



west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone (304) 926-0475 • FAX: (304) 926-0479

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.: R13-3104
Plant ID No.: 091-00040
Applicant: Alta Mesa Services, LP
Facility Name: Fairmont Tools, Inc.
Location: Taylor County
NAICS Code: 211111
Application Type: Construction
Received Date: July 17, 2013
Engineer Assigned: Jill Harris
Fee Amount: \$4,500.00
Date Received: September 4, 2013
Complete Date: September 4, 2013
Due Date: December 3, 2013
Applicant Ad Date: August 2, 2013
Newspaper: *The Mountain Statesman*
UTM's: Easting: 573.308 km Northing: 4358.2810 km Zone:
17
Description: Alta Mesa Services, LP (Alta Mesa) is proposing to construct and operate a new natural gas production facility near Fairmont in Taylor County.

DESCRIPTION OF PROCESS

Wet natural gas and water are pumped from the wells as a mixture. The wet gas and water enter the Heater Treaters (EPN:HT1E through HT5E). After treatment in the Heater Treaters, the wet gas and water mixture is fed into the 2 phase high pressure separators. The water and wet gas is separated in the high pressure 2 phase separator. The wet gas portion is routed from the separator to a meter then into a common main line. The separated water is routed to the water storage tanks. The wet gas in the main line from all 5 well heads is then fed into a compressor (EPN: ENG1E) to be pressurized for the sales line. The pressured wet gas is processed through a Triethylene Glycol (TEG) Dehydrator

(EPN: DH1E & GLY1E) were the remaining water vapor in the wet gas is dried out producing dry natural gas. The dry gas is sent from the TEG Dehydrator to the transfer line. The remaining separated water is routed to the water storage tanks where it is stored until transportation and disposal offsite is arranged. The dry gas in the transfer line is transported roughly 3 miles. During this transfer the remaining moisture and some of the gas is condensed to a liquid phase due to the change in temperature and reduced pressure cooling. The condensate is gathered in a drip tank where it is collected and stored until transport and disposal is arranged to remove the condensate (EPN: LOD1E). The dry gas is then sent through an additional scrubbing system prior to going to sales meter/line.

SITE INSPECTION

On September 19, 2013, the writer conducted a site inspection of the proposed site. The closest residence is approximately 1,000 feet from the proposed site. There are no other residences near the site. Photos are available in the file.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emission Unit ID#	Process Equipment	Calculation Methodology
HT1S, HT2S, HT3S, HT4S, HT5S	2.1 mmBtu/hr Heater Treater	AP-42 Chapter 1 Section 4, Tables 1.4-1 and Table 1.4-2
ENG1S	945 hp Compressor Engine	AP-42 Emission Factors Stationary Internal Combustion Sources: Chapter 3, Table 3.2-2 (Uncontrolled emission factors for 4-stroke lean-burn engines)
DEH1S	TEG Dehydrator	Inlet Gas Stream: Based on typical gas stream analysis in region. GRI-GYLCALC
	TEG Dehydrator Reboiler	AP-42, Table 1.4-1 and Table 1.4-2
FUG1S	Equipment Fugitives	EPA, API oil and gas fugitive emission factors
FUG2S	Dust Fugitives	WV DEP Methodology Worksheet
GLY1S	Glycol Storage Tank	Tanks 4.09d
CON1S	Condensation/Drip Tank & Produced Water Tanks	Flash Emissions E&P TANK V2 Working/Breathing Emissions Tanks 4.09d
LOD1S	Condensation & Produced Tank Loading	AP-42 Methodology

