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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**216**	FACILITY ID: **095-00072**

- [x] 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): JAY-BEE OIL & GAS INC		
Federal Employer ID No. (FEIN): 55-073-8862		
Applicant's Mailing Address: 3570 Shields Hill Rd		
City: Cairo	State: WV	ZIP Code: 26337
Facility Name: Moe Well Pad Production Facility		
Operating Site Physical Address: Klondike Acres Rd. If none available, list road, city or town and zip of facility.		
City: Middlebourne	Zip Code: 26149	County: Tyler
Latitude & Longitude Coordinates (NAD83, Decimal Degrees to 5 digits): Latitude: 39.47509 Longitude: -80.88063		
SIC Code: 1311 NAICS Code: 211111	Date Application Received: August 26, 2016	
Fee Amount: $4,000	Date Fee Received: August 31, 2016	
Applicant Ad Date: October 5, 2016	Newspaper: Tyler Star News	
Date Application Complete: October 5, 2016	Due Date of Final Action: November 18, 2016	
Engineer Assigned: Jonathan Carney		

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Description of Permitting Action: Installation and operation of: three (3) processing units (GPUs), three (3) 1.5 MMBtu /hr heaters, one (1) 0.5 MMBtu/hr line heater, one (1) condensate truck loading (30,000 BBL/yr), one (1) produced water truck loading (63,600 BBL/yr), one (1) 84 hp vapor recovery unit driver, one (1) 4.4 kW/hr thermal electric generator, two (2) 10.0 MMBtu/hr enclosed combustors, three (3) 210BBL each condensate tanks, three (3) 210 BBL each produced water tanks, and one dehydration unit.

PROCESS DESCRIPTION

The following process description was taken from Registration Application G70-C216:
Natural gas and produced fluids (condensate and water) will be received from three wells and passed through Gas Processing Units (one per Marcellus well and two per Utica well) to avoid ice formation during subsequent pressure drops. These materials will then pass through a three-way separator where gas, condensate, and water are separated. All gas fired equipment will use natural gas produced at the site as fuel. The Facility will then dehydrate the gas and then inject gas into a gathering pipeline owned and operated by others.

Both condensate and produced water will be accumulated in six (6) 210 BBL tanks (three for condensate and three for produced water), pending truck transport by others.

Flash, working, and breathing losses from these tanks will be routed to a vapor recovery unit (VRU) with the captured vapors routed back to the raw gas discharge line. An enclosed combustor will be utilized as a backup control device for times when the VRU is not available and will also be utilized if a large slug of condensate production generates flash gas in excess of the capacity of the VRU.

The dehydration unit will generate emissions from the still vent and re-boiler. Still vent vapors will be routed to an enclosed combustor. Emissions from the reboiler combustion will be vented to the atmosphere.

A thermo-electric generator will be used to meet minor electric demands for monitoring and data tracking equipment.

