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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	R13-3381
Plant ID No.:	041-00052
Applicant:	CNX Gas Company, LLC
Facility Name:	Dry Fork
Location:	Camden, Lewis County
NAICS Code:	211111
Application Type:	Modification
Received Date:	October 6, 2017
Engineer Assigned:	Roy F. Kees, P.E.
Fee Amount:	$3,500.00
Date Received:	October 10, 2017, November 13, 2017
Complete Date:	November 14, 2017
Due Date:	February 14, 2017
Applicant Ad Date:	October 18, 2017
Newspaper:	*Western Democrat*
UTM's:	Easting: 538.508 km Northing: 4,323.067 km Zone: 17
Latitude:	39.05584
Longitude:	-80.56500
Description:	Replacement of compressor engine with two smaller units.

DESCRIPTION OF PROCESS

The following process description was taken from Permit Application R13-3381:

The site will consist of (2) 4SRB Cat 3306 NA compressors and (1) 50 bbl slop oil tank. The site also has small tanks for new/used lube oil. There are (2) conventional well sites within a quarter of a mile of a facility. The first, well site #6718, utilizes two (2) additional 50 bbl produced liquid tanks and the second, well site #10986, incorporates two (2) 100 bbl produced liquid tanks.

The Dry Fork Station collects gas from conventional wells in the area and provides compression services. Any liquid removed within the inlet separator and/or the compressor suction pots will be sent to the slop oil tank. All tank and engine emissions will be uncontrolled at this site.

The source's potential to emit was modeled using ProMax equation of state (EOS) software based on gas and pressurized condensate sampling taken from the Minnie Lee No.1 well pad. In accordance with DAQ guidance, emission potentials were evaluated and reported for truck loading, fugitive equipment leaks, and compressor blowdowns. The emission calculations summarized within this application show the facility's potential to emit to be no more than 40.75 tpy NOx, 42.55 tpy CO, and 3.73 tpy VOC.

PROCESS CHANGES

CNX is applying for a 45CSR13 permit to account for the removal of the larger G3406 TA (276 Hp) compressor permitted by G30-D072A in 2010 and reflect the installation of two smaller G3306 NA (145 Hp) compressors. This application reflects updated compressor emissions, as well as emissions from two adjacent well sites within ¼ mile which are operated by CNX and due to the common booster compressor have shared equipment. This change will increase emissions permitted by the previous G30-D permit.

SITE INSPECTION

A full on site inspection was conducted by the John Moneypenny on August 29, 2017. The engines present replaced an engine listed in the previous permit. this will be addressed in an upcoming consent order which will list several sites with compliance problems. present engines are: 2-Caterpillar 3306 NA 145 hp units. Serial numbers 07Y06922 and G6X04515. Each unit has a catalyst. A permit application has been submitted.

Directions as given in the permit application are as follows:

From Weston, take Route 33-W/119-S (towards Glenville) for 5.1 miles and turn right onto the dirt access road. Follow the access road for 0.4 miles, the station will be located on the right.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions associated with this facility consist of the equipment listed in the following table and fugitive emissions. Fugitive emissions for the facility are based on calculation methodologies presented in EPA Protocol for Equipment Leak Emission Estimates and 40CFR98 Subpart W. The following table indicates which methodology was used in the emissions determination:

Emission Unit ID#	Process Equipment	Calculation Methodology
CE-4	145 hp Caterpillar G3606 NA Reciprocating Internal Combustion Engine (RICE)	Manufacturer's Data, EPA AP-42 Emission Factors
CE-5	145 hp Caterpillar G3606 NA Reciprocating Internal Combustion Engine (RICE)	Manufacturer's Data, EPA AP-42 Emission Factors
T-1	Compressor Station Pipeline Liquids Tank	ProMax
T-2	Associated Well # 6718 Pipeline Liquids Tank	ProMax
T-3	Associated Well # 6718 Pipeline Liquids Tank	ProMax
T-4	Associated Well # 10986 Pipeline Liquids Tank	ProMax
T-5	Associated Well # 10986 Pipeline Liquids Tank	ProMax
TL-1	383,250 gal/year Loadout Rack	EPA AP-42 Emission Factors

There are no Control Devices located at the facilities.

