



west virginia department of environmental protection

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Earl Ray Tomblin, Governor
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MEMORANDUM

To: Bev McKeone
From: Jerry Williams 
Date: November 25, 2015
Subject: G70-A026B, Noble Energy, Inc. (Noble) – Pennsboro 1 Production Facility (085-00035)

SUMMARY

Noble submitted G70-A026B on November 18, 2015. G70-A026B was submitted to remove one (1) 690 hp Caterpillar 3508B engine used for compression of flash gas associated with condensate stabilization due to a decline in production. Noble proposes to install one (1) 95 hp Caterpillar G3304NA engine to serve the same function at the facility. The replacement engine is equipped with an interlocked catalyst such that operation of the engine is prohibited in the absence of the properly functioning catalyst.

DAQ's Policy for Potential-to-Potential Netting under Rule 13 enables this change to be performed under a 45CSR13 Class I Administrative Update. This is due to the change resulting in a decrease in all regulated air pollutants and the engine being removed was on-site and operational within the past 12 months. The following table indicates the reduction in emissions associated with this application:

Pollutant	690 hp Caterpillar 3508B Annual Emissions (tpy)	95 hp Caterpillar G3304NA Annual Emissions (tpy)	Annual Change in Emissions (tpy)
Nitrogen Oxides	6.66	1.34	-5.32
Carbon Monoxide	13.33	2.69	-10.64
Volatile Organic Compounds	4.66	0.93	-3.73
Sulfur Dioxide	0.0029	0.0004	-0.002
Particulate Matter-10	0.21	0.03	-0.18
Formaldehyde	1.16	0.24	-0.92

The proposed engine to be installed was manufactured on April 1, 1995. This engine would be an 'existing' engine under 40CFR63 Subpart ZZZZ and would not be subject to 40CFR60 Subpart JJJJ. However, there are no substantive requirements under 40CFR63 Subpart ZZZZ. The only requirements under 40CFR63 ZZZZ are to minimize idle time during startup and

change engine oil and filter, inspect spark plugs, and inspect/replace as necessary all hoses and belts every 1,440 hours or annually (whichever comes first).

Therefore, it is my opinion that this request qualifies for a Class I administrative update because there is an overall decrease in emissions and no substantive requirement of any State or Federal air quality regulation is triggered. This application review did not address any other prior permitting determinations.