

# Permit to Construct



**R13- 3358**

*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

*Issued to:*

**CONE Midstream Partners LP**  
**Cain Run/Doddridge County**  
**017-00166**

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*William F. Durham*  
*Director*

*Issued: DRAFT • Effective: DRAFT*

Facility Location: New Milton, Doddridge County, West Virginia  
Mailing Address: 1000 Consol Energy Drive  
Facility Description: Natural Gas Compression and Dehydration Facility  
NAICS Codes: 486210  
UTM Coordinates: 520.430 km Easting • 4335.746 km Northing • Zone 17  
Permit Type: Construction

*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 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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**1.0. Emission Units**

<b>Emission Unit ID</b>	<b>Emission Point ID</b>	<b>Emission Unit Description</b>	<b>Year Installed</b>	<b>Design Capacity</b>	<b>Control Device</b>
CE-1	1e	Cat G3516 Compressor Engine Mfg date April 16, 2012	2017	1380 hp	C1
MG-1	2e	30 kW MicroTurbine Generator	2017	30 kW	None
RBV-1	3e	TEG Reboiler	2017	0.375 MMBtu/hr	None
RSV-1	4e	TEG Dehy Still Vent	2017	20 MMscf/d	F-1
F-1	4e	Ground Flare	2017	2 MMBtu/hr	APCD
T1	5e	Produced Water Tank	2017	400 BBL	None
TL-1	Fugitives	Truck Loading	2017	50,400 gal/yr	None
CE-1	Blowdowns	Compressor Blowdown	2017	6,163 scf/event	None
Pig Launcher	Blowdowns	Piping Blowdown for PIG	2017	4,133 scf/event	None
Desiccant Dehy	Blowdowns	Blowdowns for Desiccant Dehydrator Vessels	2017	13,650 scf/event	None

## 2.0. General Conditions

### 2.1. Definitions

- 2.1.1. All references to the “West Virginia Air Pollution Control Act” or the “Air Pollution Control Act” mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The “Clean Air Act” means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. “Secretary” means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary’s designated representative for the purposes of this permit.

### 2.2. Acronyms

<b>CAAA</b>	Clean Air Act Amendments	<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>CBI</b>	Confidential Business Information	<b>NSPS</b>	New Source Performance Standards
<b>CEM</b>	Continuous Emission Monitor	<b>PM</b>	Particulate Matter
<b>CES</b>	Certified Emission Statement	<b>PM<sub>2.5</sub></b>	Particulate Matter less than 2.5 μm in diameter
<b>C.F.R. or CFR</b>	Code of Federal Regulations	<b>PM<sub>10</sub></b>	Particulate Matter less than 10μm in diameter
<b>CO</b>	Carbon Monoxide	<b>Ppb</b>	Pounds per Batch
<b>C.S.R. or CSR</b>	Codes of State Rules	<b>Pph</b>	Pounds per Hour
<b>DAQ</b>	Division of Air Quality	<b>Ppm</b>	Parts per Million
<b>DEP</b>	Department of Environmental Protection	<b>Ppmv or ppmv</b>	Parts per Million by Volume
<b>dscm</b>	Dry Standard Cubic Meter	<b>PSD</b>	Prevention of Significant Deterioration
<b>FOIA</b>	Freedom of Information Act	<b>Psi</b>	Pounds per Square Inch
<b>HAP</b>	Hazardous Air Pollutant	<b>SIC</b>	Standard Industrial Classification
<b>HON</b>	Hazardous Organic NESHAP	<b>SIP</b>	State Implementation Plan
<b>HP</b>	Horsepower	<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>lbs/hr</b>	Pounds per Hour	<b>TAP</b>	Toxic Air Pollutant
<b>LDAR</b>	Leak Detection and Repair	<b>TPY</b>	Tons per Year
<b>M</b>	Thousand	<b>TRS</b>	Total Reduced Sulfur
<b>MACT</b>	Maximum Achievable Control Technology	<b>TSP</b>	Total Suspended Particulate
<b>MDHI</b>	Maximum Design Heat Input	<b>USEPA</b>	United States Environmental Protection Agency
<b>MM</b>	Million	<b>UTM</b>	Universal Transverse Mercator
<b>MMBtu/hr or mmbtu/hr</b>	Million British Thermal Units per Hour	<b>VEE</b>	Visual Emissions Evaluation
<b>MMCF/hr or mmcf/hr</b>	Million Cubic Feet per Hour	<b>VOC</b>	Volatile Organic Compounds
<b>NA</b>	Not Applicable	<b>VOL</b>	Volatile Organic Liquids
<b>NAAQS</b>	National Ambient Air Quality Standards		
<b>NESHAPS</b>	National Emissions Standards for Hazardous Air Pollutants		

