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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.: R13-3027
Plant ID No.: 103-00061
Applicant: Stone Energy Corporation (Stone)
Facility Name: Nice Well Pad Compressor Station
Location: New Martinsville, Wetzel County
NAICS Code: 211111 (Natural Gas Extraction)
Application Type: Construction
Received Date: November 26, 2012
Engineer Assigned: Jerry Williams, P.E.
Fee Amount: \$2,000.00
Date Received: November 26, 2012
Complete Date: February 8, 2013
Due Date: May 9, 2013
Applicant Ad Date: January 23, 2013
Newspaper: *The Wetzel Chronicle*
UTM's: Easting: 514.869 km Northing: 4,391.039 km Zone: 17
Description: Proposal to construct and operate a natural gas well pad compressor facility with two (2) natural gas fired reciprocating internal combustion engines, six (6) line heaters, one (1) condensate storage tank, three (3) produced water storage tanks, product loading, and related fugitive emissions.

DESCRIPTION OF PROCESS

The following process description was taken from Permit Application R13-3027:

Natural gas and produced fluids (condensate and water) are received from the six (6) wells at approximately 1,000 psi and passed through heaters to avoid ice formation during pressure drops. These materials then pass through three-way separators where gas, condensate, and water are separated. The gas is routed directly to one (1) of two (2) main compression units and then to a tri-ethylene glycol (TEG) dehydration unit owned and operated by Williams Ohio Valley Midstream (Williams).

The produced water is routed to a series of three (3) 210 barrel (bbl) atmospheric tanks. The condensate is routed to the contiguous Williams facility where it is passed through a flash separator and then placed into a pipeline for transportation to a processing facility. Gases from the flash separator are routed to compression owned and operated by Williams. A small amount of organics are condensed during this compression of flash gas. This organic liquid is routed to a 210 bbl condensate tank owned and operated by Stone. All natural gas fired equipment use natural gas received at the station as fuel.

SOURCE AGGREGATION

This application states that Stone currently owns and operates natural gas wells, line heaters, separators and storage tanks at its Mary-Nice well pad, and further states that Williams owns and operates its Nice Compressor Station on contiguous property. This compressor station receives natural gas and associated liquids produced by Stone, dehydrates and compresses the gas and injects it into a pipeline for transportation to one of several area processing plants. The liquids are injected into a liquids line for transportation to its Fort Beeler station. Installation of the proposed equipment will allow Stone Energy greater flexibility as to how they wish to produce their wells.

Under USEPA and WVDEP-DAQ policy, “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.

The Nice Well Pad Compressor Station is located in Wetzel County and will be operated by Stone, who is owner and operator.

- “Contiguous or Adjacent” determinations are made on a case by case basis. These determinations are proximity based, and it is important to focus on this and whether or not it meets the common sense notion of a plant. The terms “contiguous” or “adjacent” are not defined by USEPA. Contiguous has a dictionary definition of being in actual contact; touching along a boundary or at a point. Adjacent has a dictionary definition of not distant; nearby; having a common endpoint or border. **The Williams Nice Compressor Station is located on contiguous property with the Stone station.**
- The Stone Well Pad Compressor Station and the Williams Nice Compressor Station will operate under SIC code 1311 (Crude Petroleum and Natural Gas Extraction). Both contiguous facilities share the same two-digit major SIC code of 13 for oil and gas exploration and production. **Therefore, the Nice Well Pad Compressor Station does share the same SIC code as the wells and surrounding compressor stations.**
- According to Stone, they are a separate corporate entity with Williams and do not share parent corporations. Stone’s proposed compressor station will serve primarily for increasing production from its wells.

The proposed facility that Stone has planned to locate on Williams' property establishes a possible control relationship. Once this occurs, a list of questions must be answered that have been developed through USEPA guidance and prior determinations. The answers to these questions assist in making a common control and support facility determination.

A. Common control that is established through ownership.

- Do the facilities share common workforces, plant managers, security forces, corporate executive officers, or board of executives?
 - According to the permit application, Stone has stated that the facilities do not share these services. However, Stone and Williams have agreed upon and share the cost of a contract security force for the facility.
- Will managers or other workers be shared or involved actively at both facilities?
 - According to the permit application, Stone will not share a common work force.
- Do the facilities share common payroll activities, employee benefits, health plans, retirement funds, insurance coverage, or other administrative functions?
 - These issues were not addressed in the permit application.

