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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	R13-3081C
Plant ID No.:	051-00143
Applicant:	CONE Gathering LLC (CONE)
Facility Name:	Majorsville Station
Location:	Majorsville, Marshall County
NAICS Code:	211111
Application Type:	Modification
Received Date:	July 20, 2015 (Application Resubmittal - 9/1/2015)
Engineer Assigned:	Jerry Williams, P.E.
Fee Amount:	$4500.00
Date Received:	July 20, 2015
Complete Date:	September 18, 2015
Due Date:	December 17, 2015
Applicant Ad Date:	September 3, 2015
Newspaper:	*Moundsville Daily Echo*
UTM's:	Easting: 539.827 km Northing: 4,424.302 km Zone: 17T
Description:	This permitting action proposes a throughput increase of the existing glycol dehydration units, addition of one (1) blowdown flare, one (1) glycol dehydration unit and reboiler and one (1) enclosed combustor. Two (2) natural gas fired compressor engines will be removed and replaced with three (3) electric compressor motors.

DESCRIPTION OF PROCESS

The following modification process description was taken from Permit Application R13-3081C:

CONE is proposing to increase the current permit limits of the existing glycol dehydration units from 150 million standard cubic feet per day (mmscfd) to 200 mmscfd in addition to installing one (1) blowdown flare, one (1) glycol dehydration unit and reboiler and one (1) enclosed combustor. Three (3) natural gas fired compressor engines (E-3, E-4, E-5) will be removed and replaced with three (3) electric compressor units (each rated at 4,500 HP).

Natural gas enters the station via a pipeline system and is compressed using the natural gas-fired compressor engines. The compressed natural gas stream is then processed by each triethylene glycol (TEG) dehydration unit (with each associated reboiler). The dehydration unit will introduce TEG to the gas stream in a contact tower to absorb water vapor from the gas to a level not exceeding 7 pounds per million standard cubic feet (lb/MMscf). The TEG is then sent to the natural gas fired reboiler. The water is evaporated from the TEG in the reboiler and discharged, and the glycol is then sent back to the contact tower for reuse. Each dehydration unit is equipped with an enclosed combustor which will control emissions from the dehydration still vent, and the emissions from the flash tank. The natural gas stream from the contact tower flows into the pipeline to be transported further along the pipeline system.

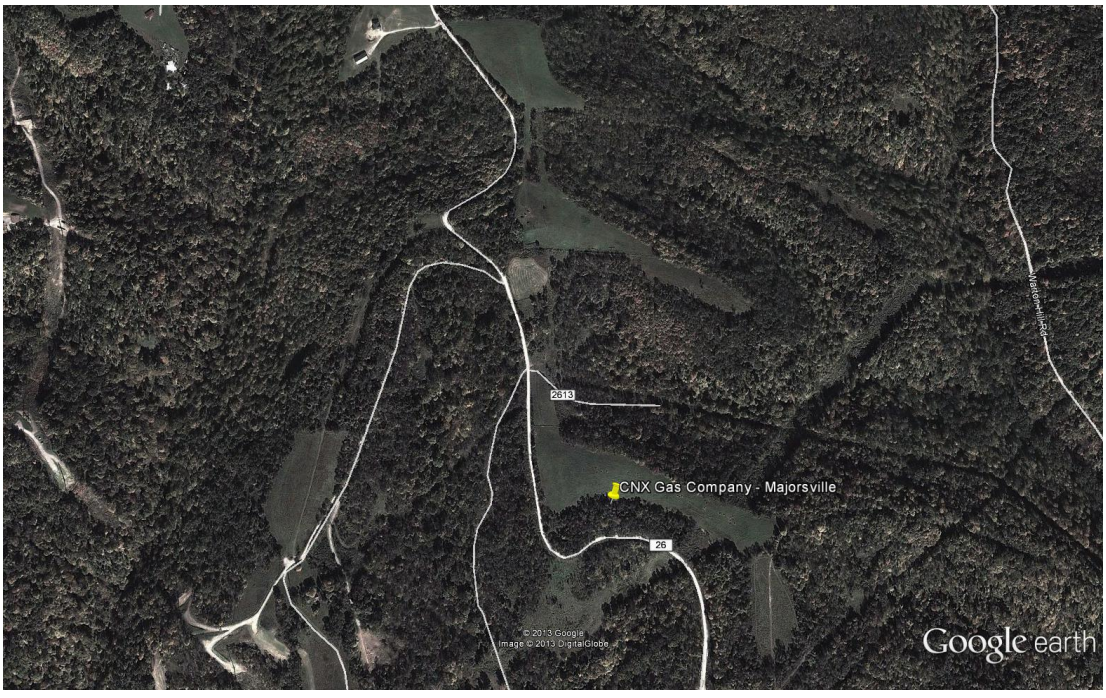
SITE INSPECTION

A site inspection was conducted by Steve Sobutka of the Northern Panhandle Regional Office. Mr. Sobutka stated that the site is relatively remote and the majority of the site is surrounded by woods. The closest residence is more than 1,000 feet from the site.

