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G70-C GENERAL PERMIT ENGINEERING EVALUATION

PREVENTION AND CONTROL OF AIR POLLUTION IN REGARD TO THE CONSTRUCTION, MODIFICATION, RELOCATION, ADMINISTRATIVE UPDATE AND OPERATION OF NATURAL GAS PRODUCTION FACILITIES LOCATED AT THE WELL SITE

APPLICATION NO.: G70-C**173A**	FACILITY ID: **069-00113**

☐ CONSTRUCTION
☒ MODIFICATION
☐ RELOCATION
☐ CLASS I ADMINISTRATIVE UPDATE
☐ CLASS II ADMINISTRATIVE UPDATE

BACKGROUND INFORMATION

Name of Applicant (as registered with the WV Secretary of State's Office): SWN Production Company, LLC

Federal Employer ID No. (FEIN): 26-4388727

Applicant's Mailing Address: 10000 Energy Drive

City: Spring	State: TX	ZIP Code: 77389

Facility Name: Alice Edge Pad

Operating Site Physical Address: Access road off of US 40.
If none available, list road, city or town and zip of facility.

City: Near Valley Grove	Zip Code: 26060	County: Ohio

Latitude & Longitude Coordinates (NAD83, Decimal Degrees to 5 digits):
Latitude: 40.099853
Longitude: -80.56066

SIC Code: 1311 NAICS Code: 211111	Date Application Received: June 3, 2016
Fee Amount: 1,000	Date Fee Received: June 23, 2016
Applicant Ad Date: June 28, 2016	Newspaper: The Intelligencer
Date Application Complete: August 1, 2016	Due Date of Final Action: September 15, 2016

Engineer Assigned: David Keatley

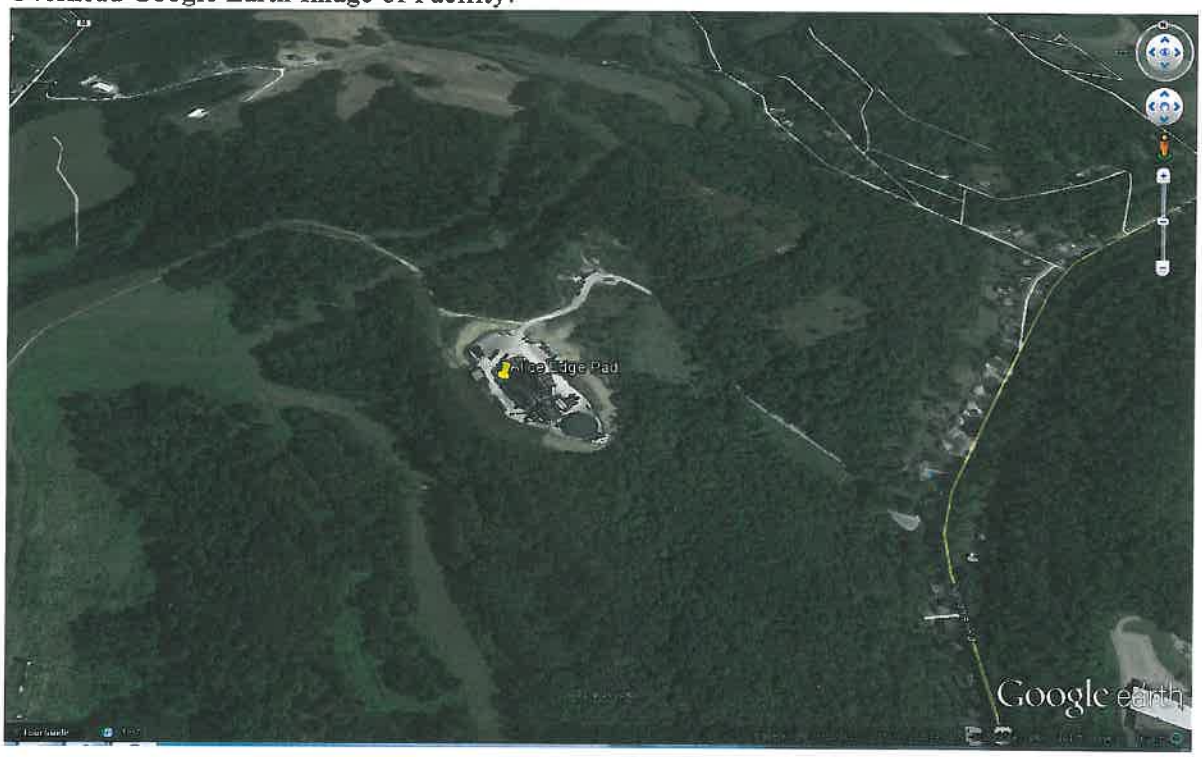
Description of Permitting Action: Increase in condensate and produced water throughput. Removal of one (1) 77-kW engine and one (1) 146.2-kW engine.

