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**west virginia department of environmental protection**

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Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone 304/926-0475

Jim Justice, Governor  
Austin Caperton, Cabinet Secretary  
[www.wvdep.org](http://www.wvdep.org)

July 31, 2017

Mr. Joseph Fink  
Chief Operating Officer  
CONE Gathering LLC  
1000 Consol Energy Drive  
Canonsburg, PA 15317

RE: Approved Registration G35-D075B  
CONE Gathering LLC  
Philippi Station  
Facility ID No. 001-00128

Dear Mr. Fink:

The Director has determined that the submitted Registration Application and proposed modification and operation of a natural gas compressor station demonstrates eligibility and compliance with the requirements, provisions, standards and conditions of General Permit G35-D and hereby grants General Permit registration authorizing the proposed activity.

Please be aware of the actions required in Monitoring Requirements, Testing Requirements, Recordkeeping Requirements, and the Reporting Requirements.

Should you have any questions, please contact the undersigned engineer at (304)926-0499 ext. 1203.

Sincerely,

Jonathan Carney  
Engineer

Enclosures: Registration G35-D075B  
General Permit G35-D

c. Joseph Fink - Chief Operating Officer  
[joefink@consolenergy.com](mailto:joefink@consolenergy.com)

Patrick Flynn - Air Quality Officer  
[patrickflynn@consolenergy.com](mailto:patrickflynn@consolenergy.com)

Jessie Hanshaw, P.E. - Principal Engineer  
[jhanshaw@slrconsulting.com](mailto:jhanshaw@slrconsulting.com)

*West Virginia Department of Environmental Protection  
Division of Air Quality*

*Jim Justice  
Governor*

*Austin Caperton  
Cabinet Secretary*

## Class II General Permit G35-D Registration to Modify



for the  
Prevention and Control of Air Pollution in regard to the  
Construction, Modification, Relocation, Administrative Update and  
Operation of Oil and Natural Gas Compressor and/or Dehydration Facilities

*The permittee identified at the facility listed below is authorized to  
construct the stationary sources of air pollutants identified herein in accordance  
with all terms and conditions of General Permit G35-D.*

**G35-D075B**

Issued to:  
**CONE Gathering LLC**  
**Philippi Station**  
**001-00128**

A handwritten signature in blue ink, appearing to read 'William F. Durham', is written over a horizontal line.

*William F. Durham  
Director*

*Issued: July 31, 2017*

This Class II General Permit Registration will supercede and replace G35-D075A

Facility Location: Philippi, Barbour County, West Virginia  
Mailing Address: 1000 Consol Energy Drive, Canonsburg, PA 15317  
Physical Address: Taylors Drain Rd. Philippi, WV 26416  
Facility Description: Natural Gas Compression and Dehydration Services  
NAICS Code: 486210  
SIC Code: 4922  
Longitude Coordinates: -80.01851  
Latitude Coordinates: 39.19162  
Directions to Facility: From Philippi, take US Route 119/250 N for 4.5 miles and turn right onto County Route 6 (Arden Rd.). Go 0.9 miles and turn right onto CR 6/5 (Taylors Drain Rd.). Take this road for approximately 1 mile from the start.  
Registration Type: Modification  
Description of Change: The applicant proposes the removal of two gas processing units and two produced water tanks from the facility as well as modifying emission estimates from the engines, dehydration units, storage tanks, and truck loading.

*Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit or registration issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [ §§ 22B-1-1 et seq. ], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.*

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*The source is not subject to 45CSR30.*

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## Permit Section Applicability for the Registrant

*All registered facilities under General Permit G35-D are subject to Sections 1.0, 2.0, 3.0, and 4.0 of General Permit G35-D.*

The following additional sections of General Permit G35-D apply to the registrant:

GENERAL PERMIT G35-D APPLICABLE SECTIONS	
<input checked="" type="checkbox"/> Section 5.0	Storage Vessels Containing Condensate and/or Produced Water <sup>1</sup>
<input type="checkbox"/> Section 6.0	Storage Vessel Affected Facility (NSPS, Subpart OOOO/OOOOa)
<input type="checkbox"/> Section 7.0	Control Devices and Emission Reduction Devices not subject to NSPS Subpart OOOO and/or NESHAP Subpart HH
<input checked="" type="checkbox"/> Section 8.0	Small Heaters and Reboilers not subject to 40CFR60 Subpart Dc
<input type="checkbox"/> Section 9.0	Pneumatic Controllers Affected Facility (NSPS, Subpart OOOO/OOOOa)
<input checked="" type="checkbox"/> Section 10.0	Centrifugal Compressor Affected Facility (NSPS, Subpart OOOO/OOOOa) <sup>2</sup>
<input type="checkbox"/> Section 11.0	Reciprocating Compressor Affected Facility (NSPS, Subpart OOOO/OOOOa) <sup>2</sup>
<input checked="" type="checkbox"/> Section 12.0	Reciprocating Internal Combustion Engines, Generator Engines. Microturbine Generators
<input checked="" type="checkbox"/> Section 13.0	Tanker Truck Loading <sup>3</sup>
<input checked="" type="checkbox"/> Section 14.0	Glycol Dehydration Units <sup>4</sup>
<input checked="" type="checkbox"/> Section 15.0	Blowdown and Pigging Operations
<input checked="" type="checkbox"/> Section 16.0	Fugitive Emission Components (NSPS, Subpart OOOOa)

- 1 Registrants that are subject to Section 5 may also be subject to Section 6 if the applicant is subject to the NSPS, Subpart OOOO/OOOOa control requirements or the applicable control device requirements of Section 7.*
- 2 Registrants that are subject to Section 10 and 11 are also subject to the applicable RICE requirements of Section 12.*
- 3 Registrants that are subject to Section 13 may also be subject to control device and emission reduction device requirements of Section 7.*
- 4 Registrants that are subject to Section 14 are also subject to the requirements of Section 8 (reboilers). Registrants that are subject to Section 14 may also be subject to control device and emission reduction device requirements of Section 7.*

STORAGE VESSELS										
Emission Unit ID#	Emission Point ID#	Content	Maximum Volume (gal)	Annual Throughput Limit (gal/yr)	Control Device ID#	Manuf. Date	Year Installed/Modified	VRU	Subject to 40CFR60 Subpart OOOO/OOOOa? <sup>1</sup>	G35-D Applicable Sections
T03	T03E	"Slop" Tank (Oils, Condensate, Pipeline Fluids, Storm Water Runoff MixtureL)	4,200	239,921	None	-	2011	None	<input checked="" type="checkbox"/> OOOO <input type="checkbox"/> OOOOa <input type="checkbox"/> No	5.0
T04	T04E	"Slop" Tank (Oils, Condensate, Pipeline Fluids, Storm Water Runoff MixtureL)	4,200	239,921	None	-	2014	None	<input checked="" type="checkbox"/> OOOO <input type="checkbox"/> OOOOa <input type="checkbox"/> No	5.0
T05	T05E	"Slop" Tank (Oils, Condensate, Pipeline Fluids, Storm Water Runoff MixtureL)	4,200	239,921	None	-	TBD	None	<input type="checkbox"/> OOOO <input checked="" type="checkbox"/> OOOOa <input type="checkbox"/> No	5.0
T06	T06E	"Slop" Tank (Oils, Condensate, Pipeline Fluids, Storm Water Runoff MixtureL)	4,200	239,921	None	-	TBD	None	<input type="checkbox"/> OOOO <input checked="" type="checkbox"/> OOOOa <input type="checkbox"/> No	5.0
T08	T08E	Dehy Unit Water/Condensate Storage	1,000	148,004	None	-	2011	None	<input checked="" type="checkbox"/> OOOO <input type="checkbox"/> OOOOa <input type="checkbox"/> No	5.0
T10	T10E	Dehy Unit Water/Condensate Storage	1,000	148,004	None	-	TBD	None	<input type="checkbox"/> OOOO <input checked="" type="checkbox"/> OOOOa <input type="checkbox"/> No	5.0

<sup>1</sup> Commenced construction, modification or reconstruction after August 23, 2011 and on or before September 18, 2015 for 40CFR60 Subpart OOOO.