B. Common control that is established through decision making authority.

- What are the contractual arrangements for providing goods and services?
 - The permit application states Stone currently owns and operates natural gas wells, line heaters, separators and storage tanks at its Mary-Nice well pad, and further states that Williams owns and operates its Nice Compressor Station on contiguous property. This compressor station receives natural gas and associated liquids produced by Stone, dehydrates and compresses the gas and injects it into a pipeline for transportation to one of several area processing plants. The liquids are injected into a liquids line for transportation to its Fort Beeler station. Installation of the proposed equipment will allow Stone greater flexibility as to how they wish to produce their wells.
- Do the facilities share equipment, other property, or pollution control equipment? Can the managing entity of one facility make decisions that affect pollution control at the other facility?
 - According to the permit application, Stone and Williams will not share equipment operating responsibilities. Each is responsible for the purchase, installation, operation and maintenance of its equipment.

C. Does a support and/or dependency relationship exist between the two companies such that a common control relationship exists?

- **A determination of common control may be made on the basis of indirect control, such as when the goods or services provided by a collocated, contract-for-service entity are integral to or contribute to the output provided by a separately ‘owned or operated’ activity with which it operates or supports.**
 - These facilities are collocated and Williams’ Nice Compressor Station only receives natural gas and produced liquids from the adjacent Stone well pads. Conversely, all natural gas and liquids produced at the Stone well pads are managed and placed into transportation pipelines by Williams.
- Where more than 50% of the output or services provided by one facility is dedicated to another facility that it supports, then a support facility relationship is presumed to exist. When a support facility is established, such as in this case, a common control relationship does exist.
 - The application represents that Williams only receives natural gas and produced liquids from the adjacent Stone well pads. Conversely, all natural gas and liquids produced at the Stone well pads are managed and placed into transportation pipelines by Williams. Therefore, the Stone facility is a support facility for the Williams facility and a common control relationship does exist.

Because the facilities belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person (support facility), the emissions from both facilities must be aggregated in determining major source or Prevention of Significant Deterioration (PSD) status.

Aggregated Emissions

The following table details Stone's and Williams' annual (tons/year) facility potential to emit (PTE) in relation to Title V and PSD threshold:

Facility	NO _x	CO	VOC	PM	SO ₂	CO ₂ e
Stone	40.03	26.41	19.81	0.06	0.90	12,178
Williams	46.14	45.25	24.50	0.05	0.86	12,828
Total	86.17	71.66	44.31	0.11	1.76	25,006
Title V Applicability Threshold	100	100	100	100	100	NA
PSD Applicability Threshold	250	250	250	250	250	100,000

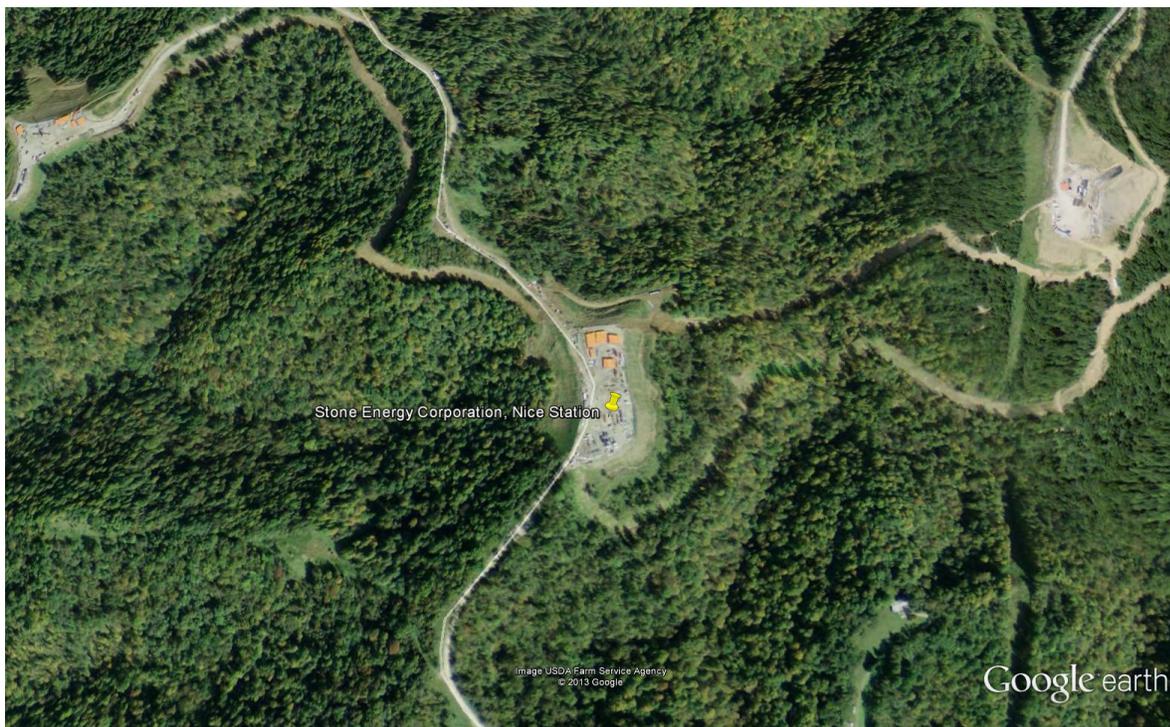
As shown in the table above, the aggregation of these two (2) facilities emissions do not result in the Title V or PSD threshold being exceeded. Therefore, neither facility would be subject to Title V or PSD review.

