



west virginia department of environmental protection

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DRAFT ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

General Permit No.: Class II General Permit G70-A (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)

The Secretary may develop and issue Class I and Class II general permits under 45CSR13 authorizing the construction, modification or relocation of a category of sources by the same owner or operator or involving the same or similar processes or pollutants upon the terms and conditions specified in the general permit.

Eligible SIC Codes:	1311 (Crude Petroleum and Natural Gas)
Eligible NAICS Codes:	211111 (Crude Petroleum and Natural Gas Extraction)
Engineer Assigned:	Laura Jennings
G70-A Registration Fee Amount:	\$500.00 (Construction, Modification, and Relocation)
	\$300.00 (Class II Administrative Update)
	\$1,000.00 NSPS fee for 40 CFR60, Subpart JJJJ*
	\$1,000.00 NSPS fee for 40 CFR60, Subpart OOOO*
	\$2,500.00 NESHAP fee for 40 CFR63, Subpart ZZZZ

* Only one NSPS fee will apply

Description: General Permit G70-A is for natural gas exploration and production facilities designed and operated for the purpose of natural gas production located at the well site. Activities may include: natural gas well completion operations; transferring natural gas, condensate, and water from the well heads; separation of the condensate, natural gas and water in gas production units; additional separation of the natural gas, condensate, and water emulsion in heater treaters; compression of the flash gas in the vapor recovery unit (VRU); storage of the condensate and produced water; and loading of tank trucks to transport condensate and produced water from the facility.

The permission/approval for Gas Well Drilling is not part of this general permit and is handled by the WV DEP, Office of Oil & Gas.

The G70-A general permit language will be the same for all facilities that receive registration to the G70-A general permit. The G70-A general permit allows registrants to install and operate specified equipment and air pollution control devices to control emissions of regulated pollutants into the air.

The G70-A general permit registration will be tailored specifically for each individual facility. The general permit registration will list all emission sources and will specify which sections of the general permit are applicable to the particular facility. The G70-A general permit registration will include facility specific emission limits, throughputs, and specific air pollution control device information.

The G70-A general permit will undergo public notice prior to being issued. The public notice will appear in The Charleston Gazette, The Dominion Post (Morgantown), The Herald Dispatch (Huntington), The Intelligencer (Wheeling), The Parkersburg News, The Exponent/Telegram (Clarksburg), The Journal, and The State Register consistent with other General Permit public notices.

EMISSION SOURCES AND G70-A GENERAL PERMIT ELIGIBILITY

Emission units at eligible natural gas production facilities may include any of the following pieces of equipment:

- Natural Gas well affected facility(ies)
- Storage vessel affected facility(ies)
- Natural-gas driven pneumatic controller affected facility(ies)
- Natural gas in-line heater(s)
- Natural gas production unit(s)
- Natural gas heater treater(s)
- Low pressure tower(s)
- Tank truck loading facility(ies)
- Natural gas-fired compressor engine (s) (RICE)

There may be other small storage tanks located at the site for the storage of freeze protection materials and lubricants; however if the de minimis source requirements per Table 45-13B of 45CSR13 are met, they are not required to be listed in the general permit application and/or registration.

Air pollution control devices may include:

- Completion combustion devices
- Enclosed combustion devices including thermal vapor incinerators, catalytic vapor incinerators, boilers, and process heaters
- Flares

- Vapor recovery devices including carbon adsorption systems and condensers
- Post-combustion catalytic control technologies for reciprocating internal combustion engines: Rich-burn engine with Nonselective Catalytic Reduction (NSCR); Lean-burn engine with Selective Catalytic Reduction (SCR); Lean-burn engine with Catalytic Oxidation

For the purposes of General Permit G70-A, a *natural gas production facility located at the well site* means any permanent combination of equipment (including but not limited to natural gas wells, storage vessels, natural gas-driven pneumatic controllers, in-line heaters, natural gas production units, natural gas heater treaters, low pressure towers, tank truck loading facilities, and natural gas-fired compressor engines, etc.) that is used to transfer crude natural gas from the well head and produce natural gas that will be transported off-site via natural gas pipelines and produce condensate and produced water during the process that is transferred to storage and then transported off-site. This does not include permitting for or approval of the natural gas well drilling that is handled by the Office of Oil & Gas.