Commenced construction, modification or reconstruction after September 18, 2015 for 40CFR60 Subpart OOOOa.

FUEL BURNING UNITS					
See Section 8.0					
Emission Unit ID#	Emission Point ID#	Description	MDHI (MMBTU/hr)	Year Installed/Modified	G35-D Applicable Sections
RBLR-1	RBLR-1E	Exterran Reboiler; Model # SB36-16	1.50	2013	8.0
RBLR-2	RBLR-2E	Exterran Reboiler; Model # SB36-16	1.50	TBD	8.0

### PNEUMATIC CONTROLLERS

Are there any applicable pneumatic controllers subject to 40CFR60 Subpart OOOO/OOOOa at this facility?

- 40CFR60 Subpart OOOO
- 40CFR60 Subpart OOOOa
- No

Approximate Number of 40CFR60 Subpart OOOO applicable Pneumatic Controllers  
 Approximate Number of 40CFR60 Subpart OOOOa applicable Pneumatic Controllers

See Section 9.0

### CENTRIFUGAL COMPRESSORS

Are there any applicable centrifugal compressors subject to 40CFR60 Subpart OOOO/OOOOa at this facility?

- Yes     No

See Section 10.0

### RECIPROCATING COMPRESSORS

Are there any applicable reciprocating compressors subject to 40CFR60 Subpart OOOO/OOOOa at this facility?

- Yes     No

See Section 11.0

Description	Requirement
E01-4SLB – Caterpillar G3516BLE	<input checked="" type="checkbox"/> 40CFR60 Subpart OOOO <input type="checkbox"/> 40CFR60 Subpart OOOOa
E02-4SLB – Caterpillar G3516BLE	<input checked="" type="checkbox"/> 40CFR60 Subpart OOOO <input type="checkbox"/> 40CFR60 Subpart OOOOa
E03-4SLB – Caterpillar G3516BLE	<input checked="" type="checkbox"/> 40CFR60 Subpart OOOO <input type="checkbox"/> 40CFR60 Subpart OOOOa
E04-4SLB – Caterpillar G3516BLE	<input checked="" type="checkbox"/> 40CFR60 Subpart OOOO <input type="checkbox"/> 40CFR60 Subpart OOOOa
E05-4SLB – Caterpillar G3516BLE	<input type="checkbox"/> 40CFR60 Subpart OOOO <input checked="" type="checkbox"/> 40CFR60 Subpart OOOOa

