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Jim Justice, Governor  
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west virginia department of environmental protection

## G35-D GENERAL PERMIT ENGINEERING EVALUATION

PREVENTION AND CONTROL OF AIR POLLUTION IN REGARD TO THE CONSTRUCTION, MODIFICATION,  
RELOCATION, ADMINISTRATIVE UPDATE AND OPERATION OF  
NATURAL GAS COMPRESSOR AND/OR DEHYDRATION FACILITIES

APPLICATION NO.: G35-D130

FACILITY ID: 061-00237

CONSTRUCTION  
 MODIFICATION  
 RELOCATION

CLASS I ADMINISTRATIVE UPDATE  
 CLASS II ADMINISTRATIVE UPDATE

### BACKGROUND INFORMATION

Name of Applicant (as registered with the WV Secretary of State's Office): DTE Appalachian Gathering LLC

Federal Employer ID No. (FEIN): 45-0718671

Applicant's Mailing Address: 333 Technology Drive, Suite 255

City: Canonsburg

State: PA

ZIP Code: 15317

Facility Name: Coopers Run Dehydration Facility

Operating Site Physical Address: Coopers Run

If none available, list road, city or town and zip of facility.

City: Blacksville

Zip Code: 26521

County: Monongalia

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

Latitude: 39.70213

Longitude: -80.19867

SIC Code: 1311

NAICS Code: 211111

Date Application Received:

October 31, 2017

Fee Amount: \$3000.00

Date Fee Received: October 31, 2017

Applicant Ad Date: November 3, 2017

Newspaper: The Dominion Post

Date Application Complete: November 27, 2017

Due Date of Final Action: January 10, 2017

Engineer Assigned: Jonathan Carney

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RELOCATION, ADMINISTRATIVE UPDATE AND OPERATION OF  
NATURAL GAS COMPRESSOR AND/OR DEHYDRATION FACILITIES

APPLICATION NO.: G35-D**130**

FACILITY ID: **061-00237**

- CONSTRUCTION
- MODIFICATION
- RELOCATION

- CLASS I ADMINISTRATIVE UPDATE
- CLASS II ADMINISTRATIVE UPDATE

Description of Permitting Action: The applicant proposes addition of one (1) 140 MMscfd dehydration unit with 1.5 MMBtu/hr reboiler, one (1) 500gal tri-ethylene glycol storage tank and one (1) 210 bbl produced fluid storage tank.

## **PROCESS DESCRIPTION**

The following process description was taken from Registration Application G35-D130:

The Coopers Run Dehydration Station dehydrates natural gas prior to transmission along the pipeline system. The process starts when the station's inlet gas stream passes through triethylene glycol (TEG) dehydration units. Each TEG unit introduces TEG to the stream in a contact tower to absorb water vapor from the gas to meet customer specifications. The TEG from each unit is then sent to the natural gas-fired reboiler, which uses heat to evaporate entrained water from the TEG. The TEG is then discharged back to the contact tower for reuse, while the natural gas stream from the contact towers flow into the

## SITE INSPECTION

Site Inspection Date: 11/28/2017

Site Inspection Conducted By: Inspector Kirk A. Powroznik

Results of Site Inspection: On 11/28/17 at approximately 8:25am I visited the Coopers Run Dehydration site 061-00237 for the purpose of evaluating Permit Application # G35-D130. I spoke with James Houser of DTE Appalachia Gathering, LLC. The site is located on top of a hill off Route 218 directly across from Jess Tennant Road. The latitude and longitude listed in the permit application appeared accurate. The second dehydration unit, and ancillary equipment was not onsite at the time of this evaluation. This facility is slightly greater than 3/10ths of a mile from the Coopers Run Compressor Station facility ID 061-00205 and permit G35-D126. The closest home was greater than three hundred (300) feet from the site, a google map photo is attached.

Did Applicant meet Siting Requirements? Yes

If applicable, was siting criteria waiver submitted?

Directions to Facility: Take I-79 exit 132 for US-250 S. Turn right onto US-250 S/Fairmont Ave/White Hall Blvd (travel 0.1 mi). Turn right onto Middletown Rd (0.9 mi). Turn right onto Industrial Park Rd (travel 1.4 mi). Turn left onto Manley Chapel Rd (travel 1.6 mi). Turn right onto Co Rd 27 (travel 1.9 mi). Continue onto Everson St (travel 341 ft). Everson St turns slightly left and becomes Co Rd 27 (travel 0.6 mi). Turn left onto US-19 S (travel 0.4 mi). Turn right onto WV-218 N (travel 4.4 mi). Turn right onto US-250 S (travel 0.3 mi). Turn left onto WV-218 N/Main St and continue to follow WV-218 N (travel 6.9 mi). Turn right onto WV-218 N/ Jefferson St and continue to follow WV-218 N (travel 9.0 mi). Turn right onto the access road, travel 1.8 miles and the facility will be on your left.