### **2.3. Authority**

This permit is issued in accordance with West Virginia Air Pollution Control Act W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;

### **2.4. Term and Renewal**

- 2.4.1. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

### **2.5. Duty to Comply**

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-3358, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;  
**[45CSR§§13-5.11 and 10.3.]**
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

### **2.6. Duty to Provide Information**

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

## **2.7. Duty to Supplement and Correct Information**

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

## **2.8. Administrative Update**

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4.]

## **2.9. Permit Modification**

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

## **2.10 Major Permit Modification**

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§13-5.1]

## **2.11. Inspection and Entry**

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

## **2.12. Emergency**

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by



improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - b. The permitted facility was at the time being properly operated;
  - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
  - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5 The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

### **2.13. Need to Halt or Reduce Activity Not a Defense**

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

### **2.14. Suspension of Activities**

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

### **2.15. Property Rights**

This permit does not convey any property rights of any sort or any exclusive privilege.

### **2.16. Severability**

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

**2.17. Transferability**

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1.]

**2.18. Notification Requirements**

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

**2.19. Credible Evidence**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

### 3.0. Facility-Wide Requirements

#### 3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.  
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.  
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.  
[40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.  
[45CSR§4-3.1] *[State Enforceable Only]*
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.  
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.  
[45CSR§11-5.2.]

#### 3.2. Monitoring Requirements

*[Reserved]*

#### 3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary

exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
  1. The permit or rule evaluated, with the citation number and language;
  2. The result of the test for each permit or rule condition; and,
  3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

### 3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded

in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.  
**[45CSR§4. State Enforceable Only.]**

### 3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class or by private carrier with postage prepaid to the address(es), or submitted in electronic format by email as set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

**DAQ:**  
Director  
WVDEP  
Division of Air Quality  
601 57<sup>th</sup> Street  
Charleston, WV 25304-2345

**DAQ Compliance and Enforcement<sup>1</sup>:**  
[DEPAirQualityReports@wv.gov](mailto:DEPAirQualityReports@wv.gov)

**US EPA:**  
Associate Director  
Office of Air Enforcement and Compliance Assistance  
(3AP20)  
U.S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

<sup>1</sup>For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, Notice of Compliance Status Reports, Initial Notifications, etc.

#### 3.5.4. Operating Fee

- 3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a

Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

- 3.5.4.2. In accordance with 45CSR22 – Air Quality Management Fee Program, enclosed with this permit is an Application for a Certificate to Operate (CTO). The CTO will cover the time period beginning with the date of initial startup through the following June 30. Said application and the appropriate fee shall be submitted to this office prior to the date of initial startup. For any startup date other than July 1, the permittee shall pay a fee or prorated fee in accordance with Section 4.5 of 45CSR22. A copy of this schedule may be found on the reverse side of the CTO application.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

## 4.0. Source-Specific Requirements

### 4.1. Limitations and Standards

- 4.1.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
- The date, place as defined in this permit, and time of sampling or measurements;
  - The date(s) analyses were performed;
  - The company or entity that performed the analyses;
  - The analytical techniques or methods used;
  - The results of the analyses; and
  - The operating conditions existing at the time of sampling or measurement.
- 4.1.2. **Minor Source of Hazardous Air Pollutants (HAP).** HAP emissions from the facility shall be less than 10 tons/year of any single HAP or 25 tons/year of any combination of HAPs. Compliance with this Section shall ensure that the facility is a minor HAP source.
- 4.1.3. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.  
**[45CSR§13-5.11.]**
- 4.1.4. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- The equipment involved.
  - Steps taken to minimize emissions during the event.
  - The duration of the event.
  - The estimated increase in emissions during the event.
- For each such case associated with an equipment malfunction, the additional information shall also be recorded:
- The cause of the malfunction.
  - Steps taken to correct the malfunction.
  - Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.
- 4.1.5. For the purpose of demonstrating compliance with the minor source status of hazardous air pollutants required by permit condition 4.1.2, the permittee shall maintain a record of all potential to emit (PTE) HAP calculations for the entire affected facility.