Site Emission Summary Table

Desc.	Heater Treater 1: Emissions from 2.11MMBtu/hr fuel consumption		Heater Treater 2: Emissions from 2.11MMBtu/hr fuel consumption		Heater Treater 3: Emissions from 2.11MMBtu/hr fuel consumption		Heater Treater 4: Emissions from 2.11MMBtu/hr fuel consumption		Heater Treater 5: Emissions from 2.11MMBtu/hr fuel consumption		Compressor Engine: Emissions from 945HP, Lean Burn 4-Stroke, 7571Btu/hp-hr rating engine		TEG Dehydrator: Emissions from 5.62Mscf/day fuel consumption		Equipment Fugitives		Dust Fugitives		750 gal. Glycol Storage Tank		210 bbl Condensation/Drip Tank	
	EPN:	HT1E	HT2E		HT3E		HT4E		HT5E		ENG1E		DEH1E		FUG1E		FUG2E		GLY1E		CON1E	
Pollutant	Max Hourly	Tons/Yr	Max Hourly	Tons/Yr	Max Hourly	Tons/Yr	Max Hourly	Tons/Yr	Max Hourly	Tons/Yr	Max Hourly	Tons/Yr	Max Hourly	Tons/Yr								
NO _x	0.20	0.88	0.20	0.88	0.20	0.88	0.20	0.88	0.20	0.88	4.17	18.25	0.02	0.10	-	-	-	-	-	-	-	-
VOC	0.01	0.05	0.01	0.05	0.01	0.05	0.01	0.05	0.01	0.05	0.65	2.83	15.72	68.84	0.18	0.77	-	-	0.00	0.00	0.63	2.76
CO	0.17	0.74	0.17	0.74	0.17	0.74	0.17	0.74	0.17	0.74	3.75	16.43	0.02	0.09	-	-	-	-	-	-	-	-
PM ₁₀	0.00	0.02	0.00	0.02	0.00	0.02	0.00	0.02	0.00	0.02	0.00	0.00	0.00	0.00	-	-	4.73	4.32	-	-	-	-
PM _{2.5}	0.01	0.05	0.01	0.05	0.01	0.05	0.01	0.05	0.01	0.05	0.00	0.00	0.00	0.01	-	-	-	-	-	-	-	-
PM	0.02	0.07	0.02	0.07	0.02	0.07	0.02	0.07	0.02	0.07	0.07	0.31	0.00	0.01	-	-	10.51	9.59	-	-	-	-
SO ₂	0.00	0.01	0.00	0.01	0.00	0.01	0.00	0.01	0.00	0.01	0.00	0.02	0.00	0.00	-	-	-	-	-	-	-	-
CO ₂	240.00	1,051.20	240.00	1,051.20	240.00	1,051.20	240.00	1,051.20	240.00	1,051.20	1,037.52	4,544.33	28.10	123.08	-	-	-	-	-	-	-	-
CH ₄	0.00	0.02	0.00	0.02	0.00	0.02	0.00	0.02	0.00	0.02	8.94	39.17	44.60	195.36	-	-	-	-	-	-	-	-
N ₂ O	0.00	0.02	0.00	0.02	0.00	0.02	0.00	0.02	0.00	0.02	0.00	0.00	0.00	0.00	-	-	-	-	-	-	-	-
HAPS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.53	2.31	0.54	2.36	-	-	-	-	-	-	-	-

Site Emission Totals

Site Emission Totals		
Pollutant	Max Hourly	Tons/Yr
NO _x	5.19	22.73
VOC	31.79	78.25
CO	4.61	20.19
PM ₁₀	4.75	4.40
PM _{2.5}	0.06	0.26
PM	10.66	10.24
SO ₂	0.01	0.05
CO ₂	2,266	9,923
CH ₄	53.57	234.63
N ₂ O	0.02	0.10
HAPS	1.07	4.68

Site CO₂e Emissions

Sitewide CO ₂ e Emissions			
Pollutant	Quantity (ton/yr)	SAR GWP Factor	CO ₂ e (ton/yr)
CH ₄	234.63	21.00	4,927.32
N ₂ O	0.10	310.00	30.57
CO ₂	9,923.41	1.00	9,923.41
Total CO ₂ e (tons/yr)			14,881.30

REGULATORY APPLICABILITY

The following rules and regulations apply to the facility.

45CSR2 To Prevent and Control Particulate Air Pollution From Combustion of Fuel In Indirect Heat Exchangers

This rule establishes emission limitations for smoke and particulate matter which are discharge from fuel burning units.