SITE INSPECTION

A site inspection was conducted by Douglas Hammel of the DAQ Enforcement Section on February 27, 2013. Mr. Hammel stated that the site was an acceptable location and was approximately 1,400 feet from the closest residence.

Directions to the facility (Latitude 39.669, Longitude - 80.826) as given in the permit application are as follows:

From the junction of State Route 2 and County Route 3 (North Street) in New Martinsville, proceed east on Route 3 for approximately one (1) mile. Turn left onto County Route 3/1 (Slop Hollow Road). Proceed on County Route 3/1 (Slop Hollow Road) approximately 2.4 miles to a roadway on the left leading to Lewis Wetzel Park. The site is approximately 0.7 miles towards the park on the left.



ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions associated with this construction application consist of the combustion emissions from two (2) natural gas fired compressor engines (1E-2E), six (6) line heaters (HTR-1), three (3) produced water tanks (T01-T03), one (1) condensate storage tank (T04), product loading, and fugitive emissions. Fugitive emissions for the facility are based on calculation methodologies presented in EPA Protocol for Equipment Leak Emission Estimates. The following table indicates which methodology was used in the emissions determination:

Emission Point ID#	Process Equipment	Calculation Methodology
1E	1,340 hp Caterpillar G3516LE Reciprocating Internal Combustion Engine (RICE) w/ NSCR	Manufacturer's Data, EPA AP-42 Emission Factors
2E	1,004 hp Caterpillar G3512 LE RICE	Manufacturer's Data, EPA AP-42 Emission Factors
HTR-1	Six (6) 0.5 Million British Thermal Units per Hour (MMBtu/hr) Line Heaters	EPA AP-42 Emission Factors
T01-T03	Three (3) 210 bbl Produced Water Storage Tanks	EPA Tanks 4.09d
T04	One (1) 210 bbl Condensate Storage Tank	EPA Tanks 4.09d and Vasquez-Beggs (Flashing)
Truck Loading	36,000 gallons per year Product Loadout	EPA AP-42 Emission Factors

The following table indicates the control device efficiencies that are required for this facility:

Emission Unit	Pollutant	Control Device	Control Efficiency
1,340 hp Caterpillar G3516 LE RICE (1E)	Carbon Monoxide	NSCR	85 %
	Volatile Organic Compounds		60 %
	Formaldehyde		70 %

The total facility PTE for the Stone Nice Station is shown in the following table:

Pollutant	Facility Wide PTE (tons/year)
Nitrogen Oxides	40.03
Carbon Monoxide	26.41
Volatile Organic Compounds	19.81
Particulate Matter	0.90
Sulfur Dioxide	0.06
Formaldehyde	2.94
Total HAPs	4.40
Carbon Dioxide Equivalent	12,178

Maximum detailed controlled point source emissions were calculated by Stone and checked for accuracy by the writer and are summarized in the table on the next page.