**5.0. Source-Specific Requirements (Compressor Engine, CE-1; MicroTurbine Generator, MG-1)**

**5.1. Limitations and Standards**

5.1.1 Maximum emissions from the 4SLB 1,380 Hp natural gas fired reciprocating engine equipped with oxidation catalysts, Caterpillar G3516 BLE (CE-1) shall not exceed the follow limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
Nitrogen Oxides	3.04	13.33
Carbon Monoxide	6.08	26.65
Volatile Organic Compounds (includes formaldehyde)	2.13	9.33
Formaldehyde	1.19	5.20

5.1.2. The Microturbine driven generator, identified as MG-1, shall only be fired by natural gas.

5.1.3. The maximum emissions from each Microturbine shall not exceed the limits given in the following table:

Pollutant	lb/hr	TPY
CO	0.05	0.24
NOx	0.02	0.08

5.1.4. As the annual emissions from the Microturbine (MG-1) are based on 8,760 hours of operation, there are no annual limits on hours of operation or natural gas combusted on an annual basis.

5.1.5. The engine (CE-1) shall be operated and maintained as follows

- a. In accordance with the manufacturer’s recommendations and specifications or in accordance with a site specific maintenance plan; and,
- b. In a manner consistent with good operating practices.

5.1.6. The permittee shall operate and maintain the engine (CE-1) so that it achieves the emission limits in section 5.1.1 over the entire life of the engine (CE-1).

5.1.7. Requirements for Use of Catalytic Reduction Devices (OxCat (C1))

- a. The lean-burn natural gas engine equipped with oxidation catalyst air pollution control device shall be fitted with a closed-loop automatic air/fuel ratio feedback controller to ensure emissions of regulated pollutants do not exceed permit requirement 5.1.1 for any engine/oxidation catalyst combination under varying load. The closed-loop, automatic air/fuel ratio controller shall control a fuel metering valve to ensure a lean-rich mixture;
- b. The automatic air/fuel ratio controller or closed-loop automatic feedback controller shall provide a warning or indication to the operator and/or be interlocked with the engine ignition



system to cease engine operation in case of a masking, poisoning or overrich air/fuel ratio situation which results in performance degradation or failure of the catalyst element; and

- c. No person shall knowingly:
    - 1. Remove or render inoperative any air pollution or auxiliary air pollution control device installed subject to the requirements of this permit;
    - 2. Install any part or component when the principal effect of the part or component is to bypass, defeat or render inoperative any air pollution control device or auxiliary air pollution control device installed subject to the requirements of this permit; or
    - 3. Cause or allow engine exhaust gases to bypass any catalytic reduction device.
  - d. The permittee shall follow a written operation and maintenance plan that provides the periodic and annual maintenance requirements.
- 5.1.8. Periods of start-up and shut-down shall not exceed 30 minutes per occurrence. The registrant shall operate the engine in a manner consistent with good air pollution control practices for minimizing emissions at all times including periods of start-up and shut-down.

## 5.2. Monitoring Requirements

### 5.2.1. Catalytic Oxidizer Control Device (OxCat (C1))

- a. The permittee shall regularly inspect, properly maintain and/or replace catalytic reduction devices and auxiliary air pollution control devices to ensure functional and effective operation of the engine's (CE-1's) physical and operational design. The permittee shall ensure proper operation, maintenance and performance of catalytic reduction devices and auxiliary air pollution control devices by:
  - 1. Maintaining proper operation of the automatic air/fuel ratio controller or automatic feedback controller.
  - 2. Following operating and maintenance recommendations of the catalyst element manufacturer.

## 5.3. Testing Requirements

- 5.3.1. See Facility-Wide Testing Requirements Section 3.3.
- 5.3.2. To demonstrate compliance with the emission limits in section 5.1.1 the permittee shall conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter.
- 5.3.3. The permittee shall conduct the performance tests in section 5.3.2. according to the procedures in paragraphs (a) through (f) below.
  - a. Each performance test must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and according to the requirements in §60.8 and under the specific conditions that are specified by Table 2. [40CFR§60.4244(a)]
  - b. The permittee shall not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in §60.8(c). If the permittee's stationary SI internal combustion engine is non-operational, the permittee does not need to startup the engine solely to conduct a performance test; however, the permittee shall conduct the performance test immediately upon startup of the engine. [40CFR§60.4244(b)]

- c. The permittee shall conduct three separate test runs for each performance test required in this section, as specified in §60.8(f). Each test run must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and last at least 1 hour. [40CFR§60.4244(c)]
- d. To determine compliance with the NO<sub>x</sub> mass per unit output emission limitation, convert the concentration of NO<sub>x</sub> in the engine exhaust using Equation 1 of this section:

$$ER = \frac{C_d \times 1.912 \times 10^{-3} \times Q \times T}{HP - hr} \quad (\text{Eq. 1})$$

Where:

ER = Emission rate of NO<sub>x</sub> in g/HP-hr.