PROCESS DESCRIPTION

This facility is an oil and natural gas exploration and production facility which produces natural gas and condensate. Condensate, gas, and water come from the five (5) natural gas wells to the GPUs (gas production units), where the first stage of separation occurs. Liquids (condensate and produced water) from the eleven (11) 1.0-mmBtu/hr GPUs will be sent to the heater treaters. The natural gas from the GPUs will exit the facility via the sales gas pipeline. The five (5) 0.5-mmBtu/hr heater treaters are used to treat emulsions, which are stable mixtures of condensate, solids, and water. These units use thermal, gravitational, mechanical, and sometimes chemical methods to break the emulsions and separate the condensate from water. Elevating the emulsion temperature is particularly effective in lowering condensate viscosity and promoting phase separation. The process causes hydrocarbons, including methane, to vaporize and escape. The flash from the heater treaters is captured via the flash gas compressors driven by natural gas fired engines then exit the facility via the sales gas pipeline. Produced water from the heater treaters flows into four (4) 400-bbl produced water tanks and will be truck offsite at maximum rate of 12,264,000 gallons/year. Condensate from the heater treaters flows to the stabilizers. The stabilizers are heated by three (3) 1.5-mmBtu/hr stabilizer heaters. The vapors from the stabilizers are sent to the flash gas compressors to increase the pressure of the vapors and will then exit the facility via the sales gas pipeline. The flash gas compressors are powered by the following natural gas fired four-stroke engines: two (2) 145-bhp Caterpillar G3306 NA rich-burn equipped with a NSCR catalyst, one (1) 622-bhp Caterpillar G3508 TALE AFR lean-burn, and one (1) 567-bhp Caterpillar G3508 TALE lean-burn. The condensate from the stabilizers flows to twelve (12) 400-bbl condensate tanks (eight (8) additional tanks) and will be trucked offsite at a maximum rate of 68,985,000 gallons/year. Condensate and produced water are transported off site via truck. Loading emissions will be controlled with vapor return, which has at least 70% capture efficiency, routed to the vapor combustor for at least 98% destruction efficiency. Working, breathing and flashing vapors from the 400 bbl condensate storage tanks and 400 bbl produced water tanks will be routed to a 30 mmBtu/hr MRW vapor combustors with 98% destruction efficiency. The vapor combustors have natural gas fired pilots to ensure a constant flame for combustion. In the original application SWN wanted to allow two VRU engines, but agreed in a meeting on 10/22/2015 that neither would be permitted.

SITE INSPECTION

Site Inspection Date: May 13, 2013
Site Inspection Conducted By: Steve Sobutka
Results of Site Inspection: The facility was deemed in compliance.
Did Applicant meet Siting Requirements? Yes
If applicable, was siting criteria waiver submitted? Not Applicable
Directions to Facility: From Interstate 70 east of Wheeling, WV, take Exit 5 and travel east on US RT 40. Continue straight on US RT 40 for approximately 6.8 miles to well pad entrance on the left, immediately after the bridge.
Overhead Google Earth Image of Facility:



ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

The following table indicates which methodology was used in the emissions determination:

Emission Unit ID#	Process Equipment	Calculation Methodology (e.g. ProMax, GlyCalc, mfg. data, AP-42, etc.)
EU-ENG5	Compressor Engine	mfg. data and AP-42
EU-ENG6	Compressor Engine	mfg. data and AP-42
EU-MC1498	Compressor Engine	mfg. data and AP-42
EU-MC2322	Compressor Engine	mfg. data and AP-42
EU-GPU1 through EU-GPU11	Gas Production Units	AP-42
EU-HT1 Through EU-HT4	Heater Treaters	AP-42
EU-SH1 Through EU-SH3	Stabilizer Heaters	AP-42
EU-TANKS-COND	Condensate Tanks	ProMax and TANKS 4.0.9d
EU-TANKS-PW	Produced Water	ProMax and TANKS 4.0.9d
EU-LOAD-COND	Condensate Loading	AP-42
EU-LOAD-PW	Produced Water Loading	AP-42
EU-PILOT	Enclosed Combustor Pilot	AP-42
EU-FUG	Fugitive Emissions	AP-42
EU-HR	Haul Road Emissions	AP-42

The total facility PTE for the facility (including fugitive emissions) is shown in the following table:

Pollutant	Facility Wide PTE (tons/year)
Nitrogen Oxides	52.77
Carbon Monoxide	78.89
Volatile Organic Compounds	70.59
Particulate Matter	2.35
Particulate Matter-10/2.5	2.35
Sulfur Dioxide	0.19
Formaldehyde	2.96
Hexane	3.44
Benzene	0.08
Toluene	0.24
Ethylbenzene	0.24
Xylenes	0.79
Total HAPs	8.53
Carbon Dioxide Equivalent	32,916

Estimated New/Modified Maximum Controlled PTE:

Emission Point ID	Emission Unit ID	Emission Source	Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
APC-COMB-TKLD	EU-TANKS-COND, EU-TANKS-PW, EU-LOAD-COND, EU-LOAD-PW, and EU-PILOT	MRW Enclosed Combustor (Controlling: Produced Water Tanks, Condensate Tanks, Condensate Loading, and Produced Water Truck Loading)	Nitrogen Oxides	4.16	18.22
			Carbon Monoxide	8.28	36.28
			Total Particulate Matter	0.09	0.39
			Volatile Organic Compounds	3.13	13.71
			n-Hexane	0.78	3.44
			Benzene	<0.01	0.01
			Toluene	0.06	0.24
			Ethylbenzene	0.05	0.24
			Xylenes	0.18	0.79
			CO_2e	3,529	15,457
EP-LOAD-COND	EU-LOAD-COND	Condensate Truck Loading 65,919,000 gallons/year	Volatile Organic Compounds	8.34	35.20
			n-Hexane	0.46	2.04
			Benzene	0.01	0.02
			Toluene	0.03	0.14
			Ethylbenzene	0.03	0.15
			Xylenes	0.12	0.50
			CO_2e	3	10
EP-LOAD-PW	EU-LOAD-PW	Produced Water Truck Loading 76,650,000 gallons/year	Volatile Organic Compounds	0.18	0.80
			Xylenes	<0.01	0.01
			n-Hexane	0.01	0.05
			CO_2e	3,529	15,457

REGULATORY APPLICABILITY

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

The purpose of 45CSR2 (Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers) 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) MMBTU/hr 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. If the individual heat input of all of the proposed fuel burning units are below 10 MMBTU/hr, these units are exempt from the aforementioned sections of 45CSR2. However, the registrant would be subject to the opacity requirements in 45CSR2, which is 10% opacity based on a six minute block average. Fuel burning units greater than 10 MMBTU/hr are ineligible for registration under General Permit G70-C

Emission Unit ID#	Emission Unit Description	Maximum Design Heat Input (MDHI) (MMBTU/hr)
EU-GPU1 through EU-GPU11	Gas Production Units	1.0 each
EU-HT1 Through EU-HT4	Heater Treaters	0.5 each
EU-SH1 Through EU-SH3	Stabilizer Heaters	1.5 each

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

45CSR6 prohibits open burning, establishes emission limitations for particulate matter, and establishes opacity requirements. Sources subject to 45CSR6 include completion combustion devices, enclosed combustion devices, and flares.