Latitude: 39.9675
Longitude: -80.5331

Directions are as follows:

From Wheeling: Travel east on I-70 for approximately 9.3 miles. Take Exit 11 onto Dallas Pike. Turn right onto Dallas Pike and travel approximately 1.7 miles. Take a slight left onto Middle Wheeling Creek Road (Old Co. 39) for 0.4 miles. Continue onto Dallas Pike and travel 3.0 miles. Turn right onto Number 2 Ridge Road and travel 3.6 miles. Turn right and the facility will be 0.5 miles on the right.



ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions associated with this modification application consist of the emissions from increasing the throughput of the existing TEG dehydration units (DEHY-1, DEHY-2), the addition of a TEG dehydration unit (DEHY-3) and associated reboiler (BLR-4), the addition of an enclosed vapor combustor (FL-3) and an emergency blowdown flare (BDF-1). Three (3) existing compressor engines (E-3, E-4, E-5) will be removed.

Greenhouse gas (GHG) fugitive emissions are based on global warming potentials presented in 40 CFR Part 98 Subpart W. 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**
DEHY-1 DEHY-2 DEHY-3	200 MMSCFD Glycol Dehydration Units (Still Vent and Flash Tank)	EPA AP-42 Emission Factors, GRI-GlyCalc 4.0
BLR-4	2.86 MMBTU/hr Glycol Dehydration Unit Reboiler	EPA AP-42 Emission Factors
FL-3	6 MMBTU/hr Enclosed Vapor Combustor	EPA AP-42 Emission Factors
BDF-1	Emergency Blowdown Flare	EPA AP-42 Emission Factors

The total PTE after this proposed modification are shown in the following table:

Pollutant	**Maximum Pre-Modification Annual Facility Wide Emissions (tons/year)**	**Maximum Post-Modification Annual Facility Wide Emissions (tons/year)**	**Net Facility Wide Emissions Changes (tons/year)**
Nitrogen Oxides	64.48	38.53	-25.95
Carbon Monoxide	40.29	24.28	-16.01
Volatile Organic Compounds	92.39	95.57	3.18
Particulate Matter-10/2.5	3.82	2.04	-1.78
Sulfur Dioxide	0.25	0.15	-0.10
Total HAPs	21.46	12.95	-8.51
Greenhouse Gas (CO_2e)	52,963	38,190	14,746

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

CONE Gathering LLC – Majorsville Station (R13-3081C)

