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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	R13-3291
Plant ID No.:	061-00205
Applicant:	M3 Appalachia Gathering, LLC
Facility Name:	Coopers Run Station
Location:	Middlebourne, Monongalia County
NAICS Code:	486210 (Natural Gas Transmission)
Application Type:	Construction
Received Date:	January 05, 2016
Engineer Assigned:	Thornton E. Martin Jr.
Fee Amount:	$2,000.00
Date Received:	January 14, 2016
Complete Date:	February 23, 2016
Applicant Ad Date	January 06, 2016
Newspaper:	*The Dominion Post*
UTM's:	Easting: 568.12409 km Northing: 4,395.19410 km Zone: 17S
Description:	Construction and operation of the Coopers Run natural gas compressor station located in Blacksville, Monongalia County, WV.

DESCRIPTION OF PROCESS

The following process description was taken from Permit Application R13-3291:

The Coopers Run Compressor Station will compress lean wet natural gas (Approximately 95-98% Methane) that originates from 3rd party producers and compresses the gas to pressures necessary to deliver into M3's Appalachia Gathering System (AGS) 24 inch pipeline. Between 75 MMSCFD and 100MMSCFD of wet natural gas at approximately 300-450 psig first enters the compressor station via pipeline into a 60 inch diameter by 10 foot inlet separator. The gas then travels through a suction control valve and into the main suction header which feeds into

three natural gas driven CAT 3606 engine/compressor units. The gas is compressed to 900-1125 psig and travels to an off-site downstream Dehydration Station, for ultimate delivery into the AGS gathering system. The compressor station will be located in Monongalia County, WV, at 39° 70' 38.86" N and 80º 20' 53.44" W.

Other major equipment on site will include one 30 barrel waste oil tank, three 500 gallon engine lube oil make-up tanks, three 500 gallon compressor lube oil tanks, two 30 barrel engine coolant tanks, and a 335 gallon methanol storage/containment tank.

M3 AGS is proposing to install three (3) natural gas-fired reciprocating engines (CAT 3606 Units) to compress the natural gas to main gathering system pressures. The engines will be 4-stroke, lean burn, spark ignition engines, each rated at 1775 hp and equipped with an oxidation catalyst for control of carbon monoxide (CO), volatile organic compounds (VOC) and formaldehyde (HCHO) emissions.

Only T02 (Methanol) is expected to have VOC emissions although they will be minimal. The other tanks consist of lube oils for both the engine and compressor on the Compressor Units, engine coolant which consists of a 50% ethylene glycol and water mix, or wastes of each. All tanks will have secondary containment. The Coopers Run Compressor Station will include 10 storage tanks as follows:

- T02 – Methanol 335 gallons
- T03 – Coolant Make Up Tank – 30 barrel
- T04 – Coolant Drain Tank – 30 barrel
- T05 – Engine Lube Oil for CE-1 – 500 gallon
- T06 – Compressor Lube Oil for CE-1 – 500 gallon
- T07 – Engine Lube Oil for CE-2 – 500 gallon
- T08 – Compressor Lube Oil for CE-2 – 500 gallon
- T09 – Engine Lube Oil for CE-3 – 500 gallon
- T10 – Compressor Lube Oil for CE-3 – 500 gallon

There will be one small natural gas driven Generator set (GE-1) that will be required for electrical instrumentation and control purposes. The Genset will be a Gillette Generator natural gas driven 126 hp unit.

Other equipment located at the compressor station includes piping, separators, gas scrubbers, filters, valves and meters. None of the equipment is expected to be a significant source of air emissions although are considered as part of the evaluation of fugitive emissions.

SITE INSPECTION

A site inspection was conducted by Brian Tephabock of the North Central Regional Office of the Division of Air Quality on February 24, 2016. Mr. Tephabock stated that the site is currently an undeveloped well pad. The access road will pass by a few homes, but the well pad is very remote and at least 1200 feet from any home.

