



**west virginia department of environmental protection**

Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone (304) 926-0475 • FAX: (304) 926-0479

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
[www.dep.wv.gov](http://www.dep.wv.gov)

**ENGINEERING EVALUATION / FACT SHEET**

BACKGROUND INFORMATION

Application No.: R13-3081B  
Plant ID No.: 051-00143  
Applicant: CNX Gas Company, LLC (CNX)  
Facility Name: Majorsville Station  
Location: Majorsville, Marshall County  
NAICS Code: 211111  
Application Type: Modification  
Received Date: January 22, 2014  
Engineer Assigned: Jerry Williams, P.E.  
Fee Amount: \$4,500.00  
Date Received: December 2, 2013  
Complete Date: March 11, 2014  
Due Date: June 9, 2014  
Applicant Ad Date: January 22, 2014  
Newspaper: *Moundsville Daily Echo*  
UTM's: Easting: 539.827 km      Northing: 4,424.302 km      Zone: 17T  
Description: This permitting action proposes the installation of a triethylene glycol (TEG) dehydration unit, hot oil heater, condensate stabilizer, electric drive gas compressor and condensate dryer train. The condensate flash drum line heater will be removed. In addition, the equipment covered under general permit registration G35-A066A will be consolidated under this modification.

DESCRIPTION OF PROCESS

The following modification process description was taken from Permit Application R13-3081B:

The TEG dehydration unit will process 150 million standard cubic feet per day (mmscfd) of natural gas. The design of the dehydration unit includes a flash tank. The regenerator still vent and a slip stream of the flash tank off gases will be vented to a new enclosed flare. The majority of the off gas emissions (approximately 86.7%) from the flash tank will be routed to the dehydration unit's reboiler for fuel. The design rated heat input of the reboiler is 2.86 million British Thermal Units per hour (MMBtu/hr) and will burn plant gas. The dehydration unit will

be equipped with a 7.13 MMBtu/hr TEG line heater and will burn plant gas. The modification will include the installation of a condensate stabilizer column and condensate dryer system for processing additional condensate product. Additional gas compression capacity is needed as a result of the proposed increase in the site's processing rate. A new electric powered compressor will be installed. The facility will reinstall the vapor destruction unit (VDU) as a backup unit to the vapor recovery unit (VRU). The VDU was originally permitted under R13-3069T.

Additionally, the station proposes to increase the condensate capacity at the bulk liquid transfer operation from 1,050,000 gallons per year to 31,500,000 gallons per year.

## SITE INSPECTION

A site inspection was conducted by Steve Sobotka of the Northern Panhandle Regional Office. Mr. Sobotka stated that the site is relatively remote and the majority of the site is surrounded by woods. The closest residence is more than 1,000 feet from the site.

Latitude: 39.9675  
Longitude: -80.5331

Directions are as follows:

*From Wheeling: Travel east on I-70 for approximately 9.3 miles. Take Exit 11 onto Dallas Pike. Turn right onto Dallas Pike and travel approximately 1.7 miles. Take a slight left onto Middle Wheeling Creek Road (Old Co. 39) for 0.4 miles. Continue onto Dallas Pike and travel 3.0 miles. Turn right onto Number 2 Ridge Road and travel 3.6 miles. Turn right and the facility will be 0.5 miles on the right.*



ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions associated with this modification application consist of the emissions from one (1) TEG dehydration unit, one (1) flare, one (1) hot oil heater, one (1) condensate stabilizer, one (1) condensate dryer train and fugitive emissions. Fugitive emissions for the facility are based on calculation methodologies presented in EPA Protocol for Equipment Leak Emission Estimates. Greenhouse gas (GHG) fugitive emissions are based on global warming potentials presented in 40 CFR Part 98 Subpart W.