The facility-wide requirements of the general permit include the open burning limitations §§45-6-3.1 and 3.2.

All completion combustion devices, enclosed combustion devices, and flares are subject to the particulate matter weight emission standard set forth in §45-6-4.1; the opacity requirements in §§45-6-4-3 and 4-4; the visible emission standard in §45-6-4.5; the odor standard in §45-6-4.6; and, the testing standard in §§45-6-7.1 and 7.2.

Enclosed combustion control devices and flares that are used to comply with emission standards of NSPS, Subpart OOOO are subject to design, operational, performance, recordkeeping and reporting requirements of the NSPS regulation that meet or exceed the requirements of 45CSR6.

Emission Unit ID#	Maximum Design Heat Input (MDHI) (MMBTU/hr)	Subject to Weight Emission Standard?	Control Efficiency Claimed by Registrant	Provide Justification how 45CSR6 is met.
APC-COMB-TKLD	30	☒ Yes ☐ No	98%	The estimated emissions are less than the allowable PM standard.

45CSR10 (To Prevent and Control Air Pollution from the Emission of Sulfur Oxides)

45CSR10 establishes emission limitations for SO_2 emissions which are discharged from stacks of fuel burning units. A "fuel burning unit" means and includes any furnace, boiler apparatus, device, mechanism, stack or structure used in the process of burning fuel or other combustible material for the primary purpose of producing heat or power by indirect heat transfer. Sources that meet the definition of "Fuel Burning Units" per 45CSR10-2.8 include GPUs, in-line heaters, heater treaters, and glycol dehydration unit reboilers.

Fuel burning units less than 10 MMBtu/hr are exempt. The sulfur dioxide emission standard set forth in 45CSR10 is generally less stringent than the potential emissions from a fuel burning unit for natural gas. The SO_2 emissions from a fuel burning unit will be listed in the G70-C permit registration at the discretion of the permit engineer on a case-by-case basis. Issues such as non-attainment designation, fuel use, and amount of sulfur dioxide emissions will be factors used in this determination. Fuel burning units greater than 10 MMBTU/hr are ineligible for registration under General Permit G70-C

Fuel burning units burning natural gas are exempt from Section 8 (Monitoring, Recording and Reporting) as well as interpretive rule 10A. The G70-C eligibility requirements exclude from eligibility any fuel burning unit that does not use natural gas as the fuel; therefore, there are no permit conditions for 45CSR10.

Emission Unit ID#	Emission Unit Description	Maximum Design Heat Input (MDHI) (MMBTU/hr)
EU-GPU1 through EU-GPU11	Gas Production Units	1.0 each
EU-HT1 Through EU-HT4	Heater Treaters	0.5 each
EU-SH1 Through EU-SH3	Stabilizer Heaters	1.5 each

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 the applicant is defined as a "stationary source" under 45CSR13 Section 2.24.b. *Stationary source* means, for the purpose of this rule, any building, structure, facility, installation, or emission unit or combination thereof, excluding any emission unit which meets or falls below the criteria delineated in Table 45-13B which: (a) is subject to any substantive requirement of an emission control rule promulgated by the Secretary; (b) discharges or has the potential to discharge more than six (6) pounds per hour and ten (10) tons per year, or has the potential to discharge more than 144 pounds per calendar day, of any regulated air pollutant; (c) discharges or has the potential to discharge more than two (2) pounds per hour or five (5) tons per year of hazardous air pollutants considered on an aggregated basis; (d) discharges or has the potential to discharge any air pollutant(s) listed in Table 45-13A in the amounts shown in Table 45-13A or greater; or, (e) an owner or operator voluntarily chooses to be subject to a construction or modification permit pursuant to this rule, even though not otherwise required to do so. 45CSR13 has an original effective date of June 1, 1974.