All natural gas exploration and production facilities included in NAICS code 211111 (Crude Petroleum and Natural Gas Extraction), and/or SIC code 1311 (Crude Petroleum and Natural Gas) are eligible for the G70-A General Permit registration except for:

- Any natural gas production facility which is a major source, as defined in 45CSR14, 45CSR19, or 45CSR30.
- Any natural gas production facility that is located in Putnam County, Kanawha County, Cabell County, Wayne County, or Wood County and is required by 45CSR 21, Section 40 to conduct a Reasonably Available Control Technology (RACT) Analysis.
- Any natural gas production facility that has a fuel burning unit that is not fueled by natural gas.
- Any natural gas production facility with a compression ignition engine. (e.g. fueled by diesel)
- Any natural gas production facility with a dehydration unit.
- Any natural gas processing plant.
- Any natural gas sweetening plant.
- Any natural gas transmission compressor station.
- Any natural gas production facility that is subject to NSPS, Subpart Kb.
- Any natural gas production facility which will require an individual air quality permit review process and/or individual permit provisions to address the emission of a regulated pollutant or to incorporate regulatory requirement(s) other than those established by General Permit G70-A.

SITE INSPECTION

All persons submitting a G70-A General Permit Registration Application to construct, modify or relocate a natural gas well affected facility shall be subject to the following siting criteria:

- a. No person shall construct, locate or relocate any affected facility or emission unit within three hundred (300) feet of any occupied dwelling, business, public building, school, church, community, institutional building or public park. An owner of an occupied dwelling or business may elect to waive the three hundred (300) feet siting criteria.
- b. Any person proposing to construct, modify or relocate a natural gas production facility within three (300) feet of any occupied dwelling, business, public building, school, church, community, institutional building or public park may elect to obtain an individual permit pursuant to 45CSR13.

The registrant shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times enter upon the registrant's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this General Permit.
- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution Control equipment), practices, or operations regulated or required under this General Permit.
- d. Sample or monitor at reasonable times, substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Sources of emissions at eligible natural gas production facilities may include gas well completion operations, pneumatic controllers, gas production units (GPU), heater treaters, compressor engines (RICE), storage tanks, truck loading facilities, vapor combustors, and other specified control devices. Sources of fugitive emissions may include loading operations, haul road emissions, equipment leaks, and general clean-up emissions. An estimate of the maximum potential emissions of regulated air pollutants will be submitted with each G70-A general permit registration application.

Applicants are required to submit emission estimates and supporting calculations for each emission point and for each type of fugitive emissions at the facility. These emissions will be reviewed by the assigned DAQ permit engineer to determine if the registrant meets the requirements of G70-A general permit prior to recommending whether or not the general permit registration should be issued. The G70-A general permit registration application must include the basis of the emission calculations used to determine the potential emissions.

The maximum potential emissions after controls will not exceed 100 tons per year of any regulated air pollutant, 10 tons per year of any hazardous air pollutant (HAP), or 25 tons per year of any combination of hazardous air pollutants (HAPs).

AGGREGATION DETERMINATION

Applicants for the G70-A general permit registration will be required to provide information regarding the aggregation of stationary sources that must include the 3-prong test for stationary source determinations. DAQ has provided guidance on the information needed for the aggregation determination in Appendix A of the G70-A forms and instructions document.

REGULATORY APPLICABILITY

The following state and federal regulations apply to sources requesting registration under the G70-A General Permit:

State Regulations:

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

45CSR2 establishes emission limitations for smoke and particulate matter that are discharged from fuel burning units. Sources subject to 45CSR2 include gas producing units, in-line heaters, and heater treaters.

