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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.: R13-3267
Plant ID No.: 095-00019
Applicant: Jay-Bee Oil & Gas, Inc.
Facility Name: Bunker Run Compressor Station
Location: Alvy/Blue, Tyler County
NAICS Code: 211111
Application Type: Modification
Received Date: July 6, 2015
Engineer Assigned: Roy F. Kees, P.E.
Fee Amount: \$4,500.00
Date Received: July 18, 2015
Complete Date: August 31, 2015
Due Date: December 1, 2015
Applicant Ad Date: August 19, 2015
Newspaper: *Tyler Star News*
UTM's: Easting: 528.816 km Northing: 4,366.766 km Zone: 17
Description: Modification and operation of a natural gas compressor station.

DESCRIPTION OF PROCESS

The Bunker Run Compressor Station is located in Tyler County, West Virginia and is currently registered under G35-A065. Jay-Bee proposes with this modification to remove one Caterpillar G3512 engine (CE-1) from the facility, update the emissions on the two remaining Caterpillar G3516 TALE engines (CE-2 & CE-3) to align with the catalyst warranty, replace one 10.5 mmscfd (RSV-1, RBV-1) and one 13 mmscfd (RSV-2, RBV-2) dehy with one 20 mmscfd dehy, (RSV-3, RBV-3) add one 22,100 scfd enclosed combustor (EC-1) to control tank emissions, and to increase liquids production, thus adding truck loading to the permitted processes at the facility. Because the current G35-A General Permit does not have provisions included for truck loading, these changes will fall under a 45CSR13 Modification.

SITE INSPECTION

A site inspection was not deemed necessary at this time due to the facility being a currently operational natural gas compressor station and the changes to the facility being minor.

Directions as given in the permit application are as follows:

From Bridgeport/Clarksburg, take Route 50 West 25.5 miles to Route 18 West (West Union Exit). Turn right onto 18 West and travel 20 miles to Indian Creek Road (C/R 13). Turn right on Indian Creek Road and travel 10.8 miles to Bunker Run Road (C/R 13/6). Turn right on Bunker Run Road and travel 0.5 miles to the proposed site on left.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions associated with this modification application consist of the combustion emissions from two (2) natural gas fired compressor engines (CE-2 & CE-3), one (1) TEG dehydrator still vent (RSV-3), one (1) TEG dehydrator reboiler (RBV-3), one (1) 100 bbl tank (condensate / produced water) (TD2), one (1) product loadout rack (TL-1), 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 Unit ID# | Process Equipment | Calculation Methodology |
|--------------------------|---|--|
| CE-2 & CE-3 | Caterpillar G3516 TALE Compressor Engines 1,340 Horsepower | Manufacturer's Data, EPA AP-42 Emission Factors |
| RSV-3 | 20 mmscfd TEG Dehydrator Still Vent | GRI-GlyCalc 4.0 |
| RBV-1 | 0.50 MMBtu/hr TEG Dehydrator Reboiler | EPA AP-42 Emission Factors |
| TD2 | (1) 100 bbl Produced Fluid Tank | EPA Tanks 4.09d and direct measurement GOR and Flash Gas Composition |
| TD3 | 300 Gallon Oil Tank | Negligible |
| TD4 | 300 Gallon Oil Tank | Negligible |
| TL-1 | 18,000 gal / year Product Loadout Rack | 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 TALE RICE w/ Cat (CE-2 & CE-3) | Nitrogen Oxides | Oxidation Catalyst | N/A |
| | Carbon Monoxide | | 90 % |
| | Volatile Organic Compounds | | 50 % |
| | Formaldehyde | | 80 % |
| 100 bbl Produced Fluids Tank (TD2) | Volatile Organic Compounds | Abutec 20 Enclosed Combustor | 98% |
| | Total HAPs | | 98% |

The total facility PTE for the Bunker Run Compressor Station is shown in the following table:

| Pollutant | Proposed Facility Wide PTE (tons/year) | Current Facility Wide PTE (tons/year) | Change (tons/year) |
|----------------------------|---|--|---------------------------|
| Nitrogen Oxides | 52.02 | 71.30 | -19.28 |
| Carbon Monoxide | 5.72 | 41.86 | -36.14 |
| Volatile Organic Compounds | 40.91 | 44.54 | -3.63 |
| Particulate Matter-10/2.5 | 1.01 | 1.64 | -0.63 |
| Sulfur Dioxide | 0.06 | 0.09 | -0.03 |
| Formaldehyde | 1.42 | 6.72 | -5.30 |
| Total HAPs | 9.20 | 12.98 | -3.78 |
| Carbon Dioxide Equivalent | 16,429 | 21,241 | -4,812 |

