



west virginia department of environmental protection

Division of Air Quality
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Earl Ray Tomblin, Governor
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MEMORANDUM

To: Bev McKeone, NSR Program Manager

From: Caraline Griffith, Permit Engineer

Date: March 1, 2016

Subject: Class I Administrative Update, R13-2975C, SWN Production Company, LLC

On February 25, 2016 the DAQ received an administrative update request for SWN Production Company, LLC to make changes to Permit R13-2975B. Attached to this memo is the letter of approval and updated Permit R13-2975C, along with the suggested changes.

It is being requested that the Caterpillar G3306 NA compressor engine (EU-MC4238) located at the Kathy Mayhew well pad be removed based on the basis that the flash gas emissions produced by the heater treaters can be routed directly through the produced water and condensate tanks. Based on 45CSR13 "Class I Administrative Updates" are limited to changes including the permanent removal of equipment, not including air pollution control equipment. Therefore, a Class I Administrative Update is needed and it is recommended for approval.

The emissions will decrease as follows:

Pollutant	R13-2976B (TPY)	R13-2976C (TPY)	Change in PTE (TPY)
NOx	22.54	21.08	-1.46
CO	41.50	36.68	-2.83
VOC	38.96	14.13	-24.84
PM	4.59	0.86	-3.72
Formaldehyde	0.09	<0.01	-0.09
Total HAPs	3.18	1.05	-2.13