Emission Point ID#	Source	NO_x		CO		VOC		PM-10/2.5		SO_2		Formaldehyde		Total HAPs		CO_2e
		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
E3	Caterpillar 3608 RICE	2.61	11.44	1.00	4.40	1.64	7.21	0.16	0.69	0.01	0.04	0.33	1.45	0.63	2.81	8078
E4	Caterpillar 3608 RICE	2.61	11.44	1.00	4.40	1.64	7.21	0.16	0.69	0.01	0.04	0.33	1.45	0.63	2.81	8078
EG-1	Emergency Generator	7.82	1.95	0.50	0.12	0.18	0.04	0.08	0.02	0.02	0.01	<0.01	<0.01	<0.01	<0.01	195
FL-1	Glycol Dehy Flare	0.52	2.26	0.43	1.90	1.95	8.55	0.04	0.17	<0.01	0.01	<0.01	<0.01	0.15	0.68	3680
FL-2	Glycol Dehy Flare	0.52	2.26	0.43	1.90	1.95	8.55	0.04	0.17	<0.01	0.01	<0.01	<0.01	0.15	0.68	3680
FL-3	Glycol Dehy Flare	0.52	2.26	0.43	1.90	1.95	8.55	0.04	0.17	<0.01	0.01	<0.01	<0.01	0.15	0.68	3680
BLR-1	Glycol Dehy Reboiler	0.23	1.02	0.20	0.85	0.01	0.06	<0.01	0.02	<0.01	<0.01	<0.01	<0.01	<0.01	0.02	1467
BLR-2	Condensate Reboiler	0.06	0.27	0.05	0.22	<0.01	0.01	<0.01	0.02	<0.01	<0.01	<0.01	<0.01	<0.01	0.01	385
BLR-3	Glycol Dehy Reboiler	0.23	1.02	0.20	0.85	0.01	0.06	<0.01	0.02	<0.01	<0.01	<0.01	<0.01	<0.01	0.02	1467
BLR-4	Glycol Dehy Reboiler	0.23	1.02	0.20	0.85	0.01	0.06	<0.01	0.02	<0.01	<0.01	<0.01	<0.01	<0.01	0.02	1467
VRU	Tanks	0.00	0.00	0.00	0.00	NA	42.20	0.00	0.00	0.00	0.00	0.00	0.00	NA	1.19	0
HTR-2	Hot Oil Heater	0.58	2.54	0.49	2.13	0.03	0.14	0.01	0.05	<0.01	0.02	<0.01	<0.01	0.01	0.05	3658
BDF-1	Emergency Blowdown Flare	11.80	1.05	53.79	4.77	8.60	2.11	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0.13	0.03	2094
Total Point Source		**27.73**	**38.53**	**58.73**	**24.28**	**17.97**	**84.75**	**0.53**	**2.04**	**0.04**	**0.15**	**0.66**	**2.90**	**1.86**	**8.99**	**37929**
Fugitive	Component Leaks	0.00	0.00	0.00	0.00	2.47	10.82	0.00	0.00	0.00	0.00	<0.01	<0.01	0.91	3.96	261
Total Fugitive		**0.00**	**0.00**	**0.00**	**0.00**	**2.47**	**10.82**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**<0.01**	**3.96**	**261**
Total Sitewide		**27.73**	**38.53**	**58.73**	**24.28**	**20.44**	**95.57**	**0.53**	**2.04**	**0.04**	**0.15**	**0.66**	**2.90**	**2.45**	**12.95**	**38190**

REGULATORY APPLICABILITY

The following rules apply to the equipment associated with this modification:

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.

The individual heat input of the proposed 2.86 MMBTU/hr reboiler (BLR-4) is below 10 MMBTU/hr. Therefore, this unit is exempt from the aforementioned sections of 45CSR2.

CONE would also be subject to the opacity requirements in 45CSR2, which is 10% opacity based on a six minute block average.

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.

CONE has one (1) flare associated with this modification application. The flare is subject to section 4, emission standards for incinerators. The facility will demonstrate compliance by maintaining records of the amount of natural gas consumed by the flare and the hours of operation. The facility will also monitor the flame of the flare and record any malfunctions that may cause no flame to be present during operation.

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

The purpose of 45CSR10 is to establish emission limitations for sulfur dioxide which are discharged from fuel burning units. 45CSR10 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 3 (weight emission standard), 6 (registration), 7 (permits), and 8 (testing, monitoring, recordkeeping, reporting). 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.

The individual heat input of the proposed 2.86 MMBTU/hr reboiler (BLR-4) is below 10 MMBTU/hr. Therefore, this unit is exempt from the aforementioned sections of 45CSR10.

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

45CSR13 applies to this source due to the fact that CONE's proposed modification exceeds the regulatory emission threshold for criteria pollutants of 6 lb/hr and 10 ton/year. In addition, the flare is subject to a substantive requirement under 45CSR6. CONE has published the required Class I legal advertisement notifying the public of their permit application, and 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, Subparts JJJJ and OOOO. These requirements are discussed under that rule below.

45CSR30 (Requirements for Operating Permits)

The source is a nonmajor source subject to 45CSR30. This facility is a deferred Title V source (40CFR60 Subpart Kb).

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:

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

There are no gas wells at the Majorsville Station. Therefore, all requirements regarding gas wells under 40 CFR 60 Subpart OOOO 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 associated with this modification application.

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 no reciprocating compressors associated with this modification application.

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.

There are no continuous bleed natural gas-driven pneumatic controllers associated with this modification application.

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 OOOO defines a storage vessel as a unit that is constructed primarily of nonearthen 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.

There are no storage vessels associated with this modification application.

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 §§60.5400, 60.5401, 60.5402, 60.5421 and 60.5422 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 §§60.5400, 60.5401, 60.5402, 60.5421 and 60.5422 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 Majorsville Station 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 §60.5423(c) but are not required to comply with §§60.5405 through 60.5407 and paragraphs 60.5410(g) and 60.5415(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 §§60.5405 through 60.5407, 60.5410(g), 60.5415(g), and 60.5423 of this subpart.

There are no sweetening units at the Majorsville Station. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOO would not apply.