SITE INSPECTION

Site Inspection Date: September 20, 2016

Site Inspection Conducted By: Douglas Hammell

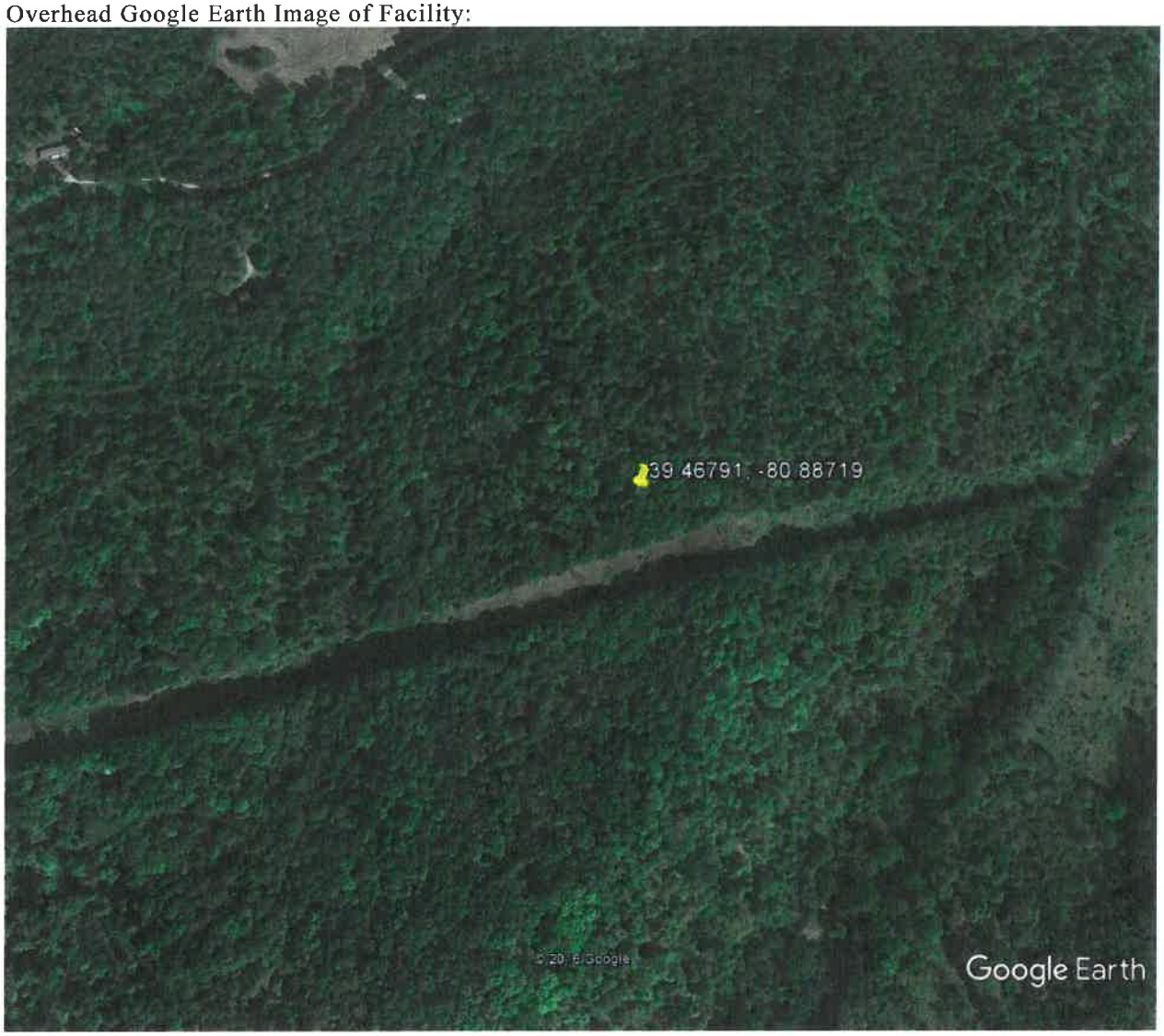
Results of Site Inspection: The inspector reported that the pad was approximately 1,200 feet from the nearest dwelling. No emission units listed in the application were on site.

Did Applicant meet Siting Requirements? According to the inspector, the site is acceptable for general permit G70-C216.

If applicable, was siting criteria waiver submitted? N/A

Directions to Facility: Middlebourne, SR-18S-R on Bridgeway, 0.3, Lon Wick, 0.5, L on CR-46, Klondike Ridge, 0.4, L on Klondike Acres, 0.9. Take access road from Larry Well Pad for 0.7 miles to Moe Well Pad