C<sub>d</sub> = Measured NO<sub>x</sub> concentration in parts per million by volume (ppmv).

1.912×10<sup>-3</sup> = Conversion constant for ppm NO<sub>x</sub> to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meter per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, horsepower-hour (HP-hr).

[40CFR§60.4244(d)]

- d. To determine compliance with the CO mass per unit output emission limitation, convert the concentration of CO in the engine exhaust using Equation 2 of this section:

$$ER = \frac{C_d \times 1.164 \times 10^{-3} \times Q \times T}{HP - hr} \quad (\text{Eq. 2})$$

Where:

ER = Emission rate of CO in g/HP-hr.

C<sub>d</sub> = Measured CO concentration in ppmv.

1.164×10<sup>-3</sup> = Conversion constant for ppm CO to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, in HP-hr.

[40CFR§60.4244(e)]

- e. For purposes of this subpart, when calculating emissions of VOC, emissions of formaldehyde should not be included. To determine compliance with the VOC mass per unit output emission limitation, convert the concentration of VOC in the engine exhaust using Equation 3 of this section:

$$ER = \frac{C_d \times 1.833 \times 10^{-3} \times Q \times T}{HP - hr} \quad (\text{Eq. 3})$$

Where:

ER = Emission rate of VOC in g/HP-hr.

C<sub>d</sub> = VOC concentration measured as propane in ppmv.

1.833×10<sup>-3</sup> = Conversion constant for ppm VOC measured as propane, to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, in HP-hr.

[40CFR§60.4244(f)]

- f. If the owner/operator chooses to measure VOC emissions using either Method 18 of 40 CFR part 60, appendix A, or Method 320 of 40 CFR part 63, appendix A, then it has the option of correcting the measured VOC emissions to account for the potential differences in measured values between these methods and Method 25A. The results from Method 18 and Method 320 can be corrected for response factor differences using Equations 4 and 5 of this section. The corrected VOC concentration can then be placed on a propane basis using Equation 6 of this section.

$$RF_i = \frac{C_{Mi}}{C_{Ai}} \quad (\text{Eq. 4})$$

Where:

RF<sub>i</sub> = Response factor of compound i when measured with EPA Method 25A.

C<sub>Mi</sub> = Measured concentration of compound i in ppmv as carbon.

C<sub>Ai</sub> = True concentration of compound i in ppmv as carbon.

$$C_{i,corr} = RF_i \times C_{i,meas} \quad (\text{Eq. 5})$$

Where:

C<sub>i,corr</sub> = Concentration of compound i corrected to the value that would have been measured by EPA Method 25A, ppmv as carbon.

C<sub>i,meas</sub> = Concentration of compound i measured by EPA Method 320, ppmv as carbon.

$$C_{Peq} = 0.6098 \times C_{i,corr} \quad (\text{Eq. 6})$$

Where:

C<sub>Peq</sub> = Concentration of compound i in mg of propane equivalent per DSCM.

[40CFR§60.4244(g)]

#### **5.4. Recordkeeping Requirements**

- 5.4.1. The permittee shall maintain records of the hours of operation of the engine (CE-1). Said records shall be kept in accordance with permit condition 3.4.1.
- 5.4.2. The permittee shall maintain a copy of the manufacturer maintenance plan or site specific maintenance plan and records of maintenance performed on the engine (CE-1).
- 5.4.3. To demonstrate compliance with permit condition 5.2.1, the permittee shall maintain records of all catalytic reduction device maintenance. Said records shall be kept in accordance with permit condition 3.4.1.
- 5.4.4. The permittee shall maintain records that demonstrate that the non-certified engine (CE-1) meets the emissions limits in section 5.1.1.

