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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:** July 12, 2016  
**Subject:** R13-3225A, Jay-Bee Oil & Gas (Jay-Bee) – Big Moses Site (095-00027)

**SUMMARY**

Jay-Bee submitted R13-3225A on May 20, 2016.

This facility is located on contiguous property with the Icon Midstream Big Moses Facility and shares the same two-digit SIC code of 13. It is also under common control with the Icon facility. Therefore, because the Jay-Bee and Icon facilities share the same two-digit SIC code, are contiguous, and are under common control, the emissions from both facilities should be aggregated in determining major source or PSD status. These facilities are assigned the same facility identification number.

During review of the Icon Midstream permit application (R13-3293), it was determined that aggregation of the emissions with the Jay-Bee facility would trigger the need for a Title V (45CSR30) permit due to combined potential VOC emissions of the two (2) facilities exceeding 100 tons per year. However, upon startup of the Icon Big Moses facility, several emission sources at the contiguous Jay-Bee Big Moses Station will no longer be needed or needed in a reduced capacity. Sources that will be removed, will be removed within 30 days of start-up of the Icon facility and hourly restrictions on equipment with reduced utilization will begin immediately. Thus, annual VOC emissions of the combined facilities will be below 100 tons per year. Therefore, it was determined that a Title V permit is not required.

This Class I administrative update application is in response to the requirement in R13-3293 for Icon Midstream to remove one (1) CAT3608 engine and associated compressor from the Jay-Bee permit and establish an hourly restriction on one (1) of the three (3) dehydration units to 1,750 hours per year and limit one (1) of the remaining CAT3608 engines to 1,000 hours per year of operation.

The total potential to emit (PTE) for Jay-Bee's Big Moses Site after this proposed administrative update 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	59.02	34.84	-24.18
Carbon Monoxide	25.36	15.85	-9.51
Volatile Organic Compounds	85.86	56.10	-29.76
Particulate Matter-10/2.5	4.47	2.94	-1.53
Sulfur Dioxide	0.23	0.14	-0.09
Total HAPs	16.01	10.21	-5.80

The total point source potential to emit (PTE) for Icon's Big Moses Facility (R13-3293) are shown in the following table:

<b>Pollutant</b>	<b>Maximum Facility Wide Emissions (tons/year)</b>
Nitrogen Oxides	2.56
Carbon Monoxide	4.78
Volatile Organic Compounds	33.25
Particulate Matter-10/2.5	0.30
Sulfur Dioxide	0.01
Total HAPs	1.42

The following table shows that the aggregate point source potential to emit (PTE) for both facilities are below 45CSR30 (Title V) thresholds:

<b>Pollutant</b>	<b>Maximum Facility Wide Emissions (tons/year)</b>
Nitrogen Oxides	37.40
Carbon Monoxide	20.63
Volatile Organic Compounds	87.83
Particulate Matter-10/2.5	2.59
Sulfur Dioxide	0.15
Total HAPs	11.61

45CSR13 Section 4.2.a states that a Class I administrative update includes permanent removal of equipment (engine, CE-6), and changes in a permit condition to allow changes in operating parameters which results in a decrease in the emission of any regulated air pollutant (limiting hours of operation on engine, CE-5 and still vent, RSV-3). Therefore, it is my opinion that this request qualifies for a Class I administrative update.