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west virginia department of environmental protection

## 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**094C**

FACILITY ID: **051-00208**

- 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: Van Aston Pad

Operating Site Physical Address: Access road is off of CR 17/2

If none available, list road, city or town and zip of facility.

City: Moundsville

Zip Code: 26041

County: Marshall

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

Latitude: 39.848045

Longitude: -80.650608

SIC Code: 1311  
NAICS Code: 211111

Date Application Received:  
June 23, 2016

Fee Amount: \$4,000

Date Fee Received: May 24, 2016 and July 7, 2016

Applicant Ad Date: June 24, 2016

Newspaper: The Intelligencer

Date Application Complete: July 27, 2016

Due Date of Final Action: September 10, 2016

Engineer Assigned: David Keatley

Description of Permitting Action:

Installation and operation of one (1) 215-bhp compressor engine and one (1) 23.6-bhp emergency generator engine. Removal of two (2) 1,380-bhp compressor engines and two (2) 145-bhp compressor engines. The condensate throughput has been reduced to 200 bbl/d and the produced water throughput has been reduced to 200 bbl/d.

## PROCESS DESCRIPTION

This facility produces natural gas and condensate. Raw natural gas (condensate, natural gas, and water) come from four (4) natural gas wells which goes to four (4) 1.0-mmBtu/hr gas production unit (GPU) burners (EU-GPU1 through EU-GPU4). The GPU burners heat the raw natural gas in the first step of separation. Natural gas from the GPU will be sent to a triethylene glycol (TEG) dehydration unit. The liquids from the GPUs are sent to two (2) 0.5-mmBtu/hr heater treaters (EU-HT1 and EU-HT2). Flash gases from the heater treaters are sent to a flash gas compressor to raise the pressure of the flash gas. The flash gas compressor is powered by one (1) four-stroke rich-burn 215-bhp Caterpillar G3406 NA TM8513-05 natural gas fired compressor engines equipped with NSCR catalysts. After compression the flash gases are sent to a TEG dehydration unit. The produced water from the heater treaters is sent to five (5) 400-bbl produced water tanks (EU-TANKS-PW) at a maximum rate of 250 bbl/d. The condensate from the heater treaters is sent to two (2) low-pressure towers. The flash gases from the low-pressure towers are sent to the inlet side of a flash gas compressor. The flash gas compressor from the low-pressure towers is powered by one (1) four-stroke rich-burn Kubota DG972-E2 natural gas fired compressor engine. The liquid from the low-pressure towers flows to five (5) 400-bbl condensate tanks (EU-TANKS-COND) at a maximum rate of 250 bbl/d. Working, breathing, and flash vapors from the condensate and produced water tanks will be routed to a 30-mmBtu/hr MRW Technologies, Inc. enclosed combustor. The enclosed combustor will have three (3) 50-scf/d pilots (150 scfd total) to ensure a constant flame to ensure a 98% control efficiency.

The natural gas stream from the GPUs and flash gas compressors will be routed to a triethylene glycol (TEG) dehydration unit to reduce the water content of the natural gas stream. The 30-mmscf/day (maximum) natural gas will flow countercurrent to circulating TEG in a contactor. The dehydrated natural gas will exit the facility via pipeline. The rich TEG will first be sent to a flash tank to reduce hydrocarbons. The flash tank vapors will be controlled by the enclosed combustor with a 96% control efficiency. Liquids from the flash tank will be sent to a regenerator to remove the water from the TEG. The regenerator is heated by a 0.75 mmBtu/hr reboiler (EU-RB1). Vapors from the still vent will be go through a condenser and then controlled by the reboiler for a control efficiency of 50%.

## SITE INSPECTION

Site Inspection Date: November 17, 2014

Site Inspection Conducted By: Alfred Carducci

Results of Site Inspection: The facility seems to meet G70-C siting criteria.

Did Applicant meet Siting Requirements? Yes

If applicable, was siting criteria waiver submitted? NA

Directions to Facility: From the intersection of US 250 and SR 2 in Moundsville, travel east on US 250 for approximately 14.2 miles to the intersection of US 250 and CR 17 (Fork Ridge Road). Turn right onto CR 17 (Fork Ridge Road) and travel approximately 3.8 miles to CR 17/2 (Brushy Run). Travel approximately 0.7 miles on CR 17/2 and the road to the facility is on the left.

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-C1	Flash Compressor Engine	MFG and AP-42
EU-C2	Flash Gas Compressor Engine	MFG and AP-42
EU-GPU1	Gas Production Unit Burner	AP-42
EU-GPU2	Gas Production Unit Burner	AP-42
EU-GPU3	Gas Production Unit Burner	AP-42
EU-GPU4	Gas Production Unit Burner	AP-42
EU-HT1	Heater Treater	AP-42
EU-HT2	Heater Treater	AP-42
EU-DEHY1	TEG Dehydration Unit	GRI-GLYCalc 4.0
EU-RB1	TEG Reboiler	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 Truck Loading	AP-42
EU-LOAD-PW	Produced Water Truck Loading	AP-42
APC-COMB-TKLD	Enclosed Combustor	AP-42
EU-PILOTS	Enclosed Combustor Pilots	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	24.42
Carbon Monoxide	67.05
Volatile Organic Compounds	27.54
Particulate Matter	0.75
Particulate Matter-10/2.5	0.75
Sulfur Dioxide	0.02
Formaldehyde	0.15
Benzene	0.50
Toluene	0.62
Ethylbenzene	0.18
Xylenes	0.47
n-Hexane	0.97
Total HAPs	2.96
Carbon Dioxide Equivalent	19,714

