the replacement compressor engine.
- Citation for conditions 4.1.18, 4.2.4, 4.2.5, 4.4.7 and 4.5.4 were updated to add the units that are applicable to 40 C.F.R. Part 60 Subpart OOOO for Rod Packing Changes.

40 C.F.R. 63 Subpart ZZZZ Changes

• 40 C.F.R. 63 Subpart ZZZZ requirements were updated in Section 4 of this permit due to changes to the regulation. This affected conditions 4.1.21, 4.1.22, 4.2.3 and 4.4.3.

40 C.F.R. 60 Subpart JJJJ Changes

• 40 C.F.R. 60 Subpart JJJJ requirements were updated in Section 4 of this permit due to changes to the regulation. This affected conditions 4.1.12, 4.3.2, 4.4.6, 4.5.5, 4.5.7 and 4.5.8.

40 C.F.R. 60 Subpart OOOOa

• The reciprocating compressor was manufactured in October 2020; therefore, 40 C.F.R. Part 60 Subpart OOOOa requirements apply to this Compressor. 40 C.F.R. Part 60 Subpart OOOOa requirements were added as conditions 4.1.28, 4.2.6, 4.2.7, 4.4.10 and 4.5.9 of this permit.

Title V Boilerplate Changes

- Conditions 2.1.3., 3.5.4., and 3.5.8.a.2. Revised resulting from changes to 45CSR30.
- **Condition 2.11.4.** The citation was revised due to changes to 45CSR30.
- Condition 2.22.1. The citation was revised because 45CSR38 has been repealed.
- Condition 3.5.3. The mailing address for the U.S. EPA was revised.
- Conditions 2.17., 3.5.7., 3.5.8.a.1. Deleted based on changes to 45CSR30.
- Conditions 3.1.6. and 3.3.1. The citation was revised to refer to the current version of the WV Code.
- **Condition 3.3.1.b.** This condition was updated to include the following additional language: "If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit shall be revised in accordance with 45CSR§30-6.4 or 45CSR§30-6.5 as applicable."

Non-Applicability Determinations

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

N/A

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:	N/A
Ending Date:	N/A

Point of Contact

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

Beena Modi West Virginia Department of Environmental Protection Division of Air Quality 601 57th Street SE Charleston, WV 25304 Phone: 304/926-0499 ext. 41283 Beena.j.modi@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.