

Fact Sheet



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

Permit Number: **R30-00700006-2007**

Application Received: **May 15, 2002**

Plant Identification Number: **03-54-007-00006**

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

Facility Name: **Burnsville #71 Compressor Station**

Mailing Address: **100 Allegheny Center Mall, Pittsburgh, PA 15212-5331**

Physical Location:	Burnsville, Braxton County, West Virginia
UTM Coordinates:	529.40 km Easting • 4301.40 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. Cross the railroad tracks and go down the bank. Station is on the right.

Facility Description

The Burnsville Compressor Station #71 is a natural gas production and transmission facility covered by NAICS 48210 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) 600-hp natural gas internal combustion reciprocating engine, two (2) 1350-hp natural gas internal combustion reciprocating engines, one (1) heating boiler, one (1) dehydration boiler, one (1) dehydration flare, (1) 251-hp electric generator, and seven (7) tanks of various capacities.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2006 Actual Emissions
Carbon Monoxide (CO)	112.3756	50.9019
Nitrogen Oxides (NO _x)	306.2295	250.0605
Particulate Matter (PM ₁₀)	3.3715	2.9613
Total Particulate Matter (TSP)	4.4357	3.7878
Sulfur Dioxide (SO ₂)	0.0679	0.053
Volatile Organic Compounds (VOC)	51.3228	9.9904
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2006 Actual Emissions
Benzene	2.4587	0.1970
Ethyl Benzene	0.0093	0.0082
Formaldehyde	5.8608	4.5305
Hexane	1.4070	0.0449
Naphthalene	0.0099	0.0077
2,2,4-Trimethylpentane	0.0687	0.0631
Toluene	5.5688	0.1832
Xylenes	9.8518	0.2181
Total	25.235	5.2527
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		

Title V Program Applicability Basis

This facility has the potential to emit 306.23 tons per year of NO_x, 112.38 tons per year of CO, and 25.24 tons per year of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of regulated pollutant and over 25 tons per year of aggregate HAPs, 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	To Prevent and Control Particulate Air Pollution from the Emissions of Sulfur Dioxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	New Source Review permits for 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.
	40 C.F.R. Part 61	Asbestos inspection and removal
	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 draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft 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, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R30-0070006-1996	March 19, 1998	

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 B," which may be downloaded from DAQ's website.

Determinations and Justifications

A determination was made that 45CSR10 does not apply to engines and compressors. The heating and dehydrator boilers are less than 10 MMBtu/hr, thus, they are exempt from sulfur dioxide weight emission standards for fuel burning units, registration, permits, testing, monitoring, and recordkeeping, 45CSR§§10-3, 6 through 8. The Burnsville facility does not refine or process gas streams, therefore, it is not subject to 45CSR§10-5. Also, since the Burnsville facility is not a manufacturing process, it is not subject to 45CSR§10-4. In addition, pipeline quality natural gas has very low sulfur content, and total sulfur includes H₂S, therefore it is no longer required to analyze the inlet gas stream for total sulfur and H₂S for the dehy flare to demonstrate compliance with 45CSR10.

The 1.25 MMBtu/hr heating and 0.025 MMft³/day dehydrator boilers are exempt from monitoring and testing under 45CSR2 and 45CSR2A since they are fueled by natural gas. Since the design heat input of the heater and boilers are less than 10 MMBtu/hr, they are not subject to 45CSR2A, per 45CSR§2A-3.1. According to 45CSR§2-11.1, the heater and boilers are also exempt from Sections 45CSR§§2-4, 5, 6, 8 and 9; Weight Emission Standards, Control of Fugitive Particulate Matter, Registration, Testing, Monitoring, Recordkeeping and Reporting, and Start-ups, Shutdowns and Malfunctions, respectively. The Director reserves the right to require testing pursuant to 45CSR§§ 2-8.1.b and 2-8.1.c.

40 CFR part 63 Subpart HH

Federally and Practically Enforceable requirements for the Dehydrator Facilities have been added to the Title V Permit, Sections 5.1, 5.2, 5.3, 5.4, and 5.5.2 through 5.5.4. The dehydration units can be exempt (Section 5.1.5.) from Subpart HH in accordance with 40 C.F.R. § 63.764 (e) (1) (ii) by limiting the benzene emissions through a NSR permit or by taking a limit via 45CSR§30-12.7. The owner or operator must monitor actual average benzene emissions in accordance with 40 C.F.R. § 63.772 (b) (2), which requires the use of GLYCalc Version 3.0 or higher (Section 5.1.5.). However, Sections 5.2.5, 5.3.4, and 5.5.5 require the use of GLYCalc Version 4.0 or higher, therefore the monitoring requirement of 40 C.F.R. § 63.772 (b) (2) was streamlined with Condition 5.3.4 of the Title V Permit. The owner or operator must maintain records of the benzene emissions in accordance with 40 C.F.R. § 63.774 (d) (1).

40 CFR 64 - Compliance Assurance Monitoring (CAM)

Triethylene Glycol Dehydrator (TEG) has pre-controlled potential emissions that exceed major source thresholds for volatile organic compounds (VOC) and hazardous air pollutants (HAPs), and is equipped with a flare that is used to comply with federally-enforceable emission limits associated with the dehydration operation. Therefore, the TEG represents two pollutant specific emissions units (PSEUs), one for volatile organic compounds (VOC) and one for hazardous air pollutants (HAPs). Since one control device is common to both PSEUs, one monitoring plan was submitted in accordance with 40 C.F.R. § 64.4 (f). The submitted plan meets the requirements of the CAM rule for the Dehy Flare controlling VOCs and HAPs from the dehydration unit.

Monitoring per the CAM Plan for VOC and HAPs emissions will be as follows:

		Indicator No. 1
I.	Indicator	Presence of Flame (permit condition 5.1.2.d.)
	Monitoring Approach	Use of thermocouple, infrared device, or equivalent (permit condition 5.2.1.).
II.	Indicator Range or Designated Condition	Indicator provides data regarding presence or absence of flame.
III.	Performance Criteria	A thermocouple, infrared detector, pilot eye, or equivalent device will be installed to continuously monitor the presence of a pilot flame (permit condition 5.2.1.).
	A. Data Representativeness	
	B. Verification of Operational Status	All manufacturer's recommendations regarding periodic testing/checks for the proper installation and operation of the pilot eye device will be followed (permit condition 5.3.3.).
	C. QA/QC Practices and Criteria	For the device that detects the presence of a flame, calibration, maintenance and operation will be conducted in accordance with manufacturer's specifications (permit condition 5.3.2.).
	D. Monitoring Frequency	Continuously

	Data Collection Procedures	Records of all flame outs or loss of pilot eye, along with any applicable corrective actions will be documented and maintained (permit condition 5.4.1 and 5.5.1.).
	Data averaging periods	No averaging periods

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. Burnsville #71 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 Burnsville #71 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 Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. All tanks 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. 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.
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 Burnsville #71 Compressor Station.
40 C.F.R. 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines. There are no turbines at the Burnsville #71 Compressor Station.
40 CFR 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.

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 18, 2007

Ending Date: October 18, 2007

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

Wayne Green
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

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.

Point of Contact

Wayne Green
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1258 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.