The following table indicates the control device efficiencies that are required for this modification:

| <b>Emission Unit</b>                               | <b>Pollutant</b>           | <b>Control Device</b> | <b>Control Efficiency</b> |
|--|----------------------------|-----------------------|---------------------------|
| DEHY-2 (TEG Dehydration Unit Still and Flash Tank) | Volatile Organic Compounds | FL-2                  | 98 %                      |
|  | Total HAPs                 | Air Assisted Flare    | 98 %                      |
| Bulk Liquids Transfer Unloading (BLT01)            | Volatile Organic Compounds | VRU                   | 95 %                      |
|  | Total HAPs                 | VDU (Backup)          | 95 %                      |

The total PTE after this proposed modification are shown in the following table:

| <b>Pollutant</b>                   | <b>Maximum Pre-Modification Annual Facility Wide Emissions (tons/year)</b> | <b>Maximum Post-Modification Annual Facility Wide Emissions (tons/year)</b> | <b>Net Facility Wide Emissions Changes (tons/year)</b> |
|------------------------------------|--|---|--|
| Nitrogen Oxides                    | 50.87  | 64.48   | 13.61  |
| Carbon Monoxide                    | 24.04  | 40.29   | 16.25  |
| Volatile Organic Compounds         | 44.94  | 92.39   | 47.45  |
| Particulate Matter-10/2.5          | 2.97   | 3.82  | 0.85   |
| Sulfur Dioxide                     | 0.19   | 0.25  | 0.06   |
| Total HAPs                         | 12.06  | 21.46   | 9.40   |
| Greenhouse Gas (CO <sub>2</sub> e) | 56,709   | 52,963  | -3,746   |

The GHG emissions resulted in a permitted decrease due to AP-42 emission factors utilized in an earlier permitting action.

Maximum detailed controlled point source emissions were calculated by CNX and checked for accuracy by the writer and are summarized in the table on the next page.

## CNX Gas Company, LLC – Majorsville Station (R13-3081B)

| Emission Point ID# | Source                    | NO <sub>x</sub> |              | CO          |              | VOC          |              | PM-10/2.5   |             | SO <sub>2</sub> |             | Formaldehyde |             | Total HAPs  |              | CO <sub>2</sub> e |              |
|--------------------|---------------------------|-----------------|--------------|-------------|--------------|--------------|--------------|-------------|-------------|-----------------|-------------|--------------|-------------|-------------|--------------|-------------------|--------------|
|                    |                           | lb/hr           | ton/year     | lb/hr       | ton/year     | lb/hr        | ton/year     | lb/hr       | ton/year    | lb/hr           | ton/year    | lb/hr        | ton/year    | lb/hr       | ton/year     | lb/hr             | ton/year     |
| E1                 | Caterpillar 3608          | 2.61            | 11.44        | 1.00        | 4.40         | 1.64         | 7.21         | 0.16        | 0.69        | 0.01            | 0.04        | 0.33         | 1.45        | 0.63        | 2.81         | 1844              | 8078         |
| E2                 | Caterpillar 3608          | 2.61            | 11.44        | 1.00        | 4.40         | 1.64         | 7.21         | 0.16        | 0.69        | 0.01            | 0.04        | 0.33         | 1.45        | 0.63        | 2.81         | 1844              | 8078         |
| E3                 | Caterpillar 3608          | 2.61            | 11.44        | 1.00        | 4.40         | 1.64         | 7.21         | 0.16        | 0.69        | 0.01            | 0.04        | 0.33         | 1.45        | 0.63        | 2.81         | 1844              | 8078         |
| E4                 | Caterpillar 3608          | 2.61            | 11.44        | 1.00        | 4.40         | 1.64         | 7.21         | 0.16        | 0.69        | 0.01            | 0.04        | 0.33         | 1.45        | 0.63        | 2.81         | 1844              | 8078         |
| E5                 | Caterpillar G3606         | 1.95            | 8.56         | 0.75        | 3.30         | 1.23         | 5.39         | 0.13        | 0.56        | <0.01           | 0.03        | 0.16         | 0.72        | 0.48        | 2.15         | 1419              | 6216         |
| EG-1               | Emergency Generator       | 7.82            | 1.95         | 0.50        | 0.12         | 0.18         | 0.04         | 0.08        | 0.02        | 0.02            | 0.01        | <0.01        | <0.01       | <0.01       | <0.01        | 45                | 195          |
| FL-1               | Glycol Dehy Flare         | 0.22            | 0.95         | 1.18        | 5.19         | 0.79         | 3.50         | 0.02        | 0.08        | <0.01           | 0.02        | <0.01        | <0.01       | 0.37        | 1.61         | 376               | 1645         |
| BLR-1              | Glycol Dehy Reboiler      | 0.18            | 0.79         | 0.15        | 0.67         | 0.01         | 0.04         | 0.01        | 0.06        | <0.01           | <0.01       | <0.01        | <0.01       | <0.01       | <0.01        | 519               | 2272         |
| BLR-2              | Condensate Reboiler       | 0.14            | 0.62         | 0.06        | 0.28         | 0.01         | 0.02         | 0.01        | 0.03        | <0.01           | <0.01       | <0.01        | <0.01       | <0.01       | 0.01         | 155               | 677          |
| VRU                | Tanks                     | 0               | 0            | 0           | 0            | NA           | 42.22        | 0           | 0           | 0               | 0           | 0            | 0           | NA          | 1.19         | 0                 | 0            |
| FL-2               | TEG Dehy Still Vent/Flare | 0.41            | 1.79         | 2.22        | 9.72         | 0.79         | 3.47         | 0.02        | <0.01       | <0.01           | 0.01        | <0.01        | <0.01       | 0.28        | 1.22         | 704               | 3085         |
| BLR-3              | TEG Dehy Reboiler         | 0.23            | 1.00         | 0.19        | 0.84         | 0.01         | 0.06         | 0.02        | 0.08        | <0.01           | <0.01       | <0.01        | <0.01       | <0.01       | 0.02         | 411               | 1799         |
| HTR-2              | Hot Oil Heater            | 0.70            | 3.06         | 0.59        | 2.57         | 0.04         | 0.17         | 0.05        | 0.23        | <0.01           | 0.02        | <0.01        | <0.01       | 0.01        | 0.06         | 1025              | 4489         |
| FUG                | Fugitive Emissions        | 0               | 0            | 0           | 0            | 1.97         | 8.64         | 0           | 0           | 0               | 0           | 0            | 0           | 0.91        | 3.96         | 62                | 273          |
| <b>Total</b>       | <b>Total Facility PTE</b> | <b>22.09</b>    | <b>64.48</b> | <b>9.64</b> | <b>40.29</b> | <b>11.59</b> | <b>92.39</b> | <b>0.98</b> | <b>3.82</b> | <b>0.06</b>     | <b>0.25</b> | <b>1.48</b>  | <b>6.52</b> | <b>4.57</b> | <b>21.46</b> | <b>12093</b>      | <b>52963</b> |