Registered fuel burning units may be subject to the weight emission standard for particulate matter set forth in 45CSR2-4.1. The particulate matter emission standard set forth in 45CSR2 is generally less stringent than the potential emissions from the fuel burning unit utilizing natural gas; therefore, only the potential emissions from the fuel burning unit will be included in the general permit registration.

Each registrant is subject to the opacity requirements set forth in 45CSR2, Section 3.1. The G70-A general permit includes the opacity limit along with the monitoring, recordkeeping, and reporting requirements in section 7.0.

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

45CSR4 states that an objectionable odor is an odor that is deemed objectionable when in the opinion of a duly authorized representative of the Air Pollution Control Commission (Division of Air Quality), based upon their investigations and complaints, such odor is objectionable. All facilities are inspected by the DAQ Enforcement Section. The facility-wide requirements of the general permit include the odor standards of 45CSR §4-3.1.

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. Sections 5.0, 12.0 and 14.0 of the G70-A general permit include requirements for 45CSR6.

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.

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 gas producing units, in-line heaters, and heater treaters.

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 fuel burning unit will be listed in the G70-A 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 burning natural gas are exempt from section 8 (Monitoring, Recording and Reporting) as well as interpretive rule 10A. The G70-A 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.

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

As provided in 45CSR13 §5.12, the Secretary may develop and issue Class I and Class II general permits under this rule authorizing the construction, modification, relocation, and operation of a category of sources by the same owner or operator or involving the same or similar processes or pollutants upon the terms and conditions specified in the general permit. The designation of Class I or Class II for a general permit is made at the time the permit goes through public comment and adoption for the source category governed by the general permit. The designation for the G70-A general permit is Class II.

The scope of the G70-A general permit is for minor stationary sources that are not subject to 45CSR14, 45CSR19, or 45CSR30. The general conditions of section 2.0 and the facility-wide requirements of section 3.0 of the G70-A general permit include the authority and other general provisions of 45CSR13.

The G70-A Class II general permit will have public notice in accordance with the Notice Level B provisions of subsection 8.4 and in accordance with 45CSR13 §8.9. The Secretary will place a Class I legal advertisement of the agency's intent to issue the G70-A general permit in the several newspapers of general circulation in areas throughout the state where sources may be located. The public notice will appear in The Charleston Gazette, The Dominion Post (Morgantown), The Herald Dispatch (Huntington), The Intelligencer (Wheeling), The Parkersburg News, The Exponent/Telegram (Clarksburg), The Journal, and The State Register.

At the time that an application for a Class II general permit registration is submitted by the applicant, the applicant shall place a Class I legal advertisements in a newspaper of general circulation in the area where the source is or will be located. No such general permit registration shall be issued to any applicant until at least thirty (30) days' notice has been provided to the public in accordance with the requirements of 45CSR13 §8.3 for Notice Level A.

Class II general permit registrations are subject to a \$500 application fee and any applicable additional fees under the provisions of subdivision 3.4.b of 45CSR22 in accordance with 45CSR13 §12.1. The possible additional fees are a \$1,000 NSPS fee for applicants subject to NSPS requirements and a \$2,500 NESHAP fee for applicants subject to NESHAP requirements.

For eligible registrants, the G70-A General Permit Registration satisfies the construction, modification, relocation and operating permit requirements of 45CSR13. General Permit G70-A sets forth reasonable conditions that enable eligible registrants to establish enforceable permit limits.

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, Subpart JJJJ and OOOO are included in the G70-A general permit. Excluded from G70-A general permit eligibility are any sources that are subject to NSPS, Subparts Kb, IIII, KKK, or LLL.

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 the G70-A general permit is group 9M (all other sources) with an annual operating fee of \$200.