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.)
HTR-1	Gas Processing Unit	AP-42
HTR-2	Gas Processing Unit	AP-42
HTR-3	Gas Processing Unit	AP-42
HTR-4	Line Heater	AP-42
TL-1	Condensate Truck Loading	AP-42
TL-2	Produced Water Truck Loading	AP-42
VRU-1	VRU Drive	AP-42
TEG-1	Thermal Electric Generator	AP-42
EC-1	Enclosed Combustor	AP-42 and 40 CFR 98
T01	Condensate Tank	Material Balance, EPA
T02	Condensate Tank	Material Balance, EPA
T03	Condensate Tank	Material Balance, EPA
T04	Produced Water Tank	Material Balance
T05	Produced Water Tank	Material Balance
T06	Produced Water Tank	Material Balance
RBV-1	Dehydration Unit Re-boiler Vent	AP-42
RSV-1	Dehy Unit Stil Vent	AP-42 and 40 CFR 98
EC-2	Dehy. Unit Combustor Enclosed Combustion	AP-42 and 40 CFR 98

The total facility PTE for the facility (including fugitive emissions) is shown in the following table:

Pollutant	Facility Wide PTE (tons/year)
Nitrogen Oxides	5.67
Carbon Monoxide	12.96
Volatile Organic Compounds	13.25
Particulate Matter	0.47
Particulate Matter-10/2.5	0.47
Sulfur Dioxide	0.02
Formaldehyde	0.07
Total HAPs	0.76
Carbon Dioxide Equivalent	7121.86

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

APPLICANT: Jay-Bee Oil & Gas, Inc. **FACILITY NAME:** Moe Well Pad **G70-C**216

Emission Point ID#	NO_x		CO		VOC		SO_2		PM_{10}		$PM_{2.5}$		GHG (CO_2e)	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
HTR-1	0.15	0.66	0.13	0.55	0.01	0.04	0.00	0.00	0.01	0.05	0.11	0.05	175.65	769.33
HTR-2	0.15	0.66	0.13	0.55	0.01	0.04	0.00	0.00	0.01	0.05	0.11	0.05	175.65	769.33
HTR-3	0.15	0.66	0.13	0.55	0.01	0.04	0.00	0.00	0.01	0.05	0.11	0.05	175.65	769.33
HTR-4	0.05	0.22	0.04	0.18	0.00	0.01	0.00	0.00	0.00	0.02	0.00	0.02	58.55	256.44
TL-1	-	-	-	-	2.96	0.91	-	-	-	-	-	-	-	-
TL-2	-	-	-	-	0.08	0.04	-	-	-	-	-	-	-	-
VRU-1	0.19	0.83	0.38	1.66	0.04	0.18	0.00	0.00	0.01	0.03	0.01	0.03	83.24	364.61
TEG-1	<0.01	0.01	<0.01	<.0.01	<.0.01	<0.01	<0.01	<0.01	<.0.01	<0.01	<0.01	<0.01	1.61	7.07
T01-T06	-	-	-	-	1.83	8.03	-	-	-	-	-	-	6.5	28
EC-1	0.29	1.25	1.10	4.81	1.84	0.43	<0.01	<.0.01	<0.01	<0.01	<0.01	<0.01	446.7	1956
RBV-1	0.05	0.22	0.04	0.18	0.00	0.01	0.00	0.00	0.00	0.02	0.00	0.02	62.11	272.04
EC-2	0.27	1.19	1.03	4.5	0.81	3.54	<0.01	<0.01	0.04	0.16	0.04	0.16	417.4	1828.1
Fugitive	-	-	-	-	0.40	1.76	-	-	-	-	-	-	8.9	38.78
Haul Roads Fugitive	-	-	-	-	-	-	-	-	12.90	2.56	-	-	-	-
TOTAL	1.3	5.7	2.98	12.98	5.76	13.25	<0.01	<0.01	0.08	0.38	0.08	0.38	1611.96	7059.03