**RECIPROCATING INTERNAL COMBUSTION ENGINES**

See Section 12.0

Emission Unit ID#	Emission Point ID#	Make/Model/HP	Control Device ID#	Year Installed/Modified	Engine Manufacture Date	Subject to 12.1.3/12.2.1	Engine Type	Applicable Rules	40CFR63 Subpart ZZZZ New or Existing?
E01	E01E	Reciprocating Engine/Compressor G3516BLE; 4SLB Caterpillar	OC	2014	May 10, 2017	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> 2SLB <input checked="" type="checkbox"/> 4SLB <input type="checkbox"/> 4SRB	<input checked="" type="checkbox"/> 40CFR60 Subpart JJJJ Certified? <input type="checkbox"/> 40CFR60 Subpart IIII Certified? <input checked="" type="checkbox"/> 40CFR63 Subpart ZZZZ <input type="checkbox"/> NESHAP ZZZZ/ NSPS JJJJ Window	<input checked="" type="checkbox"/> New <input type="checkbox"/> Existing
E02	E02E	Reciprocating Engine/Compressor G3516BLE; 4SLB Caterpillar	OC	2014	November 16, 2012	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> 2SLB <input checked="" type="checkbox"/> 4SLB <input type="checkbox"/> 4SRB	<input checked="" type="checkbox"/> 40CFR60 Subpart JJJJ Certified? <input type="checkbox"/> 40CFR60 Subpart IIII Certified? <input checked="" type="checkbox"/> 40CFR63 Subpart ZZZZ <input type="checkbox"/> NESHAP ZZZZ/ NSPS JJJJ Window	<input checked="" type="checkbox"/> New <input type="checkbox"/> Existing
E03	E03E	Reciprocating Engine/Compressor G3516BLE; 4SLB Caterpillar	OC	2014	October 28, 2011	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> 2SLB <input checked="" type="checkbox"/> 4SLB <input type="checkbox"/> 4SRB	<input checked="" type="checkbox"/> 40CFR60 Subpart JJJJ Certified? <input type="checkbox"/> 40CFR60 Subpart IIII Certified? <input checked="" type="checkbox"/> 40CFR63 Subpart ZZZZ <input type="checkbox"/> NESHAP ZZZZ/ NSPS JJJJ Window	<input checked="" type="checkbox"/> New <input type="checkbox"/> Existing
E04	E04E	Reciprocating Engine/Compressor G3516BLE; 4SLB Caterpillar	OC	2014	November 15, 2013	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> 2SLB <input checked="" type="checkbox"/> 4SLB <input type="checkbox"/> 4SRB	<input checked="" type="checkbox"/> 40CFR60 Subpart JJJJ Certified? <input type="checkbox"/> 40CFR60 Subpart IIII Certified? <input checked="" type="checkbox"/> 40CFR63 Subpart ZZZZ <input type="checkbox"/> NESHAP ZZZZ/ NSPS JJJJ Window	<input checked="" type="checkbox"/> New <input type="checkbox"/> Existing
E05	E05E	Reciprocating Engine/Compressor G3516BLE; 4SLB Caterpillar	OC	TBD	TBD	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> 2SLB <input checked="" type="checkbox"/> 4SLB <input type="checkbox"/> 4SRB	<input checked="" type="checkbox"/> 40CFR60 Subpart JJJJ Certified? <input type="checkbox"/> 40CFR60 Subpart IIII Certified? <input checked="" type="checkbox"/> 40CFR63 Subpart ZZZZ <input type="checkbox"/> NESHAP ZZZZ/ NSPS JJJJ Window	<input checked="" type="checkbox"/> New <input type="checkbox"/> Existing



G01	G01E	Reciprocating Engine/Generator - Cummins; Model QSL; Diesel	None	TBD	TBD	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> 2SLB <input type="checkbox"/> 4SLB <input type="checkbox"/> 4SRB	<input type="checkbox"/> 40CFR60 Subpart JJJJ Certified? <input type="checkbox"/> 40CFR60 Subpart IIII Certified? <input checked="" type="checkbox"/> 40CFR63 Subpart ZZZZ NESHP ZZZZ/ NSPS JJJJ Window	<input checked="" type="checkbox"/> New <input type="checkbox"/> Existing
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*New or reconstructed sources in accordance with 63.76590(c) must only meet the requirements of 40CFR60 Subparts IIII or JJJJ.*

