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west virginia department of environmental protection

G35-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 COMPRESSOR AND/OR DEHYDRATION FACILITIES

APPLICATION NO.: G35-C120

FACILITY ID: 015-00014

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):
Enervest Operating, LLC

Federal Employer ID No. (FEIN): 76-0460809

Applicant's Mailing Address: 300 Capitol Street, Suite 200

City: Charleston

State: WV

ZIP Code: 26301

Facility Name: Elk River Compressor Station

Operating Site Physical Address: Dundan Widen Rd.
If none available, list road, city or town and zip of facility.

City: Ivydale

Zip Code: 25113

County: Clay

Latitude & Longitude Coordinates (NAD83, Decimal Degrees to 5 digits):

Latitude: 38.524425

Longitude: -80.959924

SIC Code: 1311

NAICS Code: 211111

Date Application Received: July 18, 2016

Fee Amount: \$1,500.00

Date Fee Received: August 18, 2016

Applicant Ad Date: August 15, 2016

Newspaper: *Charleston Gazette Mail*

Date Application Complete: August 24, 2016

Due Date of Final Action: October 11, 2016

Engineer Assigned: Thornton E. Martin Jr.

Description of Permitting Action: The facility will continue to operate as a natural gas compression facility with the only changes being the removal of a single Ajax engine and replacing it with two (2) 400 hp natural gas Waukesha engines, addition of a 0.25 mmbtu heater and a gas conditioning membrane.

PROCESS DESCRIPTION

The following process description was taken from Registration Application G35-C120:

Natural Gas is produced from conventional oil and gas wells. The gas is then transported to the compressor station via pipeline. Once the gas is at the compressor station, it is compressed to raise the pressure of the gas. The gas is then sent through a heater to increase the temperature of the gas so that it does not freeze in the next step. Once the gas leaves the heater, it enters the gas filtration membrane which separates the heavier gases from the lighter gases into separate streams. To ensure the membranes functionality, a portion of the wet gas must be recirculated. Once the gas streams are separated, the gas streams can be sent to separate transmission lines for different pricing.

This modification is for the removal of the single Ajax engine and replacing it with two Waukesha engines. In addition, a heater and gas filtration membrane will be added. The membrane does not process the gas but allows the stream to be sent to separate transmission lines.

SITE INSPECTION

A site inspection by the writer was deemed to be not necessary because the station is an existing, operating stationary source whose location is well known to the DAQ.

Last Site Inspection Date: March 19, 2014

Site Inspection Conducted By: Roy F. Teel

Results of Site Inspection: Full Compliance Enforcement (F.C.E.) Inspection found the facility in compliance and the compliance status code of 30 was assigned to the inspection.

Did Applicant meet Siting Requirements? Yes

If applicable, was siting criteria waiver submitted? No

Directions to Facility: *From Ivydale, head East on WV-16 N / WV-4 N toward Ivydale Bridge. Turn right onto Ivydale Bridge. Turn left onto Dundon-Widen Rd., follow for 3.3 miles, destination will be on the right.*

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.)
CE-1	Waukesha / F18GL / 400 hp 2002 MY / SN:C-14266/1	For NOx and CO: factors provided by Eng. Mfg.; Other criteria pollutants and all other HAPs are calculated using U.S. EPA's AP-42 for NG-Fired Engines; Cal. assume heat content of 1,050 Btu/scf for Natural Gas.
CE-2	Waukesha / F18GL / 400 hp 2008 MY / SN:C-18350/1	For NOx and CO: factors provided by Eng. Mfg.; Other criteria pollutants and all other HAPs are calculated using U.S. EPA's AP-42 for NG-Fired Engines; Cal. assume heat content of 1,050 Btu/scf for Natural Gas.
H-1	Heater (0.25 MMBTU/hr)	U.S. EPA's AP-42 Table 1.4-2. Emission Factors for Criteria Pollutants and Greenhouse Gases from Natural Gas Combustion.
F-01	Fugitives	EPA-453/R-95-017: Table 2-4. Oil and Gas Production Operations Average Emission Factors (kg/hr/source)

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

Pollutant	Facility Wide PTE (tons/year)	PTE Change for Modification (tons/year)
Nitrogen Oxides	15.56	---
Carbon Monoxide	10.13	---
Volatile Organic Compounds	3.12	---
Particulate Matter	0.008	---
Particulate Matter-10/2.5	0.008	---
Sulfur Dioxide	0.007	---
Formaldehyde	1.296	---
Total HAPs	1.303	1.303
Carbon Dioxide Equivalent	80.80	80.80

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: ENERVEST OPERATING, LLC FACILITY NAME: Elk River Compressor G35-C120

Emission Point ID#	NO _x		CO		VOC		SO ₂		PM ₁₀		PM _{2.5}		GHG (CO ₂ e)	
	lb/hr	Typ	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
CE-1	1.76	7.725	1.146	5.021	0.33	1.45	0.002	0.007	0.00	0.00	0.00	0.00	---	---
CE-2	1.76	7.725	1.146	5.021	0.33	1.45	0.002	0.007	0.00	0.00	0.00	0.00	---	---
H-1	0.024	0.11	0.02	0.09	0.001	0.006	---	---	0.002	0.008	0.002	0.008	---	---
F-01	---	---	---	---	0.048	0.212	---	---	---	---	---	---	18.44	80.80
TOTAL	3.54	15.56	2.31	10.13	0.412	3.12	0.004	0.007	0.002	0.008	0.002	0.008	18.44	80.80