Overhead Google Earth Image of Facility:



## ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

The following table indicates which methodology was used in the emissions determination:

Emission Unit ID#	Process Equipment	Calculation Methodology (e.g. ProMax, GlyCalc, mfg. data, AP-42, etc.)
TEG-1	140 MMscfd Dehydration Unit	GRI-GlyCalc
REB-1	1.5 MMBtu/hr Reboiler	AP-42, 40CFR 98
TEG-2	140 MMscfd Dehydration Unit	GRI-GlyCalc
REB-2	1.5 MMBtu/hr Reboiler	AP-42, 40CFR 98
T01	Tri-ethylene Glycol Tank	EPA Tanks 4.0.9d
T02	Tri-ethylene Glycol Tank	EPA Tanks 4.0.9d
T03	Waste Fluids Tank	E&P Tank
T04	Waste Fluids Tank	E&P Tank
L01	Liquid Loading	EPA

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

Pollutant	Facility Wide PTE (tons/year)
Nitrogen Oxides	1.27
Carbon Monoxide	1.07
Volatile Organic Compounds	11.72
Particulate Matter	0.32
Particulate Matter-10/2.5	0.32
Sulfur Dioxide	0.01
Total HAPs	0.07
Carbon Dioxide Equivalent	41,365

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

APPLICANT: DTE Appalachia Gathering, LLC		FACILITY NAME: Coopers Run Dehy										G35-D130		
Emission Point ID#	NO <sub>x</sub>		CO		VOC		SO <sub>2</sub>		PM <sub>10</sub>		PM <sub>2.5</sub>		GHG (CO <sub>2</sub> e)	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
TEG-1	-	-	1.17	5.15	-	-	-	-	-	-	-	-	4,546.36	19,913.06
REB-1	0.15	0.64	0.12	0.54	0.01	0.04	<0.01	<0.01	0.01	0.05	0.01	0.05	175.68	769.47
TEG-2	-	-	1.17	5.15	-	-	-	-	-	-	-	-	4,546.36	19,913.06
REB-2	0.15	0.64	0.12	0.54	0.01	0.04	<0.01	<0.01	0.01	0.05	0.01	0.05	175.68	769.47
T01	-	-	<0.01	<0.01	<0.01	<0.01	-	-	-	-	-	-	-	-
T02	-	-	<0.01	<0.01	<0.01	<0.01	-	-	-	-	-	-	-	-
T03	-	-	0.05	0.23	0.05	0.23	-	-	-	-	-	-	<0.01	<0.01
T04	-	-	0.05	0.23	0.05	0.23	-	-	-	-	-	-	0.03	0.15
L01	-	-	0.05	0.01	0.05	0.01	-	-	-	-	-	-	-	-
Fugitives	-	-	-	0.89	-	-	-	-	-	-	-	-	-	463.03
Haul Roads	-	-	-	-	-	-	-	-	-	0.22	-	0.02	-	-
TOTAL	0.29	1.27	2.52	11.72	<0.01	0.01	0.02	0.32	0.02	0.12	0.02	0.12	9,444.11	41,828.22

Emission Point ID#	Formaldehyde		Benzene		Toluene		Ethylbenzene		Xylenes		Hexane		Total HAPs	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
TEG-1	-	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
REB-1	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	-	-	-	-	<0.01	0.01	<0.01	0.01
TEG-2	-	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
REB-2	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	-	-	-	-	<0.01	0.01	<0.01	0.01
T03	-	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
T04	-	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
L01	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fugitives	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Haul Roads	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TOTAL	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01

## REGULATORY APPLICABILITY

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

The purpose of 45CSR2 (Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers) is to establish emission limitations for smoke and particulate matter which are discharged from fuel burning units.