Stone Energy Corporation – Nice Well Pad Compressor Station (R13-3027)

Emission Point ID#	Source	NO _x		CO		VOC		PM		SO ₂		Formaldehyde		Total HAPs		CO ₂ e	
		lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year
1E	1,340 hp CAT 3516LE	4.43	19.41	1.12	4.92	1.09	4.79	0.11	0.47	<0.01	0.03	0.27	1.16	0.46	2.01	1,377	6,030
2E	1,004 hp CAT 3512LE	4.43	19.39	4.67	20.46	0.66	2.91	0.08	0.34	<0.01	0.02	0.41	1.78	0.55	2.39	1,065	4,663
HTR-1	Six (6) Line Heaters	0.28	1.23	0.24	1.03	0.02	0.07	0.02	0.09	<0.01	0.01	<0.01	<0.01	<0.01	<0.01	339	1,485
T01-T03	Produced Water Storage Tanks	0	0	0	0	0.10	0.44	0	0	0	0	0	0	0	0	0	0
T04	Condensate Storage Tank	0	0	0	0	2.41	10.56	0	0	0	0	0	0	0	0	0	0
Truck Loading	Truck Loading	0	0	0	0	34.30	0.21	0	0	0	0	0	0	0	0	0	0
Fugitive	Fugitive Emissions	0	0	0	0	0.17	0.84	0	0	0	0	0	0	0	0	0	0
Total	Total Facility PTE	9.14	40.03	6.03	26.41	38.75	19.81	0.20	0.90	0.01	0.06	0.67	2.94	1.00	4.40	2,780	12,178

REGULATORY APPLICABILITY

Unless otherwise stated WVDEP DAQ did not determine whether the permittee is subject to an area source air toxics standard requiring Generally Achievable Control Technology (GACT) promulgated after January 1, 2007 pursuant to 40 CFR 63, including the area source air toxics provisions of 40 CFR 63, Subpart ZZZ and HH.

The following rules apply to the facility:

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

The purpose of 45CSR2 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) million B.T.U.'s per hour 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.

The individual heat input of each of the proposed line heaters (HTR-1) is below 10 MMBTU/hr. Therefore, this unit is exempt from the aforementioned sections of 45CSR2.

Stone would also be subject to the opacity requirements in 45CSR2, which is 10% opacity based on a six minute block average.

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

The purpose of 45CSR10 is to establish emission limitations for sulfur dioxide which are discharged from fuel burning units. 45CSR10 states that any fuel burning unit that has a heat input under ten (10) million B.T.U.'s per hour is exempt from sections 3 (weight emission standard), 6 (registration), 7 (permits), and 8 (testing, monitoring, recordkeeping, reporting). 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.

The individual heat input of each of the proposed line heaters (HTR-1) is below 10 MMBTU/hr. Therefore, this unit is exempt from the aforementioned sections of 45CSR10.

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 Stone exceeds the regulatory emission threshold for criteria pollutants of 6 lb/hr and 10 ton/year, and they are also subject to a substantive requirement of an emission control rule promulgated by the Secretary (40CFR60 Subparts JJJJ and OOOO).

Stone paid the appropriate application fee and published the required legal advertisement for a construction permit application.

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

45CSR16 applies to this source by reference of 40CFR60, Subparts JJJJ and OOOO. These requirements are discussed under that rule below.

45CSR22 (Air Quality Management Fee Program)

Stone is not subject to 45CSR30. The Nice Compressor Station is subject to 40CFR60 Subparts JJJJ and OOOO, however they are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided they are not required to obtain a permit for a reason other than their status as an area source.

Stone is required to pay the appropriate annual fees and keep their Certificate to Operate current.

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

40CFR60 Subpart JJJJ establishes emission standards for applicable SI ICE.

The 1,004 hp Caterpillar 3512 LE SI ICE (2E) was manufactured after the July 1, 2007 date for engines with a maximum rated power capacity greater than or equal to 500 hp.

The proposed 1,004 hp Caterpillar 3512 LE SI ICE (2E) will be subject to the following emission limits: NO_x – 2.0 g/hp-hr (4.43 lb/hr); CO – 4.0 g/hp-hr (8.86 lb/hr); and VOC – 1.0 g/hp-hr (2.21 lb/hr). Based on the manufacturer's specifications for these engines, the emission standards will be met.

The proposed 1,340 hp Caterpillar 3516 LE SI ICE (1E) was manufactured on November 23, 2003, which is before the July 1, 2007 applicability date for engines with a maximum rated power capacity greater than or equal to 500 hp. Therefore, this engine is not subject to this standard.

