

**ALLEGHENY COUNTY HEALTH DEPARTMENT**  
**Air Quality Program**

**SUMMARY OF PUBLIC COMMENTS AND DEPARTMENT RESPONSES**  
**ON THE PROPOSED ISSUANCE OF HYPERION MIDSTREAM, LLC –**  
**CHAMPION COMPRESSOR STATION**  
**INSTALLATION PERMIT NO. 0996-I001**

*[Notice of the opportunity for public comment appeared in the legal section of the Pittsburgh Post-Gazette on February 16, 2023. The public comment period ended on March 28, 2023]*

1. **Comment:** The commenter suggests that the dehydrator can be operated for up to four (4) hours with the enclosed combustor off-line without exceeding VOC limits. This is based on the assertion that Title V VOC limits would not be exceeded if the enclosed combustor was not operating at all.

**Response:** Condition V.B.1.c requires that the dehydrator not be operated unless the enclosed combustor is in operation. As the combustor is the control equipment for the process, any shutdown of the control equipment must be approved by the Department per condition IV.6. Emission limits are established based on potential-to-emit, not minor source status, so the fact that the uncontrolled emissions are still below major source thresholds is irrelevant. The Department declines to modify the condition.

2. **Comment:** Condition V.B.1.e. The commenter noted an error in the stated outlet temperature of the dehydrator and supplied the correct number.

**Response:** The Department revised the Condition to correct the error.

3. **Comment:** The commenter suggested a change in the emissions limits for VOCs based on Comment No. 1 above.

**Response:** The Department declines to change the VOC limits in the permit. See response to Comment No. 1 above.

4. **Comment:** The commenter requested the deletion of Conditions V.B.3.a and V.B.4.d because there is no BTEX condenser on the dehydrator.

**Response:** The Department removed the cited Conditions. Emissions from the dehydrator are controlled by an enclosed combustor.

5. **Comment:** The commenter suggested a change in the emission factor for VOCs for the compressors, from 0.094 g/hp·hr to 0.095 g/hp·hr.

**Response:** The commenter did not provide a reason for the change. Furthermore, the change requested adds only 0.01 g/bhp-hr to the emission calculation. The Department finds the change to be insignificant and declines to make such an adjustment.

6. **Comment:** The Commentor identified a typographical error in the technical support document (TSD) with the VOC emission factor in the BACT analysis.

**Response:** The TSD has been revised.

7. **Comment:** The commenter requested that the Department “partner with our local township Board of Commissioners to ensure that OUR LOCAL ORDINANCES are upheld.” Odor and opacity ordinances were cited specifically.

**Response:** The Department declines to consult with the township Board of Commissioners because the Department is constrained by Article XXI which does not allow the Department to consider said ordinances. It should be noted that the Permit Conditions are more restrictive than the Ordinances cited.

8. **Comment:** The commenter requested that the Department limit the permittee to two (2) compressors at the site.

**Response:** The permit limits the facility to two (2) compressors. Only the equipment authorized by the permit may be installed at this facility. If the permittee wishes to install additional equipment, the permittee would be required to submit a new application and receive a new installation permit for the new equipment.

9. **Comment:** Several commenters voiced their opposition to the draft permit based on an increase in emissions caused by the new facility.

**Response:** The Air Quality Program of the ACHD is a regulatory agency and must adhere to the rules and laws that the Environmental Protection Agency (EPA), the State of Pennsylvania, and Allegheny County have set for the regulation of air pollution. While these regulations are in place to improve and protect air quality, they also protect the rights of the regulated industry to emit pollution within the regulated limits. ACHD, PADEP, or even EPA does not have the authority to deny the permitting of industry abiding by those regulations. The purpose of an air permit is to limit emissions to a level which is not harmful to human health or the environment, as determined by a number of factors, including EPA and other health studies. Article XXI, ACHD’s environmental regulations, are designed to do that. By applying for a permit, the applicant is required to adhere to these regulations.

10. **Comment:** Several commenters suggested that fence line monitoring should be incorporated into the permit.

**Response:** Neither Article XXI nor any applicable federal regulations require fence line monitoring for this type of facility. Accordingly, the Department cannot require it.

11. **Comment:** One commenter questioned why there is a separate permit for everything that a company wants to do rather than a single permit for everything that a company does.