The total facility PTE (including fugitives) is shown in the following table:

Pollutant	R13-3381 PTE (tons/year)	Change (tons/year)
Nitrogen Oxides	40.74	+35.41
Carbon Monoxide	42.55	+37.22
Volatile Organic Compounds	3.73	+2.98
Particulate Matter-10	0.22	0.00
Sulfur Dioxide	0.02	0.00
Formaldehyde	0.76	+0.57
Total HAPs	0.89	+0.57
Carbon Dioxide Equivalent	1,347.73	0.00

Maximum detailed controlled point source emissions were calculated by CNX and checked for accuracy by the writer and are summarized in the table on the following two (2) pages.

CNX Gas Company, LLC - Dry Fork (R13-3381)

Emission Point ID#	Source	NO_x		CO		VOC		PM-10		SO_2		Formaldehyde		Total HAPs		CO2e
		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
E01	Compressor Engine CE-4	4.66	20.37	4.86	21.27	0.16	0.70	0.03	0.11	0.00	0.01	0.09	0.38	0.11	0.45	662.29
E02	Compressor Engine CE-5	4.66	20.37	4.86	21.27	0.16	0.70	0.03	0.11	0.00	0.01	0.09	0.38	0.11	0.45	662.29
E03-E07	Tanks	--	--	--	--	0.15	0.66	--	--	--	--	--	--	--	--	--
E08	Truck Loading	--	--	--	--	0.05	0.21	--	--	--	--	--	--	--	--	--
BD	Compressor Blowdowns	--	--	--	--	--	0.23	--	--	--	--	--	--	--	--	--
Total Point Source		**9.32**	**40.74**	**9.72**	**42.54**	**0.52**	**2.50**	**0.06**	**0.22**	**0.00**	**0.02**	**0.18**	**0.76**	**0.22**	**0.90**	**1347.73**
Fugitive	Component Leaks	--	--	--	--	0.23	1.00	--	--	--	--	--	--	--	--	23.16
Fugitive	Dust	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Total Fugitive		**0.00**	**0.00**	**0.00**	**0.00**	**0.23**	**1.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**23.16**
Total Sitewide		**9.32**	**40.74**	**9.72**	**42.54**	**8.45**	**3.50**	**0.06**	**0.22**	**0.00**	**0.02**	**0.18**	**0.76**	**0.22**	**0.90**	**1370.89**

REGULATORY APPLICABILITY

The following rules apply to this modification:

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)

The proposed change has the potential to emit in excess of six (6) lbs/hour and ten (10) TPY of a regulated pollutant and, therefore, pursuant to §45-13-2.24, meets the definition of a "stationary source" under 45CSR13. Pursuant to §45-13-5.1, "[n]o person shall cause, suffer, allow or permit the construction, modification, relocation and operation of any stationary source to be commenced without . . . obtaining a permit to construct." Therefore, CNX is required to obtain a Modification under 45CSR13 for the construction of the facility.

As required under §45-13-8.3 ("Notice Level A"), CNX placed a Class I legal advertisement in a "newspaper of general circulation in the area where the source is . . . located." Additionally, CNX paid the appropriate application fee.

45CSR16 (Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60)

45CSR16 applies to this source by reference of 40CFR60, Subpart OOOOa. These requirements are discussed under that rule below.

45CSR22 (Air Quality Management Fee Program)

CNX is not subject to 45CSR30. The Dry Fork facility is subject to 40CFR60 Subpart OOOOa, 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.

CNX is required to pay the appropriate annual fees and keep their Certificate to Operate current.

40CFR60 Subpart OOOOa (Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced after September 18, 2015)

EPA published its New Source Performance Standards (NSPS) and air toxics rules for the oil and gas sector on August 16, 2012. EPA published amendments to the Subpart on September 23, 2013 and June 3, 2016. 40CFR60 Subpart OOOOa establishes emission standards and compliance schedules for the control of the pollutant greenhouse gases (GHG). The greenhouse gas standard in this subpart is in the form of a limitation on emissions of methane from affected facilities in the crude oil and natural gas source category that commence construction, modification or reconstruction after September 18, 2015. This subpart also establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO_2) emissions from

affected facilities that commence construction, modification or reconstruction after September 18, 2015. The effective date of this rule is August 2, 2016.

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

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

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.

There are no centrifugal compressors at the Dry Fork facility. Therefore, all requirements regarding centrifugal compressors under 40 CFR 60 Subpart OOOOa would not apply.

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.

