

# Fact Sheet



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

Permit Number: **R30-09100013-2011**  
Application Received: **February 14, 2011**  
Plant Identification Number: **091-00013**  
Permittee: **Equitrans, L.P.**  
Facility Name: **Comet Compressor Station #43**  
Mailing Address: **Route 3 Box 165**  
**Bridgeport, WV 26330**

*Revised: NA*

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Physical Location: Bridgeport, Taylor County, West Virginia  
UTM Coordinates: 572.56 km Easting • 4352.11 km Northing • Zone 17  
Directions: From Interstate 79, take exit 124 for WV-279/Jerry Dove Dr toward US-50 E (0.4 mi). Turn left at CR-707 E/FBI Center Rd/WV-279 E and continue to follow WV-279 E (2.9 mi). Turn left at US-50 (3.2 mi). Turn left at CR-3/Meadland Rd (0.3 mi). Comet Station is on left.

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### Facility Description

The Comet Station 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. The station consists of two (2) 300-hp and two (2) 330-hp natural gas internal combustion reciprocating engines, one (1) 2.25 MMBtu/hr heating boiler, one (1) 600-hp natural gas internal combustion reciprocating engine, one (1) 12-hp compressor, one (1) 251-hp electric generator, and three (3) tanks of various sizes.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2009 Actual Emissions</b>
Carbon Monoxide (CO)	41	5.6
Nitrogen Oxides (NO <sub>x</sub> )	253	42.4
Particulate Matter (PM <sub>10</sub> )	3.87	0.6
Total Particulate Matter (TSP)	3.87	0.6
Sulfur Dioxide (SO <sub>2</sub> )	0.05	0.0
Volatile Organic Compounds (VOC)	9.44	2.4

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2009 Actual Emissions</b>
Formaldehyde	4.34	0.7
Acrolein	0.610	0.0
Acetaldehyde	0.609	0.0
Methanol	0.201	0.0
Benzene	0.155	0.0
Other HAPs	0.351	0.0
Total HAPs	6.26	0.7

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

### Title V Program Applicability Basis

This facility has the potential to emit 253 TPY of NO<sub>x</sub>. 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	Control particulate matter.
	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	
	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 63, Subpart ZZZZ	Reciprocating internal combustion engines
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR42	Greenhouse Gas Emissions Inventory Program

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, 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> )
N/A		

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**

**Changes to Emission Units Table**

The following changes were made to the emission units table:

- The Design Capacity for Tank 1, which contains pipeline condensate, was revised from 4000 gallons to 1000 gallons to reflect the tank's correct capacity.
- The Design Capacity for the Three Phase Electric Compressor (Emission Unit: 011) was revised from 12HP to 15HP to more accurately describe the engine.
- Another Three Phase Electric Compressor (Emission Unit: 012) was added. This compressor was installed the same year as the other, but it was not listed in the Title V permit.
- Tank 4, which contains used oil, was installed in 2011 and was added to this table.

**New Boilerplate Language**

In addition to formatting and other minor changes, the following boilerplate changes were made from the previous Title V permit (R30-09100013-2006):

- Conditions 3.1.9. and 3.5.10. were added to address greenhouse gas emission and reporting.
- Conditions 3.5.3. and 3.5.5. were revised to address electronic submittal of the annual compliance certification to the US EPA.

#### **40 CFR 63, Subpart ZZZZ RICE MACT Applicability**

The compressor engines (C-005, C-006, C-007, C-008, and C-009) are existing spark-ignition (SI) two-stroke lean burn (2SLB) non-emergency units that combust pipeline quality natural gas and are rated from 300 to 600 hp. The generator (CPR01) is an existing SI four-stroke rich burn (4SRB) non-emergency unit that combusts pipeline quality natural gas and is rated at 251 hp. As stated below, the engines and compressor meet the definition for reciprocating internal combustion engines (RICE) according to 40 CFR § 63.6685(a):

A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

Since this facility is not a major source of HAPS, this MACT's area source requirements apply. RICE within the horsepower range for four of compressor engines (C-006, C-007, C-008, and C-009) fit into the 2SLB engines less than 500 hp category as established by the regulation, and the other compressor engine (C-005) fits into the greater than 500 hp category. However, both categories have the same requirements for area sources. The generator engine (G-001) fits into the 4SRB less than 500 hp category.