#### **5.5. Reporting Requirements**

- 5.5.1 The permittee shall submit a copy of each performance test to the Division of Air Quality within 60 days of completion of the testing.

## 6.0. Source-Specific Requirements (TEG Reboiler, RBV-1)

### 6.1 Limitations and Standards

6.1.1. The Glycol Dehydrator Reboiler (RBV-1) shall meet the following requirements:

- a. The MDHI shall not exceed 0.375 MMBtu/hr and the unit shall only be fired by natural gas;
- b. The maximum emissions from the combustion exhaust of the unit shall not exceed the limits given in the following table;

Pollutant	PPH	TPY
CO	0.03	0.14
NOx	0.04	0.16

- c. As the annual emissions are based on 8,760 hours of operation, there is no annual limit on hours of operation or natural gas combusted on an annual basis.
- d. The permittee shall not permit emission of smoke and/or particulate matter into the open air from the unit which is greater than ten (10) percent opacity based on a six minute block average.

### 6.2 Monitoring Requirements

- 6.2.1 If requested by the Director, compliance with visible emissions limitations set forth in 6.1.1(d) the permittee shall:
- a. Conduct monthly Method 22 visible emission observations of the Reboiler exhaust to ensure proper operation for a minimum of one (1) minutes each month the unit is in operation.
  - b. In the event visible emissions are observed in excess of the limitations given under 6.1.1(d), the permittee shall take immediate corrective action.

### 6.3 Recordkeeping Requirements

- 6.3.1 Maintain records of the visible emission opacity tests conducted per Section 6.2.1. Said records shall be maintained in accordance with section 3.4 of this permit.

### 6.4 Reporting Requirements

- 6.4.1 Any deviation(s) from the allowable visible emission requirement in Section 6.2.1 discovered during observations using 40CFR Part 60, Appendix A, Method 9 or 22 shall be reported in writing to the Director of the Division of Air Quality as soon as practicable, but in any case within ten (10) calendar days of the occurrence and shall include at least the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned. Said reporting shall be in accordance with section 3.5 of this permit.

**7.0. Source-Specific Hazardous Air Pollutant Requirements (Natural Gas Dehydration Unit Not Subject to MACT standards and being controlled by a Flare Control Device, F-1)**

**7.1. Limitations and Standards**

7.1.1. **Maximum Throughput Limitation.** The maximum dry natural gas throughput to the TEG dehydration unit/still column (RSV-1) shall not exceed 20 million standard cubic feet per day.

7.1.2. The TEG dehydration unit/still column (RSV-1) shall be controlled by the flare control device (F-1) at all times. Maximum emissions from the flare (F-1) shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
Volatile Organic Compounds (includes formaldehyde)	0.29	1.23
HAPs	0.04	0.18

7.1.3. The flare (F-1) subject to this section shall be designed and operated in accordance with the following:

- a. The flare shall be air-assisted, steam-assisted, or non-assisted.
- b. The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
- c. The flare shall be operated, with a flame present at all times whenever emissions may be vented to them, except during SSM (Startup, Shutdown, Malfunctions) events.
- d. The flare shall be used only where the net heating value of the gas being combusted is 11.2 MJ/scm (300 Btu/scf) or greater if the flare is steam-assisted or air-assisted; or where the net heating value of the gas being combusted is 7.45 MJ/scm (200 Btu/scf) or greater if the flares is non-assisted. The net heating value of the gas being combusted in a flare shall be calculated using the following equation:

$$H_T = K \sum_{i=1}^n C_i H_i$$

Where:

$H_T$ =Net heating value of the sample, MJ/scm; where the net enthalpy per mole of off gas is based on combustion at 25 °C and 760 mm Hg, but the standard temperature for determining the volume corresponding to one mole is 20 °C.

K=Constant=

$$1.740 \times 10^{-7} \left( \frac{1}{ppmv} \right) \left( \frac{g\text{-mole}}{scm} \right) \left( \frac{MJ}{kcal} \right)$$

where the standard temperature for (g-mole/scm) is 20 °C.

$C_i$ =Concentration of sample component i in ppmv on a wet basis, which may be measured for organics by Test Method 18, but is not required to be measured using Method 18 (unless designated by the Director).

$H_i$ =Net heat of combustion of sample component i, kcal/g-mole at 25 °C and 760 mm Hg. The heats of combustion may be determined using ASTM D2382–76 or 88 or D4809–95 if published values are not available or cannot be calculated.

n=Number of sample components.