APPLICANT: ENERVEST OPERATING, LLC FACILITY NAME: Elk River Compressor G35-C120

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
CE-1	0.148	0.648	---	---	---	---	---	---	---	---	---	---	0.148	0.648
CE-2	0.148	0.648	---	---	---	---	---	---	---	---	---	---	0.148	0.648
H-1	---	---	---	---	---	---	---	---	---	---	---	---	---	---
F-01	---	---	---	---	---	---	---	---	---	---	0.002	0.007	0.002	0.007
TOTAL	0.296	1.296	---	---	---	---	---	---	---	---	0.002	0.007	0.298	1.303

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 G35-C.

The heater is a fuel burning unit and therefore must comply with this regulation. Per 45 CSR 2-3, opacity of emissions from units shall not exceed 10 percent, based on a six-minute block average. Per CSR 2-4, PM emissions from the units will not exceed a level measured in lb/hr of 0.09 multiplied by the heat design inputs in MM Btu/hr.

Emission Unit ID#	Emission Unit Description	Maximum Design Heat Input (MDHI) (MMBTU/hr)
H-1	Heater	0.250

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.
No enclosed combustion control devices and flares.				

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

45CSR10 establishes emission limitations for SO₂ 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 SO₂ emissions from a fuel burning unit will be listed in the G35-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 G35-C

Fuel burning units burning natural gas are exempt from Section 8 (Monitoring, Recording and Reporting) as well as interpretive rule 10A. The G35-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.

This rule potentially applies to fuel burning units, including in-line heaters. Per 45CSR10-10.1, units rated less than 10 MMBtu/hr are exempt from the SO₂ emission limitations and testing, monitoring, recordkeeping and reporting requirements of this rule. The in-line heater is rated less than 10 MM Btu/hr and as such are exempt from this rule.

Emission Unit ID#	Emission Unit Description	Maximum Design Heat Input (MDHI) (MMBTU/hr)
H-1	Heater	0.250

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 G35-C Registration satisfies the construction, modification, relocation and operating permit requirements of 45CSR13. General Permit G35-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 G35-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 G35-C is Group 8D (natural gas compressor stations greater than 1,000 HP) with an annual operating fee of \$500 or 9M (all other sources) with an annual operating fee of \$200.

The applicant is in the following fee group:

- 8D (Natural Gas Compressor Stations Greater than 1,000 HP)
- 9M (All Other Sources)

40CFR60 Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines)

Subpart IIII sets forth non-methane hydrocarbon (NMHC), hydrocarbon (HC), nitrogen oxides (NO_x), carbon monoxide (CO), and particulate matter (PM) 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 compression ignition (CI) internal combustion engines for owners or operators of this Subpart have been included in General Permit G35-C, Section 13. The following CI engines are subject to this section:

Emission Unit ID#	Engine Description (Make, Model)	Engine Size (HP)	Date of Manufacture	Provide Justification how 40CFR60 Subpart III is met.
No CI/Diesel internal combustion engines.				

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 G35-C, Section 12.

Subpart JJJJ affects owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 75 KW (100 HP) (except gasoline and rich burn engines that use LPG) must comply with the emission standards in Table 1 to this subpart for their stationary SI ICE.

The engine (CE-1) at the Elk River Compressor Station is a 4-stroke, lean burn spark ignition RICE (rated at >130 hp) manufactured before July 1, 2008. The engine (CE-1) is not certified by the engine manufacturer (Waukesha), however, manufacturers' data states the engine will meet the standard.

After July 1, 2010, owners and operators may not install stationary SI ICE with a maximum engine power of less than 500 HP that do not meet the applicable requirements in §60.4233. [40CFR§60.4236(a)]

Enervest Operating, LLC must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, Enervest Operating, LLC must conduct an initial performance test within 1 year of engine startup to demonstrate compliance. [40CFR§60.4243(a)]

The engine (CE-2) at the Elk River Compressor Station is a 4-stroke, lean burn spark ignition RICE (rated at >130 hp) manufactured after July 1, 2008. The engine (CE-2) is subject to the emission standards per Table 1 of NSPS JJJJ non-emergency use engines and will be compliant with the NSPS JJJJ limits. Enervest Operating, LLC will continue to demonstrate compliance with this subpart for the certified engine (CE-2) at the Elk River Compressor Station in accordance with 40 CFR 60.4243 (a) (1).

Emission Unit ID#	Engine Description (Make, Model)	Engine Size (HP)	Date of Manufacture	Provide Justification how 40CFR60 Subpart JJJJ is met.
CE-1	Waukesha / F18GL 2002 MY SN:C-14266/1	400	2002	<input checked="" type="checkbox"/> Met Emission Standard <input type="checkbox"/> Certified Engine
CE-2	Waukesha / F18GL 2008 MY SN:C-18350/1	400	2008	<input type="checkbox"/> Met Emission Standard <input checked="" type="checkbox"/> 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 (SO₂) 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:

Centrifugal compressor affected facilities are included in General Permit G35-C, Section 10.0.