Latitude: 39.703886
Longitude: -80.205344

Directions to the facility are as follows:

From Charleston, WV: Merge onto I-79 N for approximately 154 miles. Take exit 155 toward WV-7/West Virginia University. Keep right on fork and follow signs for Star City/WVU/Osage and merge onto Chaplin Hill Road. Turn left onto US-19 N / WV-7 W. Turn left onto WV-7 E and drive for approximately 14.5miles to Blacksville. Turn left onto Rt. 218 and follow for approximately 2.2 miles and turn left onto access road which is directly across Rt. 218 from Jess Tennant Hill Road. Follow that access road for approximately 1.0 mile to well pad.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions associated with this construction application consist of the combustion emissions from three (3) natural gas fired compressor engines (CE-1, CE-2 and CE-3), one (1) natural gas fired generator (GE-1), one (1) Methanol Tank (T02) and fugitive emissions. Fugitive emissions for the facility are based on calculation methodologies presented in EPA Protocol for Equipment Leak Emission Estimates. The following table indicates which methodology was used in the emissions determination:

Emission Unit ID#	**Process Equipment**	**Calculation Methodology**
CE-1 CE-2 CE-3	1,775 hp Caterpillar 3606 Reciprocating Internal Combustion Engine (RICE) w/ oxidation catalyst	Manufacturer's Data, EPA AP-42 Emission Factors
GE-1	126 hp Gillette Natural Gas Generator	Manufacturer's Data, EPA AP-42 Emission Factors
T02	(335 gal) Methanol Storage Tank	E & P Tank v4.09 (Working, Breathing & Flashing)
Fugitive	Equipment Leaks, Blowdown Events, Methanol Transfer (Loading)	EPA AP-42 Emission Factors, 40CFR Part 98, Subpart W Engineering Estimates

The following table indicates the control device efficiencies that are required for this facility:

Emission Unit	Pollutant	Control Device	Control Efficiency
1,775 hp, Caterpillar 3606 RICE, (CE-1, CE-2, CE-3)	Carbon Monoxide	EMIT Technologies, Catalytic Oxidation Catalyst Model No. ELS-4200-820F-4CEO-361	94 %
	Volatile Organic Compounds		73 %
	Formaldehyde		77 %
126 hp Gillette Generator (GE-1)	Volatile Organic Compounds	Not Applicable	
	Hazardous Air Pollutants		
Methanol Storage (T02)	Volatile Organic Compounds	Not Applicable	
	Hazardous Air Pollutants		
Methanol Loading	Volatile Organic Compounds	Not Applicable	
	Hazardous Air Pollutants		

The Applicant published their Class I Legal Notice with total facility PTE values (rounded) for the Coopers Run Station as shown in the following table:

Pollutant	Facility Wide PTE (tons/year)
Nitrogen Oxides	27.0
Carbon Monoxide	11.0
Volatile Organic Compounds	10.4
Particulate Matter-10/2.5	0.01
Sulfur Dioxide	0.10
Formaldehyde	3.40
Total HAPs	6.70
Carbon Dioxide Equivalent	23,330

Note: it appears that the values for Particulate Matter-10/2.5 and Sulfur Dioxide were reversed in error within the Applicants' Class I Legal Notice. The maximum detailed controlled point source emissions were calculated by M3 AGS and checked for accuracy by the writer and are summarized in the table on the next page. These values will be published in the DAQ Notice of Intent to Approve.

M3 Appalachia Gathering, LLC – Coopers Run Station (R13-3291)