- e. Air-assisted flares shall be designed and operated with an exit velocity less than the velocity,  $V_{max}$ , as determined by the method specified below:

The maximum permitted velocity,  $V_{max}$ , for air-assisted flares shall be determined by the following equation.

$$V_{max} = 8.706 + 0.7084 (HT)$$

$V_{max}$  = Maximum permitted velocity, m/sec

8.706 = Constant

0.7084 = Constant

HT = The net heating value as determined in paragraph (f)(3) of §60.18.

- 7.1.4. The permittee is not required to conduct a flare compliance assessment for concentration of sample (i.e. Method 18) and tip velocity (i.e. Method 2) until such time as the Director requests a flare compliance assessment to be conducted in accordance with section 7.3.2, but the permittee is required to conduct a flare design evaluation in accordance with section 7.4.2. Alternatively, the permittee may elect to demonstrate compliance with the flare design criteria requirements of section 7.1.3 by complying with the compliance assessment testing requirements of section 7.3.2.

## 7.2. Monitoring Requirements

- 7.2.1. In order to demonstrate compliance with the requirements of permit condition 7.1.3.c, the permittee shall monitor the presence or absence of a flare pilot flame using a thermocouple or any other equivalent device, except during SSM events.
- 7.2.2. The permittee shall monitor the throughput of natural gas fed to the dehydration system on a monthly basis for each glycol dehydration unit.

## 7.3. Testing Requirements

- 7.3.1. In order to demonstrate compliance with the flare opacity requirements of permit condition 7.1.3.b the permittee shall conduct a Method 22 opacity test for at least two hours. This test shall demonstrate no visible emissions are observed for more than a total of 5 minutes during any 2 consecutive hour period using 40CFR60 Appendix A Method 22. The permittee shall conduct this test within one (1) year of permit issuance or initial startup whichever is later. The visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40 CFR part 60, appendix A, Method 22 or from the lecture portion of 40 CFR part 60, appendix A, Method 9 certification course.
- 7.3.2. The Director may require the permittee to conduct a flare compliance assessment to demonstrate compliance with permit condition 7.1.3. This compliance assessment testing shall be conducted in accordance with Test Method 18 for organics and Test Method 2, 2A, 2C, or 2D in appendix A to 40 CFR part 60, as appropriate, or other equivalent testing approved in writing by the Director. Also, Test Method 18 may require the permittee to conduct Test Method 4 in conjunction with

Test Method 18.

7.3.3. In order to demonstrate compliance with the minor source status of hazardous air pollutants required by permit condition 4.1.2, upon request of the Director, the permittee shall demonstrate compliance with the HAP emissions thresholds using GLYCalc Version 3.0 or higher. The permittee shall sample in accordance with GPA Method 2166 and analyze the samples utilizing the extended GPA Method 2286 as specified in the GRI-GLYCalc V4 Technical Reference User Manual and Handbook.

7.3.4 Determination of glycol dehydration benzene emissions. In order to demonstrate that the benzene emissions are less than 1 tpy, the permittee shall determine the actual average benzene emissions using the procedure in the paragraph below. Emissions shall be determined either uncontrolled, or with federally enforceable controls in place.

The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled “Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions” (GRI-95/0368.1).

**[40CFR§63.772 (b)(2)]**

#### **7.4. Recordkeeping Requirements**

7.4.1. For the purpose of demonstrating compliance with permit conditions 7.1.3.c and 7.2.1, the permittee shall maintain records of the times and duration of all periods which the pilot flame was absent.

7.4.2. For the purpose of demonstrating compliance with permit conditions 7.1.4, the permittee shall maintain a record of the flare design evaluation. The flare design evaluation shall include, net heat value calculations, exit (tip) velocity calculations, and all supporting concentration calculations and other related information requested by the Director.

7.4.3. The permittee shall document and maintain the corresponding records specified by the on-going monitoring requirements of section 7.1 and testing requirements of section 7.2.

7.4.4. For the purpose of demonstrating compliance with permit condition 7.1.3.b, the permittee shall maintain records of the visible emission opacity tests conducted per Section 7.3.1.

7.4.5. The permittee shall maintain a record of the dry natural gas throughput through the dehydration system to demonstrate compliance with permit condition 7.1.1 and 7.2.2.