Are there any applicable centrifugal compressor affected facilities not located at the well site?

Yes No

If Yes, list.

Engine Description (Make, Model)
No Centrifugal Compressor Affected Facilities.

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 G35-C, Section 11.0.

Are there any applicable reciprocating compressor affected facilities not located at the well site?

Yes No

If Yes, list.

Engine Description (Make, Model)
CE-1 / Waukesha / F18GL / 400 hp / 2002 MY
CE-2 / Waukesha / F18GL / 400 hp / 2008 MY

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 reciprocating compressors at the facility are subject to the requirement of NSPS OOOO, 40 CFR §60.5385, which requires owners and operators of affected reciprocating compressors to change the rod packing prior to each operating 26,000 hours or prior to 36 months of since start up or the last packing replacement. Enervest Operating, LLC will continue to comply with the requirement of this rule.

Pneumatic controllers affected facilities are included in General Permit G35-C, Section 9.0.

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 G35-C, Section 6.0. Determination of storage vessel affected facility status is included in Section 5.0 of General Permit G35-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. No reduction devices for storage vessels at the facility. The storage vessels at the facility have VOC emissions less than 6 tpy and, therefore are not subject to Subpart OOOO.

If Yes, list.

Emission Unit ID#	Storage Vessel Description	SV Size (gal)	Provide Justification how 40CFR60 Subpart OOOO is met.
The Storage Vessels have no control devices. VOC emissions are less than 6 tpy, and therefore are not subject to Subpart OOOO.			

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.

Subpart OOOO applies to affected facilities than commenced construction, reconstruction, or modification after August 23, 2011. This NSPS was published in the Federal Register on August 16, 2012, and has been subsequently amended. The list of potentially affected facilities includes:

- Gas wellheads
- Centrifugal compressors located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment
- Reciprocating compressors located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment
- Continuous bleed natural gas-driven pneumatic controllers with a bleed rate of >6 scfh located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment (excluding natural gas processing plants)
- Continuous bleed natural gas-driven pneumatic controllers located at natural gas processing plants
- Storage vessels in the production, processing, or transmission and storage segments
- Sweetening units located onshore that process natural gas produced from either onshore or offshore wells

The Elk River Compressor Station is not a gas wellhead, nor is it a natural gas processing plant. Therefore, the only potentially applicable requirements for the equipment at the station are those for storage vessels, reciprocating compressors where construction commenced after August 23, 2011.

The are no produced water storage vessels for the Elk River Compressor Station that commenced construction after the applicability date, and are potentially subject to the requirements of Subpart OOOO. Subpart OOOO applies to storage vessels with VOC emissions equal to or greater than 6 tpy. The storage vessels at the facility have VOC emissions less than 6 tpy and, therefore, are not subject to Subpart OOOO.

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 area source requirements are included in General Permit G35-C, as defined in §63.761.

For area source applicability, the affected source includes each triethylene 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 G35-C, Section 14.0.

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 12.0.

40 CFR §63.6590(c) states that a new or reconstructed RICE located at an area HAP source must meet the requirements of NESHAP Subpart ZZZZ by meeting the requirements of NSPS Subpart JJJJ. No further requirements apply for such engines under NESHAP Subpart ZZZZ. The Elk River Compressor Station is a minor (area) source of hazardous air pollutants and the affected compressor engine (CE-1 and CE-2) are considered a new stationary RICE. Therefore, the requirements contained in §63.6590 (c) are applicable. Enervest Operating, LLC will be in compliance with applicable requirements of 40 CFR 63 Subpart ZZZZ by meeting the applicable requirements of 40 CFR 60 Subpart JJJJ.

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.
CE-1	Waukesha / F18GL 2002 MY SN:C-14266/1	400	2002	New	Performance Testing
CE-2	Waukesha / F18GL 2008 MY SN:C-18350/1	400	2008	New	By Meeting the applicable requirements of 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? X Yes No

If so, list the engines: CE-1

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?
X Yes No

Are the properties in question located on "contiguous or adjacent" properties?
X Yes No

Are there surrounding facilities that share the same two (2) digit SIC code?
X Yes No

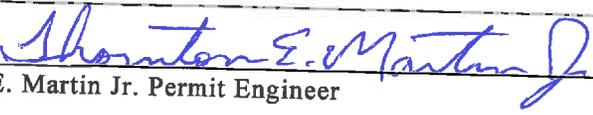
Final Source Aggregation Decision.

Source not aggregated with any other source.

Source aggregated with another source. List Company/Facility Name: Enervest Operating, LLC

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 G35-C. Therefore, impact on the surrounding area should be minimized and it is recommended that the facility should be granted registration under General Permit G35-C.

Permit Engineer Signature: 
Name and Title: Thornton E. Martin Jr. Permit Engineer
Date: August 29, 2016