

Fact Sheet



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

Permit Number: **R30-01300002-2022**
Application Received: **July 9, 2021**
Plant Identification Number: **03-54-013-00002**
Permittee: **Eastern Gas Transmission and Storage, Inc**
Facility Name: **Orma Compressor Station**
Mailing Address: **925 White oaks Blvd., Bridgeport, WV 26330**

Physical Location: Orma, Calhoun County, West Virginia
UTM Coordinates: 492.68 km Easting • 4288.86 km Northing • Zone 17
Directions: From the intersection of Rt. 33/Rt. 119 West & 16 South at Arnoldsburg take Rt. 16 South 4.7 miles to Orma, turn left onto Euclid/Nicut Road and travel 1.0 mile, turn left onto Crooked Run Road and go 0.1 miles to station on the left.

Facility Description

Orma Compressor Station is a natural gas compressor station facility covered by Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of two (2) 660 HP natural gas fired reciprocating engines, one (1) 112.2 HP emergency generator, one (1) dehydrator reboiler, one (1) dehydration unit with flare, and eight (8) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions
Carbon Monoxide (CO)	42.46	13.74
Nitrogen Oxides (NO _x)	259.69	81.06
Particulate Matter (PM _{2.5})	1.83	0.03
Particulate Matter (PM ₁₀)	1.83	0.12
Total Particulate Matter (TSP)	2.31	0.24
Sulfur Dioxide (SO ₂)	0.03	<0.01
Volatile Organic Compounds (VOC)	42.08	12.36

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2020 Actual Emissions
Acetaldehyde	0.37	0.08
Acrolein	0.37	0.08
Benzene	0.21	0.06
Ethylbenzene	0.09	0.02
Formaldehyde	2.62	0.37
Hexane	0.07	0.03
Toluene	0.44	0.09
Xylene	1.06	0.13

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

Title V Program Applicability Basis

This facility has the potential to emit 256.69 ton of NO_x. 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	To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers
	45CSR6	Open burning prohibited.

	45CSR11	Standby plans for emergency episodes.
	45CSR13	New Source Construction
	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 61	Asbestos inspection and removal
	40 C.F.R. 63, Subpart HH	Area Source Natural Gas Production
	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	To Prevent and Control 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 Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2945A	October 17, 2012	

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 is the fourth Title V renewal for this facility. There have been no changes to this facility since the last Title V Renewal.

3.0 Facility-Wide Requirements

- Updated to the most recent boiler-plate language. Non-boiler plate conditions did not change since there have been no changes to the underlying R13 permit (R13-2945A), 45CSR17, or the Emergency Operating Scenario.

4.0 Source-Specific Requirements [emission point ID(s): RBR02, DEHY02, & F1]

- There have been no changes to the underlying R13 permit (R13-2945A) nor any changes to the applicable requirements of 45CSR2, 45CSR6, 40 C.F.R. 63 Subpart A, and 40 C.F.R. 63 Subpart HH.
- Conditions 4.1.6 and 4.2.4 from the previous Title V permit were not included in this permit. 45CSR§10-4.1 sets an in-stack sulfur dioxide concentration limit of 2,000 parts per million by volume, but 45CSR§10-4.1.e. exempts facilities from this limit if the potential to emit SO₂ is less than 500 lbs/year. Orma Compressor station is exempt from 45CSR§10-4.1; reported facility-wide PTE of SO₂ is 60 lbs/year.
- Conditions 4.1.7 and 4.2.5 from the previous Title V permit were not included in this permit. Pipeline-quality natural gas cannot contain more than 20 grains total sulfur per 100 cubic feet of gas, which is much less than 50 grains H₂S per 100 cubic feet of gas required under 45CSR§10-5.1. Therefore, Orma Compressor station is not subject to 45CSR§10-5.1.

5.0 Source-Specific Requirements [emission point ID(s):EN01 & EN02]

- There have been no changes to the applicable requirements of 40 C.F.R. 63 Subpart ZZZZ for EN01 and EN02 which are existing non-emergency 2SLB engines greater than 500HP located at an area source of HAPs. Therefore, no changes were made to this section of the Title V Permit during this renewal.

6.0 Source-Specific Requirements [emission point ID(s): EG01]

- 40 C.F.R. 60 Subpart JJJJ was updated on September 29, 2021 resulting in minor changes to conditions 6.2.2.(f). and 6.4.2.(a)(3).
- Vacated sections 40 C.F.R. §§60.4243(d)(2)(ii) and (iii) were removed from condition 6.2.2.
- Requirements from 40 C.F.R. §60.4245(e) were added as condition 6.5.2.
- There have been no changes to the underlying R13 permit (R13-2945A) so no other changes were made to this section.

Non-Applicability Determinations

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

- 40 C.F.R. 60 Subpart JJJJ.** The compressor engines (EN01 and EN02) are not subject to this subpart since they were manufactured before 1965, before the applicability date.
- 40 C.F.R. 60 Subpart OOOO.** This subpart does not apply to the facility since the facility is a gathering facility that does not have gas wells, centrifugal compressors, reciprocating compressors, and/or pneumatic controllers constructed, modified or reconstructed after August 23, 2011 and on or before September 18, 2015. Tanks TK08, TK09, TK11, and TK12, installed between these applicability dates, do not meet the applicability requirements in 40 C.F.R. § 60.5365(e).
- 40 C.F.R. 60 Subpart OOOOa.** This facility has no equipment with applicable requirements under Subpart OOOOa. This subpart applies to equipment installed after September 18, 2015. The facility has no affected emissions units that have been installed after the applicable Subpart OOOOa effective date.
- 40 C.F.R. 63 Subpart HHH.** This subpart does not apply to the facility since the facility is not a transmission or storage station and is not a major source of HAPs.
- 40 C.F.R. 63 Subpart DDDDD.** The reboiler (RBR02) is not subject to this subpart since this facility is not a major source of HAPs.

- f. **40 C.F.R. 63 Subpart JJJJJJ.** The reboiler (RBR02) is not subject to this subpart since it is considered a “process heater,” which is excluded from the definition of “boiler.”
- g. **40 C.F.R. 64-Compliance Assurance Monitoring.** The facility does not have any pollutant specific emissions units (PSEU) that satisfied all of the applicability criteria requirements of 40 CFR §64.2(a). There have been no changes to any equipment at the facility since the last renewal that have resulted in a source satisfying the applicability requirements of 40 CFR §64.2(a) and becoming subject to CAM.

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: March 3, 2022

Ending Date: April 4, 2022

Point of Contact

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

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41286
Robert.A.Mullins@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.