The facility is proposing to install (5) five heat treaters at the facility. Each heat treater has a design capacity of 2.1 MMBtu/hr.

Section 11 of this rule states that any fuel burning unit(s) having a heat input under ten (10) MMBtu per hour will be exempt from sections 4, 5, 6, 8 and 9.

The facility is subject to the visible emission requirements set forth in section 3 of this rule.

The facility will demonstrate compliance with this rule by maintaining the amount natural gas consumed in each heater and conducting an initial opacity check in accordance with Method 22 upon startup of the heaters and conduct Method 9 opacity checks at the request of the Director.

45CSR4 To Prevent and Control the Discharge of Air Pollutants Into the Open Air Which Causes or Contributes to an Objectionable Odor or Odors

Series 4 is designed to prevent and control the discharge of pollutants into the open air which causes or contributes to an objectionable odor or odors.

No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location by the public.

No person shall be considered in violation of this rule unless notified that he is discharging an air pollutant or air pollutants which cause or contributes to an objectionable odor.

45CSR10 To Prevent and Control Air Pollution From the Emission of Sulfur Oxides

The purpose of this rule is to prevent and control air pollution from the emission of sulfur oxides.

Fuel Quality Goals - It is the intent of the Director that all persons engaged in the burning of fuel make a maximum effort to utilize the best quality fuel available regardless of the requirements of this rule.

Section 10 of this rule states that any fuel burning units having a design heat input under ten (10) million BTU per hour will be exempt from sections 3 and 6 through 8 of this rule. In addition, an owner or operator of a fuel burning unit(s) which combust natural gas alone shall be exempt from the requirements of section 8.

The facility's proposed heat treaters are less than 10 MMBtu/hr (2.1 MMBtu/hr). The facility is also proposing to combust only natural gas in the heaters. The facility is exempt from the requirements of this rule.

45CSR13 Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, Permission to Commence Construction, and Procedures for Evaluation

The purpose of this rule is to set forth the procedures for stationary source reporting, and the criteria for obtaining a permit to construct and operate a new stationary source which is not a major stationary source.

The facility is proposing to construct a new natural gas production facility in Taylor County, WV. The facility will meet the threshold required to obtain a construction permit. In addition, the facility is subject to New Source Performance Standards. The facility has published a Class I Legal Advertisement in the *Mountain Statesman*. The facility filed a construction permit application with the agency on July 17, 2013.

45CSR16 Standards of Performance for New Stationary Sources

This rule establishes and adopts standards of performance for new stationary sources promulgated by the USEPA pursuant to section 111(b) of the federal Clean Air Act, as amended (CAA).

The facility will demonstrate compliance with this rule by demonstrating compliance with 40 CFR 60 Subpart JJJJ and Subpart OOOO.

45CSR34 Emission Standards for Hazardous Air Pollutants

This rule establishes and adopts a program of national emission standards for hazardous air pollutants (NESHAPS) and other regulatory requirements promulgated by the USEPA pursuant to 40 CFR Parts 61, 63 and section 112 of the federal Clean Air Act, as amended (CAA).

The facility will subject to the requirements of 40 CFR 63 Subpart ZZZZ and Subpart HH.

40CFR60 Subpart JJJJ Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

The provisions of this subpart are applicable to manufacturers, owners and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1)

through (6) of this section.

The facility is proposing to install a 945 hp Caterpillar G3512. The manufactured date is assumed to be 2013.

Section §60.4230(a)(4)(ii) applies to owners and operators of stationary SI ICE that commence construction after June 12, 2006, where the stationary SI ICE are manufactured on or after January 1, 2008 for lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 HP.

Section §60.4233(e) states that owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 100 HP must comply with the emission standards in Table 1 to this subpart for their stationary SI ICE.

