

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 March 15, 2021.

Permit Number: **R30-05100127-2021 (MM01)**
Application Received: **February 23, 2021**
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: *MM01* Revised: *May 4, 2021*

Physical Location: Cameron, Marshall County, West Virginia
UTM Coordinates: 535.00 km Easting • 4,414.33 km Northing • Zone 17
Directions: From Main Street in Cameron head north on US-250/Waynesburg Pike
 ~3.7 miles. Turn left to continue on US-250 ~2.5 miles. Turn left onto
 access road ~0.2 mile. Entrance to site is straight ahead.

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 Plant 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 contactor/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.

Emissions Summary

This modification results in the following emission changes:

Pollutants	Change in PTE (TPY)
Carbon Monoxide (CO)	-11.08
Nitrogen Oxides (NO _x)	-3.63
Particulate Matter (PM _{2.5})	- 0.40
Particulate Matter (PM ₁₀)	- 0.40
Total Particulate Matter (TSP)	- 0.40
Sulfur Dioxide (SO ₂)	-0.01
Volatile Organic Compounds (VOC)	-9.12
Total HAPs	-0.31

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 157.68 tpy of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Williams Ohio Valley Midstream LLC's Fort Beeler Gas Processing Plant 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	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
45CSR34	Emission Standards for Hazardous Air Pollutants
40 C.F.R. Part 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

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>)
R13-2826O	March 4, 2021	

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 incorporates revisions associated with the Class I Administrative Update permit R13-2826O to remove the 800 bhp Caterpillar G399TA compressor engine (CE-06) permitted under R13-2826N and reinstate the existing 225 bhp Caterpillar G342NA compressor engine (CE-01) which had been removed under R13-2826N. The facility will not install the 800 bhp compressor engine and will keep the existing 225 bhp compressor engine. The 225 bhp engine was removed from the Title V permit through minor modification application (MM04) to R30-05100127-2015 which was processed with the renewal permit R30-05100127-2021 and issued on March 15, 2021. This modification to the renewal permit essentially will undo the MM04 changes to the Title V permit. Substantial changes to R30-05100127-2021 consist of the following:

1) **Section 1.1. Emission Units Table:**

- Added compressor engine CE-01 and removed compressor engine CE-06.
- Revised Emission Unit Description for "SSM" to add CE-01 and remove CE-06.

2) **Section 1.2. Active R13, R14, and R19 Permits:** The table has been updated to the latest versions of the Rule 13 permits.

- R13-2826O issued on March 4, 2021 – The updated requirements of this permit are associated with this minor modification as described above and have been included in Section 4.0 of the Title V permit.

3) **Section 4.0. description** – Revised to reflect the addition of CE-01 and the removal of CE-06.

4) **Section 4.1. Requirements** – The requirements for CE-01 have been added and the requirements for CE-06 have been removed in Section 4.1. of the permit.

- The requirements for CE-06 have been replaced with the requirements for CE-01 in conditions 4.1.1. and 4.1.2.
- The applicability reference for CE-01 has been added and CE-06 has been removed in conditions 4.1.9., 4.1.13., 4.1.15., 4.1.16. and 4.1.17. CE-06 has been removed from conditions 4.1.14., 4.1.22.
- Condition 4.1.24. containing 40 CFR 63 Subpart ZZZZ requirements for CE-01 has been added to the permit.

- 5) **Section 4.2. Requirements** – The requirements for CE-01 have been added and the requirements for CE-06 have been removed in Section 4.2. of the permit.
- The 03-NSCR has been replaced with 01-NSCR in condition 4.2.1.
 - The applicability reference for CE-01 has been added and CE-06 has been removed in conditions 4.2.2. and 4.2.3.
 - Condition 4.2.6. containing 40 CFR 63 Subpart ZZZZ requirements for CE-01 has been added to the permit.
- 6) **Section 4.4. Requirements** – The requirements for CE-01 have been added and the requirements for CE-06 have been removed in Section 4.4. of the permit.
- The applicability reference for CE-01 has been added and CE-06 has been removed in conditions 4.4.3., 4.4.4., 4.4.5. and 4.4.9.
- 7) **Section 4.5. Requirements** – The requirements for CE-01 have been added and the requirements for CE-06 have been removed in Section 4.5. of the permit.
- The applicability reference for CE-01 has been added and CE-06 has been removed in conditions 4.5.1., 4.5.2. and 4.5.6.

40 C.F.R. 63 Subpart ZZZZ – National Emission 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 Fort Beeler Gas Processing plant is an area source of HAP. Pursuant to 40 CFR §63.6590(a)(1)(iii), engine CE-01 is considered an *Existing stationary RICE* for Subpart ZZZZ since its construction commenced before June 12, 2006.
 - The applicable requirements of this subpart for which this engine is subject are contained in permit conditions 4.1.13., 4.1.15., 4.1.16., 4.1.17., 4.1.24., 4.2.2., 4.2.3., 4.2.6., 4.4.3., 4.4.4., 4.4.5., 4.4.9., 4.5.1., 4.5.2. and 4.5.6.

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 – 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 40 C.F.R. §§60.4230(a)(1) through (6). For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

- CE-01 is a 225 bhp gas-fired, 4SRB compressor engine with a construction date (according to the application) prior to June 12, 2006. Therefore, pursuant to 40 CFR §60.4230(a)(4) it is not subject to this subpart.

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: Not Applicable for minor modifications.
Ending Date: N/A

Point of Contact

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

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41910
frederick.tipane@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.