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. The glycol dehydration units at the Majorsville Station are subject to the area source requirements for glycol dehydration units. However, because the facility is an area source of HAP emissions and the actual average benzene emissions from the glycol dehydration unit is below 0.90 megagram per year (1.0 tons/year) it is exempt from all requirements of Subpart HH except to maintain records of actual average flowrate of natural gas to demonstrate a continuous exemption status.

40CFR60 Subpart 60.18 (General Control Device and Work Practice Requirements)

40CFR60 Subpart 60.18 contains requirements for control devices when they are used to comply with applicable subparts of 40CFR60 and 40CFR61. The proposed flare is required to meet the design specifications in Section 60.18(c)(3) and applicable work practice requirements in Section 60.18.

The following rules do not apply to this modification:

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 Majorsville Station is not a natural gas processing plant, therefore, CONE would not be subject to this rule.

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)

On September 30, 2013, EPA approved a redesignation request and State Implementation Plan (SIP) revision submitted by the State of West Virginia. The West Virginia Department of Environmental Protection (WVDEP) requested that the West Virginia portion of the Wheeling, WV–OH fine particulate matter ($PM_{2.5}$) nonattainment area (''Wheeling Area'' or ''Area'') be redesignated as attainment for the 1997 annual $PM_{2.5}$ national ambient air quality standard (NAAQS).

The Majorsville Station is located in Marshall County, which is located in this metropolitan statistical area and is an attainment county for all pollutants. Therefore the Majorsville Station is not subject to 45CSR19.

As shown in the table below, CONE is not subject to 45CSR14 or 45CSR19 review.

Pollutant	**PSD (45CSR14) Threshold (tpy)**	**NANSR (45CSR19) Threshold (tpy)**	**Majorsville PTE (tpy)**	**45CSR14 or 45CSR19 Review Required?**
Carbon Monoxide	250	NA	24.28	No
Nitrogen Oxides	250	NA	38.53	No
Sulfur Dioxide	250	NA	0.15	No
Particulate Matter 2.5	250	NA	2.04	No
Ozone (VOC)	250	NA	84.75	No

45CSR30 (Requirements for Operating Permits)

CONE is not subject to 45CSR30. The Majorsville 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.

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.

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 Majorsville Station is located in Marshall County and will be operated by CONE.

1. The Majorsville Station will operate under SIC code 1311 (Crude Petroleum and Natural Gas Extraction). There are surrounding wells and compressor stations operated by CONE that share the same two-digit major SIC code of 13 for oil and gas exploration and production. Therefore, the Majorsville Station does share the same SIC code as the wells and surrounding compressor stations.

2. "Contiguous or Adjacent" determinations are made on a case by case basis. These determinations are proximity based, and it is important to focus on this and whether or not it meets the common sense notion of a plant. The terms "contiguous" or "adjacent" are not defined by USEPA. Contiguous has a dictionary definition of being in actual contact; touching along a boundary or at a point. Adjacent has a dictionary definition of not distant; nearby; having a common endpoint or border.

   The closest CONE facility to the Majorsville Station is over one quarter (1/4) mile away. Operations separated by these distances do not meet the common sense notion of a plant. Therefore, the properties in question are not considered to be on contiguous or adjacent property.

3. According to CONE, none of the wells in the area are under common control with the Majorsville Station.

Because the facilities are not considered to be on contiguous or adjacent properties, the emissions from the Majorsville Station should not be aggregated with other facilities in determining major source or PSD status.

MONITORING OF OPERATIONS

CONE will be required to perform the following monitoring:

- Monitor and record quantity of natural gas consumed for all combustion sources.
- Monitor all applicable requirements of 40CFR60 Subparts JJJJ and OOOO, 40CFR63 Subpart HH.
- Monitor the presence of the vapor combustor and blowdown flare pilot flame with a thermocouple or equivalent.

CONE will be required to perform the following recordkeeping:

- Maintain records of the amount of natural gas consumed and hours of operation for all 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.
- Maintain records of all applicable requirements of 40CFR60 Subparts IIII and OOOO, 40CFR63 Subpart HH.
- Maintain records of the vapor combustor and blowdown flare design evaluation.
- The records shall be maintained on site or in a readily available off-site location maintained by CONE for a period of five (5) years.

RECOMMENDATION TO DIRECTOR

The information provided in the modification permit application indicates CONE's Majorsville Station meets all the requirements of applicable regulations. Therefore, impact on the surrounding area should be minimized and it is recommended that the Marshall County location should be granted a 45CSR13 modification permit for this proposed permitting action.

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Jerry Williams, P.E.
Engineer

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Date