

Fact Sheet



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

Permit Number: **R30-04100010-2021**
Application Received: **February 15, 2021**
Plant Identification Number: **041-00010**
Permittee: **Eastern Gas Transmission and Storage, Inc.**
Facility Name: **Camden Compressor Station**
Mailing Address: **925 White Oaks Blvd., Bridgeport, WV 26330**

Physical Location:	6153 US Highway 33 W, Camden, Lewis County, West Virginia
UTM Coordinates:	534.85 km Easting • 4323.27 km Northing • Zone 17
Directions:	Interstate 79 North to the Weston Exit. Turn left on Route 33 West through Weston. Turn left onto Smith Run Road and go 1.5 miles. Turn left onto gravel road and proceed 0.3 miles to station on the left.

Facility Description

Camden Compressor Station (CS) is a natural gas transmission facility covered by Standard Industrial Classification (SIC) Code 4922 and North American Industry Classification System (NAICS) Code 486210. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of five (5) 660 HP natural gas fired reciprocating engines, one (1) emergency generator, one (1) dehydrator reboiler, one (1) dehydration unit, and eight (8) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions
Carbon Monoxide (CO)	98.09	41.18
Nitrogen Oxides (NO _x)	647.08	252.66
Particulate Matter (PM _{2.5})	4.56	0.43
Particulate Matter (PM ₁₀)	4.56	0.79
Total Particulate Matter (TSP)	5.77	0.79
Sulfur Dioxide (SO ₂)	0.07	0.03
Volatile Organic Compounds (VOC)	212.65	78.65

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2020 Actual Emissions
Acrolein	0.92	0.28
Acetaldehyde	0.92	0.28
Benzene	0.75	0.21
Ethylbenzene	0.32	< 0.01
Formaldehyde	6.55	1.99
Hexane	0.39	0.16
Xylene	1.59	0.12
Toluene	1.02	0.21
Total HAPs	12.46	3.26

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

Title V Program Applicability Basis

This facility has the potential to emit 647.08 TPY of NO_x and 212.65 TPY of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Eastern Gas Transmission and Storage, Inc. Camden Compressor Station 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 of PM from Combustion of Fuel in Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur requirements for fuel burned
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction Permits
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60 (NSPS)
	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	National Emission Standards for Hazardous Air Pollutants for Source Categories Pursuant to 40 C.F.R. 63 (NESHAP)
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	40 C.F.R. Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. 63 Subpart HH	NESHAP: Oil & Natural Gas Production Facilities.
	40 C.F.R. 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)
State Only:	45CSR4	No objectionable odors.
	45CSR17	Fugitive Particulate

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 (<i>if any</i>)
R13-2792	March 4, 2009	
G60-C014	December 4, 2009	

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 – added one (1) 550 gallon above ground Tank K2 (Emission Point TK09, Emission Unit TK09) containing wastewater installed in 2018.
2. Condition 4.2.1 – added opacity monitoring requirement 45CSR§2-3.2 applicable to the Reboiler RBR01 in order to demonstrate compliance with the (10) percent opacity limit in condition 4.1.1 (45CSR§2-3.1).
3. Conditions 5.1.6 (45CSR§10- 4.1) and 5.2.3 (monitoring) - were removed from the permit for the following reason: 45CSR§10- 4.1 sets an in-stack sulfur dioxide concentration limit of 2,000 parts per million by volume, but 45CSR§10-4.1.e. exempts facilities from this limit if the potential to emit for SO₂ is less than 500 lbs/year. Camden Compressor Station's facility-wide PTE for SO₂ is 0.07 TPY or 140 lbs/yr, therefore it is exempt from the 45CSR§10-4.1. The remaining conditions in Sections 5.1.and 5.2 were re-numbered.
4. Conditions 5.1.7 (45CSR§10-5.1) and 5.2.4 (monitoring) - were not included in this permit for the following reason: Pipeline-Quality natural gas cannot contain more than 20 grains total sulfur per 100 cubic feet of gas, which is less than 50 grains H₂S per 100 cubic feet of gas. Therefore, Camden Compressor Station is not subject to 45CSR§10-5.1. The remaining conditions in Sections 5.1.and 5.2 were re-numbered.
5. Condition 6.1.6 – vacated sections of the 40 C.F.R. 60 Subpart JJJJ (§ 60.4243(d)(2)(ii) and (d)(2)(iii)) were removed from the permit.
6. Condition 6.5.1 – applicable 40 C.F.R. 60 Subpart JJJJ reporting requirement 40 C.F.R. §60.4245(e)) was added for the emergency Generator EG01.

Non-Applicability Determinations

1. The following requirements has been determined not to be applicable to the subject facility and has been included in the Permit Shield (condition 3.7.2) due to the following:
 - a. **40 C.F.R. Part 63 Subpart HHH – National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities.** According to §63.1270(a), this MACT applies to major sources of HAPs. This facility is not a major source of HAPs; therefore, this MACT does not apply. Furthermore, 40 C.F.R. §63.1270(a) states, “A compressor station that transports natural gas prior to the point of custody transfer, or to a natural gas processing plant (if present) is not considered a part of the natural gas transmission and storage source category.” This statement also excludes the facility from being subject to Subpart HHH.
 - b. **40 C.F.R. 60 Subpart JJJJ** – The compressor engines (EN01 – EN05) are not subject to this subpart since they were installed in 1962 and 1964, before the applicability date.
 - c. **40 C.F.R. 60 Subpart OOOO** – This subpart does not apply to the facility since the facility is a gathering facility that does not have tanks, gas wells, centrifugal compressors, reciprocating compressors, and/or pneumatic controllers constructed, modified, or reconstructed after August 23, 2011, and on or before September 18, 2015
 - d. **40 C.F.R. 63 Subpart DDDDD** – The reboiler (RBR01) is not subject to this subpart since the facility is not a major source of HAPs.

- e. **40 C.F.R. 60, Subpart OOOOa** –This facility has no equipment with applicable requirements under Subpart OOOOa. This subpart applies to equipment installed after September 18, 2015. The facility has no affected emissions units that have been installed after the applicable Subpart OOOOa effective date.
 - f. **40 C.F.R. 63 Subpart JJJJJJ** – The reboiler (RBR01) is not subject to this subpart since it is considered a “process heater”, which is excluded from the definition of “boiler” in 40 C.F.R. §63.11237.
2. 40 C.F.R. 60 Subpart Kb – this subpart doesn’t apply to the newly added tank TK09 for the reasons described below:

Tank ID	Content	Year Installed	Design capacity (gal)	Design capacity (m ³)	Subpart Kb non-applicability basis
TK09	Wastewater (not a VOL)	2018 (after July 23, 1984)	550	2.08	Design capacity < 75 m ³ , not containing a VOL - exempt from Subpart Kb per 40 C.F.R. §60.110b(a)

3. 40 C.F.R. 64 (CAM Rule) – this is the fourth Title V permit renewal for the Camden Compressor Station. During this renewal no Pollutant Specific Emissions Units (PSEUs) were added to the facility, therefore CAM remains not applicable.

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: October 27, 2021
Ending Date: November 29, 2021

Point of Contact

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

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Division of Air Quality
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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)

Not applicable.