The compressor engines are only subject to the maintenance requirements (every 4,320 hours change oil/filter, inspect spark plugs, and inspect hoses/belts). The generator engine is also only subject to maintenance requirements (every 1,440 hours change oil/filter, inspect spark plugs, and inspect hoses/belts).

According to the RICE Summary Table of requirements provided by the EPA (<http://www.epa.gov/ttn/atw/rice/ricepg.html>), none of the units have testing, notification, or reporting requirements under Subpart ZZZZ. The only applicable RICE MACT requirements are:

- 40 CFR § 63.6603: Emission Limitations
- 40 CFR § 63.6605: Continuous Compliance
- 40 CFR §§ 63.6625 (e), (h), and (i): Monitoring Requirements
- 40 CFR § 63.6640: Continuous Compliance
- 40 CFR § 63.6655: Recordkeeping Requirements

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

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

**40 C.F.R. 60, Subpart D—Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971.** This subpart does not apply because the boiler does not have a generating capacity in excess of 250 MMBtu/hr as specified in 40 CFR §60.40(a)(1).

**40 C.F.R. 60, Subpart Da—Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978.** This subpart does not apply because the boiler does not have a generating capacity in excess of 250 MMBtu/hr as specified in 40 CFR §60.40Da(a)(1).

**40 C.F.R. 60, Subpart Db—Standards of Performance for Industrial-Commercial-Institutional steam Generating Units.** This subpart does not apply because the boiler does not have a generating capacity in excess of 100 MMBtu/hr as specified in 40 CFR §60.40b(a).

**40 C.F.R. 60, Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional steam Generating Units.** This subpart does not apply because the boiler does not have a generating capacity in excess of 10 MMBtu/hr as specified in 40 CFR §60.40c(a).

**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.** This subpart does not apply to the storage tanks at the facility because the tanks were installed after 1978.

**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.** This subpart does not apply to the storage tanks at the facility because the tanks were installed after 1984.

**40 C.F.R. 60, Subpart Kb—Standard of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.** This subpart does not apply to the storage tanks at the facility because the tanks have a capacity of 4,000 gallons or less, which is below this subpart's threshold of 75 m<sup>3</sup> (19,813 gallons) as specified in 40 CFR §60.110b(a).

**40 C.F.R. 60, Subpart KKK—Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants.** This subpart does not apply because the operations at this facility do not meet the definition of a processing plant.

**40 C.F.R. 60, Subpart LLL—Standards of Performance for Onshore Natural Gas Processing: SO<sub>2</sub> Emissions.** This subpart applies to “each sweetening unit, and each sweetening unit followed by a sulfur recovery unit” as specified in 40 CFR §60.640(a). This facility does not have a sweetening unit, therefore this subpart does not apply.

**40 C.F.R. 60, Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.** All of the engines at this facility, including the emergency generators, are spark ignition engines, therefore this subpart does not apply.

**40 C.F.R. 60, Subpart JJJJ—Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.** The earliest applicability date in this rule is June 12, 2006. All engines at this facility, including the emergency generators, were installed no later than 1995; this subpart does not apply.

**40 C.F.R. 63, Subpart HH—National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.** This subpart contains requirements for dehydration units, located at natural gas production facilities. This facility does not meet the definition of a natural gas production facility per 40 CFR §63.761 and does not have a dehydration unit, therefore this subpart does not apply.

**40 C.F.R. 63, Subpart HHH—National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities.** This facility is not a major source of HAPs, therefore this subpart does not apply per 40 CFR §63.1270(a).

**40 C.F.R. 63, Subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.** The only heaters and boilers at this facility are a hot water heater and a heating boiler used for comfort heating. Units used for comfort heat or space heat are exempt per 40 CFR §63.7575, and water heaters are exempt per 40 CFR §63.7491(h). Therefore, this subpart does not apply to this facility.

**40 CFR 64—Compliance Assurance Monitoring:** CAM was not triggered with the previous permit renewal, and no significant changes have been made at this facility since that renewal.

### **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: May 6, 2011

Ending Date: June 6, 2011

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

Rex Compston  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> 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**

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

### **Response to Comments (Statement of Basis)**

Not applicable.