# 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: **R30-04100009-2023**Application Received: **December 12, 2022**Plant Identification Number: **03-54-04100009** 

Permittee: Equitrans, L.P.

Facility Name: Copley Run Compressor Station #70 Mailing Address: Route 4, Box 640 Weston, WV 26452

Physical Location: Weston, Lewis County, West Virginia

UTM Coordinates: 541.30 km Easting • 4314.80 km Northing • Zone 17

Directions: Interstate 79 to Exit 91. Proceed toward Weston for approximately 1 mile,

take a left onto Copley Road (Route 17). The station is approximately ½

mile on the left.

# **Facility Description**

Copley Run Compressor Station #70 is a natural gas transmission facility covered under Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate twenty-four (24) hours per day, seven (7) days per week. This station consists of three (3) 1350 hp compressor engines, one (1) 2250 hp compressor engine, one (1) 1800 hp compressor engine, one (1) 2.2 MMBtu/hr natural gas fired electric generator, one (1) 150 KW Kohler 150REZGC Generator, one (1) 1.63 MMBtu/hr natural gas fired hot water boiler, one (1) 0.03 MMBtu/hr natural gas fired hot water heater, one (1) 2.1 MM Btu/hr inline gas heater, two (2) triethylene glycol dehydration units, and six (6) tanks of various sizes.

#### **Emissions Summary**

Regulated Pollutants	Potential Emissions	2022 Actual Emissions	
Carbon Monoxide (CO)	136.34	57.78	
Nitrogen Oxides (NO <sub>X</sub> )	480.75	244.58	
Particulate Matter (PM <sub>2.5</sub> )	10.50	5.41	
Particulate Matter (PM <sub>10</sub> )	10.50	5.41	
Total Particulate Matter (TSP)	10.50	5.41	
Sulfur Dioxide (SO <sub>2</sub> )	0.19	0.07	
Volatile Organic Compounds (VOC)	131.96	20.07	

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

Hazardous Air Pollutants	Potential Emissions	2022 Actual Emissions	
Formaldehyde (HCHO)	14.47	6.01	
Ethyl Benzene	0.18	0.02	
Toluene	2.63	0.16	
Hexane	2.29	0.11	
Xylenes (Mixed Isomers)	0.99	0.16	
2,2,4-Trimethylpentane	0.62	0.10	
Benzene	2.39	0.31	
Other HAPs	5.20	0	
Total HAPs	28.77	6.87	

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

## **Title V Program Applicability Basis**

This facility has the potential to emit 136.34 tpy of CO; 480.75 tpy of NO<sub>x</sub>; 131.96 tpy of VOCs; 14.47 tpy of formaldehyde; and 28.77 tpy of total HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of total HAPs, Equitrans L.P.'s Copley Run Compressor Station #70 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 45CSR6 45CSR11 45CSR13 45CSR16	Opacity and PM limits for fuel burning units Open burning prohibited. Standby plans for emergency episodes. New Source Review Permit requirements Emission standards for New Stationary Sources pursuant to 40 C.F.R. Part 60
	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 Pursuant to 40 C.F.R. Part 63
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63 Subpart HH	Natural Gas Production Facilities MACT
	40 C.F.R. Part 60, Subpart JJJJ	NSPS for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. 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.
	45CSR17	Particulate Fugitive

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)
R13-2397E	5/17/2021	
G60-C085	2/25/2016	

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**

This is the fourth renewal of the Title V permit. The following changes to the Title V permit were made as part of this renewal:

- Title V Boilerplate changes:
  - Condition 2.1.3 The section of Rule 30 that defines Secretary changed in a previous version of Rule 30 and we failed to update this condition. Also, in the recently revised Rule 30, the word "such" was removed.
  - Condition 2.11.4. The reference notation was changed from 45CSR§30-2.39 to 45CSR§30-2.40 because this definition was renumbered in 45CSR30.
  - Condition 2.22.1. The reference notation was changed to delete 45CSR38 because it has been repealed.
  - Condition 3.5.3. The EPA contact information and address were updated.
  - Conditions 2.17, 3.5.7, and 3.5.8.a.1 The section for Emergency was removed and replaced with Reserved in condition 2.17. Section 5.7 of Rule 30 which pertained to emergencies and affirmative defense was removed in the revised Rule 30.
  - Condition 3.5.4 Under the revised Rule 30, certified emissions statements are no longer required to be submitted. Facilities have been submitting their emissions data in SLEIS and paying fees based on their SLEIS submittal, so this requirement was no longer needed.
  - Condition 3.5.8.a.2 Under the revised Rule 30, "telefax" was replaced with "email".
- ❖ Condition 3.1.9 was added as a facility wide requirement.
- ❖ Condition 4.2.1 was added as a monitoring requirement for Indirect Heat Exchangers: 003-01a, 003-02.
- Condition 4.3.1 was added as a testing requirement for Indirect Heat Exchangers: 003-01a, 003-02.
- Condition 7.5.3 was updated because of changes to the regulation and was moved as condition 7.1.2.
- ❖ The requirements of 40 C.F.R. §63.6650(h) were added as condition 7.5.3.
- Conditions 9.2.1 (2)(ii) and (iii) were removed because these sections of 40 CFR §60.4243(d) have been deleted. Also, emergency demand response was removed from condition 9.2.1.
- Conditions 9.2.5, 9.4.1 and 9.5.2 were updated according to changes to the regulations.

#### **Non-Applicability Determinations**

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

- a. 40 CFR part 60 Subpart Dc The boilers at Copley Run station are below 10 mmBtu/hr.
- b. 40 CFR part 60 Subpart GG There are no turbines at Copley Run station.
- c. 40 CFR part 60 Subparts K, Ka All tanks at Copley Run station are less than 40,000 gallons in capacity.
- d. 40 CFR part 60 Subpart KKK Copley Run station is not engaged in the extraction of natural gas liquids from field gas or in the fractionation of mixed natural gas liquids to natural gas products.
- e. 40 CFR part 60 Subpart LLL There are no sweetening units at Copley Run station.

- f. 40 CFR part 60 Subpart IIII The engines at Copley Run Station are not stationary compression ignition (CI) internal combustion engines (ICE).
- g. 45CSR27 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."
- h. 40 CFR 64 Since the last renewal, there have not been any changes in equipment at this facility. The 40 C.F.R. 64 Compliance Assurance Monitoring (CAM) requirements for the flare on Dehy 004-01 also remain unchanged.

#### **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: September 6, 2023 Ending Date: October 6, 2023

#### **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 601 57<sup>th</sup> Street SE

Charleston, WV 25304

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#### **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.