The applicant meets the definition of a stationary source because (check all that apply):

- ☒ Subject to a substantive requirement of an emission control rule promulgated by the Secretary.
- ☐ Discharges or has the potential to discharge more than six (6) pounds per hour and ten (10) tons per year, or has the potential to discharge more than 144 pounds per calendar day, of any regulated air pollutant.
- ☐ Discharges or has the potential to discharge more than two (2) pounds per hour or five (5) tons per year of hazardous air pollutants considered on an aggregated basis.
- ☐ Discharges or has the potential to discharge any air pollutant(s) listed in Table 45-13A in the amounts shown in Table 45-13A or greater.
- ☐ Voluntarily chooses to be subject to a construction or modification permit pursuant to this rule, even though not otherwise required to do so.

General Permit G70-C Registration satisfies the construction, modification, relocation and operating permit requirements of 45CSR13. General Permit G70-C sets forth reasonable conditions that enable eligible registrants to establish enforceable permit limits.

Section 5 of 45CSR13 provides the permit application and reporting requirements for construction of and modifications to stationary sources. No person shall cause, suffer, allow or permit the construction, modification, relocation and operation of any stationary source to be commenced without notifying the Secretary of such intent and obtaining a permit to construct, modify, relocate and operate the stationary source as required in the rule or any other applicable rule promulgated by the Secretary.

If applicable, the applicant meets the following (check all that apply):

☐ Relocation
☒ Modification
☐ Class I Administrative Update (45CSR13 Section 4.2.a)
☐ Class II Administrative Update (45CSR13 Section 4.2.b)

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

45CSR16 applies to all registrants that are subject to any of the NSPS requirements described in more detail in the Federal Regulations section. Applicable requirements of NSPS, Subparts IIII, JJJJ and OOOO are included in General Permit G70-C.

The applicant is subject to:

☐ 40CFR60 Subpart IIII
☒ 40CFR60 Subpart JJJJ
☒ 40CFR60 Subpart OOOO

45CSR22 (Air Quality Management Fee Program)

45CSR22 is the program to collect fees for certificates to operate and for permits to construct or modify sources of air pollution. 45CSR22 applies to all registrants. The general permit fee of $500 is defined in 45CSR13. In addition to the application fee, all applicants subject to NSPS requirements or NESHAP requirements shall pay additional fees of $1,000 and $2,500, respectively.

Registrants are also required to obtain and have in effect a valid certificate to operate in accordance with 45CSR22 §4.1. The fee group for General Permit G70-C is 9M (all other sources) with an annual operating fee of $200.

40CFR60 Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines)

Subpart JJJJ sets forth nitrogen oxides (NOx), carbon monoxide (CO), and volatile organic compound (VOC) emission limits, fuel requirements, installation requirements, and monitoring requirements based on the year of installation of the subject internal combustion engine. The provisions for stationary spark ignition (SI) internal combustion engines for owners or operators of this Subpart have been included in General Permit G70-C, Section 13.

Emission Unit ID#	Engine Description (Make, Model)	Engine Size (HP)	Date of Manufacture	Provide Justification how 40CFR60 Subpart JJJJ is met.
EU-ENG5	Caterpillar G3306 NA	145	After January 1, 2011	☒ Met Emission Standard ☐ Certified Engine
EU-ENG6	Caterpillar G3306 NA	145	After January 1, 2011	☒ Met Emission Standard ☐ Certified Engine
EU-MC1498	Caterpillar G3508 TALE AFR	622	February 2, 1010	☒ Met Emission Standard ☐ Certified Engine

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

EPA published its New Source Performance Standards (NSPS) and air toxics rules for the oil and gas sector on August 16, 2012. EPA published final amendments to the Subpart on September 23, 2013.

40CFR60 Subpart OOOO establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO_2) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. The affected sources which commence construction, modification or reconstruction after August 23, 2011 are subject to the applicable provisions of this Subpart as described below:

Gas well affected facilities are included in General Permit G70-C in Section 5.0.
Are there any applicable gas well affected facilities? ☒ Yes ☐ No
If Yes, list.

