# 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: **R30-10300033-2023**Application Received: **November 11, 2022**Plant Identification Number: **03-54-103-00033** 

Permittee: Equitrans, L.P.

Facility Name: Logansport #49 Compressor Station
Mailing Address: 2200 Energy Drive, Canonsburg, PA 15317

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Physical Location: Smithfield, Wetzel County, West Virginia

UTM Coordinates: 538.78 km Easting • 4378.47 km Northing • Zone 17

Directions: From Smithfield, take WV-20 N for 1.1 miles and turn right onto Co Rd.

7/8/Fallen Timber Run Rd. Go 2.8 miles and keep left to continue on Fallen Timber Run Rd/Shuman Hill/Co Rd 80. Go 0.8 miles and turn right onto Co Rd. 80/Shuman Hill. Continue 1.5 miles and turn left onto

N Fork Rd. Destination on the left in 0.4 miles.

**Facility Description** 

The Logansport #49 Compressor Station is a natural gas transmission facility covered by NAICS 486210 and SIC 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) 800-hp natural gas internal combustion reciprocating engines, one (1) electric generator, one (1) triethylene glycol dehydrator, one (1) heating boiler, one (1) dehydration reboiler, one (1) line heater, four (4) catalytic heaters, one (1) space heater and six (6) tanks of various sizes. The

Logansport #49 Compressor Station is used to compress storage gas.

# **Emissions Summary**

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	<b>Potential Emissions</b>	2021 Actual Emissions
Carbon Monoxide (CO)	29.12	5.19
Nitrogen Oxides (NO <sub>X</sub> )	195.32	32.23
Particulate Matter (PM <sub>2.5</sub> )	2.76	0.40
Particulate Matter (PM <sub>10</sub> )	2.76	0.40
Total Particulate Matter (TSP)	2.76	0.59
Sulfur Dioxide (SO <sub>2</sub> )	0.07	0.02
Volatile Organic Compounds (VOC)	10.62	2.80

 $PM_{10}$  is a component of TSP.

Hazardous Air Pollutants	<b>Potential Emissions</b>	2021 Actual Emissions
Benzene	0.22	0.04
Toluene	0.24	0.03
Ethylbenzene	0.03	< 0.01
Xylene	0.49	0.04
n-Hexane	0.20	0.07
Formaldehyde	3.32	0.53
Other HAPs	1.24	0.01
Total HAPs	5.74	0.72

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

# **Title V Program Applicability Basis**

This facility has the potential to emit 195.32 tpy of NO<sub>X</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Equitrans, L.P. 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

	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	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 61	Asbestos inspection and removal
	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 Particulate Air Pollution from Materials Handling Preparation, Storage, and Other Sources of 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)
R13-3371A	March 13, 2018	
G60-D101	November 15, 2018	

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 Permit renewal for this facility. The following changes were made as part of this renewal.

#### 1.1 Emission Units

- Emergency generator (03-003) was added to the Emission Units table. This emergency generator was permitted under G60-D101.
- Generators 003-01 and 003-02 were removed when Emergency Generator 03-003 was installed in 2018. Generators 003-01 and 003-02 did not have any associated R13 Permit Requirements.
- The Indirect Gas Fired Heater (HTR) and the Separator Triethylene Glycol Tank (Tank 1) were removed from the facility in 2018 when the Dehydrator (TEG Dehy) was installed. HTR and Tank 1 did not have any associated R13 Requirements.
- Added Equipment Blow Downs (BLD) to the Emission Units table. There are no associated R13 requirements for BLD nor are there any applicable State Rules or Federal Regulations.

# 3.0 Facility-Wide Requirements

• Updated the Boilerplate language.

#### 4.0 Source-Specific Engine Requirements

- Removed generators G001 and G002 from the section title and removed condition 4.1.2.b. since generators G001 and G002 were removed from the facility.
- There have been no changes to the applicable 40 C.F.R. 63 Subpart ZZZZ requirements for compressor engines C001 and C002 since the last Title V renewal.

#### 5.0 Source-Specific Requirements

- Removed Indirect Gas Fired Heater (HTR) from the section title and the citation of condition 5.1.4.
- There have been no changes to the applicable requirements of 45CSR2, 45CSR6, and R13-3371A, for BLR, BLR02, LHTR and COMB-1 since the last Title V renewal.