7.4.6. To demonstrate that the permittee is exempt from the requirements of 40 CFR § 63.764 (d) if the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere is less than 0.90 megagram per year (1 tpy), as determined by the procedures specified in 40 CFR § 63.772(b)(2) and section 7.3.4 of this permit, records of the actual average benzene emissions (in terms of benzene emissions per year) shall be maintained.

**[40CFR§63.764(e)]**

7.4.7. All records required under Section 8.4 shall be kept in accordance with permit condition 3.4.1.

#### **7.5. Reporting Requirements**

7.5.1. If permittee is required by the Director to demonstrate compliance with permit condition 7.3.2, then the permittee shall submit a testing protocol at least thirty (30) days prior to testing and shall submit a notification of the testing date at least fifteen (15) days prior to testing. The permittee



shall submit the testing results within sixty (60) days of testing and provide all supporting calculations and testing data.

- 7.5.2. Any deviation(s) from the allowable visible emission requirement for any emission source discovered during observations using 40CFR Part 60, Appendix A, Method 9 or 22 shall be reported in writing to the Director of the Division of Air Quality as soon as practicable, but in any case within ten (10) calendar days of the occurrence and shall include at least the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.
- 7.5.3. Any deviation(s) from the flare design and operation criteria in permit condition 7.1.3 shall be reported in writing to the Director of the Division of Air Quality as soon as practicable, but in any case within ten (10) calendar days of discovery of such deviation.

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## 8.0. Source-Specific Requirements (Produced Water Tank, T1, and Truck Loading, TL)

### 8.1. Limitations and Standards

8.1.1. The maximum annual throughput of product to the storage tank shall not exceed the following:

Storage Tank ID	Product Stored	Maximum Annual Throughput (gal/yr)
T01	Produced Water	50,400

[45CSR§13-5.11]

### 8.2. Monitoring Requirements

8.2.1. The permittee shall monitor the throughput to the storage vessel (T01) on a monthly basis.

### 8.3. Recordkeeping Requirements

8.3.1. To demonstrate compliance with section 8.1.1, the permittee shall maintain a record of the aggregate throughput for the storage tanks on a monthly and rolling twelve month total. Said records shall be maintained on site or in a readily accessible off-site location maintained by the registrant for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

## **9.0. Source-Specific Requirements (Blowdown and Pigging Operations)**

### **9.1. Limitations and Standards**

- 9.1.1. The maximum number of blowdown events per year shall not exceed 60, with an estimated 6,163 scf per event. Compliance shall be determined using a twelve month rolling total. A twelve month rolling total shall mean the sum of the blowdown events at any given time during the previous twelve consecutive calendar months.
- 9.1.2. The maximum number of pigging events per year shall not exceed 60, with an estimated 4,133 scf per event. Compliance shall be determined using a twelve month rolling total. A twelve month rolling total shall mean the sum of the low pressure pigging events at any given time during the previous twelve consecutive calendar months.

### **9.2. Recordkeeping Requirements**

- 9.2.1. All records required under section 9.1 of this permit shall be kept in accordance with permit condition 3.4.1.
- 9.2.2. To demonstrate compliance with permit conditions 9.1.1 and 9.1.2, the permittee shall maintain a record of the blowdown and pigging events and estimated volume per event (scf) on a monthly and rolling twelve month total.

### **9.3. Reporting Requirements**

- 9.3.1. Any exceedance of permit section 9.1 must be reported in writing to the Director of the DAQ as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: the date of the exceedance, the estimate of VOC emissions released to the atmosphere as a result of the exceedance and any corrective measures taken or planned.

## **10.0. Source-Specific Requirements (40CFR60 Subpart OOOOa Requirements, Fugitive Emission Components)**

### **10.1. Limitations and Standards**

10.1.1. For each affected facility including, but not limited to, valves, connectors, pressure relief devices, open-ended lines, flanges, covers and closed vent systems (not used to comply with the emission standards for centrifugal compressor wet seal degassing systems, reciprocating compressors, pneumatic pumps and storage vessels), thief hatches or other openings on a controlled storage vessel (not subject to VOC standards that apply to storage vessel affected facilities), compressors, instruments, and meters the permittee 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 this section.