45CSR2 states that any fuel burning unit that has a heat input under ten (10) MMBTU/hr is exempt from Sections 4 (weight emission standard), 5 (control of fugitive particulate matter), 6 (registration), 8 (testing, monitoring, recordkeeping, reporting) and 9 (startups, shutdowns, malfunctions). However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date. If the individual heat input of all of the proposed fuel burning units are below 10 MMBTU/hr, these units are exempt from the aforementioned sections of 45CSR2. However, the registrant would be subject to the opacity requirements in 45CSR2, which is 10% opacity based on a six minute block average. Fuel burning units greater than 10 MMBTU/hr are ineligible for registration under General Permit G35-D

Emission Unit ID#	Emission Unit Description	Maximum Design Heat Input (MDHI) (MMBTU/hr)
REB-1	1.5 MMBtu/hr Reboiler	1.5
REB-2	1.5 MMBtu/hr Reboiler	1.5

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

45CSR6 prohibits open burning, establishes emission limitations for particulate matter, and establishes opacity requirements. Sources subject to 45CSR6 include completion combustion devices, enclosed combustion devices, and flares.

The facility-wide requirements of the general permit include the open burning limitations §§45-6-3.1 and 3.2.

All completion combustion devices, enclosed combustion devices, and flares are subject to the particulate matter weight emission standard set forth in §45-6-4.1; the opacity requirements in §§45-6-4-3 and 4-4; the visible emission standard in §45-6-4.5; the odor standard in §45-6-4.6; and, the testing standard in §§45-6-7.1 and 7.2.

Enclosed combustion control devices and flares that are used to comply with emission standards of NSPS, Subpart OOOO are subject to design, operational, performance, recordkeeping and reporting requirements of the NSPS regulation that meet or exceed the requirements of 45CSR6.



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

45CSR10 establishes emission limitations for SO<sub>2</sub> emissions which are discharged from stacks of fuel burning units. A “fuel burning unit” means and includes any furnace, boiler apparatus, device, mechanism, stack or structure used in the process of burning fuel or other combustible material for the primary purpose of producing heat or power by indirect heat transfer. Sources that meet the definition of “Fuel Burning Units” per 45CSR10-2.8 include GPUs, in-line heaters, heater treaters, and glycol dehydration unit reboilers.

Fuel burning units less than 10 MMBtu/hr are exempt. The sulfur dioxide emission standard set forth in 45CSR10 is generally less stringent than the potential emissions from a fuel burning unit for natural gas. The SO<sub>2</sub> emissions from a fuel burning unit will be listed in the G35-D permit registration at the discretion of the permit engineer on a case-by-case basis. Issues such as non-attainment designation, fuel use, and amount of sulfur dioxide emissions will be factors used in this determination. Fuel burning units greater than 10 MMBTU/hr are ineligible for registration under General Permit G35-D

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

Emission Unit ID#	Emission Unit Description	Maximum Design Heat Input (MDHI) (MMBTU/hr)
REB-1	Reboiler	1.5
REB-2	Reboiler	1.5

**45CSR13 (Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation)**

45CSR13 applies to this source due to the fact that the applicant is defined as a “stationary source” under 45CSR13 Section 2.24.b. *Stationary source* means, for the purpose of this rule, any building, structure, facility, installation, or emission unit or combination thereof, excluding any emission unit which meets or falls below the criteria delineated in Table 45-13B which: (a) is subject to any substantive requirement of an emission control rule promulgated by the Secretary; (b) discharges or has the potential to discharge more than six (6) pounds per hour and ten (10) tons per year, or has the potential to discharge more than 144 pounds per calendar day, of any regulated air pollutant; (c) discharges or has the potential to discharge more than two (2) pounds per hour or five (5) tons per year of hazardous air pollutants considered on an aggregated basis; (d) discharges or has the potential to discharge any air pollutant(s) listed in Table 45-13A in the amounts shown in Table 45-13A or greater; or, (e) an owner or operator voluntarily chooses to be subject to a construction or modification permit pursuant to this rule, even though not otherwise required to do so. 45CSR13 has an original effective date of June 1, 1974.

The applicant meets the definition of a stationary source because (check all that apply):

- Subject to a substantive requirement of an emission control rule promulgated by the Secretary.
- Discharges or has the potential to discharge more than six (6) pounds per hour and ten (10) tons per year, or has the potential to discharge more than 144 pounds per calendar day, of any regulated air pollutant.
- Discharges or has the potential to discharge more than two (2) pounds per hour or five (5) tons per year of hazardous air pollutants considered on an aggregated basis.
- Discharges or has the potential to discharge any air pollutant(s) listed in Table 45-13A in the amounts shown in Table 45-13A or greater.
- Voluntarily chooses to be subject to a construction or modification permit pursuant to this rule, even though not otherwise required to do so.

General Permit G35-D Registration satisfies the construction, modification, relocation and operating permit requirements of 45CSR13. General Permit G35-D sets forth reasonable conditions that enable eligible registrants to establish enforceable permit limits.