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

EPA published in the Federal Register new source performance standards (NSPS) and air toxics rules for the oil and gas sector on August 16, 2012. 40CFR60 Subpart OOOO establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO₂) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. The following affected sources which commence construction, modification or reconstruction after August 23, 2011 are subject to the applicable provisions of this subpart:

- a. Each gas well affected facility, which is a single natural gas well.

The gas wells that currently exist at this facility were drilled principally for the production of natural gas and were done so after August 23, 2011. Therefore, these wells would be considered affected facilities under this subpart. The compliance date for these hydraulically fractured wells is October 15, 2012. Stone is required under §60.5410 to submit an initial notification, initial annual report, maintain a log of records for each well completion, and maintain records of location and method of compliance. §60.5420 requires Stone demonstrate continuous compliance by submitting reports and maintaining records for each completion operation.

- b. 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. For the purposes of this subpart, your centrifugal compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. 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.

There are no centrifugal compressors at this facility. Therefore, all requirements regarding centrifugal compressors under 40 CFR 60 Subpart OOOO would not apply.

- c. 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. For the purposes of this subpart, your reciprocating compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. 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.

There are reciprocating internal combustion engines located at this facility. This engine will be delivered after the effective date of this rule. However, §60.5365(c) states that 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. Therefore, all requirements regarding reciprocating compressors under 40 CFR 60 Subpart OOOO would not apply.

d. Pneumatic Controllers

- 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 which commenced construction after August 23, 2011, and is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not located at a natural gas processing plant.
- Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller which commenced construction after August 23, 2011, and is located at a natural gas processing plant.

There will be applicable pneumatic controllers at this facility. Therefore, the requirements regarding pneumatic controllers under 40 CFR 60 Subpart OOOO would apply. Stone would be required to perform the following:

- *Each pneumatic controller located between the wellhead and a natural gas processing plant must have a bleed rate less than or equal to 6 standard cubic feet per hour (scfh).*
- *Each pneumatic controller must be tagged with the month and year of installation, reconstruction, or modification, and identification information that allows traceability to the records for that controller.*
- *Submit the appropriate start up notifications.*
- *Submit the applicable annual reports for pneumatic controllers.*
- *Maintain records of the date, location and manufacturer specifications for each pneumatic controller, records of the demonstration that the used of pneumatic controllers with a natural gas bleed rate greater than 6 scfh are required and the reasons why, records of the manufacturer's specifications indicating that the controller is designed such that the natural gas bleed rate is less than or equal to 6 scfh, records of deviations in cases where the pneumatic controllers was not operated in compliance.*

- e. 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.

40CFR60 Subpart OOOO defines a storage vessel as a unit that is constructed primarily of nonearthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provides structural support and is designed to contain an accumulation of liquids or other materials. The following are not considered storage vessels:

- Vessels that are skid-mounted or permanently attached to something that is mobile (such as trucks, railcars, barges or ships), and are intended to be located at a site for less than 180 consecutive days. If the source does not keep or are not able to produce records, as required by §60.5420(c)(5)(iv), showing that the vessel has been located at a site for less than 180 consecutive days, the vessel described herein is considered to be a storage vessel since the original vessel was first located at the site.
- Process vessels such as surge control vessels, bottoms receivers or knockout vessels.
- Pressure vessels designed to operate in excess of 204.9 kilopascals and without emissions to the atmosphere.

This rule requires that the permittee determine the VOC emission rate for each storage vessel affected facility utilizing a generally accepted model or calculation methodology within 30 days of startup, and minimize emissions to the extent practicable during the 30 day period using good engineering practices. For each storage vessel affected facility that emits more than 6 tpy of VOC, the permittee must reduce VOC emissions by 95% or greater within 60 days of startup. The compliance date for applicable storage vessels is October 15, 2013.

The storage vessels located at this facility. Stone will be required to reduce the VOC emissions from the applicable storage tanks by 95% by October 15, 2013. This requirement will apply to the condensate tank (T04). Stone will be required to choose a control device that will meet this requirement and have it installed by the applicability date of the rule. Stone will be required to update this permit accordingly, once the control device has been selected.