**SPARK IGNITION RECIPROCATING INTERNAL COMBUSTION ENGINES TESTING REQUIREMENTS**

See Section 12.0

Emission Unit ID#	Emission Point ID#	Make/Model/HP	Control Device ID#	Year Installed/Modified	Engine Manufacture Date	40CFR60 Subpart JJJJ Testing Requirements
E01	E01E	Reciprocating Engine/Compressor Caterpillar G3516BLE; 4SLB; 1,380	OC	2014	May 10, 2017	<input checked="" type="checkbox"/> Initial Performance Test <input checked="" type="checkbox"/> Every 8,760 hours of operation or 3 years (whichever comes first)
E02	E02E	Reciprocating Engine/Compressor Caterpillar G3516BLE; 4SLB; 1,380	OC	2014	November 16, 2012	<input checked="" type="checkbox"/> Initial Performance Test <input checked="" type="checkbox"/> Every 8,760 hours of operation or 3 years (whichever comes first)
E03	E03E	Reciprocating Engine/Compressor Caterpillar G3516BLE; 4SLB; 1,380	OC	2014	October 28, 2011	<input checked="" type="checkbox"/> Initial Performance Test <input checked="" type="checkbox"/> Every 8,760 hours of operation or 3 years (whichever comes first)
E04	E04E	Reciprocating Engine/Compressor Caterpillar G3516BLE; 4SLB; 1,380	OC	2014	November 15, 2013	<input checked="" type="checkbox"/> Initial Performance Test <input checked="" type="checkbox"/> Every 8,760 hours of operation or 3 years (whichever comes first)
E05	E05E	Reciprocating Engine/Compressor Caterpillar G3516BLE; 4SLB; 1,380	OC	TBD	TBD	<input checked="" type="checkbox"/> Initial Performance Test <input checked="" type="checkbox"/> Every 8,760 hours of operation or 3 years (whichever comes first)

**TANKER TRUCK LOADOUT**

Are there any tanker truck loadout operations at this facility?

Yes    No

See Section 13.0

Emission Unit ID#	Emission Point ID#	Description	Annual Throughput Limit (gal/yr)	Year Installed/Modified	Control Device ID#	Closed System Collection?
TL-1	TL-1E	Emission Point ID#: TL-LE	1,255,690	2017	None	<input type="checkbox"/> Tanker trucks passing the MACT level annual leak test <input type="checkbox"/> Tanker trucks passing the NSPS level annual leak test <input type="checkbox"/> Tanker trucks not passing one of the above annual leak tests but has vapor return

**GLYCOL DEHYDRATION UNITS**

Are there any glycol dehydration units at this facility?

Yes  No

See Section 14.0

Emission Unit ID#	Emission Point ID#	Description (Make, Model)	Year Installed/Modified	Subject to 40CFR63 Subpart HH? <sup>1</sup>	40CFR63 Subpart HH Exemptions	Max Dry Gas Flow Rate (mmscf/day)	APCD/ERD ID#
DEHY-1	DEHY-1E	Exterran Dehydration Unit Still Vent	2013	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Pump Optimization <input type="checkbox"/> No	<input checked="" type="checkbox"/> Benzene Exemption <input type="checkbox"/> Flowrate Exemption	80.0	None
DEHY-2	DEHY-2E	Exterran Dehydration Unit Still Vent	TBD	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Pump Optimization <input type="checkbox"/> No	<input checked="" type="checkbox"/> Benzene Exemption <input type="checkbox"/> Flowrate Exemption	80.0	None

<sup>1</sup> If Yes, specify if registrant meets benzene or flowrate exemption.

**BLOWDOWN AND PIGGING OPERATIONS**

See Section 15.0

Type of Event	# of Events (event/yr)	Amount Vented per event (scf/event)	MW of vented gas (lb/lb-mol)	Total Emissions (ton/yr)	VOC weight fraction	VOC emissions (ton/yr)
Compressor Blowdown	300	4,628	16.46	29.68	1.80	0.53
Compressor Startup						
Plant Shutdown						
Low Pressure Pig Venting	60	596.44	16.46	0.76	1.80	0.01
High Pressure Pig Venting						

Type of Event	# of Events (event/yr)	Amount Vented per event (scf/event)	MW of vented gas (lb/lb-mol)	Total Emissions (ton/yr)	HAP weight fraction	HAP emissions (ton/yr)
Compressor Blowdown	300	4,628	16.46	29.68	0.00	0.00
Compressor Startup						
Plant Shutdown						
Low Pressure Pig Venting	60	596.44	16.46	0.76	0.00	0.00
High Pressure Pig Venting						

**FUGITIVE EMISSION COMPONENTS**

Is the facility subject to quarterly LDAR monitoring under 40CFR60 Subpart OOOOa?

