Fact Sheet

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

Permit Number: **R30-00700006-2017**
Application Received: **August 3, 2017**
Plant Identification Number: **03-54-007-00006**
Permittee: **Equatrans, L.P.**
Facility Name: **Burnsville # 71 Compressor Station**
Mailing Address: **P.O. Box 191 Burnsville, WV 26335**

Physical Location: Burnsville, Braxton County, West Virginia
UTM Coordinates: 529.40 km Easting • 4,301.40 km Northing • Zone 17
Directions: From Charleston, take Interstate 79 North to the Burnsville Exit. Go to the Exxon station and turn left. Turn left at the next intersection. Stay on this road, as it passes the grade school and goes under the interstate.

Facility Description
The Burnsville Compressor Station #71 is a natural gas production and 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) 1350-hp natural gas internal combustion reciprocating engines, one (1) heating boiler, one (1) dehydration boiler, one (1) TEG dehydrator, one (1) dehydration flare, one (1) 302-hp Kohler Generator and six (6) tanks of various capacities.

Emissions Summary

<table>
<thead>
<tr>
<th>Regulated Pollutants</th>
<th>Potential Emissions</th>
<th>2016 Actual Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>37.52</td>
<td>15.94</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOx)</td>
<td>262.59</td>
<td>125.74</td>
</tr>
</tbody>
</table>
### Plantwide Emissions Summary [Tons per Year]

<table>
<thead>
<tr>
<th>Regulated Pollutants</th>
<th>Potential Emissions</th>
<th>2016 Actual Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM$_{2.5}$)</td>
<td>4.47</td>
<td>1.96</td>
</tr>
<tr>
<td>Particulate Matter (PM$_{10}$)</td>
<td>4.47</td>
<td>1.96</td>
</tr>
<tr>
<td>Total Particulate Matter (TSP)</td>
<td>4.47</td>
<td>1.96</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO$_2$)</td>
<td>0.09</td>
<td>0.03</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>30.95</td>
<td>13.70</td>
</tr>
</tbody>
</table>

*PM$_{10}$ is a component of TSP.*

<table>
<thead>
<tr>
<th>Hazardous Air Pollutants</th>
<th>Potential Emissions</th>
<th>2016 Actual Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Formaldehyde</td>
<td>4.46</td>
<td>2.18</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>10.04</td>
<td>6.54</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 262.59 tons per year of NO$_x$. 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.
  - Open burning prohibited.

- 45CSR6
- 45CSR10
  - To Prevent and Control Air Pollution from the Emission of Sulfur Oxides

- 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 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 HH National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities.


40 C.F.R. Part 64 Compliance Assurance Monitoring

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

<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>R13-3252</td>
<td>August 8, 2016</td>
<td></td>
</tr>
<tr>
<td>G60-C060A</td>
<td>August 12, 2015</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

Since the last Title V renewal, compressor engine C-001 and G-001 have been decommissioned and G60-C060A was issued to install generator G-002A. The following changes were made to the Title V Permit due to those actions and any changes to the applicable State Rules and Federal Regulations.

1.0 Emission Units

- The Superior Model No. 66-825 reciprocating engine C-001 has been decommissioned and therefore removed from the Emission Units table.

- The Cummins Generator GTA 743 reciprocating engine G-001 has been decommissioned and therefore removed from the Emission Units table.

- Added Emission Unit G-002A to the Emission Units table. It was installed in 2015 and was permitted under G60-C060A.
In 2016 the 1.25 mmBtu/hr heating boiler (BLR) was replaced with a 1.26 mmBtu/hr unit.

4.0 Source-Specific Engine Requirements [emission point ID (C-002, C-003, G-001, and G-002A)]

- Removed the 40 C.F.R. 63 Subpart ZZZZ requirements that were solely applicable to emission units C-001 and G-001, since the engine C-001 and G-001 have been decommissioned.

- Added the applicable requirements of G60-C060A and 40 C.F.R. 60 Subpart JJJJ for Emission Unit G-002A to the Title V Permit as the following conditions: 4.1.7 – 4.1.16, 4.3.1, 4.4.2-4.4.4, and 4.5.2.

- Emission unit G-002A demonstrates compliance with 40 C.F.R. 63 Subpart ZZZZ by complying with the requirements of 40 C.F.R. 60 Subpart JJJ.

5.0 Source-Specific Requirements [emission point ID (FLARE, BLR, DEHY)]

- There have been no changes made to the equipment in Section 5.0 since the last modification issued on January 30, 2017, nor have there been any changes to the applicable State Rules or Federal Regulations. Therefore, there were no changes made to Section 5.0.

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

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>45CSR21</td>
<td>Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds. Burnsville #71 station is not located in Cabell, Kanawha, Putnam, Wayne, or Wood counties that are affected by 45CSR21.</td>
</tr>
<tr>
<td>45CSR27</td>
<td>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.”</td>
</tr>
<tr>
<td>40 C.F.R. 60 Subpart Dc</td>
<td>This subpart applies to steam generating units greater than 10 MMBtu/hr and less than 100 MMBtu/hr. Burnsville #71 Compressor Station does not have any steam generating units greater than 10 MMBtu/hr.</td>
</tr>
<tr>
<td>40 C.F.R. 60 Subpart GG</td>
<td>Standards of Performance for Stationary Gas Turbines. There are no turbines at the Burnsville #71 Compressor Station.</td>
</tr>
<tr>
<td>40 C.F.R. 60 Subpart K</td>
<td>Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 1, 1973, and Prior to May 19, 1978. All tanks are below 40,000 gallons in capacity.</td>
</tr>
<tr>
<td>40 C.F.R. 60 Subpart Ka</td>
<td>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.</td>
</tr>
<tr>
<td>40 C.F.R. 60 Subpart Kb</td>
<td>Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. All tanks are below 75 m³ in capacity.</td>
</tr>
<tr>
<td>40 C.F.R. 60 Subpart KKK</td>
<td>Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants. Burnsville #71 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.</td>
</tr>
<tr>
<td>40 C.F.R. 60 Subpart LLL</td>
<td>Standards of Performance for Onshore Natural Gas Processing: SO2 Emissions. There are no sweetening units at the Burnsville #71 Compressor Station.</td>
</tr>
<tr>
<td>40 C.F.R. 60 Subpart III</td>
<td>Standards of performance for Stationary Compression Ignition Engines. All engines at Burnsville #71 Compressor Station are spark ignition engines.</td>
</tr>
<tr>
<td>40 C.F.R. 60 Subpart KKKK</td>
<td>Standards of Performance for Stationary Combustion Turbines.</td>
</tr>
</tbody>
</table>
There are no turbines at the Burnsville #71 Compressor Station.

40 C.F.R. 60 Subparts OOOO and OOOOa
These subparts apply to affected facilities that commenced construction, reconstruction, or modification after August 23, 2011 for Subpart OOOO, or before September 18, 2015 for Subpart OOOOa. The equipment at the Burnsville Station was installed prior to the applicability dates of both rules. Therefore, 40 C.F.R. 60 Subparts OOOO and OOOOa are not applicable.

40 C.F.R 63 Subpart HHH
National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities. The Burnsville #71 Compressor Station is not subject to Subpart HHH since the Burnsville’s gas custody transfer is at an extraction facility and not to a natural gas transmission facility.

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. Burnsville #71 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 Burnsville #71 Compressor Station fire natural gas exclusively. Natural gas boilers are exempt from the rule per 40 C.F.R. §63.11195(e).

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: Tuesday, October 11, 2017
Ending Date: Thursday, November 9, 2017

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
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478
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)

Not applicable.