45CSR34 Emission Standards for Hazardous Air Pollutants

45CSR34 will apply to any registrant that is subject to 40 CFR 63, Subpart ZZZZ after WVDAQ has taken delegation of the Subpart. Excluded from G70-A general permit eligibility are any sources that are subject to NESHAP Subparts HH and HHH.

Federal Regulations:

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

Subpart JJJJ sets forth nitrogen oxides (NO_x), 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 non-emergency stationary spark ignition (SI) internal combustion engines for owners or operators of this subpart have been included in the G70-A General Permit, Section 13. EPA finalized amendments to this subpart on January 15, 2013 and they were published in the Federal Register on January 30, 2013. The final rule is effective on April 1, 2013.

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. 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:

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

Gas well affected facilities are included in the G70-A general permit in Section 5.0.
- 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. 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.
- 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. 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.

- d. 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.

Pneumatic controllers affected facilities are included in the G70-A General Permit, Section 8.0.

- e. Each storage vessel affected facility, which is a single storage vessel located in the oil and natural gas production segment. Storage vessel affected language is included in the G70-A General Permit, Sections 6.0 and 12.0.
- f. Processing units, sweetening units and compressor stations are outside the scope of the G70-A general permit and are excluded from applicability for the general permit. The G70-A general permit is focused on activities at the production pad facility and is not intended to be a comprehensive NSPS, Subpart OOOO general permit.

Other general permits exist for natural gas compressor stations. The existing general permits for natural gas compressor stations are the Class II General Permit G30-D, the Class I General Permit G33-A (stationary spark ignition internal combustion engines \geq 25 HP and \leq 500 HP), and the Class II General Permit G35-A (natural gas compressor stations with glycol dehydration units, flares, or other specified control devices).

The following sections of NSPS, Subpart OOOO are included in the general permit as follows:

§60.5365 applicability requirements are included the G70-A General Permit, Section 4.0.

§60.5370 compliance requirements are included in the G70-A General Permit, Section 4.0.

§60.5375 standards applying to gas well affected facilities and §60.5365(h) provisions for gas well facilities that are hydraulically refractured are included in the G70-A General Permit, Section 5.0.

§60.5390 standards applying to pneumatic controller affected facilities are included in the G70-A General Permit, Section 8.0.

§60.5395 standards applying to storage vessel affected facilities are included in the G70-A General Permit, Sections 6.0 and 12.0.

§60.5410 initial compliance standards are included in the G70-A General Permit, Sections 5.0, 8.0, and 12.0.

§§60.5411, 60.5412, 60.5416, and 60.5417 additional initial compliance, inspection, and monitoring requirements are included in section the G70-A General Permit, Section 12.0.

§60.5413 performance testing requirements for control devices used to demonstrate compliance with storage vessel affected facilities are included in the G70-A General Permit, Section 12.0.

§60.5415 continuous compliance standards are included in the G70-A General Permit, Sections 5.0, 8.0, and 12.0.

§60.5420 notification, recordkeeping, and reporting standards are included in the G70-A General Permit, Sections 5.0, 8.0, and 12.0.

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. Only the area source requirements for non-emergency spark ignition engines are included in the G70-A general permit, Section 15.0. Requirements for engines that combust landfill or combustor gas are not included in the G70-A general permit. 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 will be taking delegation of the area source air toxics provisions of this subpart requiring Generally Achievable Control Technology (GACT); however, has not yet taken delegation. The provisions of this subpart have been included in this general permit in preparation for when that time comes. Sources can opt out of this language until DAQ takes delegation but must apply for a modification application at any time after to include the provisions.

The following state and federal regulations were reviewed but do not apply to the G70-A general permit:

45CSR21 (Regulation to Prevent and Control Air Pollution from the Emissions of Volatile Organic Compounds)

It is the intent of the Director that all persons engaged in the manufacture, mixing, storage, use, or application of volatile organic compound control the emission of volatile organic compounds through the application of reasonable available control technology (RACT). This regulation applies to sources located in Putnam County, Kanawha County, Cabell County, Wayne County, and Wood County.

