



west virginia department of environmental protection

Division of Air Quality
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Evaluation Memorandum

Application Number: PD15-004
Facility ID Number: 041-00067
Name of Applicant: CNX Gas Company LLC
Name of Facility: Camden 17
Application Type: Permit Determination
Submission Date: January 26, 2015
Complete Date: February 6, 2015
Engineer: David Keatley

On January 16, 2015, the DAQ received information from CNX Gas Company LLC proposing to install and operate: two (2) 1.0-mmBtu/hr GPUs, four (4) 210-bbl produced water tanks, two (2) 210-bbl condensate tanks, and tanker truck loading for Camden 17. This evaluation will examine the potential permit applicability under 45CSR13.

Investigation

It has been determined that a permit will not be required under 45CSR13 for the proposed microturbine generators and produced water tanks for the Blacksville facility. This determination is based on the application provided. Emissions from the six (6) storage tanks and tanker truck loading was estimated using a gas analysis from this facility and a representative liquid sample using in ProMax. Emissions from the GPU burners were estimated with AP-42 emission factors. For 45CSR13 the potential to emit for regulated air pollutants the highest values were volatile organic compounds 3.14 lbs/hr and 13.74 ton/yr of total regulated air pollutant which is less than the rule triggering six (6) lbs/hr and ten (10) tons/yr; and the indicated HAP(s) are 0.02 total HAPs which is less than the rule triggering two (2) lbs/hr of a single HAP or five (5) tons/yr of total HAPs. In addition the facility is subject to 40CFR60 subpart OOOO for a gas well affected facility, however these requirements will not be considered substantive.

Recommendation

Based on the emissions calculations submitted the recommendation of the writer is that a new permit is not required from CNX Gas Company LLC for Camden 17.



David Keatley
Permit Writer - NSR Permitting

February 6, 2015

Date