There are reciprocating internal combustion engines located at the Dry Fork facility that were constructed after September 18, 2015. However, since they are located at the well site, the requirements regarding reciprocating compressors under 40 CFR 60 Subpart OOOOa will not apply.

d. 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.

Therefore, there are no applicable pneumatic controllers which commenced construction after September 18, 2015. Therefore, all requirements regarding pneumatic controllers under 40 CFR 60 Subpart OOOOa would not apply.

e. Each storage vessel affected facility, which is a single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment.

40CFR60 Subpart OOOOa 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.

The potential for VOC emissions must be calculated using a generally accepted model or calculation methodology, based on the maximum average daily throughput for a 30-day period of production prior to the applicable emission determination deadline specified in this subsection. The determination may take into account requirements under a legally and practically enforceable limit in an operating permit or other requirement established under a federal or state authority. 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.

There are no Storage Vessel affected facilities located at the Dry Fork facility. The storage vessels located at the compressor station and associated well sites were constructed in 1968, 1998 & 2005 before the applicability date of Subpart OOOO & OOOOa.

f. 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 §§60.5400a, 60.5401a, 60.5402a, 60.5421a and 60.5422a 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 §§60.5400a, 60.5401a, 60.5402a, 60.5421a and 60.5422a 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 Dry Fork facility is not a natural gas processing plant. Therefore, Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants would not apply.

g. 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 (H_2S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423a(c) but are not required to comply with §§60.5405a through 60.5407a and paragraphs 60.5410a(g) and 60.5415a(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 §§60.5405a through 60.5407a, 60.5410a(g), 60.5415a(g), and 60.5423a of this subpart.

There are no sweetening units at the Dry Fork facility. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOOa would not apply.

h. Pneumatic Pumps

The pneumatic pump requirements apply only to natural gas processing facilities and well sites. Therefore, all requirements regarding pneumatic pumps under 40 CFR 60 Subpart OOOOa would not apply to the Dry Fork facility.

i. Collection of fugitive emission components.

The rule requires quarterly leak monitoring at natural gas compressor stations. In addition to optical gas imaging (OGI), the rule allows owners/operators to use Method 21 with a repair threshold of 500 ppm as an alternative for finding and repairing leaks. Method 21 is an EPA method for determining VOC emissions from process equipment. The method utilizes a portable VOC monitoring instrument.

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 (CE4-CE5) at the Dry Fork facility are subject to the area source requirements for non-emergency spark ignition engines.

Engine CE-4 is an existing engine under Subpart ZZZZ and must meet the applicable requirements. Engine CE-5 is a new engine under Subpart ZZZZ, but its manufacture date falls before the Subpart JJJJ emission limits.

Because these engines are not certified by the manufacturer, CNX 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:

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

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 Dry Fork facility is located in Lewis County, which is an unclassified county for all criteria pollutants, therefore the Dry Fork facility is not applicable to 45CSR19.

As shown in the following table, CNX is not a major source subject to 45CSR14 or 45CSR19 review. According to 45CSR14 Section 2.43.e, fugitive emissions are not included in the major source determination because it is not listed as one of the source categories in Table 1. Therefore, the fugitive emissions are not included in the PTE below.

Pollutant	**PSD (45CSR14) Threshold (tpy)**	**NANSR (45CSR19) Threshold (tpy)**	**Dry Fork PTE (tpy)**	**45CSR14 or 45CSR19 Review Required?**
Carbon Monoxide	250	NA	42.55	No
Nitrogen Oxides	250	NA	40.74	No
Sulfur Dioxide	250	NA	0.02	No
Particulate Matter 2.5	250	NA	0.22	No
Ozone (VOC)	250	NA	3.73	No

40CFR60 Subpart Kb (Standards of Performance for VOC Liquid Storage Vessels)

40CFR60 Subpart Kb does apply to storage vessels with a capacity greater than or equal to 75 cubic meters (19,812.9 gal). There are no tanks at the facility with a capacity larger than 75 cubic meters.

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 Dry Fork facility is not a natural gas processing facility, therefore, CNX is not subject to this rule.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

The majority of non-criteria regulated pollutants fall under the definition of HAPs which, with some revision since, were 188 compounds identified under Section 112(b) of the Clean Air Act (CAA) as pollutants or groups of pollutants that EPA knows or suspects may cause cancer or other serious human health effects. The Dry Fork facility is classified as an area source of hazardous air pollutants. Listed below is a description of the primary hazardous air pollutants for this facility.