Emission Point ID#	Source	NOx		CO		VOC		PM-10/2.5		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
CE-1	Compressor Engine	1.96	8.57	0.63	2.74	0.67	2.91	0.001	0.004	0.007	0.03	0.24	1.03	0.45	1.99	7559
CE-2	Compressor Engine	1.96	8.57	0.63	2.74	0.67	2.91	0.001	0.004	0.007	0.03	0.24	1.03	0.45	1.99	7559
CE-3	Compressor Engine	1.96	8.57	0.63	2.74	0.67	2.91	0.001	0.004	0.007	0.03	0.24	1.03	0.45	1.99	7559
GE-1	Generator Set	0.28	1.22	0.56	2.43	0.19	0.85	0.013	0.06	0.001	0.003	0.07	0.30	0.09	0.41	537
T02	Methanol Tank	----	----	----	----	0.002	0.009	----	----	----	----	----	----	0.002	0.009	----
T02 Transfer	Tank Loadout	----	----	----	----	0.008	0.033	----	----	----	----	----	----	0.008	0.033	----
Total Point Source		**6.16**	**26.93**	**2.45**	**10.65**	**2.21**	**9.622**	**0.016**	**0.072**	**0.022**	**0.093**	**0.79**	**3.39**	**1.45**	**6.422**	**23214**
Fugitive	Component Leaks / Venting	----	----	----	----	----	0.339	----	----	----	----	----	----	----	0.293	112
Total Fugitive		----	----	----	----	----	**0.339**	----	----	----	----	----	----	----	**0.293**	**112**
Total Site Wide		**6.16**	**26.93**	**2.45**	**10.65**	**2.21**	**9.961**	**0.016**	**0.072**	**0.022**	**0.093**	**0.79**	**3.39**	**1.45**	**6.715**	**23326**

REGULATORY APPLICABILITY

The following rules apply to the facility:

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 M3 AGS exceeds the regulatory emission threshold for criteria pollutants of 6 lb/hr and 10 ton/year, and they are also subject to a substantive requirement of an emission control rule promulgated by the Secretary (40CFR60, Subparts JJJJ and OOOO, 40CFR63 Subpart ZZZZ).

M3 AGS paid the appropriate application fee and published the required legal advertisement for a construction permit application.

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

45CSR16 applies to this source by reference of 40CFR60, Subparts JJJJ and OOOO, and 40CFR63 Subpart ZZZZ. These requirements are discussed under that rule below.

45CSR22 (Air Quality Management Fee Program)

M3 AGS is not subject to 45CSR30. The Coopers Run Station is subject to 40CFR60, Subparts JJJJ and OOOO, and 40CFR63 Subpart ZZZZ, 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.

M3 AGS is required to pay the appropriate annual fees and keep their Certificate to Operate current.

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

40CFR60 Subpart JJJJ establishes emission standards for applicable SI ICE.

The proposed 126 hp Gillette Generator (GE-1) was manufactured after July 1, 2008 and is EPA certified to meet the emission standards listed in 40CFR60 Subpart JJJJ. Certificate Number: FPS1B8.80NGP-020.

The 1,775 hp Caterpillar 3606 RICE (CE-1, CE-2 and CE-3) were manufactured after the July 1, 2007 date for engines with a maximum rated power capacity greater than or equal to 500 hp.

The proposed 1,775 hp Caterpillar 3606 RICE (CE-1, CE-2 and CE-3) will be subject to the following emission limits: NOx – 1.0 g/hp-hr(3.91 lb/hr); CO – 2.0 g/hp-hr(7.81

lb/hr); and VOC – 0.7 g/hp-hr(2.73 lb/hr). Based on the manufacturer's specifications for these engines, the emission standards will be met.

The proposed 1,775 hp Caterpillar 3606 RICE (CE-1, CE-2 and CE-3) are not EPA certified by the manufacturer to meet the emission standards listed in 40CFR60 Subpart JJJJ. Therefore, M3 AGS will be required to conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or three (3) years, whichever comes first, to demonstrate compliance.