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

Jay-Bee Oil & Gas, Inc. – Bunker Run Compressor Station & T1213 Pad (R13-3267)

| Emission Point ID# | Source | NO _x | | CO | | VOC | | PM-10 | | Formaldehyde | | SO ₂ | | Total HAPs | | CO _{2e} |
|--------------------|-------------------------------------|-----------------|--------------|-------------|-------------|--------------|--------------|-------------|-------------|--------------|-------------|-----------------|-------------|-------------|-------------|------------------|
| | | 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 | ton/year |
| CE-2 | Caterpillar G516 TALE | 5.91 | 25.88 | 0.62 | 2.72 | 0.75 | 3.27 | 0.11 | 0.49 | 0.16 | 0.71 | 0.01 | 0.03 | 0.37 | 1.61 | 6822 |
| CE-3 | Caterpillar G516 TALE | 5.91 | 25.88 | 0.62 | 2.72 | 0.75 | 3.27 | 0.11 | 0.49 | 0.16 | 0.71 | 0.01 | 0.03 | 0.37 | 1.61 | 6822 |
| RBV-3 | Dehydrator Reboiler | 0.05 | 0.22 | 0.04 | 0.18 | 0.00 | 0.01 | 0.00 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 265 |
| RSV-3 | Dehydrator Still Vent | 0.00 | 0.00 | 0.00 | 0.00 | 7.40 | 32.43 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.35 | 5.90 | 2120 |
| TD2 | 100 bbl Produced Fluid Tank | 0.01 | 0.05 | 0.02 | 0.10 | 0.03 | 0.14 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 68.91 |
| TL-1 | Truck Loading | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0 |
| Fugitives | Equipment Leaks | 0.00 | 0.00 | 0.00 | 0.00 | 0.07 | 0.29 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 130 |
| Total | Total Bunker Run PTE | 11.89 | 52.07 | 1.33 | 5.82 | 9.00 | 40.91 | 2.40 | 1.01 | 0.33 | 1.42 | 0.01 | 0.06 | 2.09 | 9.20 | 16,429 |
| Total | Total T1213 Pad PTE | 0.33 | 1.44 | 0.28 | 1.21 | 1.32 | 3.77 | 0.02 | 0.11 | 0.00 | 0.00 | 0.00 | 0.00 | 0.11 | 0.26 | 1735 |
| Total | Total Bunker Run / T1213 PTE | 12.22 | 53.51 | 1.61 | 7.03 | 10.32 | 44.68 | 2.42 | 1.12 | 0.33 | 1.42 | 0.01 | 0.06 | 2.20 | 9.46 | 18,164 |

REGULATORY APPLICABILITY

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 the proposed reboiler (RBV-3) is below 10 MMBTU/hr. Therefore, these units are exempt from the aforementioned sections of 45CSR2.

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

45CSR6 (To Prevent and Control Air Pollution from the Combustion of Refuse)

The purpose of this rule is to prevent and control air pollution from combustion of refuse. Jay-Bee has one (1) enclosed combustor at the Bunker Run Station. The Abutec 20 ECD is subject to section 4, emission standards for incinerators.

Emissions (lb/hr) = F x Incinerator Capacity (tons/hr)

Where, the factor, F, is as indicated in Table I below:

Table I: Factor, F, for Determining Maximum Allowable Particulate Emissions.

| Incinerator Capacity | Factor F |
|-----------------------------|----------|
| A. Less than 15,000 lbs/hr | 5.43 |
| B. 15,000 lbs/hr or greater | 2.72 |

The capacity of the incinerator is 22,100 SCFD. The density of the waste gas is assumed to be 0.056 lb/ft³, which equates to 51.58 lb waste gas/hr or 0.03 ton/hr.