APPLICANT: Jay-Bee Oil & Gas, Inc. **FACILITY NAME:** Moe Well Pad **G70-C216**

Emission Point ID#	Formaldehyde		Benzene		Toluene		Ethylbenzene		Xylenes		Hexane		Total HAPs	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
HTR-1	<0.01	<0.01	-	-	-	-	-	-	-	-	<0.01	0.01	<0.01	0.01
HTR-2	<0.01	<0.01	-	-	-	-	-	-	-	-	<0.01	0.01	<0.01	0.01
HTR-3	<0.01	<0.01	-	-	-	-	-	-	-	-	<0.01	0.01	<0.01	0.01
HTR-4	<0.01	<0.01	-	-	-	-	-	-	-	-	<0.01	0.01	<0.01	0.01
TL-1	-	-	-	-	-	-	-	-	-	-	0.16	0.05	0.16	0.05
TL-2	-	-	-	-	-	-	-	-	-	-	0.01	<0.01	0.01	<0.01
VRU-1	0.01	0.06	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0.02	0.09
TEG-1	<0.01	<0.01	-	-	-	-	-	-	-	-	<0.01	<0.01	<0.01	<0.01
T01-T06	-	-	<0.01	<0.01	<0.01	0.01	<0.01	<0.01	<0.01	0.01	0.06	0.24	0.06	0.26
EC-1	<0.01	<0.01	-	-	-	-	-	-	-	-	<0.01	0.01	<0.01	0.02
RBV-1	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	-	-	-	-	<0.01	<0.01	<0.01	<0.01
EC-2	0.01	0.03	0.01	0.04	0.03	0.15	-	-	-	-	0.02	0.09	0.06	0.28
Fugitive	-	-	-	-	-	-	-	-	-	-	-	-	-	<0.01
Haul Roads Fugitive	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TOTAL	0.02	0.09	0.01	0.04	0.03	0.15	<0.01	<0.01	<0.01	<0.01	0.25	0.43	0.31	0.74

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)
HTR-1	Gas Processing Unit	1.5
HTR-2	Gas Processing Unit	1.5
HTR-3	Gas Processing Unit	1.5
HTR-4	Line Heater	0.5
TEG-1	Thermal Electric Generator	0.013
RBV-1	Reboiler	0.5

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.
EC-1	10	✓ Yes ☐No	98%	The combustor has minimal particulate matter emissions. Therefore, the combustor should demonstrate compliance with this section. The facility will demonstrate compliance by maintaining records of the amount of natural gas consumed by the combustor and the hours of operation. The facility will also monitor the flame of the combustor and record any malfunctions that may cause no flame to be present during operation
EC-2	10	✓ Yes ☐No	98%	The combustor has minimal particulate matter emissions. Therefore, the combustor should demonstrate compliance with this section. The facility will demonstrate compliance by maintaining records of the amount of natural gas consumed by the combustor and the hours of operation. The facility will also monitor the flame of the combustor and record any malfunctions that may cause no flame to be present during operation

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

45CSR10 establishes emission limitations for SO_2 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_2 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.

Emission Unit ID#	Emission Unit Description	Maximum Design Heat Input (MDHI) (MMBTU/hr)
HTR-1	Gas Processing Unit	1.5
HTR-2	Gas Processing Unit	1.5
HTR-3	Gas Processing Unit	1.5
HTR-4	Line Heater	0.5
TEG-1	Thermal Electric Generator	0.013
RBV-1	Dehydration Unit Re-boiler Vent	0.5

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 IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines)

The facility does not contain an affected source (compression ignition engine) and is therefore not subject to this subpart.

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.
VRU-1	Cummins, G5.9	84	3/19/2012	☒ Met Emission Standard ☐ 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_2) 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
47-095-02321	Planned
47-095-02322	Planned

Centrifugal compressor affected facilities are included in General Permit G70-C, Section 11.0.
Are there any applicable centrifugal compressor affected facilities not located at the well site?

☐Yes ✓ No

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. 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.

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.

The storage tank VOC emissions will be controlled to less than 6 tpy. The vapors from the storage vessels will be sent to a vapor recovery unit with an enclosed combustor control device as back-up.

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 areas source requirements are included in General Permit G70-C, as defined in §63.761.

For area source applicability, the affected source includes each trietheylene 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.
VRU-1	Cummins G5.9	84	3/16/2012	New	Commenced construction after June 12, 2006. Shall comply with 40 CFR 60 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: Jonathan Carney
Name and Title: Jonathan Carney
Date: November 7, 2016