

- Daily dehydrator log with fuel use
- Last three extended gas analyses for both legacy and Marcellus gas.
- Gly-Calc calculations for both dehydrators.
- Copy of picture taken by Williams of Serial # for Caterpillar engine.
- Potential to Emit calculations for 2014 which includes each emission source.
- Copies of emission statements sent to DEP for past three years.
- Notifications submitted to DEP or EPA for NSPS JJJJ and OOOO.

Mr. Baker agreed to provide the requested information within the next few weeks<sup>2</sup>. This completed the closing meeting and EPA exited the facility.

#### **AREAS OF CONCERN:**

The following have been identified as *potential* issues identified during the inspection. They are issues that require either further investigation by EPA or explanation by Williams. Any additional information concerning these areas provided by Williams would provide useful in determining the extent of any future actions by EPA.

1. Videos taken during the inspection indicate possible uncombusted hydrocarbons or a large amount of methane being emitted from the still vent of the 40MMscf/day dehydrator. There was a large amount of steam observed from the still vent stack. Williams indicated that the configuration of the dehydrator results in more steam than some other glycol dehydrators.
2. Williams was not sure where in the facility the extended gas analysis used to estimate VOC emissions is taken. Operators indicated during the inspection that the sample may be taken at the metering skid to the gas outlet. Williams was unable to point out the exact location of sampling for this analysis. In addition, there should be two gas analysis because the dehydrators use different gas (legacy vs. expansion) and VOC emissions are calculated at each unit.

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<sup>2</sup> Mr. Baker provided the requested information via email on 11/17/2015 and it is currently under review.