Allowable Emissions (lb/hr) = 5.43 x 0.3 tons/hr = 0.16 lb/hr

Hourly particulate matter emissions from the flare are estimated to be <0.01 lb/hr. Therefore, the facility's vapor combustor should demonstrate compliance with this section if the vapor combustor is maintained and operated according to the manufacturer's guidance. The facility will demonstrate compliance by maintaining records of the amount of natural gas consumed by the vapor combustor and the hours of

operation. The facility will also monitor the flame of the vapor combustor and record any malfunctions that may cause no flame to be present during operation. Monthly visual emission checks will also be conducted of the vapor combustor.

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 the proposed reboiler (RBV-3) is below 10 MMBTU/hr. Therefore, these units are 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 Jay-Bee is subject to a substantive requirement of an emission control rule promulgated by the Secretary (45CSR6, 40CFR60 Subparts JJJJ and OOOO). Also, since the current G-35A does not contain provisions for tank truck loading, the facility will not be eligible for a General Permit Modification and will have to be permitted under a 45CSR13 Modification Permit.

Jay-Bee paid the appropriate application fee of \$1,000.00, NSPS Fee of \$1,000.00, NESHAP fee off \$2,500.00 and published the required legal advertisement in *The Tyler Star News* on August 19, 2015.

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)

Jay-Bee is not subject to 45CSR30. The Bunker Run 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.

Jay-Bee 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 1,340 hp Caterpillar G3516 TALE RICE (CE-2 & CE-3) were manufactured after the July 1, 2007 date for engines with a maximum rated power capacity greater than or equal to 500 hp.

The proposed 1,340 hp Caterpillar G3516 TALE RICE (CE-2 & CE-3) will be subject to the following emission limits: NO_x – 2.0 g/hp-hr (5.91 lb/hr); CO – 4.0 g/hp-hr (11.81 lb/hr); and VOC – 1.0 g/hp-hr (2.95 lb/hr). Based on the manufacturer's specifications for these engines and catalysts, the emission standards will be met.

The proposed 1340 hp Caterpillar G3516 TALE RICE (CE-2 & CE-3) are not certified by the manufacturer to meet the emission standards listed in 40CFR60 Subpart JJJJ. Therefore, Jay-Bee will be required to conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or three (3) years, whichever comes first, to demonstrate compliance.

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

There are no gas wells at this facility. Therefore, all requirements regarding gas well affected facilities under 40 CFR 60 Subpart OOOO would not apply.

- a. 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 the Bunker Run Compressor Station. Therefore, all requirements regarding centrifugal compressors under 40 CFR 60 Subpart OOOO would not apply.

- b. 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 two reciprocating internal combustion engines located at the Bunker Run Compressor Station that were constructed prior to August 23, 2011. Therefore, the requirements regarding reciprocating compressors under 40 CFR 60 Subpart OOOO will not apply.

c. 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.

All pneumatic controllers at the facility were constructed prior to the applicability date of August 23, 2011. Therefore, there are no applicable pneumatic controllers which commenced construction after August 23, 2011. Therefore, all requirements regarding pneumatic controllers under 40 CFR 60 Subpart OOOO would not apply.

- d. 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 non-earthen 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 vessel located at the Bunker Run Compressor Station will have the potential to emit to 6.70 tpy of VOC with no controls installed. Therefore, Jay-Bee will install an enclosed combustor rated at 98% control.

- e. 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 Bunker Run Compressor Station is not a natural gas processing plant. Therefore, Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants would not apply.

- f. 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 the Bunker Run Compressor Station. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOO would not apply.

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

Subpart HH establishes national emission limitations and operating limitations for HAPs emitted from oil and natural gas production facilities located at major and area sources of HAP emissions. The glycol dehydration units at the Bunker Run Compressor Station are subject to the area source requirements for glycol dehydration units. However, because the facility is an area source of HAP emissions and the actual average benzene emissions from the glycol dehydration unit is below 0.90 megagram per year (1.0 tons/year) it is exempt from all requirements of Subpart HH except to maintain records of actual average flowrate of natural gas to demonstrate a continuous exemption status.

40CFR63 Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines)

Subpart ZZZZ establishes national emission limitations and operating limitations for HAPs emitted from stationary 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. The engines (CE-2 & CE-3) at the Bunker Run Compressor Station are subject to the area source requirements for non-emergency spark ignition engines.

The applicability requirements for new stationary RICEs located at an area source of HAPs, is the requirement to meet the standards of 40CFR60 Subpart JJJJ. These requirements were outlined above. The proposed engines meet these standards.