- Yes  
 No

See Section 16.0

**AIR POLLUTION CONTROL DEVICES**

Are there any air pollution control devices at this facility?

Yes  No

See Sections 6.0, 7.0

**EMISSION REDUCTION DEVICES (ERD)**

Are there any ERDs (VRU, Recycled Reboiler, BTEX Eliminator, etc.) at this facility?

Yes  No

See Sections 6.0, 7.0

**EMISSION LIMITATIONS**

Emission Unit ID#	Emission Point ID#	Emission Unit Description	Pollutant	Maximum Potential Emissions	
				Hourly (lb/hr)	Annual (tons/year)
E01	E01E	Reciprocating Engine/Compressor Caterpillar G3516BLE; 4SLB	Nitrogen Oxides	3.04	13.33
			Carbon Monoxide	4.26	18.66
			Volatile Organic Compounds	2.13	9.33
			Formaldehyde	0.33	1.41
E02	E02E	Reciprocating Engine/Compressor Caterpillar G3516BLE; 4SLB	Nitrogen Oxides	3.04	13.33
			Carbon Monoxide	4.26	18.66
			Volatile Organic Compounds	2.13	9.33
			Formaldehyde	0.33	1.41
E03	E03E	Reciprocating Engine/Compressor Caterpillar G3516BLE; 4SLB	Nitrogen Oxides	3.04	13.33
			Carbon Monoxide	4.26	18.66
			Volatile Organic Compounds	2.13	9.33
			Formaldehyde	0.33	1.41
E04	E04E	Reciprocating Engine/Compressor Caterpillar G3516BLE; 4SLB	Nitrogen Oxides	3.04	13.33
			Carbon Monoxide	4.26	18.66
			Volatile Organic Compounds	2.13	9.33
			Formaldehyde	0.33	1.41
E05	E05E	Reciprocating Engine/Compressor Caterpillar G3516BLE; 4SLB	Nitrogen Oxides	3.04	13.33
			Carbon Monoxide	4.26	18.66
			Volatile Organic Compounds	2.13	9.33
			Formaldehyde	0.33	1.41
E06	E06E	Reciprocating Engine/Compressor	Nitrogen Oxides	3.04	13.33
			Carbon Monoxide	4.26	18.66

		Caterpillar G3516BLE; 4SLB	Volatile Organic Compounds	2.13	9.33
			Formaldehyde	0.33	1.41
DEHY-1	DEHY-1E	Glycol Dehy Still Vent Data	Volatile Organic Compounds	1.60	6.98
			Benzene	1.77	0.78
			Toluene	0.27	1.15
			Ethylbenzene	0.40	1.74
			Xylenes	0.55	2.39
RBLR-1	RBLR-1E	Dehy Unit Reboiler	Nitrogen Oxides	0.15	0.66
			Carbon Monoxide	0.13	0.55
			Volatile Organic Compounds	0.01	0.04
DEHY-2	DEHY-2E	Glycol Dehy Still Vent Data	Volatile Organic Compounds	1.60	6.98
			Benzene	1.77	0.78
			Toluene	0.27	1.15
			Ethylbenzene	0.40	1.74
			Xylenes	0.55	2.39
RBLR-2	RBLR-2E	Dehy Unit Reboiler	Nitrogen Oxides	0.15	0.66
			Carbon Monoxide	0.13	0.55
			Volatile Organic Compounds	0.01	0.04