Section 40 (Other Facilities that Emit Volatile Organic Compound (VOC) applies to any facility that has aggregate maximum theoretical emissions of 100 tons or more of VOCs per calendar year in the absence of control devices. Any source at a facility subject to section 40 that has maximum theoretical emissions of 6 pounds per hour or more must comply with a control plan developed on a case-by-case basis that meets the definition of RACT.

Any natural gas production facility that is located in Putnam County, Kanawha County, Cabell County, Wayne County, or Wood County and is required by 45CSR21, Section 40 to conduct a Reasonably Available Control Technology (RACT) Analysis is excluded from G70-A general permit applicability; therefore, this rule does not apply.

45CSR30 Requirements for Operating Permits

The G70-A applicability criterion excludes facilities that meet the definition of a major source for being eligible for the general permit.

Certain spark ignition internal combustion engines may be subject to NSPS, Subpart JJJJ; however, NSPS, Subpart JJJJ is exempt from 45CSR30 for minor sources.

Affected facilities that commence construction, modification or reconstruction after August 23, 2011 are subject to NSPS, Subpart OOOO; however, NSPS, Subpart OOOO is exempt from 45CSR30 for minor sources.

Certain spark ignition internal combustion engines may be subject to 40CF63, Subpart ZZZZ as area sources; however, area sources subject to 40CFR63, Subpart ZZZZ are exempt from 45CSR30.

40CFR60.18 (General control device and work practice requirements)

The requirements apply only to flares that are required for compliance to an NSPS Standard. Completion combustion devices and enclosed combustion devices used for compliance to NSPS, Subpart OOOO do not meet the definition of a flare, as it is defined in that subpart. Therefore, this rule does not apply to the G70-A general permit unless the applicant states in their general permit application that they are meeting the requirements of §60.18 for flares.

40CFR60, Subpart Kb (Standards of Performance for VOC Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984)

Subpart Kb establishes control requirements, testing requirements, monitoring requirements, and recordkeeping and reporting requirements.

Subpart Kb applies to any storage vessel with a capacity greater than 19,313 gallons that is used to store volatile organic liquids except that it does not apply to storage vessels with a capacity greater than 39,890 gallons storing a liquid with a maximum true vapor pressure less than 3.5 kPa or with a capacity greater than 19,813 gallons but less than 39,890 gallons storing a liquid with a maximum true vapor pressure less than 15.0 kPa.

This subpart does not apply to vessels with a design capacity less than or equal to 419,204 gallons used for petroleum or condensate stored, processed, or treated prior to custody transfer. *Condensate* means hydrocarbon liquid separated from natural gas that condenses due to changes in the temperature or pressure, or both, and remains liquid at standard conditions.

Any natural gas production facility that is subject to NSPS, Subpart Kb is excluded from eligibility to the G70-A general permit.

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

Natural gas production facilities that have compression ignition internal combustion engines are excluded from G70-A applicability. Compression ignition engines fueled most likely with diesel were excluded to focus the scope of the general permit and to prevent additional permit language that most likely will not be applicable to the majority of registrants. Based on the R13 permits applications for natural gas production facilities that WV DAQ has received thus far, this exclusion should not be a concern. This rule does not apply to the G70-A general permit.

40CFR60 Subpart KKK (Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants for which construction, reconstruction, or modification commenced after 1/20/84 and on or before 8/23/11)

Natural Gas Processing Plants are excluded from G70-A general permit applicability. Natural gas processing plants were excluded to focus the scope of the G70-A general permit on activities typically conducted at natural gas production. Based on the R13 permits applications for new natural gas production facilities that WV DAQ has received thus far, this exclusion should not be a concern. Furthermore, any new natural gas processing plant would be constructed, reconstructed, or modified after 8/23/11 and would no longer be subject to NSPS, Subpart KKK. Requirements for natural gas processing plants constructed, reconstructed, or modified after 8/23/11 are covered by NSPS, Subpart OOOO. This rule therefore does not apply to the G70-A general permit.