## REGULATORY APPLICABILITY

The following rules apply the equipment associated with this modification:

### **45CSR2** (Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers)

The purpose of 45CSR2 is to establish emission limitations for smoke and particulate matter which are discharged from fuel burning units. 45CSR2 states that any fuel burning unit that has a heat input under ten (10) million B.T.U.'s per hour is exempt from sections 4 (weight emission standard), 5 (control of fugitive particulate matter), 6 (registration), 8 (testing, monitoring, recordkeeping, reporting) and 9 (startups, shutdowns, malfunctions). However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date.

The individual heat input of the proposed 2.86 MMBTU/hr reboiler (BLR-3) and 7.13 MMBTU/hr Hot Oil Heater (HTR-2) are below 10 MMBTU/hr. Therefore, these units are exempt from the aforementioned sections of 45CSR2.

Crestwood would also be subject to the opacity requirements in 45CSR2, which is 10% opacity based on a six minute block average.

### **45CSR6** (To Prevent and Control Air Pollution from the Combustion of Refuse)

The purpose of this rule is to prevent and control air pollution from combustion of refuse.

CNX has one (1) flare associated with this modification application. The flare is subject to section 4, emission standards for incinerators. The facility will demonstrate compliance by maintaining records of the amount of natural gas consumed by the flare and the hours of operation. The facility will also monitor the flame of the flare and record any malfunctions that may cause no flame to be present during operation.

### **45CSR10** (To Prevent and Control Air Pollution from the Emissions of Sulfur Oxides)

The purpose of 45CSR10 is to establish emission limitations for sulfur dioxide which are discharged from fuel burning units. 45CSR10 states that any fuel burning unit that has a heat input under ten (10) million B.T.U.'s per hour is exempt from sections 3 (weight emission standard), 6 (registration), 7 (permits), and 8 (testing, monitoring, recordkeeping, reporting). However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date.

The individual heat input of the proposed 2.86 MMBTU/hr reboiler (BLR-3) and 7.13 MMBTU/hr Hot Oil Heater (HTR-2) are below 10 MMBTU/hr. Therefore, these units are exempt from the aforementioned sections of 45CSR10.