- f. The group of all equipment, except compressors, within a process unit is an affected facility.
- Addition or replacement of equipment for the purpose of process improvement that is accomplished without a capital expenditure shall not by itself be considered a modification under this subpart.
 - Equipment associated with a compressor station, dehydration unit, sweetening unit, underground storage vessel, field gas gathering system,

or liquefied natural gas unit is covered by §§60.5400, 60.5401, 60.5402, 60.5421 and 60.5422 of this subpart if it is located at an onshore natural gas processing plant. Equipment not located at the onshore natural gas processing plant site is exempt from the provisions of §§60.5400, 60.5401, 60.5402, 60.5421 and 60.5422 of this subpart.

- The equipment within a process unit of an affected facility located at onshore natural gas processing plants and described in paragraph (f) of this section are exempt from this subpart if they are subject to and controlled according to subparts VVa, GGG or GGGa of this part.

The facility is not a natural gas processing plant. Therefore, Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants would not apply.

- g. Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.
- Each sweetening unit that processes natural gas is an affected facility; and
 - Each sweetening unit that processes natural gas followed by a sulfur recovery unit is an affected facility.
 - Facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H₂S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423(c) but are not required to comply with §§60.5405 through 60.5407 and paragraphs 60.5410(g) and 60.5415(g) of this subpart.
 - Sweetening facilities producing acid gas that is completely reinjected into oil-or-gas-bearing geologic strata or that is otherwise not released to the atmosphere are not subject to §§60.5405 through 60.5407, 60.5410(g), 60.5415(g), and 60.5423 of this subpart.

There are no sweetening units at this facility. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOO would not apply.

The following rules do not apply to the facility:

45CSR30 (Requirements for Operating Permits)

Stone is not subject to 45CSR30. This facility is subject to 40CFR60 Subparts JJJJ and OOOO, however they are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided they are not required to obtain a permit for a reason other than their status as an area source.

40CFR60 Subpart Kb (Standards of Performance for VOC Liquid Storage Vessels)

40CFR60 Subpart Kb does not apply to storage vessels with a capacity less than 75 cubic meters. The largest tanks that Stone has proposed to install are 33.39 cubic meters each. Therefore, Stone would not be subject to this rule.

40CFR60 Subpart KKK (Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants)

40CFR60 Subpart KKK applies to onshore natural gas processing plants that commenced construction after January 20, 1984, and on or Before August 23, 2011. This facility is not a natural gas processing facility, therefore, Stone is not subject to this rule.

45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants)

45CSR19 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution which Cause or Contribute to Nonattainment)

This facility is located in Wetzel County, which is an attainment county for all criteria pollutants, therefore this facility is not applicable to 45CSR19.

As stated in the Source Aggregation section above, Stone is not subject to 45CSR14 or 45CSR19 review.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

There will be small amounts of various non-criteria regulated pollutants emitted from the combustion of natural gas. However, due to the concentrations emitted, detailed toxicological information is not included in this evaluation.

AIR QUALITY IMPACT ANALYSIS

Modeling was not required of this source due to the fact that the facility is not subject to 45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants) as seen in the table listed in the Regulatory Discussion Section.

MONITORING OF OPERATIONS

Stone will be required to perform the following monitoring:

1. Monitor and record quantity of natural gas consumed for all engines and combustion sources.
2. Monitor all applicable requirements of 40CFR60 Subparts JJJJ and OOOO.

Stone will be required to perform the following recordkeeping:

1. Maintain records of the amount of natural gas consumed and hours of operation for all engines and combustion sources.
2. Maintain records of testing conducted in accordance with the permit. Said records shall be maintained on-site or in a readily accessible off-site location
3. Maintain the corresponding records specified by the on-going monitoring requirements of and testing requirements of the permit.
4. Maintain records of the visible emission opacity tests conducted per the permit.
5. Maintain a record of all potential to emit (PTE) HAP calculations for the entire facility. These records shall include the natural gas compressor engines and ancillary equipment.
6. Maintain records of all applicable requirements of 40CFR60 Subparts JJJJ and OOOO.
7. Maintain records of the flare design evaluation.
8. The records shall be maintained on site or in a readily available off-site location maintained by Stone for a period of five (5) years.

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates that Stone meets all the requirements of applicable regulations. Therefore, impact on the surrounding area should be minimized and it is recommended that the Wetzel County location should be granted a 45CSR13 construction permit for their facility.

Jerry Williams, P.E.
Engineer

Date