API number(s) for each Gas Well at this facility	Date the Gas Well was drilled or re-fractured
470-690-01800	11/11/2015
470-690-01780	10/17/2015
470-690-01810	10/30/2015
470-690-01790	10/15/2015
470-690-01830	10/26/2015
470-690-01840	11/3/2015
470-690-01860	10/24/2015
470-690-01850	10/14/2015
470-690-01870	11/6/2015

Centrifugal compressor affected facilities are included in General Permit G70-C, Section 11.0.
Are there any applicable centrifugal compressor affected facilities not located at the well site?
☐ Yes ☒ No

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. 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.

Reciprocating compressor affected facilities are included in General Permit G70-C, Section 12.0.
Are there any applicable reciprocating compressor affected facilities not located at the well site?
☐ Yes ☒ No

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. 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.

Pneumatic controllers affected facilities are included in General Permit G70-C, Section 10.0.
Are there any applicable pneumatic controller affected facilities? ☐ Yes ☒ No

For the natural gas production segment (between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not including natural gas processing plants), 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.

Requirements for storage vessel affected facilities are included in General Permit G70-C, Section 7.0. Determination of storage vessel affected facility status is included in Section 6.0 of General Permit G70-C.
Are there any applicable storage vessel affected facilities? ☐ Yes ☒No
If No, list any emission reduction devices and control efficiencies used to avoid 40CFR60 Subpart OOOO.
Enclosed combustor APC-COMB-TKLD will control the vapors from the produced water and condensate with a minimum control efficiency of 98%.

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, and has the potential for VOC emissions equal to or greater than 6 tpy as determined according to this section by October 15, 2013 for Group 1 storage vessels and by April 15, 2014, or 30 days after startup (whichever is later) for Group 2 storage vessels. A storage vessel affected facility that subsequently has its potential for VOC emissions decrease to less than 6 tpy shall remain an affected facility under this subpart.

40CFR63 Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines)

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This Subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations. This section reflects EPA's final amendments to 40 CFR part 63, Subpart ZZZZ that were issued on January 15, 2013 and published in the Federal Register on January 30, 2013.

WVDEP DAQ has delegation of the area source air toxics provisions of this Subpart requiring Generally Achievable Control Technology (GACT). The provisions of this Subpart have been included in this general permit under Section 13.0.

Emission Unit ID#	Engine Description (Make, Model)	Engine Size (HP)	Date of Manufacture	New or Existing under 40CFR63 Subpart ZZZZ?	Provide Justification how 40CFR63 Subpart ZZZZ is met.
EU-ENG5	Caterpillar G3306 NA	145	After January 1, 2011	New	Subpart ZZZZ will be met by Subpart JJJJ requirements.
EU-ENG6	Caterpillar G3306 NA	145	After January 1, 2011	New	Subpart ZZZZ will be met by Subpart JJJJ requirements.
EU-MC1498	Caterpillar G3508 TALE AFR	622	February 2, 1010	New	Subpart ZZZZ will be met by Subpart JJJJ requirements.
EU-MC2322	Caterpillar G3508 TALE	567	January 24, 2007	New	No Requirements

Are there any engines that fall in the window of being new under 40CFR60 Subpart ZZZZ but manufactured before the applicability date in 40CFR60 Subpart JJJJ? ☒ Yes ☐ No

If so, list the engines: EU-MC2322

SOURCE AGGREGATION DETERMINATION

"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.

Are there surrounding wells or compressor stations under "common control" of the applicant?
☐ Yes ☒ No

Are the properties in question located on "contiguous or adjacent" properties?
☐ Yes ☐ No

Are there surrounding facilities that share the same two (2) digit SIC code?
☐ Yes ☐ No

Final Source Aggregation Decision.
☒ Source not aggregated with any other source.
☐ Source aggregated with another source. List Company/Facility Name:

RECOMMENDATION TO DIRECTOR

The information provided in the permit application, including all supplemental information received, indicates the applicant meets all the requirements of applicable regulations and the applicant has shown they meet the eligibility requirements of General Permit G70-C. Therefore, impact on the surrounding area should be minimized and it is recommended that the facility should be granted registration under General Permit G70-C.

Permit Engineer Signature: David Keatley
Name and Title: David Keatley, Permit Writer - NSR Permitting
Date: August 2, 2016