# 6.0 Source-Specific Emergency Generator Requirements

- This section was added to incorporate the requirements of G60-D101, 40 C.F.R. 60 Subpart JJJJ, and 40 C.F.R. 63 Subpart ZZZZ for emergency generator 03-003.
- Emergency generator 03-003 is a certified engine >500 HP. It is also classified under 40 C.F.R. 63 Subpart ZZZZ as a new engine located at an area source of HAPs.

# **Non-Applicability Determinations**

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

45CSR21	Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds. Logansport #49 Compressor Station is not located in Cabell, Kanawha, Putnam, Wayne, or Wood counties that are affected by 45CSR21.
45CSR27	To Prevent and Control the Emissions of Toxic Air Pollutants. Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment "used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight."

40 C.F.R. 60 Subpart Dc	This subpart applies to steam generating units greater than 10 MMBtu/hr and less than 100 MMBtu/hr. Logansport # 49 Compressor Station does not have any steam generating units greater than 10 MMBtu/hr.
40 C.F.R. 60 Subpart GG	Standards of Performance for Stationary Gas Turbines. There are no turbines at the Logansport #49 Compressor Station.
40 C.F.R. 60 Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. All tanks storing volatile organic liquids are below 75 m³ in capacity.
40 C.F.R. 60 Subpart KKK	Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants. Logansport #49 Compressor Station is not engaged in the extraction of natural gas from field gas or in the fractionation of mixed natural gas liquids to natural gas products.
40 C.F.R. 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO <sub>2</sub> Emissions. There are no sweetening units at the Logansport #49 Compressor Station.
40 C.F.R. 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Engines. All engines at Logansport #49 Compressor Station are spark ignition engines.
40 C.F.R. 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines. There are no turbines at the Logansport #49 Compressor Station.
40 C.F.R. 60 Subpart OOOO and OOOOa	Standards of Performance for Oil and Natural Gas Production, Transmission, and Distribution, applies to affected facilities that commenced construction, reconstruction, or modification after August 23, 2011 and before September 18, 2015 for OOOO and after September 18, 2015 for OOOOa. Tanks 6 & 7 were constructed after September 18, 2015, but do not meet the 6 tpy threshold. They are therefore not subject to OOOOa.
40 C.F.R. 63 Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. The Logansport #49 Compressor Station is not subject to Subpart HH since Logansport #49 Compressor Station is not a natural gas production facility.
40 C.F.R. 63 Subpart HHH	Natural Gas Transmission and Storage Facilities. The Logansport #49 Compressor Station is a transmission facility but it is an area source of HAPs and thus is not subject to this rule.
40 C.F.R. 63 Subpart DDDDD	This MACT standard applies to Industrial, Commercial, and Institutional Boilers and Process Heaters at major sources of HAPs. Logansport #49 Compressor Station is not major for HAPs.

40 C.F.R. 63 Subpart JJJJJJ	This MACT standard applies to industrial, commercial, and institutional boilers at area sources of HAPs. All boilers at Logansport #49 Compressor Station fire natural gas exclusively. Natural gas boilers are exempt from the rule per 40 C.F.R. §63.11195(e).
40 C.F.R 64	CAM was determined not to be applicable during the previous renewal and there have been no changes which trigger CAM applicability since the last renewal.

# **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 12, 2023 Ending Date: May 12, 2023

#### **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 57<sup>th</sup> Street SE
Charleston, WV 25304
304/926-0499 ext. 41286
Robert, A. Mullins

#### **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)**

No comments were received from EPA, the company or the public.

Because of revisions to Rule 45CSR30 which became effective on March 31, 2023, changes to the Title V boilerplate in Sections 2 and 3 have been incorporated. They are as follows:

• Condition 2.1.3. – This condition was updated to delete the word "such" which was removed from 45CSR30 effective March 31, 2023. The reference was changed from 45CSR§30-2.12 to 45CSR§30-2.39 because the definition of "Secretary" was renumbered in a previous version of 45CSR30.

- Conditions 2.17., 3.5.7. and 3.5.8.a.1. These conditions were deleted and replaced with "Reserved" because the emergency provisions under 45CSR§30-5.7 were removed from 45CSR30 effective March 31, 2023.
- Condition 3.5.4. This condition was updated because the requirement to submit a certified emissions statement was removed from 45CSR30 effective March 31, 2023.
- Condition 3.5.8.a.2. This condition was updated to replace the word "telefax" with "email" according to the change in 45CSR30 effective March 31, 2023.