**45CSR13** (Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation)

45CSR13 applies to this source due to the fact that CNX's proposed modification exceeds the regulatory emission threshold for criteria pollutants of 6 lb/hr and 10 ton/year. In addition, the flare is subject to a substantive requirement under 45CSR6. CNX has published the required Class I legal advertisement notifying the public of their permit application, and paid the appropriate application fee.

**45CSR16** (Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60)

45CSR16 applies to this source by reference of 40CFR60, Subpart OOOO. These requirements are discussed under that rule below.

**45CSR22** (Air Quality Management Fee Program)

This facility is a minor source and not subject to 45CSR30. CNX is required to keep their Certificate to Operate current.

**40CFR60 Subpart OOOO** (Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution)

EPA published in the Federal Register new source performance standards (NSPS) and air toxics rules for the oil and gas sector on August 16, 2012. 40CFR60 Subpart OOOO establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO<sub>2</sub>) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. The following affected sources which commence construction, modification or reconstruction after August 23, 2011 are subject to the applicable provisions of this subpart:

- a. Each gas well affected facility, which is a single natural gas well.

*There are no gas wells at the Majorsville Station. Therefore, all requirements regarding gas wells under 40 CFR 60 Subpart OOOO would not apply.*

- b. Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals that is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. For the purposes of this subpart, your centrifugal compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

*There are no centrifugal compressors associated with this application.*

- c. Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. For the purposes of this subpart, your reciprocating compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

*There is one (1) reciprocating internal combustion engines part of this modification that was constructed after August 23, 2011. Therefore, the requirements regarding reciprocating compressors under 40 CFR 60 Subpart OOOO would apply. CNX would be required to perform the following:*

- *Replace the reciprocating compressor rod packing at least every 26,000 hours of operation or 36 months.*
- *Demonstrate initial compliance by continuously monitoring the number of hours of operation or track the number of months since the last rod packing replacement.*
- *Submit the appropriate start up notifications.*
- *Submit the initial annual report for the reciprocating compressors.*
- *Maintain records of hours of operation since last rod packing replacement, records of the date and time of each rod packing replacement, and records of deviations in cases where the reciprocating compressor was not operated in compliance.*

d. Pneumatic Controllers

- Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 scfh which commenced construction after August 23, 2011, and is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not located at a natural gas processing plant.
- Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller which commenced construction after August 23, 2011, and is located at a natural gas processing plant.

*There are no continuous bleed natural gas-driven pneumatic controllers associated with this application.*

- e. Each storage vessel affected facility, which is a single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment.

40CFR60 Subpart OOOO defines a storage vessel as a unit that is constructed primarily of nonearthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provides structural support and is designed to contain an accumulation of liquids or other materials. The following are not considered storage vessels:

- Vessels that are skid-mounted or permanently attached to something that is mobile (such as trucks, railcars, barges or ships), and are intended to be located at a site for less than 180 consecutive days. If the source does not keep or are not able to produce records, as required by §60.5420(c)(5)(iv), showing that the vessel has been located at a site for less than 180 consecutive days, the vessel described herein is considered to be a storage vessel since the original vessel was first located at the site.
- Process vessels such as surge control vessels, bottoms receivers or knockout vessels.
- Pressure vessels designed to operate in excess of 204.9 kilopascals and without emissions to the atmosphere.

This rule requires that the permittee determine the VOC emission rate for each storage vessel affected facility utilizing a generally accepted model or calculation methodology within 30 days of startup, and minimize emissions to the extent practicable during the 30 day period using good engineering practices. For each storage vessel affected facility that emits more than 6 tpy of VOC, the permittee must reduce VOC emissions by 95% or greater within 60 days of startup. The compliance date for applicable storage vessels is October 15, 2013.

*The applicable storage vessels located at the Majorsville Station will be controlled by a VRU which will reduce the potential to emit to less than 6 tpy of VOC. Therefore, CNX is not required by this section to further reduce VOC emissions by 95%.*

- f. The group of all equipment, except compressors, within a process unit is an affected facility.
- Addition or replacement of equipment for the purpose of process improvement that is accomplished without a capital expenditure shall not by itself be considered a modification under this subpart.
  - Equipment associated with a compressor station, dehydration unit, sweetening unit, underground storage vessel, field gas gathering system, or liquefied natural gas unit is covered by §§60.5400, 60.5401, 60.5402, 60.5421 and 60.5422 of this subpart if it is located at an onshore natural

gas processing plant. Equipment not located at the onshore natural gas processing plant site is exempt from the provisions of §§60.5400, 60.5401, 60.5402, 60.5421 and 60.5422 of this subpart.

