

# Fact Sheet



## For Draft/Proposed Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on October 18, 2022.

Permit Number: **R30-10300009-2022**  
Application Received: **March 14, 2023**  
Plant Identification Number: **03-54-10300009**  
Permittee: **Eastern Gas Transmission and Storage, Inc.**  
Facility Name: **Hastings Extraction Plant**  
Mailing Address: **925 White Oaks Blvd., Bridgeport, WV 26330**

Permit Action Number: *SM01*      Revised: *Draft/Proposed*

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Physical Location: Pine Grove, Wetzel County, West Virginia  
UTM Coordinates: 528.64 km Easting • 4377.66 km Northing • Zone 17  
Directions: From Clarksburg take Route 20 North approximately 37 miles to Hastings. Facility is on left side of the road.

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### Facility Description

Hastings Extraction Plant is a natural gas liquids extraction and fractionation facility. Propane and heavier components of natural gas are removed through a turbo-expander cryogenic process. The heavier hydrocarbons are fractionated into the products propane, isobutane, n-butane, and natural gasoline. The SIC code for this facility is 1321.

This significant modification is based on recently issued permit R13-2468F and covers the modification of the approximately 1,000,000-gallon Tank TK10 from an internal floating roof (IFR) to a fixed roof. The modified tank's VOC emissions will be controlled with add-on control equipment (elevated flare F1).

## Emissions Summary

This modification results in the following emission changes:

Regulated Pollutants	PTE Increases, TPY
Carbon Monoxide (CO)	1.57
Nitrogen Oxides (NO <sub>x</sub> )	0.52
Particulate Matter (PM <sub>10</sub> )	0.05
Total Particulate Matter (TSP)	0.05
Volatile Organic Compounds (VOC)	2.85

## Title V Program Applicability Basis

This facility has the potential to emit 561.12 TPY of VOCs. Due to this facility's potential to emit over 100 tons per year of VOCs, 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR13	Pre-construction permit
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 60, Subpart Kb	Volatile Organic Liquid Storage Vessels

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

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2468F	May 15, 2023	

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**

1. Emission Units Table 1.1 – revised Tank TK10 description and revised the control device from an internal floating roof (IFR) to a fixed roof controlled by an elevated flare F1; also, added a description of the flare F1.
2. Section 5.0 – condition 5.2.1 was deleted from R13-2468F, so it was deleted from the Title V permit. Condition 5.2.1 had the same record keeping requirements already included in condition 5.4.1.
3. Section 7.0 – removed requirements for the internal floating roof (IFR) and added requirements from 40 C.F.R. Part 60, Subpart Kb for use of a closed vent system controlled by a flare. 45CSR6 language was also added to address flare requirements. In addition, emission limits for the flare F1 were included in condition 7.1.1, a throughput limit of gasoline through Tank TK10 with recordkeeping for compliance demonstration were included in conditions 7.1.2 and 7.2.1, and a 98% overall VOC control efficiency requirement (more stringent than Subpart Kb requirement) for flare F1 was included in condition 7.1.3.
4. 40 C.F.R. 64 – the natural gasoline Tank TK10 has a VOC emission limit of 4.25 TPY (condition 7.1.1), and an add-on control device “Elevated Flare” F1 to reduce overall VOC emissions by 98% (condition 7.1.3). Estimated pre-control device VOC emissions of the Tank TK10 are 212.5 TPY (above 100 TPY applicability threshold), therefore CAM is applicable. Since the after-control device VOC emissions are below 100 TPY, per 40 C.F.R. §64.5(b) the company does not have to add a CAM plan for Tank TK10 until the next permit renewal.

### **Non-Applicability Determinations**

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

Permit Shield (condition 3.7.2.h) – 40 C.F.R. 64 (CAM plan) is applicable to the Tank TK10 VOC emissions, therefore this condition was removed (see detailed explanation in the Determination and Justification section above, item 4).

### **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 13, 2023  
Ending Date: October 13, 2023

### **Point of Contact**

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

Natalya V. Chertkovsky-Veselova  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

304/926-0499 ext. 41250  
natalya.v.chertkovsky@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)**

**(Choose)** Not applicable.

**OR**

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.