Section 5 of 45CSR13 provides the permit application and reporting requirements for construction of and modifications to stationary sources. No person shall cause, suffer, allow or permit the construction, modification, relocation and operation of any stationary source to be commenced without notifying the Secretary of such intent and obtaining a permit to construct, modify, relocate and operate the stationary source as required in the rule or any other applicable rule promulgated by the Secretary.

If applicable, the applicant meets the following (check all that apply):

- Relocation
- Modification
- Class I Administrative Update (45CSR13 Section 4.2.a)
- Class II Administrative Update (45CSR13 Section 4.2.b)

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

45CSR16 applies to all registrants that are subject to any of the NSPS requirements described in more detail in the Federal Regulations section. Applicable requirements of NSPS, Subparts IIII, JJJJ, OOOO and OOOOa are included in General Permit G35-D.

The applicant is subject to:

- 40CFR60 Subpart IIII
- 40CFR60 Subpart JJJJ
- 40CFR60 Subpart OOOO
- 40CFR60 Subpart OOOOa

**45CSR22 (Air Quality Management Fee Program)**

45CSR22 is the program to collect fees for certificates to operate and for permits to construct or modify sources of air pollution. 45CSR22 applies to all registrants. The general permit fee of \$500 is defined in 45CSR13. In addition to the application fee, all applicants subject to NSPS requirements or NESHAP requirements shall pay additional fees of \$1,000 and \$2,500, respectively.

Registrants are also required to obtain and have in effect a valid certificate to operate in accordance with 45CSR22 §4.1. The fee group for General Permit G35-D is Group 8D (natural gas compressor stations greater than 1,000 HP) with an annual operating fee of \$500 or 9M (all other sources) with an annual operating fee of \$200.

The applicant is in the following fee group:

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

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

Subpart IIII sets forth non-methane hydrocarbon (NMHC), hydrocarbon (HC), nitrogen oxides (NOx), carbon monoxide (CO), and particulate matter (PM) emission limits, fuel requirements, installation requirements, and monitoring requirements based on the year of installation of the subject internal combustion engine. The provisions for stationary compression ignition (CI) internal combustion engines for owners or operators of this Subpart have been included in General Permit G35-D, Section 12. The following CI engines are subject to this section:

The facility does not contain an affected source (compression ignition engine) and is therefore not subject to this subpart.

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

Subpart JJJJ sets forth nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compound (VOC) emission limits, fuel requirements, installation requirements, and monitoring requirements based on the year of installation of the subject internal combustion engine. The provisions for stationary spark ignition (SI) internal combustion engines for owners or operators of this Subpart have been included in General Permit G35-D, Section 12.

The facility does not contain an affected source (spark ignition engine) and is therefore not subject to this subpart.

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

EPA published its New Source Performance Standards (NSPS) and air toxics rules for the oil and gas sector on August 16, 2012. EPA published final amendments to the Subpart on September 23, 2013.

40CFR60 Subpart OOOO establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO<sub>2</sub>) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. The affected sources which commence construction, modification or reconstruction after August 23, 2011 are subject to the applicable provisions of this Subpart as described below:

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

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

Yes       No

Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals that is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this Subpart.

***Reciprocating compressor affected facilities are included in General Permit G35-D, Section 11.0.***

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

Yes       No

Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

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

Are there any applicable pneumatic controller affected facilities?  Yes       No

For the natural gas production segment (between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not including natural gas processing plants), each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 scfh.

***Requirements for storage vessel affected facilities are included in General Permit G35-D, Section 6.0.***

***Determination of storage vessel affected facility status is included in Section 5.0 of General Permit G35-D.***

Are there any applicable storage vessel affected facilities?  Yes       No

If No, list any emission reduction devices and control efficiencies used to avoid 40CFR60 Subpart OOOO.

There is no storage vessel affected facilities located at this facility that has the potential for VOC emissions equal to or greater than 6 tpy.

Each storage vessel affected facility, which is a single storage vessel located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment, and has the potential for VOC emissions equal to or greater than 6 tpy as determined according to this section by October 15, 2013 for Group 1 storage vessels and by April 15, 2014, or 30 days after startup (whichever is later) for Group 2 storage vessels. A storage vessel affected facility that subsequently has its potential for VOC emissions decrease to less than 6 tpy shall remain an affected facility under this subpart.

**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<sub>2</sub>) emissions from affected facilities that commence construction, modification or reconstruction after September 18, 2015. The effective date of this rule is August 2, 2016.

For each compressor station, the registrant must reduce GHG (in the form of a limitation on emissions of methane) and VOC emissions by complying with fugitive emissions monitoring as required in §60.5397a and the alternative means of emission limitations in §60.5398a.