- The equipment within a process unit of an affected facility located at onshore natural gas processing plants and described in paragraph (f) of this section are exempt from this subpart if they are subject to and controlled according to subparts VVa, GGG or GGGa of this part.

*The Majorsville Station is not a natural gas processing plant. Therefore, Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants would not apply.*

- g. Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.
- Each sweetening unit that processes natural gas is an affected facility; and
  - Each sweetening unit that processes natural gas followed by a sulfur recovery unit is an affected facility.
  - Facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H<sub>2</sub>S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423(c) but are not required to comply with §§60.5405 through 60.5407 and paragraphs 60.5410(g) and 60.5415(g) of this subpart.
  - Sweetening facilities producing acid gas that is completely reinjected into oil-or-gas-bearing geologic strata or that is otherwise not released to the atmosphere are not subject to §§60.5405 through 60.5407, 60.5410(g), 60.5415(g), and 60.5423 of this subpart.

*There are no sweetening units at the Majorsville Station. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOO would not apply.*

#### **40CFR63 Subpart HH** (National Emission Standards for Hazardous Air Pollutants for Oil and Natural Gas Production Facilities)

Subpart HH establishes national emission limitations and operating limitations for HAPs emitted from oil and natural gas production facilities located at major and area sources of HAP emissions. The glycol dehydration unit at the Majorsville Station is subject to the area source requirements for glycol dehydration units. However, because the facility is an area source of HAP emissions and the actual average benzene emissions from the glycol dehydration unit is below 0.90 megagram per year (1.0 tons/year) it is exempt from all requirements of Subpart HH except to maintain records of actual average flowrate of natural gas to demonstrate a continuous exemption status.

**40CFR60 Subpart 60.18** (General Control Device and Work Practice Requirements)

40CFR60 Subpart 60.18 contains requirements for control devices when they are used to comply with applicable subparts of 40CFR60 and 40CFR61. The proposed flare is required to meet the design specifications in Section 60.18(c)(3) and applicable work practice requirements in Section 60.18.

The following rules do not apply to this modification:

**40CFR60 Subpart KKK** (Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants)

40CFR60 Subpart KKK applies to onshore natural gas processing plants that commenced construction after January 20, 1984, and on or Before August 23, 2011. The Majorsville Station is not a natural gas processing plant, therefore, CNX would not be subject to this rule.

**45CSR14** (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants)

**45CSR19** (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution which Cause or Contribute to Nonattainment)

On September 30, 2013, EPA approved a redesignation request and State Implementation Plan (SIP) revision submitted by the State of West Virginia. The West Virginia Department of Environmental Protection (WVDEP) requested that the West Virginia portion of the Wheeling, WV–OH fine particulate matter (PM<sub>2.5</sub>) nonattainment area (“Wheeling Area” or “Area”) be redesignated as attainment for the 1997 annual PM<sub>2.5</sub> national ambient air quality standard (NAAQS).

The Majorsville Station is located in Marshall County, which is located in this metropolitan statistical area and is an attainment county for all pollutants. Therefore the Majorsville Station is not subject to 45CSR19.

As shown in the table below, CNX is not subject to 45CSR14 or 45CSR19 review.

| <b>Pollutant</b>                   | <b>PSD (45CSR14) Threshold (tpy)</b> | <b>NANSR (45CSR19) Threshold (tpy)</b> | <b>Majorsville PTE (tpy)</b> | <b>45CSR14 or 45CSR19 Review Required?</b> |
|------------------------------------|--------------------------------------|--|------------------------------|--|
| Carbon Monoxide                    | 250                                  | NA                                     | 40.29                        | No   |
| Nitrogen Oxides                    | 250                                  | NA                                     | 64.48                        | No   |
| Sulfur Dioxide                     | 250                                  | NA                                     | 0.25                         | No   |
| Particulate Matter 2.5             | 250                                  | NA                                     | 3.82                         | No   |
| Ozone (VOC)                        | 250                                  | NA                                     | 92.39                        | No   |
| Greenhouse Gas (CO <sub>2</sub> e) | 100,000                              | NA                                     | 52,963                       | No   |

### **45CSR30 (Requirements for Operating Permits)**

CNX is not subject to 45CSR30. The Majorsville Station is subject to 40CFR60 Subpart OOOO, however they are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided they are not required to obtain a permit for a reason other than their status as an area source.