Emission Standards from Subpart JJJJ:

Engine type and fuel	Maximum engine power	Manufacture date	Emission Standards (g/HP-hr)		
			NOx	CO	VOC
Non-Emergency SI Lean Burn Natural Gas	500≤HP<1,350	1/1/2008 - 7/1/2010	2.0	4.0	1.0

Emissions Data from Caterpillar:

Engine type and fuel	Maximum engine power	Manufacture date	Emission Standards (g/HP-hr)		
			NOx	CO	VOC
Non-Emergency SI Lean Burn Natural Gas	945	1/1/2008 - 7/1/2010	2.0	1.8	0.31

The proposed engine will meet the emission limit standards. The facility will demonstrate compliance with the testing, recordkeeping, notification and reporting requirements set forth in this regulation. See Permit R13-3104 for all applicable requirements.

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

This subpart 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.

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

The facility is proposing (5) five gas wells at the facility that are constructed after August 23, 2011.

(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. 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 proposed centrifugal compressors.

(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. 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.

The facility is proposing to install (1) one 945 hp reciprocating compressor.

(d)(1) For the oil production segment (between the wellhead and the point of custody transfer to an oil pipeline), 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.

(2) 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.

(3) For natural gas processing plants, each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller.

(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.

Emissions from the each tank do not exceed 6 tpy. The facility is required to estimate emissions per section §60.5365(e) within 30 days of startup. If the storage tank emissions are greater than 6 tpy from each tank, the facility will be required to reduce emissions by 95% within 60 days after startup or the date specified in section §60.5395(d)(ii), whichever comes first.

(f) The group of all equipment, except compressors, within a process unit is an affected facility.

(1) 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.

(2) 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.

(3) 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 proposed facility is not a natural gas processing plant that was modified after August 23, 2011. Therefore, Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants would not apply to the proposed site.

(g) Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.

(1) Each sweetening unit that processes natural gas is an affected facility; and

(2) Each sweetening unit that processes natural gas followed by a sulfur recovery unit is an affected facility.

(3) 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 §§ 60.5410(g) and 60.5415(g) of this subpart.

(4) 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 the sweetening plant. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOO would not apply.

(h) The following provisions apply to gas well facilities that are hydraulically refractured.

(1) A gas well facility that conducts a well completion operation following hydraulic refracturing is not an affected facility, provided that the requirements of § 60.5375 are met. For purposes of this provision, the dates specified in § 60.5375(a) do not apply, and such facilities, as of October 15, 2012, must meet the requirements of § 60.5375(a)(1) through (4).

(2) A well completion operation following hydraulic refracturing at a gas well facility not conducted pursuant to § 60.5375 is a modification to the gas well affected facility.

(3) Refracturing of a gas well facility does not affect the modification status of other equipment, process units, storage vessels, compressors, or pneumatic controllers located at the well site.

(4) Sources initially constructed after August 23, 2011, are considered affected sources regardless of this provision.

The facility is proposing (5) gas wells at the facility. Therefore, the facility is subject to the provision of this subpart.

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 (HAPs) 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 emissions limitations and operating limitations.

Stationary RICE subject to Regulations under 40 CFR Part 60, which are new stationary RICE located at an area source. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

40CFR63 Subpart HH National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities

This subpart applies to the owners and operators of the emission points, for area sources, each triethylene glycol (TEG) dehydration unit located at a facility that area sources and at facilities that process, upgrade, or store hydrocarbon liquids.

The facility is proposing to install a triethylene glycol (TEG) dehydration unit. The TEG dehydration unit will process 20 Mmscf/day of dry natural gas. Section §63.764(e)(ii) states that if the actual emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less

than 1.0 ton/yr, as determined by the procedures specified in §63.772(b)(2) of this subpart, the facility is exempt from the requirements of paragraph (d) of this section. Records of that this criteria is meet must be maintained in accordance with §63.774(d)(1). The potential to emit calculated is less than 1 ton per year of benzene.

The following rules and regulations do not apply.

45CSR14 Permits for Construction and Major Modification of Major Stationary Sources for the Prevention of Significant Deterioration of Air Quality

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

The Alta Mesa Well Pad Station is located in Taylor County, which is an attainment area for all criteria pollutants, therefore the Alta Mesa Well Pad Station is not applicable to 45CSR19.

As shown in the table below, the facility is not subject to 45CSR14 or 45CSR19 review.

