West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

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

Permit Number: R30-08500004-2022
Application Received: September 17, 2021
Plant Identification Number: 03-54-085-0004
Permittee: Eastern Gas Transmission and Storage, Inc.
Facility Name: Craig Compressor Station
Mailing Address: 925 White Oaks Blvd, Bridgeport, WV 26330

Physical Location: Smithville, Ritchie County, West Virginia
UTM Coordinates: 491.49 km Easting • 4324.68 km Northing • Zone 17
Directions: From Clarksburg, take Route 50 West for 41 miles to Ellensboro exit.
Go left on Route 16 South for 18 miles thru Harrisville to Route 47.
Turn left and go 0.2 miles across bridge then turn right on Route 16 South. Go approximately 20 feet and turn right up hill. Go 0.3 miles to station.

Facility Description
Craig Compressor Station is a natural gas compressor station 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 currently consists of three (3) 869 HP natural gas fired reciprocating engines, two (2) emergency generators, one (1) natural gas fired emergency air compressor, one (1) dehydrator reboiler, one (1) dehydration unit with a thermal oxidizer, and six (6) storage tanks of various sizes.
Emissions Summary

<table>
<thead>
<tr>
<th>Regulated Pollutants</th>
<th>Potential Emissions</th>
<th>2020 Actual Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>86.36</td>
<td>37.53</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOₓ)</td>
<td>246.43</td>
<td>108.33</td>
</tr>
<tr>
<td>Particulate Matter (PM₂.₅)</td>
<td>3.63</td>
<td>0.28</td>
</tr>
<tr>
<td>Particulate Matter (PM₁₀)</td>
<td>3.63</td>
<td>0.54</td>
</tr>
<tr>
<td>Total Particulate Matter (TSP)</td>
<td>4.58</td>
<td>0.54</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO₂)</td>
<td>0.07</td>
<td>0.02</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>235.71</td>
<td>94.11</td>
</tr>
</tbody>
</table>

PM₁₀ is a component of TSP.

<table>
<thead>
<tr>
<th>Hazardous Air Pollutants</th>
<th>Potential Emissions</th>
<th>2020 Actual Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acetaldehyde</td>
<td>0.71</td>
<td>0.20</td>
</tr>
<tr>
<td>Acrolein</td>
<td>0.71</td>
<td>0.20</td>
</tr>
<tr>
<td>Benzene</td>
<td>0.38</td>
<td>0.09</td>
</tr>
<tr>
<td>Ethylbenzene</td>
<td>0.20</td>
<td>0.00</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>5.06</td>
<td>1.44</td>
</tr>
<tr>
<td>Hexane</td>
<td>0.28</td>
<td>0.06</td>
</tr>
<tr>
<td>Toluene</td>
<td>1.23</td>
<td>0.20</td>
</tr>
<tr>
<td>Xylene</td>
<td>7.84</td>
<td>0.26</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>16.41</td>
<td>2.45</td>
</tr>
</tbody>
</table>

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

Title V Program Applicability Basis
This facility has the potential to emit 246.43 tpy of NOₓ and 235.71 tpy of VOC. 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  
NSR Permits  
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 61  
Asbestos inspection and removal  
40 C.F.R. Part 60, Subpart JJJJ  
Standards of Performance for Stationary Spark Ignition Internal Combustion Engines  
40 CFR Part 63, Subpart HH  
National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities  
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 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

<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>R13-2497B</td>
<td>February 1, 2017</td>
<td></td>
</tr>
<tr>
<td>R13-2503</td>
<td>February 19, 2003</td>
<td></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

- Vacated sections 40 C.F.R. §§63.6640(f)(2)(ii) and (iii) have been deleted from condition 6.1.10.
- Condition 7.4.1 was updated.

Non-Applicability Determinations
The following requirements have been determined not to be applicable to the subject facility due to the following:

a. **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. None of the tanks meet the applicability requirements in 40 C.F.R. § 60.5365(e).

b. **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.

c. **40 C.F.R. 63 Subpart DDDDD.** The reboiler (RBR02) is not subject to this subpart since the facility is not a major source of HAPs.

d. **40 C.F.R. 63 Subpart JJJJJ.** The reboiler (RBR02) is not subject to this subpart since it is considered a “process heater,” which is excluded from the definition of “boiler” in 40 C.F.R. §63.11237.

e. **40 CFR 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.

f. **40 CFR 60 Subpart JJJJ.** The compressor engines (EN01 – EN03) and emergency generators (EN05 and EN06) are not subject to this subpart since they were manufactured before the applicability date.

g. **45 CSR 10.** Compressor engines (EN01 – EN03) have been excluded from the applicability of SO₂ and H₂S limits. WVDAQ determined that 45 CSR 10 is not applicable to compressor engines.

h. **40 CFR 64.** 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 in this permit since the previous renewal was issued, so CAM remains not applicable to any emission unit listed in the renewal application.

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: April 20, 2022
Ending Date: May 20, 2022

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
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)
None.