Acetaldehyde
Acetaldehyde is mainly used as an intermediate in the synthesis of other chemicals. It is common in the environment and may be formed in the body from the breakdown of ethanol. Acute (short-term) exposure to acetaldehyde results in effects including irritation of the eyes, skin, and respiratory tract. Symptoms of chronic (long-term) intoxication of acetaldehyde resemble those of alcoholism. Acetaldehyde is considered a probable human carcinogen (Group B2) based on human cancer studies and animal studies that have shown nasal tumors in rats and laryngeal tumors in hamsters.

Acrolein
Acrolein is primarily used as an intermediate in the synthesis of acrylic acid and as a biocide. It may be formed from the breakdown of certain pollutants in outdoor air or from the burning of organic matter including tobacco, or fuels such as gasoline or oil. It is toxic to humans following inhalation, oral or dermal exposures. Acute (short-term) inhalation exposure may result in upper respiratory tract irritation and congestion. No information is available on its reproductive, developmental, or carcinogenic effects in humans, and the existing animal cancer data are considered inadequate to make a determination that acrolein is carcinogenic to humans.

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.

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).

Methanol
Methanol is released to the environment during industrial uses and naturally from volcanic gases, vegetation, and microbes. Exposure may occur from ambient air and during the use of solvents. Acute (short-term) or chronic (long-term) exposure of humans to methanol by inhalation or ingestion may result in blurred vision, headache, dizziness, and nausea. No information is available on the reproductive, developmental, or carcinogenic effects of methanol in humans. Birth defects have been observed in the offspring of rats and mice exposed to methanol by inhalation. EPA has not classified methanol with respect to carcinogenicity.

Methanol is primarily used as an industrial solvent for inks, resins, adhesives, and dyes. It is also used as a solvent in the manufacture of cholesterol, streptomycin, vitamins, hormones, and other pharmaceuticals. Methanol is also used as an antifreeze for automotive radiators, an ingredient of gasoline (as an antifreezing agent and octane booster), and as fuel for picnic stoves. Methanol is also an ingredient in paint and varnish removers. Methanol is also used as an alternative motor fuel.

All HAPs have other non-carcinogenic chronic and acute effects. These adverse health effects may be associated with a wide range of ambient concentrations and exposure times and are influenced by source-specific characteristics such as emission rates and local meteorological conditions. Health impacts are also dependent on multiple factors that affect variability in humans such as genetics, age, health status (e.g., the presence of pre-existing disease) and lifestyle. As stated previously, *there are no federal or state ambient air quality standards for these specific chemicals*. For a complete discussion of the known health effects of each compound refer to the IRIS database located at *www.epa.gov/iris*.

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 Source Determination Rule for the oil and gas industry was published in the Federal Register on June 3, 2016 and became effective on August 2, 2016. EPA defined the term "adjacent" and stated that equipment and activities in the oil and gas sector that are under common control will be considered part of the same source if they are located on the same site or on sites that share equipment and are within ¼ mile of each other.

The Dry Fork facility will operate under SIC code 4923 (Natural Gas Distribution). There are no other compressor stations operated by CNX that share the same two-digit major SIC code of 49 for natural gas distribution.

"Contiguous or Adjacent" determinations are made on a case by case basis. There are natural gas production facilites (10986 & 6718) operating under SIC code 1311, located within 0.1 miles from the proposed facility that are under common control of CNX. These production facilities directly feed the Dry Fork station. Therefore, these facilities would be considered adjacent.

Because there are facilities that are under common control, located on contiguous or adjacent properties but not operating under the same standard industrial classification code, the emissions from the Dry Fork facility should not be aggregated with other facilities in determining major source or PSD status. However, since the Dry Fork station is dependent on the two production facilities, emissions from equipment located at the adjacent well sites will be incorporated in to this permit.

MONITORING OF OPERATIONS

CNX will be required to perform the following monitoring:

- Monitor and record quantity of natural gas consumed for all engines and combustion sources.
- Monitor all applicable requirements of 40CFR63 Subpart ZZZZ.

CNX 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 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 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 40CFR63 Subpart ZZZZ.
- The records shall be maintained on site or in a readily available off-site location maintained by CNX for a period of five (5) years.

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates that CNX Gas Company, LLC meets all the requirements of applicable regulations. Therefore, impact on the surrounding area should be minimized and it is recommended that the Dry Fork facility should be granted a 45CSR13 construction permit for their facility.

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

Date