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

EPA published in the Federal Register new source performance standards (NSPS) and air toxics rules for the oil and gas sector on August 16, 2012. 40CFR60 Subpart OOOO establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO_2) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. The following affected sources which commence construction, modification or reconstruction after August 23, 2011 are subject to the applicable provisions of this subpart:

- Gas wells
- Centrifugal compressors
- Reciprocating compressors
- Pneumatic controllers
- Storage vessels
- Equipment (as defined in §60.5430) located at onshore natural gas processing plants
- Sweetening units located onshore that process natural gas produced from either onshore or offshore wells

The Coopers Run Compressor Station does not include gas wells or centrifugal compressors, therefore, the only potentially applicable requirements are those for reciprocating compressors, storage vessels and pneumatic controllers. Rule applicability for each of these affected categories are as follows:

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

a. Each 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 Coopers Run Station that were constructed after August 23, 2011. Therefore, the requirements

regarding reciprocating compressors under 40 CFR 60 Subpart OOOO will apply. M3 AGS will be required to perform the following:

- Replace the reciprocating compressor rod packing at least every 26,000 hours of operation or 36 months.
- Demonstrate initial compliance by continuously monitoring the number of hours of operation or track the number of months since the last rod packing replacement.
- Submit the appropriate start up notifications.
- Submit the initial annual report for the reciprocating compressors.
- Maintain records of hours of operation since last rod packing replacement, records of the date and time of each rod packing replacement, and records of deviations in cases where the reciprocating compressor was not operated in compliance.

b. 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.

No pneumatic controllers installed will meet the definition of a pneumatic controller affected facility. Therefore, these units are not subject to the requirements of Subpart OOOO.

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

40CFR60 Subpart OOOO defines a storage vessel as a unit that is constructed primarily of non-earthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provides structural support and is designed to contain an accumulation of liquids or other materials. The following are not considered storage vessels:

- Vessels that are skid-mounted or permanently attached to something that is mobile (such as trucks, railcars, barges or ships), and are intended to be located at a site for less than 180 consecutive days. If the source does not keep or are not able to produce records, as required by §60.5420(c)(5)(iv), showing that the vessel has been located at a site for less than 180 consecutive days, the vessel described herein is considered to be a storage vessel since the original vessel was first located at the site.

- Process vessels such as surge control vessels, bottoms receivers or knockout vessels.

- Pressure vessels designed to operate in excess of 204.9 kilopascals and without emissions to the atmosphere.

This rule requires that the permittee determine the VOC emission rate for each storage vessel affected facility utilizing a generally accepted model or calculation methodology within 30 days of startup, and minimize emissions to the extent practicable during the 30 day period using good engineering practices. For each storage vessel affected facility that emits more than 6 tpy of VOC, the permittee must reduce VOC emissions by 95% or greater within 60 days of startup. The compliance date for applicable storage vessels is October 15, 2013.

M3 AGS will not be installing any produced fluid tanks at the Coopers Run Compressor Station and only one (1) 335 gallon methanol tank that has potential for VOC emissions. Potential VOC emissions from the 335 gallon methanol tank are less than 6 tpy. As such, the tank will not be a storage vessel affected facility under this rule.

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 at the Coopers Run Station are subject to the area source requirements for non-emergency spark ignition engines.

The applicability requirements for new four stroke lean burn stationary engines (CE-1, CE-2 and CE-3) that are located at an area source of HAPs is to meet the requirements of 40CFR60 Subpart JJJJ. These requirements were outlined above.

Because the three (3) compressor engines will not be EPA certified by the manufacturer, M3 AGS 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 applicability requirements for the EPA certified four stroke lean burn stationary engines (GE-1) that are located at an area source of HAPs is to minimize idle time at

startup, and change engine oil and filter, inspect spark plugs, and inspect/replace as necessary all hoses and belts every 1,440 hours or annually (whichever comes first).

The following rules do not apply to the facility:

45CSR2 (Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers)

The purpose of 45CSR2 is to establish emission limitations for smoke and particulate matter which are discharged from fuel burning units. 45CSR2 states that any fuel burning unit that has a heat input under ten (10) million B.T.U.'s per hour is exempt from sections 4 (weight emission standard), 5 (control of fugitive particulate matter), 6 (registration), 8 (testing, monitoring, recordkeeping, reporting) and 9 (startups, shutdowns, malfunctions). However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date.

There are no planned heaters or boilers at the Coopers Run Compressor Station so this regulation will not apply.

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

The purpose of this rule is to prevent and control air pollution from combustion of refuse.