40CFR60, Subpart LLL (Standards of Performance for SO₂ Emissions From Onshore Natural Gas Processing for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011)

Natural Gas Sweetening Units are excluded from G70-A general permit applicability. Natural gas processing plants and sweetening units were excluded to focus the scope of the G70-A general permit on activities typically conducted at natural gas production. Based on the R13 permits applications for new natural gas production facilities that WV DAQ has received thus far, this exclusion should not be a concern. Furthermore, any new natural gas processing plant or sweetening unit would be constructed, reconstructed, or modified after 8/23/11 and would no longer be subject to NSPS, Subpart KKK. Requirements for natural gas processing plants and sweetening units constructed, reconstructed, or modified after 8/23/11 are covered by NSPS, Subpart OOOO. This rule therefore does not apply to the G70-A general permit.

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

This subpart does not apply to the G70-A general permit because dehydration units are excluded from G70-A applicability. 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). Dehydration units were excluded to focus the scope of the G70-A general permit on activities typically conducted at the majority of the production pads located in West Virginia and is not intended to be a comprehensive NSPS, Subpart OOOO general permit. The exclusion of dehydration units from the G70-A general permit applicability can be re-addressed at a later time if it appears that there is a need for them to be included. Based on the R13 permits applications for new natural gas production facilities that WV DAQ has received thus far, this exclusion should not be a concern.

40CFR63 Subpart HHH (National Emission Standards for Hazardous Air Pollutants: Natural Gas Transmission and Storage)

Natural gas transmission and storage facilities are excluded from G70-A general permit applicability. Natural gas transmission and storage facilities were excluded to focus the scope of the G70-A general permit on activities typically conducted at the natural gas production pads. Based on the R13 permits applications for new natural gas production facilities that WV DAQ has received thus far, this exclusion should not be a concern. Therefore, this rule does not apply to the G70-A general permit.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

Small amounts of non-criteria regulated hazardous air pollutants such as benzene, toluene, and formaldehyde may be emitted when natural gas is combusted in reciprocating engines, combusted in the fuel burning units, or combusted in one of the combustion type air pollution control devices.

All natural gas production facilities that are issued a G70-A general permit registration by the Director will be limited to those that are classified as minor sources of hazardous air pollutants. Minor sources of hazardous air pollutants are defined as those that have a potential to emit of less than 10 tons per year of any hazardous air pollutant or less than 25 tons per year of any combination of hazardous air pollutants.

Listed below is information regarding each of the possible hazardous air pollutants.

BTEX:

BTEX is the term used for benzene, toluene, ethylbenzene, and xylene. Each of these possible hazardous air pollutants are identified in this section.

Benzene:

Benzene is found in the air from emissions from burning coal and oil, gasoline service stations, and motor vehicle exhaust. Acute (short-term) inhalation exposure of humans to benzene may cause drowsiness, dizziness, headaches, as well as eye, skin, and respiratory tract irritation, and,

at high levels, unconsciousness. Chronic (long-term) inhalation exposure has caused various disorders in the blood, including reduced numbers of red blood cells and aplastic anemia, in occupational settings. Reproductive effects have been reported for women exposed by inhalation to high levels, and adverse effects on the developing fetus have been observed in animal tests. Increased incidence of leukemia (cancer of the tissues that form white blood cells) have been observed in humans occupationally exposed to benzene. EPA has classified benzene as a Group A, human carcinogen.