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-PILOTS	MRW Enclosed Combustor  (Controlling: Produced Water Tanks, Condensate Tanks, Condensate Loading and Produced Water Truck Loading)	Nitrogen Oxides	4.16	18.20
			Carbon Monoxide	8.28	36.26
			Total Particulate Matter	0.09	0.38
			Volatile Organic Compounds	3.47	15.19
			n-Hexane	0.15	0.67
			Benzene	0.01	0.02
			Toluene	0.02	0.09
			Ethylbenzene	0.02	0.08
			Xylenes	0.04	0.20
			CO <sub>2</sub> e	3,535	15,484
EP-C1	EU-C1	Flash Gas Compressor Engine Caterpillar G3406 NA 215 bhp	Nitrogen Oxides	0.47	2.08
			Carbon Monoxide	0.95	4.15
			Volatile Organic Compounds	0.36	1.59
			Total Particulate Matter	0.03	0.14
			Formaldehyde	0.03	0.13
			CO <sub>2</sub> e	253	1,108
EP-C2	EU-C2	Flash Gas Compressor Engine Kubota DG972-E2 23.6 bhp	Nitrogen Oxides	0.31	1.36
			Carbon Monoxide	5.55	24.30
			Volatile Organic Compounds	0.31	1.36
			Total Particulate Matter	<0.01	0.02
			Formaldehyde	<0.01	0.01



## 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	Gas Production Unit	1.0
EU-GPU2	Gas Production Unit	1.0
EU-GPU3	Gas Production Unit	1.0
EU-GPU4	Gas Production Unit	1.0
EU-HT1	Heater Treater	0.5
EU-HT2	Heater Treater	0.5
EU-RB1	TEG Dehydration Unit Reboiler	0.75

### 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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	98%	The estimated emissions of 0.09 PM lb/hr of PM are less than less the allowable emissions rate of 3.97 lb/hr of PM.

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

45CSR10 establishes emission limitations for SO<sub>2</sub> 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<sub>2</sub> 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.

<b>Emission Unit ID#</b>	<b>Emission Unit Description</b>	<b>Maximum Design Heat Input (MDHI) (MMBTU/hr)</b>
EU-GPU1	Gas Production Unit	1.0
EU-GPU2	Gas Production Unit	1.0
EU-GPU3	Gas Production Unit	1.0
EU-GPU4	Gas Production Unit	1.0
EU-HT1	Heater Treater	0.5
EU-HT2	Heater Treater	0.5
EU-RB1	TEG Dehydration Unit Reboiler	0.75

**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-C1	Caterpillar G3406 NA	215	2014	<input checked="" type="checkbox"/> Met Emission Standards <input type="checkbox"/> Certified Engine
EU-C2	Kubota DG972-E2	23.6	TBD	<input type="checkbox"/> Met Emission Standards <input checked="" type="checkbox"/> 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<sub>2</sub>) 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
470-510-16310	12/14/2014
470-510-16890	12/9/2014
470-510-16900	12/12/2014
TBD	TBD

***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 vapors from the tanks at 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 HH (National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities)**

This Subpart applies to owners and operators of each triethylene glycol (TEG) dehydration unit that are located at oil and natural gas production facilities. Only area source requirements are included in General Permit G70-C, as defined in §63.761.

For area source applicability, the affected source includes each triethylene glycol (TEG) dehydration unit located at a facility that meets the criteria specified in §63.760(a).

Glycol dehydration unit(s) are included in General Permit G70-C, Section 15.0.

Are there any TEG dehydration unit(s) at this facility?  Yes  No

Are the TEG dehydration unit(s) located within an Urbanized Area (UA) or Urban Cluster (UC)?  
 Yes  No

Are the glycol dehydration unit(s) exempt from 40CFR63 Section 764(d)?  Yes  No

If Yes, answer the following questions:

The actual annual average flowrate of natural gas to the glycol dehydration unit(s) is less than 85 thousand standard cubic meters per day, as determined by the procedures specified in §63.772(b)(1) of this Subpart.  Yes  No

The actual average emissions of benzene from the glycol dehydration unit process vent(s) to the atmosphere are less than 0.90 megagram per year (1 ton per year), as determined by the procedures specified in §63.772(b)(2) of this Subpart.  Yes  No

**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-C1	Caterpillar G3406 NA	215	2014	New	Subpart ZZZZ will be met by the requirements of Subpart JJJJ.
EU-C2	Kubota DG972-E2	23.6	TBD	New	Subpart ZZZZ will be met by the requirements of Subpart JJJJ.

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

### 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: \_\_\_\_\_

Name and Title: David Keatley, Permit Writer - NSR Permitting

Date: July 28, 2016