### **TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS**

There will be small amounts of various non-criteria regulated pollutants emitted from the combustion of natural gas. However, due to the concentrations emitted, detailed toxicological information is not included in this evaluation.

### **AIR QUALITY IMPACT ANALYSIS**

Modeling was not required of this source due to the fact that the facility is not subject to 45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants) as seen in the table listed in the Regulatory Discussion Section.

### **SOURCE AGGREGATION**

“Building, structure, facility, or installation” is defined as all the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous and adjacent properties, and are under the control of the same person.

The Majorsville Station is located in Marshall County and will be operated by CNX.

1. The Majorsville Station will operate under SIC code 1311 (Crude Petroleum and Natural Gas Extraction). There are surrounding wells and compressor stations operated by CNX that share the same two-digit major SIC code of 13 for oil and gas exploration and production. Therefore, the Majorsville Station does share the same SIC code as the wells and surrounding compressor stations.
2. “Contiguous or Adjacent” determinations are made on a case by case basis. These determinations are proximity based, and it is important to focus on this and whether or not it meets the common sense notion of a plant. The terms “contiguous” or “adjacent” are not defined by USEPA. Contiguous has a dictionary definition of being in actual contact; touching along a boundary or at a point. Adjacent has a dictionary definition of not distant; nearby; having a common endpoint or border.

The closest CNX facility to the Majorsville Station is over one quarter (1/4) mile away. Operations separated by these distances do not meet the common sense notion of a plant. Therefore, the properties in question are not considered to be on contiguous or adjacent property.

3. According to CNX, none of the wells in the area are under common control with the Majorsville Station.

Because the facilities are not considered to be on contiguous or adjacent properties, the emissions from the Majorsville Station should not be aggregated with other facilities in determining major source or PSD status.

### MONITORING OF OPERATIONS

CNX will be required to perform the following monitoring:

- Monitor and record quantity of waste gas consumed in the VRU.
- Monitor the VRU that is operated per manufacturer's specifications.
- Monitor opacity from the VRU.
- Monitor the tanks to ensure that all vapors are sent to the VRU.
- Monitor the condensate truck loading to ensure that vapor return/combustion is used.
- Monitor and record quantity of natural gas consumed for all combustion sources.
- Monitor and record quantity of natural gas routed through the process flare.
- Monitor the presence of the flare pilot flame with a thermocouple or equivalent.

CNX will be required to perform the following recordkeeping:

- Maintain records of the amount of natural gas consumed and hours of operation for each heater.
- Maintain records of the amount of waste gas consumed in the VRU.
- Monitor the tanks to ensure that the tanks vapors will be sent to the VRU.
- Monitor the condensate truck loading to ensure that vapor return/combustion is used.
- Maintain records of the amount of constituents transferred from the storage tanks.
- Maintain records of the flare design evaluation.
- Maintain records of testing conducted in accordance with the permit. Said records shall be maintained on-site or in a readily accessible off-site location
- Maintain the corresponding records specified by the on-going monitoring requirements of and testing requirements of the permit.
- Maintain records of the visible emission opacity tests conducted per the permit.
- Maintain records of the truck loading operations to ensure that all trucks loaded pass an annual MACT level leak test
- Maintain a record of all potential to emit (PTE) HAP calculations for the entire facility. These records shall include the natural gas compressor engines and ancillary equipment.
- The records shall be maintained on site or in a readily available off-site location maintained by CNX for a period of five (5) years.

RECOMMENDATION TO DIRECTOR

The information provided in the modification permit application indicates CNX's Majorsville Station meets all the requirements of applicable regulations. Therefore, impact on the surrounding area should be minimized and it is recommended that the Marshall County location should be granted a 45CSR13 modification permit for this proposed permitting action.

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Jerry Williams, P.E.  
Engineer

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Date