

Fact Sheet



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

Permit Number: **R30-04900052-2017**

Application Received: **July 24, 2017**

Plant Identification Number: **049-00052**

Permittee: **Equitrans, L. P.**

Facility Name: **Curtisville #50 Compressor Station**

Mailing Address: **625 Liberty Avenue, Suite 1700; Pittsburgh, PA 15222**

Revised: N/A

Physical Location:	Mannington District, Marion County, West Virginia
UTM Coordinates:	549.65 km Easting • 4377.15 km Northing • Zone 17
Directions:	Interstate 79 North to the Downtown Fairmont Exit (Number 137). Bear to the right on off ramp and merge into left lane prior to stop light. Make left at stop light and stay on Route 310 for 3 stop lights. Make right turn onto bridge at 3rd light. Go up the hill at stop light after crossing bridge. Go thru 2nd stop light. Make a left at next stop light. Bear to the right-hand lane for two stop lights and make a right onto Route 250 North. Stay on Route 250N to Mannington. In Mannington after passing Rite Aid (on right), make left hand turn onto Market street. At the Y at the end of Market Street, bear right onto Buffalo Road and continue on this road past Mannington Fairgrounds into the community of Logansport. After leaving Logansport make a left-hand turn onto a two lane bridge (1st left after Logansport) to Owen-Davey Creek Road. The first right turn leads to the station.

Facility Description

The Curtisville Compressor Station #50 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 one (1) 1100-hp natural gas internal combustion reciprocating engine, one (1) 44-hp emergency generator, one (1) 125-hp electric generator, one (1) heating boiler, one (1) TEG dehydrator, one (1) dehydrator boiler, one (1) dehydrator flare, and four (4) tanks of various sizes. The Curtisville #50 Compressor Station is used to compress storage gas.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2016 Actual Emissions
Carbon Monoxide (CO)	21.71	4.24
Nitrogen Oxides (NO _x)	130.64	32.33
Particulate Matter (PM _{2.5})	2.02	0.39
Particulate Matter (PM ₁₀)	2.02	0.39
Total Particulate Matter (TSP)	2.02	0.39
Sulfur Dioxide (SO ₂)	0.03	0.01
Volatile Organic Compounds (VOC)	6.40	1.54

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2016 Actual Emissions
Formaldehyde	2.24	0.56
Other HAPs	1.20	0.09
Total HAPs	3.44	0.65

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

Title V Program Applicability Basis

This facility has the potential to emit 130.64 TPY 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
	45CSR6	Open burning prohibited
	45CSR10	SO _x emissions.
	45CSR11	Standby plans for emergency episodes
	45CSR16	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 HAPs
	40 C.F.R. Part 60, Subpart JJJJ	SI RICE NSPS

	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart ZZZZ	RICE MACT
	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
	45 CSR17	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)
G60-C084	2/11/2016	

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

Equipment Changes

The following equipment changes have been made at this facility since the previous permitting action:

- The 70 HP Kohler Emergency Generator (G-100) was replaced with a new 44 HP Kohler Emergency Generator (G-003).
- The 1.25 MMBtu/hr Heating Boiler (BLR01) was replaced by a new 1.26 MMBtu/hr Heating Boiler. The same Emission Point ID is being used for the new boiler.

Changes Made to Section 4.0: Engines

This section of the permit previously contained all applicable engine requirements, and most of the conditions referenced 40CFR63, Subpart ZZZZ. However, the new emergency generator will demonstrate compliance with 40CFR63, Subpart ZZZZ by complying with 40CFR60, Subpart JJJJ. 40 CFR60, Subpart JJJJ requirements will be addressed in a new permit section (see discussion below). Therefore, the following emergency engine-specific conditions were removed from this section:

- Condition 4.1.1: table item #5 and footnote 2.
- Condition 4.1.7: installation of a non-resettable hour meter.
- Condition 4.1.8: emergency RICE requirements.

- Condition 4.4.2: records of hours of operation.

Changes Made to Section 5.0: TEG Dehydration with Flare, Dehydration Boiler, and Heating Boiler

- Testing requirements in condition 5.3.1 were revised. Language pertaining to initial startup was removed since this has already happened. Testing was changed from within 30 days of permit issuance to 180 days to allow the permittee additional time to perform testing. Additionally, requirements for a second opacity test within six months of the permit expiration were removed. It is expected that the permittee will be required to perform testing after the next permit renewal issuance, making this testing redundant.
- Reporting requirements in condition 5.5.6 were also revised. The requirement to submit a copy of the most recent wet gas analysis testing with the subsequent renewal application was removed, since this is a redundant requirement. The permittee has requested, and was given, the option to submit this report with the Semi-Annual Monitoring Report. The requirement to identify the station's location with respect to a custody transfer point was removed. This location has previously been identified and is not expected to change.
- Section 5.7, the CAM plan summary, was removed since it was redundant.

New Section 6.0: Emergency Engine

This section contains all applicable requirements for the new emergency engine (G-003). This engine is also permitted by General Permit G60-C084, and is therefore covered by requirements in G60-C. The following conditions are included in this section:

Condition Number	Summary of Condition	Regulatory Citation	G60-C Condition
6.1.1.	Operate and maintain engine according to manufacturer's recommendations & specifications and consistent with good operating practices	N/A	5.1.1.
6.1.2.	Emission limits	45CSR16, 40 CFR §60.4233(d) and Table 1 to Subpart JJJJ of Part 60	5.1.2. and 8.2.4.
6.1.3.	Maximum fuel consumption limit	N/A	5.1.3.
6.1.4.	Compliance demonstration by purchasing a certified engine	45CSR16; 40CFR§§60.4243(a)(1) and (b)(1)	8.4.1. and 8.4.2.
6.1.5.	Comply with emission standards for life of engine	45CSR16; 40CFR§60.4234	8.2.9.
6.1.6.	Engine operation and yearly usage limits	45CSR16; 40CFR§60.4243(d)	8.4.4.
6.1.7.	Air-to-fuel ratio controllers	45CSR16; 40CFR§60.4243(g)	8.4.7.
6.1.8.	General Provisions	45CSR16; 40CFR§60.4246	N/A
6.2.1.	Non-resettable hour meter	45CSR16; 40CFR§60.4237(c)	8.3.9.
6.4.1.	Records of notifications, maintenance, manufacturer documentation, and records of hours of operation.	45CSR16; 40CFR§§60.4245(a) and (b)	8.6.1.a. & b.
6.4.2.	Records of fuel usage and hours of operation	N/A	5.4.1.

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. Curtisville #50 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 GG	Standards of Performance for Stationary Gas Turbines. There are no turbines at the Curtisville #50 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 m ³ in capacity.
40 C.F.R. 60 Subpart KKK	Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants. Curtisville #50 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 ₂ Emissions. There are no sweetening units at the Curtisville #50 Compressor Station.
40 C.F.R. 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines. There are no turbines at the Curtisville #50 Compressor Station.
40 CFR 63 Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. The Curtisville #50 Compressor Station is not subject to Subpart HH since Curtisville #50 Compressor Station is not a natural gas production facility.
40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. This facility is not a major source of HAPs, therefore this subpart does not apply according to 40 C.F.R. §63.7485.

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: Friday, September 22, 2017
Ending Date: Monday, October 23, 2017

Point of Contact

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

Rex Compston, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478
Rex.E.Compston@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.