Pollutant	PSD (45CSR14) Threshold (tpy)	NANSR (45CSR19) Threshold (tpy)	Alta Mesa (tpy)	45CSR14 or 45CSR19 Review Required
Carbon Monoxide	250	N/A (attainment)	20.19	No
Nitrogen Oxides	250	N/A (attainment)	22.73	No
Sulfur Dioxides	250	N/A (attainment)	0.05	No
Particulate Matter2.5	250	N/A (attainment)	0.26	No
Ozone (VOC)	250	N/A (attainment)	78.25	No
Greenhouse Gas (CO ₂ e)	100,000	N/A (attainment)	14,881.30	No

Source Aggregation:

“Building, Structure, Facility, or Installation” means all of the pollutant-emitting activities which 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 (or persons under common control). Pollutant-emitting activities are a part of the same industrial grouping if they belong to the same “Major Group” (i.e., which have the same two (2)-digit code) as described in the Standard Industrial Classification Manual, 1987.

Contiguous or Adjacent

The facility process, stores and upgrades natural gas to the point where it is transferred to a sales line.

The closest facility is approximately 3 miles away from the facility.

Same Industrial Grouping

The facility shares the same industrial grouping as other facilities nearby.

Common Control

The facility does not share a common workforce, plant manager, security forces, corporate executives, or board of executives with any other facility.

The gas produced at the proposed Alta Mesa's production facility will be transported offsite via flow line and will tie-in a gas sales line.

The facility does not share equipment, other property, or pollution control equipment with any other facility.

There will be no support an/or dependency relationship between Alta Mesa's facilities and any other facility such that a common control relationship exists.

This source will not be aggregated with any other sources in order to determine PSD applicability.

40CFR60 Subpart Kb

Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

The subpart applies to each storage vessel with a capacity greater than or equal to 75 cubic meters (19,812.9 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

The facility is proposing the following tanks that will store VOL.

TEG Storage Tank	750 gallons
Condensate/Drip Tank	8,820 gallons
Produced Water Storage Tanks	16,800 gallons

Since the design capacity of the tanks are less than the

capacity specified in this regulation, the facility's tanks are not subject to the requirements of this subpart.

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

The provisions of this subpart apply to affected facilities in onshore natural gas processing plants. A natural gas processing plant means any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both.

The facility is not defined as a natural gas processing plant and is not subject to the requirements of this subpart.

40CFR63 Subpart HHH National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities

This subpart applies to owners and operators of natural gas transmission and storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user, and are major sources of hazardous air pollutant (HAP) emissions.

The facility is not a major source of HAP emissions as defined in section §63.1271. Therefore, the facility will not be subject to the requirements of this subpart.

45CSR30 Requirements for Operating Permits

This rule provides for the establishment of a comprehensive air quality permitting system consistent with the requirements of Title V of the Clean Air Act. All fees collected pursuant to this rule shall be expended solely to cover all reasonable direct and indirect cost required to administer the Title V operating permit program and accounted for in accordance with this rule.

The proposed site is not subject to 45CSR30. The source is subject to 40CFR60 JJJJ and OOOO and 40CFR63 HH, 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.

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 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

- Monthly Method 22 (visible emission checks) of the natural gas fired heater treaters.
- Monthly monitor of the amount of natural gas consumed in the compressor engine and the hours of operation.
- Monthly wet throughput of natural gas to the TEG Dehydration Unit.
- Monthly natural gas throughput to the Reboiler.
- Bi-monthly parameters for GRI GLYcalc V3 or higher (Wet gas contractor temperature/degrees F, wet gas or contractor pressure/psig, lean glycol flow rate/gpm, 3.0 gal/lb H₂O, dry gas water content/lbH₂O/MMscf)
- Monthly throughput of the loading operations and tanks.
- Monthly temperature and pressure of the last separation unit prior to the storage tanks.

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates Alta Mesa meets all applicable requirements. Therefore, it is recommended that the Taylor County location should be granted a 45CSR13 construction permit for their facility.

Jill Harris
Engineer

Date

Fact Sheet R13-3104
Alta Mesa Services, LP
Fairmont Tools