Because these engines will not be certified by the manufacturer, Jay-Bee will be required to perform an initial performance test within 180 days from startup, and subsequent testing every 8,760 hours or 3 years, whichever comes first.

The following rules do not apply to the facility:

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)

The Bunker Run Compressor Station is located in Tyler County, which is an attainment county for all criteria pollutants, therefore the Bunker Run Compressor Station is not applicable to 45CSR19.

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

| Pollutant | PSD (45CSR14) Threshold (tpy) | NANSR (45CSR19) Threshold (tpy) | Bunker Run/T1213 PTE (tpy) | 45CSR14 or 45CSR19 Review Required? |
|------------------------------------|--|--|---|--|
| Carbon Monoxide | 250 | NA | 7.03 | No |
| Nitrogen Oxides | 250 | NA | 53.51 | No |
| Sulfur Dioxide | 250 | NA | 0.06 | No |
| Particulate Matter 2.5 | 250 | NA | 1.12 | No |
| Ozone (VOC) | 250 | NA | 44.68 | No |
| Greenhouse Gas (CO ₂ e) | 100,000 | NA | 18,164 | No |

45CSR30 (Requirements for Operating Permits)

Jay-Bee is not subject to 45CSR30. The Bunker Run 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.

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 Jay-Bee has proposed to install are 63.60 cubic meters each. Therefore, Jay-Bee 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. The Bunker Run Compressor Station is not a natural gas processing facility, therefore, Jay-Bee is not subject to this rule.

40CFR60 Subpart KKKK (Standards of Performance for Stationary Combustion Turbines)

40CFR60 Subpart KKKK does not apply because there are no stationary combustion turbines at the facility with a heat input at peak load equal to or greater than 10 MMBTU/hr, based on the higher heating value of the fuel (§60.4305).

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.

SOURCE AGGREGATION

“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 Bunker Run Compressor Station is located in Doddridge County and will be operated by Jay-Bee.

1. The Bunker Run Compressor Station will operate under SIC code 1311 (Crude Petroleum and Natural Gas). There are other facilities operated by Jay-Bee that share the same two-digit major SIC code of 13 for natural gas transmission. Therefore, the Bunker Run Compressor Station does share the same SIC code as other Jay-Bee facilities.
2. “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 Bunker Run Station currently receives and manages raw natural gas and associated produced fluids from area Jay-Bee well pads. All well pads, other than the co-located T1213 pad are greater than 0.5 miles from the station with no clear line of sight.

3. Common control. The natural gas well sites that supply the incoming natural gas streams to the Bunker Run Compressor Station are owned and operated by Jay-Bee Resources.

Because the area facilities other than the T1213 Pad are not considered to be on contiguous or adjacent properties, the emissions from the Bunker Run Compressor Station should not be aggregated with any facilities except the co-located T1213 Pad in determining major source or PSD status.

MONITORING OF OPERATIONS

Jay-Bee will be required to perform the following monitoring:

- Monitor and record quantity of natural gas consumed for all engines and combustion sources.
- Monitor and record quantity of natural gas processed through the dehy
- Monitor the amount of produced fluids sent to the storage tank.
- Monitor all applicable requirements of 40CFR60 Subparts JJJJ and OOOO.

Jay-Bee will be required to perform the following recordkeeping:

- Maintain records of the amount of natural gas consumed and hours of operation for all engines and combustion sources.
- Maintain records of the amount of natural gas processed through the dehy.
- Maintain records of the amount of produced fluids sent to the storage tank.
- 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
- Maintain the corresponding records specified by the on-going monitoring requirements of and testing requirements of the permit.
- Maintain records of the visible emission opacity tests conducted per the permit.
- 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.
- Maintain records of all applicable requirements of 40CFR60 Subparts JJJJ and OOOO.
- Maintain records of the flare design evaluation.
- The records shall be maintained on site or in a readily available off-site location maintained by Jay-Bee for a period of five (5) years.

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates that Jay-Bee should meet all the requirements of applicable regulations. Therefore, impact on the surrounding area should be minimized and it is recommended that the Bunker Run Compressor Station should be granted a 45CSR13 modification permit for their facility.

Roy F. Kees, P.E.
Engineer – NSR Permitting

Date