

Fact Sheet



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 January 8, 2019.

Permit Number: **R30-00900116-2019**
Application Received: **December 28, 2022**
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

Permit Action Number: MM01 Revised: *June 12, 2023*

| | |
|--------------------|--|
| Physical Location: | Bethany, Brooke County, West Virginia |
| UTM Coordinates: | 540.71 km Easting • 4449.70 km Northing • Zone 17 |
| Directions: | From Bethany: Head east on Bethany Pike (WV-67) ~2.8 mi; Turn left onto site access road ~0.3 mi; Entrance is on the right. |

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

This modification results in the following emission changes:

| Pollutant | PTE change (TPY) |
|---|------------------|
| Carbon Monoxide (CO) | -0.06 |
| Nitrogen Oxides (NO _x) | -0.01 |
| Volatile Organic Compounds (VOC) | 11.21 |
| Particulate Matter (PM _{2.5}) | 0.20 |
| Particulate Matter (PM ₁₀) | 0.20 |
| Sulfur Dioxide (SO ₂) | 0.02 |
| Hazardous Air Pollutants | PTE Change (TPY) |
| Acetaldehyde | - <0.01 |
| Acrolein | - <0.01 |
| Benzene | 0.13 |
| 1,3-Butadiene | - <0.01 |
| Ethylbenzene | 0.10 |
| Formaldehyde (HCHO) | -0.01 |
| n-Hexane | -0.75 |
| Methanol (MeOH) | 3.02 |
| Polycyclic Organic Matter (POM) | <0.01 |
| Toluene | 0.37 |
| 2,2,4-Trimethylpentane (TMP) | 0.06 |
| Xylenes | 0.88 |
| Other/Trace HAPs | - <0.01 |

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 212.42 tpy of VOCs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Appalachia Midstream Services, 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 | Construction permit requirement |
| | 45CSR30 | Operating permit requirement. |
| 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:

| Permit or Consent Order Number | Date of Issuance | Permit Determinations or Amendments That Affect the Permit (<i>if any</i>) |
|-----------------------------------|---------------------|---|
| R13-3048C | February 28, 2023 | |

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 minor modification is based on changes approved under R13-3048C to modify the operating parameters of each dehydrator, add emissions from upstream methanol injection, increase compressor rod packing VOC emission limitations, add pigging operations, modify the dehydrator language to be consistent with other AMS permits, and add language to allow for use of ProMax as an alternative to GlyCalc.

The facility's physical location was updated to Bethany as per the modification application.

The following changes were made to the Title V permit under this modification:

- Section 1.0
 - The pigging operations were added to the Emission Units Table.
 - Table 1.2 was updated because R13-3048C supersedes and replaces R13-3048B.
- Sections 2.0 and 3.0
 - The Title V boilerplate was updated for conditions 2.1.3, 2.11.4, 2.17, 2.22.1, 3.5.3, 3.5.4, 3.5.7, 3.5.8.a.1, and 3.5.8.a.2.
- Section 4.0
 - Condition 4.1.3 was updated with the increased compressor rod packing emissions from R13-3048C.
- Section 7.0
 - The language in conditions 7.1.3 and 7.2.2 was changed to be more similar to language in the permittee's other permits and to match the changes in R13-3048C.
 - The emission limits in conditions 7.1.4 and 7.1.5 were updated as a result of the modified operating parameters of the Dehydrators.

- Conditions 7.3.3, 7.3.4, and 7.3.5 were added to allow for the use of ProMax as an alternative to GlyCalc.
- Section 11.0
 - Condition 11.1.2 was added to address the pigging operations.
 - Conditions 11.4.2 and 11.5.1 were updated to include the pigging operations.

Non-Applicability Determinations

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

None.

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 for minor modifications
Ending Date: N/A

Point of Contact

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

Nikki B. Moats
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41282
Nikki.b.moats@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.