The Coopers Run Compressor Station will not have any processes meeting this definition and therefore this regulation will not apply.

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

45CSR10 has requirements limiting SO_2 emissions from "fuel burning units," limiting in-stack SO_2 concentrations of "manufacturing processes," and limiting H_2S concentrations in process gas streams. The only potential applicability of 45CSR10 to the Coopers Run natural gas compression station is the limitations on fuel burning units. The engines each have been determined to not meet the definition of a "fuel burning unit" under 45CSR10 - they do not use indirect heat transfer - and are not, therefore, subject to the applicable requirements therein.

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 Cooper Run Compressor Station is located in Monongalia County, which is an unclassified county for all criteria pollutants, therefore the Coopers Run Station is not applicable to 45CSR19.

As shown in the following table, M3 AGS 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)	Coopers Run PTE (tpy)	45CSR14 or 45CSR19 Review Required?
Carbon Monoxide	250	NA	11.0	No
Nitrogen Oxides	250	NA	27.0	No
Sulfur Dioxide	250	NA	0.1	No
Particulate Matter 2.5	250	NA	0.01	No
Ozone (VOC)	250	NA	10.4	No
Greenhouse Gas (CO_2e)	100,000	NA	23,330	No

45CSR30 (Requirements for Operating Permits)

M3 AGS is not subject to 45CSR30. The Coopers Run Station is subject to 40CFR60 Subparts JJJJ and OOOO, however they are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided they are not required to obtain a permit for a reason other than their status as an area source.

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

40CFR60 Subpart Kb does not apply to storage vessels with a capacity less than 75 cubic meters (~19,813 gallons). All of the proposed tanks at the Coopers Run Compressor Station have a capacity of 1260 gallons or less. Therefore, M3 AGS would not be subject to this rule.

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

40CFR60 Subpart KKK applies to onshore natural gas processing plants that commenced construction after January 20, 1984, and on or before August 23, 2011. The Coopers Run Station is not a natural gas processing facility, therefore, M3 AGS is not subject to this rule.

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

Subpart HH establishes national emission limitations and operating limitations for HAPs emitted from oil and natural gas production facilities located at major and area sources of HAP emissions and either process, upgrade or store hydrocarbon liquids prior to custody transfer or that process, upgrade or store natural gas prior to entering the natural gas transmission and storage source category.

The proposed Coopers Run Compressor Station will not process or store hydrocarbon liquids and therefore this subpart will not apply.

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 following HAPs are common to this industry. The following table lists each HAP's carcinogenic risk (as based on analysis provided in the Integrated Risk Information System (IRIS)):

HAPs	Type	Known/Suspected Carcinogen	Classification
Formaldehyde	VOC	Yes	Category B1 - Probable Human Carcinogen
Benzene	VOC	Yes	Category A - Known Human Carcinogen
Ethylbenzene	VOC	No	Inadequate Data
Toluene	VOC	No	Inadequate Data
Xylenes	VOC	No	Inadequate Data

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) or 45CSR19 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution which Cause or Contribute to Nonattainment) as shown in the table listed in the Regulatory Discussion section under 45CSR14/45CSR19.

MONITORING OF OPERATIONS

M3 AGS 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 40CFR60 Subparts JJJJ and OOOO, 40CFR63 Subpart ZZZZ.

M3 AGS 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 records of the visible emission opacity tests conducted per the permit.
- Maintain a record of all potential to emit (PTE) HAP calculations for the entire facility. These records shall include the natural gas compressor engines and ancillary equipment.
- Monitor all applicable requirements of 40CFR60 Subparts JJJJ and OOOO, 40CFR63 Subpart ZZZZ.
- The records shall be maintained on site or in a readily available off-site location maintained by M3 AGS for a period of five (5) years.

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates that M3 AGS meets all the requirements of applicable regulations. Therefore, impact on the surrounding area should be minimized and it is recommended that the Coopers Run Compressor Station should be granted a 45CSR13 construction permit for their facility.

Thornton E. Martin Jr.
Permit Engineer

February 23, 2016
Date