Ethyl Benzene:

Ethyl benzene is mainly used in the manufacturing of styrene. Acute (short-term) exposure to ethyl benzene in humans results in respiratory effects, such as throat irritation and chest constriction, irritation of the eyes, and neurological effects, such as dizziness. Chronic (long-term) exposure to ethyl benzene by inhalation in humans has shown conflicting results regarding its effects on the blood. Animal studies have reported effects on the blood, liver, and kidneys from chronic inhalation exposure to ethyl benzene. Limited information is available on the carcinogenic effects of ethyl benzene in humans. In a study by the National Toxicology Program (NTP), exposure to ethyl benzene by inhalation resulted in an increased incidence of kidney and testicular tumors in rats, and lung and liver tumors in mice. EPA has classified ethyl benzene as a Group D, not classifiable as to human carcinogenicity.

Formaldehyde:

Formaldehyde is used mainly to produce resins used in particle board products and as an intermediate in the synthesis of other chemicals. Exposure to formaldehyde may occur by breathing contaminated indoor air, tobacco smoke, or ambient urban air. Acute (short-term) and chronic (long-term) inhalation exposure to formaldehyde in humans can result in respiratory symptoms, and eye, nose, and throat irritation. Limited human studies have reported an association between formaldehyde exposure and lung and nasopharyngeal cancer. Animal inhalation studies have reported an increased incidence of nasal squamous cell cancer. EPA considers formaldehyde a probable human carcinogen (Group B1).

n-Hexane:

n-Hexane is a solvent that has many uses in the chemical and food industries, either in pure form or as a component of commercial hexane. The latter is a mixture that contains approximately 52% n-hexane; the balance is made up of structural analogs and related chemicals such as methylpentane and methylcyclopentane. Highly purified n-hexane is used as a reagent for chemical or chromatographic separations. Other grades of n-hexane are used as solvents for extracting edible fats and oils in the food industry and as a cleaning agent in the textile, furniture, and printing manufacturing industries. Hexane is the solvent base for many commercial products, such as glues, cements, paint thinners, and degreasers. n-Hexane is a minor constituent of crude oil and natural gas and occurs in different petroleum distillates. No data are available regarding the potential toxicity of n-hexane in humans orally exposed to n-hexane. However, as might be expected for a chemical with such wide application, the potential exists for persons to be environmentally and/or occupationally exposed to n-hexane via other routes of exposure.

Toluene:

The acute toxicity of toluene is low. Toluene may cause eye, skin, and respiratory tract irritation. Short-term exposure to high concentrations of toluene (e.g., 600 ppm) may produce fatigue, dizziness, headaches, loss of coordination, nausea, and stupor; 10,000 ppm may cause death from

respiratory failure. Ingestion of toluene may cause nausea and vomiting and central nervous system depression. Contact of liquid toluene with the eyes causes temporary irritation. Toluene is a skin irritant and may cause redness and pain when trapped beneath clothing or shoes; prolonged or repeated contact with toluene may result in dry and cracked skin. Because of its odor and irritant effects, toluene is regarded as having good warning properties. The chronic effects of exposure to toluene are much less severe than those of benzene. No carcinogenic effects were reported in animal studies. Equivocal results were obtained in studies to determine developmental effects in animals. Toluene was not observed to be mutagenic in standard studies.

2,2,4-Trimethylpentane

2,2,4-Trimethylpentane is released to the environment through the manufacture, use, and disposal of products associated with the petroleum and gasoline industry. During an accident, 2,2,4-trimethylpentane penetrated the skin of a human which caused necrosis of the skin and tissue in the hand and required surgery. No other information is available on the acute (short-term) effects in humans. Irritation of the lungs, edema, and hemorrhage have been reported in rodents acutely exposed by inhalation and injection. No information is available on the chronic (long-term), reproductive, developmental, or carcinogenic effects of 2,2,4-trimethylpentane in humans. Kidney and liver effects have been observed in rats chronically exposed via gavage (experimentally placing the chemical in the stomach) and inhalation. EPA has not classified 2,2,4-trimethylpentane with respect to potential carcinogenicity.