**Response:** There is a separate Installation Permit for each new facility or each new piece of equipment in an existing facility. A company’s Operating Permit is renewed every five (5) years. Any Installation Permit issued between Operating Permit renewals is incorporated in the Operating Permit renewal. From the renewal point on, the Operating Permit becomes the single document regulating the facility. This permit is for the installation of new equipment.

12. **Comment:** A commenter stated that heavy rain will flood the road leading to the facility denying access to it. The commenter expressed concern about what would happen in an emergency if no one could get to the facility.

**Response:** The facility has an Emergency Shut-down system such that the inlet and outlet valves will be closed to prevent the blowdown of gas into the atmosphere. See Condition V.A.1.i.

13. **Comment:** A commenter was concerned about a perceived lack of notification to communities outside of Allegheny County regarding this permit.

**Response:** The Department advertises draft permits in both the *Pittsburgh Post-Gazette*, on the ACHD web page, and to an interested parties list, in accordance with Article XXI, §2102.03.m. All sources of information are available to those individuals within and outside the County.

14. **Comment:** Several commenters raised the issue of ‘cumulative effects’ regarding other emissions sources in the county.

**Response:** The Department is permitting this particular facility based on the source’s expected continued compliance with the proposed permit. The purpose of the public comment period is to solicit information from the public that will identify deficiencies in the proposed permit. Based on the level of potential emissions, the effect of the facility’s emissions in combination with those of other sources in the area is under significant thresholds and therefore is not within the scope of review for this permit. See also the response to Comment No. 9 above.

15. **Comment:** The commenter stated that without continuous air monitoring data (CEMS), it will be impossible to know if the facility is in compliance with the permit. Additionally, the commenter states that the lack of monitoring is a violation of the permit, General Condition III.1 and Article XXI, §2101.11.

**Response:** Section 2101.11 prohibits air pollution “*except as is explicitly permitted by [Article XXI]*”. Section 2103.12.i requires monitoring sufficient to demonstrate compliance. The monitoring required in the permit, along with the subsequent record keeping and reporting, is sufficient to demonstrate compliance with the restrictions in the permit, and the Department believes that CEMS are unnecessary.

16. **Comment:** The commenter raised the question of how emissions limits are maintained when equipment deteriorates over time.

**Response:** The permit addresses this concern through the specific permit conditions such as testing, monitoring, and reporting. The new equipment is required to meet best available control technology (BACT), be properly maintained, and in this permit, meet certain EPA regulations. Additionally, after the permit is issued the facility is subject to routine inspections from the Enforcement Program to assure continuous compliance.

17. **Comment:** Several commenters raised issues generally related to the environment but not specific to this draft permit.

**Response:** Because the issues raised are not directed to the draft permit, the Department has determined that they are beyond the scope of this Comment/Response Document and cannot address them.

18. **Comment:** A commenter asked if the Department was going to “monitor air quality in the communities of Sutersville and West Newton.”

**Response:** Sutersville and West Newton are located in Westmoreland County and as such are beyond ACHD’s authority. The Department will not monitor the air in these communities. However, the air quality in these areas will continue to be monitored by the Pennsylvania Department of Environmental Protection (PA DEP).

19. **Comment:** A commenter asked if the Department was going to hold additional public meetings in the communities of Sutersville and West Newton. See also the response to Comment No. 17 above

**Response:** The public meeting for this permit was held on March 21, 2023 at the Elizabeth Event Center. This site was chosen for its proximity to the areas in Westmoreland County affected by this project. No additional meetings are scheduled.

20. **Comment:** Several commenters made comments and observations and expressed opinions not germane to the permit.

**Response:** The Department thanks the commenters for their input but cannot respond to these comments as they are not related to the specific permit conditions.

**List of Commenters**

Name	Affiliation
Leah Blinn	Civil & Environmental Consultants, Inc.
Mary Lou Mills	Citizen
David Holliday	Citizen
Joanne Hall	Citizen
Lisa Riley	Citizen
Patty Hoffman	Citizen
Fred Bickerton	Citizen
Kathleen Anderson	Citizen
Bill Piper	Citizen
Ted Grice	Citizen
Lisa Graves Marcucci	Environmental Integrity Project

*Hyperion Midstream, LLC  
Champion Compressor Station  
Minor Source Installation Permit No. 0996-I001*

<b>Name</b>	<b>Affiliation</b>
Nicole Ruscitto	Citizen
Janet Roslund	Citizen

Michael Dorman  
Air Quality Engineer III  
May 26, 2023