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west virginia department of environmental protection

G70-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 PRODUCTION FACILITIES LOCATED AT THE WELL SITE

APPLICATION NO.: G70-D266

FACILITY ID: 049-00198

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): EQT Production Company

Federal Employer ID No. (FEIN): 25-0724685

Applicant's Mailing Address: 625 Liberty Avenue, Suite 1700

City: Pittsburgh

State: PA

ZIP Code: 15222

Facility Name: GLO-174 Pad

Operating Site Physical Address: Off Barthollow Fork Branch
If none available, list road, city or town and zip of facility.

City: Coburn

Zip Code: 15222

County: Marion

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

Latitude: 39.55522

Longitude: -80.41393

SIC Code: 1311

NAICS Code: 211111

Date Application Received:

June 12, 2017

Fee Amount: \$1,500

Date Fee Received: July 6, 2017

Applicant Ad Date: July 19, 2017

Newspaper: *Times West Virginian*

Date Application Complete: October 23, 2017

Due Date of Final Action: December 7, 2017

Engineer Assigned: David Keatley

Description of Permitting Action: Installation and operation of: two (2) 400-bbl produced liquid tanks, two (2) 1.54-mmBtu/hr line heater, one (1) 0.013-mmBtu/hr thermoelectric generator (TEG), one (1) 100-bbl sand separator tank, and one liquid loadout.

PROCESS DESCRIPTION

Raw natural gas from two (2) natural gas wells goes to sand separator(s). The liquid from the sand separator(s) goes to one (1) 100-bbl sand blowdown tank (S006). The gas from the sand separator(s) goes to two (2) 1.54-mmBtu/hr line heaters (S003 and S004) to encourage phase separation. The heated gas from the line heaters goes to high-pressure separators. The gas from the high-pressure separators exits the facility via pipeline. The liquid from the high-pressure separators goes to two (2) 400-bbl produced liquid tanks (S001 and S002). The liquids from the facility will be loaded into trucks at a maximum rate of 766,500 gallons/year (S007) and exit the facility. One (1) 0.013-mmBtu/hr TEG will provide electric power for the facility.

SITE INSPECTION

Site Inspection Date: October 23, 2017

Site Inspection Conducted By: Karl Dettinger

Results of Site Inspection: None of the proposed emission units were on-site.

Did Applicant meet Siting Requirements? Yes

If applicable, was siting criteria waiver submitted? Not Applicable

Directions to Facility: From Logansport, WV, travel south on Buffalo Rd. toward Curtisville Pike for approximately 1.2 miles. Continue on 7 Pines Rd. Turn right onto Barthollow Fork Branch and travel or approximately 1.3 and the facility will be on the right.



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.)
S001 and S002	Produced Liquid Tanks	ProMax using gas analysis from Shafer.
S003 and S004	Line Heaters	EPA AP-42 emission factors
S005	Thermoelectric Generators	EPA AP-42 emission factors
S006	Sand Separator Tank	Promax using gas analysis from GLO-176
S007	Liquid Loading	ProMax using gas analysis from Shafer.

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

Pollutant	Facility Wide PTE (tons/year)
Nitrogen Oxides	1.29
Carbon Monoxide	1.08
Volatile Organic Compounds	0.11
Particulate Matter	0.10
Particulate Matter-10/2.5	0.10
Sulfur Dioxide	0.01
n-Hexane	0.02
Total HAPs	0.02
Carbon Dioxide Equivalent	1,594

Emission Point ID	Emission Unit ID	Emission Source	Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
E001 – E002	S001 – S002	Produced Liquid Tanks	Volatile Organic Compounds	0.01	0.04
			CO ₂ e	2	9
E003 and E004	S003 and S004	Line Heaters 1.54 mmBtu/hr (emissions from each)	Nitrogen Oxides	0.15	0.64
			Carbon Monoxide	0.12	0.54
			Volatile Organic Compounds	0.01	0.04
			Total Particulate Matter	0.01	0.05
			CO ₂ e	181	790
E005	S005	Thermoelectric Generator 0.013-mmBtu/hr	Nitrogen Oxides	<0.01	0.01
			CO ₂ e	2	7
E006	S006	Sand Separator Tank	Volatile Organic Compounds	<0.01	<0.01
E007	S007	Liquid Loading 766,500 gallons/year	Volatile Organic Compounds	<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 G70-D

Emission Unit ID#	Emission Unit Description	Maximum Design Heat Input (MDHI) (MMBTU/hr)
S003 - S004	Line Heaters	1.54 each

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

45CSR10 establishes emission limitations for SO₂ 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 SO₂ emissions from a fuel burning unit will be listed in the G70-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 G70-D

Fuel burning units burning natural gas are exempt from Section 8 (Monitoring, Recording and Reporting) as well as interpretive rule 10A. The G70-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)
S003 - S004	Line Heaters	1.54 each
S005	TEG	0.013

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 G70-D Registration satisfies the construction, modification, relocation and operating permit requirements of 45CSR13. General Permit G70-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):

- Construction
- 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 and OOOO are included in General Permit G70-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 G70-D is 9M (all other sources) with an annual operating fee of \$200.

40CFR60, Subpart OOOO (Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced after August 23, 2011, and on or before 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 OOOO establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO₂) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011 and on or before September 18, 2015. The affected sources which commence construction, modification or reconstruction after August 23, 2011 and on or before September 18, 2015 are subject to the applicable provisions of this Subpart as described below:

Gas well affected facilities are included in General Permit G70-D in Section 5.0.

Are there any applicable gas well affected facilities? Yes No

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 (SO₂) 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 well site, 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.

Gas well affected facilities are included in General Permit G70-D in Section 5.0.

Are there any applicable gas well affected facilities? Yes No

If Yes, list.

API Number	Date of Flowback	Date of Well Completion	Green Completion and/or Combustion Device	Subject to OOOOa?
47-049-02278	10/1/2017	10/1/2017	Green Completion	Yes
TBD*	TBD	TBD	Green Completion	Yes

*TBD = To Be Determined

Centrifugal compressor affected facilities are not subject. 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 not subject. 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.

None

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 well site after September 18, 2015 and is subject to §60.5397a? Yes No

For the purposes of §60.5397a, a "modification" to a well site occurs when a new well is drilled at an existing well site, a well at an existing well site is hydraulically fractured, or a well at an existing well site is hydraulically refractured.

A well site that only contains one or more wellheads is not an affected facility under this subpart. The affected facility status of a separate tank battery surface site has no effect on the affected facility status of a well site that only contains one or more wellheads.

Requirements for pneumatic pump affected facilities are included in General Permit G70-D, Section 16.0.

Are there any applicable pneumatic pump affected facilities at the well site? Yes No

Each pneumatic pump affected facility at the well site, which is a single natural gas-driven diaphragm pump. A single natural gas-driven diaphragm pump that is in operation less than 90 days per calendar year is not an affected facility under this subpart as well as the required records are kept.

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 G70-D. Therefore, impact on the surrounding area should be minimized and it is recommended that the facility should be granted registration under General Permit G70-D.

Permit Engineer Signature: _____

Name and Title: David Keatley - NSR Permit Writer

Date: October 24, 2017