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

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

Yes  No

If Yes, list.

Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals that is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this Subpart.

***Reciprocating compressor affected facilities are included in General Permit G35-D, Section 11.0.***

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

Yes  No

Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

***Pneumatic controllers affected facilities are included in General Permit G70-D, Section 10.0.***

Are there any applicable pneumatic controller affected facilities?  Yes  No

Each pneumatic controller affected facility not located at a natural gas processing plant, which is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 scfh.

**Requirements for storage vessel affected facilities are included in General Permit G70-D, Section 7.0.**

Are there any applicable storage vessel affected facilities?  Yes  No

If No, list any emission reduction devices and control efficiencies used to avoid 40CFR60 Subpart OOOO.

Each storage vessel affected facility, which is a single storage vessel with the potential for VOC emissions equal to or greater than 6 tpy as determined according to this section.

**Fugitive Emissions GHG and VOC Standards affected facilities are included in General Permit G70-D in Section 12.0.**

Did the registrant commence construction, modification, or reconstruction of the compressor station after September 18, 2015 and is subject to §60.5397a?  Yes  No

*For the purposes of §60.5397a, a "modification" to a compressor station occurs when one or more compressors is replaced by one or more compressors of greater total horsepower than the compressor(s) being replaced. The registrant must reduce GHG (in the form of a limitation on emissions of methane) and VOC emissions by complying with the requirements of paragraphs (a) through (j) of §60.5397a. These requirements are independent of the closed vent system and cover requirements in §60.5411a. These leak surveys must be conducted four (4) times per year.*

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

This Subpart applies to owners and operators of each triethylene glycol (TEG) dehydration unit that are located at oil and natural gas production facilities. Only area source requirements are included in General Permit G35-D, as defined in §63.761.

For area source applicability, the affected source includes each triethylene glycol (TEG) dehydration unit located at a facility that meets the criteria specified in §63.760(a).

Glycol dehydration unit(s) are included in General Permit G35-D, Section 14.0.

Are there any TEG dehydration unit(s) at this facility?  Yes  No

Are the TEG dehydration unit(s) located within an Urbanized Area (UA) or Urban Cluster (UC)?  
 Yes  No

Are the glycol dehydration unit(s) exempt from 40CFR63 Section 764(d)?  Yes  No

If Yes, answer the following questions:

The actual annual average flowrate of natural gas to the glycol dehydration unit(s) is less than 85 thousand standard cubic meters per day, as determined by the procedures specified in §63.772(b)(1) of this Subpart.  Yes  No

The actual average emissions of benzene from the glycol dehydration unit process vent(s) to the atmosphere are less than 0.90 megagram per year (1 ton per year), as determined by the procedures specified in §63.772(b)(2) of this Subpart.  Yes  No

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

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This Subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations. This section reflects EPA's final amendments to 40 CFR part 63, Subpart ZZZZ that were issued on January 15, 2013 and published in the Federal Register on January 30, 2013.

WVDEP DAQ has delegation of the area source air toxics provisions of this Subpart requiring Generally Achievable Control Technology (GACT). The provisions of this Subpart have been included in this general permit under Section 12.0.

The facility does not contain an affected source (reciprocating internal combustion engine) and is therefore not subject to this subpart.

Are there any engines that fall in the window of being new under 40CFR60 Subpart ZZZZ but manufactured before the applicability date in 40CFR60 Subpart JJJJ?  Yes  No

If so, list the engines:

**SOURCE AGGREGATION DETERMINATION**

"Building, structure, facility, or installation" is defined as all the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous and adjacent properties, and are under the control of the same person.

Is there equipment and/or activities used for onshore oil and natural gas production that are located on the same site, or on sites that share equipment and are within ¼ mile of each other?

Yes  No

Is this equipment and/or activities under "common control"?

Yes  No

Do these facilities share the same two (2) digit SIC code?

Yes  No

**Final Source Aggregation Decision.**

Source not aggregated with any other source.

Source aggregated with another source. List Company/Facility Name:

**RECOMMENDATION TO DIRECTOR**

The information provided in the permit application, including all supplemental information received, indicates the applicant meets all the requirements of applicable regulations and the applicant has shown they meet the eligibility requirements of General Permit G35-D. Therefore, impact on the surrounding area should be minimized and it is recommended that the facility should be granted registration under General Permit G35-D.

Permit Engineer Signature: Jonathan Carney  
Name and Title: Jonathan Carney

Date: December 13, 2017