Xylene:

Commercial or mixed xylene usually contains about 40-65% *m*-xylene and up to 20% each of *o*-xylene and *p*-xylene and ethyl benzene. Xylenes are released into the atmosphere as fugitive emissions from industrial sources, from auto exhaust, and through volatilization from their use as solvents. Acute (short-term) inhalation exposure to mixed xylenes in humans results in irritation of the eyes, nose, and throat, gastrointestinal effects, eye irritation, and neurological effects. Chronic (long-term) inhalation exposure of humans to mixed xylenes results primarily in central nervous system (CNS) effects, such as headache, dizziness, fatigue, tremors, and incoordination; respiratory, cardiovascular, and kidney effects have also been reported. EPA has classified mixed xylenes as a Group D, not classifiable as to human carcinogenicity. Mixed xylenes are used in the production of ethylbenzene, as solvents in products such as paints and coatings, and are blended into gasoline.

AIR QUALITY IMPACT ANALYSIS

Air dispersion modeling may be performed when the Director finds existing circumstances and/or submitted data provide cause for an assessment to be made concerning whether a specific natural gas well production facility may interfere with attainment or maintenance of an applicable ambient air quality standard or cause or contribute to a violation of an applicable air quality increment from any proposed General Permit Registration action. Factors to be considered when determining whether an ambient air assessment would be made include:

- a. Existing air quality of the area
- b. Topographic or meteorological factors
- c. Maximum emissions
- d. Siting criteria

DEVELOPMENT OF GENERAL PERMIT G70-A

Possible applicants for G70-A general permit registration include natural gas production facilities that may install and operate any of the following equipment to produce natural gas from the natural gas well: gas well affected facilities, natural gas-driven pneumatic controllers affected facilities, gas production units, heater treaters, natural gas-fired compressor engines (RICE), low pressure towers, produced water storage tanks, condensate storage tanks, and tank truck loading facilities. The production activities begin with an emulsion of condensate, natural gas and water from the wellhead(s) that is produced into natural gas. Natural gas will exit the facility via pipeline for transmission to downstream activities at other facilities. Condensate and produced water are transported offsite via tank truck.

The general permit was developed with the intention of being comprehensive to address the emission sources that are located at a stationary source natural gas production facility located at the well site and to provide consistent requirements for facilities within this industry group. The G70-A general permit was developed to address the increasing volume of construction permits for natural gas production facilities and to address the new NSPS, Subpart OOOO regulation that became effective October 15, 2012. The G70-A General Permit was not developed with the intention of being a comprehensive NSPS, Subpart OOOO general permit.

For affected facilities subject to federal air regulations, those sections of the G70-A general permit were developed based on the language from the federal regulations. For emission sources that are not subject to federal requirements, those sections of the general permit were developed based on language that is currently being used in the 45CSR13 construction permits to control air pollution at other natural gas production facilities with the intention of providing consistent requirements across the industry group.

All facilities registered under the G70-A general permit will be subject to Sections 1.0, 1.1, 2.0, 3.0, and 4.0 of the general permit. Each applicant will select the sections that they are seeking registration for under the G70-A general permit and will do so when they submit the G70-A general permit registration application:

Section 5	Natural Gas Well Affected Facility
Section 6	Storage Vessels
Section 7	Gas Producing Units, In-Line Heaters, and/or Heater Treaters
Section 8	Pneumatic Controllers Affected Facility
Section 9	<i>Reserved</i>
Section 10	Natural Gas-Fired Compressor Engine (s) (RICE)
Section 11	Tank Truck Loading
Section 12	NSPS, Subpart OOOO Requirements for Storage Tanks
Section 13	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (40CFR60, Subpart JJJJ)
Section 14	Control Devices not subject to NSPS, Subpart OOOO
Section 15	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR63, Subpart ZZZZ)

RECOMMENDATION TO DIRECTOR

General permit G70-A meets all requirements of applicable regulations when all of the control devices are functioning properly. Therefore, it is recommended that General Permit G70-A should be issued.

Laura M. Jennings
Permit Engineer

Date