- (a) The permittee shall monitor all fugitive emission components, including but not limited to valves, connectors, pressure relief devices, open-ended lines, flanges, covers and closed vent systems (not used to comply with the emission standards for the permittee's centrifugal compressor wet seal degassing systems, reciprocating compressors, pneumatic pumps and storage vessels), thief hatches or other openings on a controlled storage vessel (not subject to VOC standards that apply to storage vessel affected facilities), compressors, instruments, and meters in accordance with paragraphs (b) through (g) of this section. The permittee shall repair all sources of fugitive emissions in accordance with paragraph (h) of this section. The permittee shall keep records in accordance with paragraph (i) of this section and report in accordance with paragraph (j) of this section. For purposes of this section, fugitive emissions are defined as: Any visible emission from a fugitive emissions component observed using optical gas imaging or an instrument reading of 500 ppm or greater using Method 21.
- (b) The permittee shall develop an emissions monitoring plan that covers the collection of fugitive emissions components at the compressor station area in accordance with paragraphs (c) and (d) of this section.
- (c) The fugitive emissions monitoring plan must include the elements specified in paragraphs (c)(1) through (8) of this section, at a minimum.
  - (1) Frequency for conducting surveys. Surveys must be conducted at least as frequently as required by paragraphs (f) and (g) of this section.
  - (2) Technique for determining fugitive emissions (i.e., Method 21 at 40 CFR part 60, appendix A-7, or optical gas imaging).
  - (3) Manufacturer and model number of fugitive emissions detection equipment to be used.
  - (4) Procedures and timeframes for identifying and repairing fugitive emissions components from which fugitive emissions are detected, including timeframes for fugitive emission components that are unsafe to repair. The permittee's repair schedule must meet the requirements of paragraph (h) of this section at a minimum.
  - (5) Procedures and timeframes for verifying fugitive emission component repairs.
  - (6) Records that will be kept and the length of time records will be kept.
  - (7) If the permittee is using optical gas imaging, the permittee's plan must also include the elements specified in paragraphs (7)(i) through (vii) of this section.

- (i) Verification that the permittee's optical gas imaging equipment meets the specifications of paragraphs (7)(i)(A) and (B) of this section. This verification is an initial verification and may either be performed by the facility, by the manufacturer, or by a third party. For the purposes of complying with the fugitive emissions monitoring program with optical gas imaging, a fugitive emission is defined as any visible emissions observed using optical gas imaging.
  - (A) The permittee's optical gas imaging equipment must be capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions.
  - (B) The permittee's optical gas imaging equipment must be capable of imaging a gas that is half methane, half propane at a concentration of 10,000 ppm at a flow rate of  $\leq 60$ g/hr from a quarter inch diameter orifice.
- (ii) Procedure for a daily verification check.
- (iii) Procedure for determining the operator's maximum viewing distance from the equipment and how the operator will ensure that this distance is maintained.
- (iv) Procedure for determining maximum wind speed during which monitoring can be performed and how the operator will ensure monitoring occurs only at wind speeds below this threshold.
- (v) Procedures for conducting surveys, including the items specified in paragraphs (c)(7)(v)(A) through (C) of this section.
  - (A) How the operator will ensure an adequate thermal background is present in order to view potential fugitive emissions.
  - (B) How the operator will deal with adverse monitoring conditions, such as wind.
  - (C) How the operator will deal with interferences (e.g., steam).
- (vi) Training and experience needed prior to performing surveys.
- (vii) Procedures for calibration and maintenance. At a minimum, procedures must comply with those recommended by the manufacturer.
- (8) If the permittee is using Method 21 of appendix A-7 of this part, the permittee's plan must also include the elements specified in paragraphs (c)(8)(i) and (ii) of this section. For the purposes of complying with the fugitive emissions monitoring program using Method 21 a fugitive emission is defined as an instrument reading of 500 ppm or greater.
  - (i) Verification that the permittee's monitoring equipment meets the requirements specified in Section 6.0 of Method 21 at 40 CFR part 60, appendix A-7. For purposes of instrument capability, the fugitive emissions definition shall be 500 ppm or greater methane using a FID-based instrument. If the permittee wishes to use an analyzer other than a FID-based instrument, the permittee shall develop a site-specific fugitive emission definition that would be equivalent to 500 ppm methane using a FID-based instrument (e.g., 10.6 eV PID with a specified isobutylene concentration as the fugitive emission definition would provide equivalent response to the permittee's compound of interest).

- (ii) Procedures for conducting surveys. At a minimum, the procedures shall ensure that the surveys comply with the relevant sections of Method 21 at 40 CFR part 60, appendix A-7, including Section 8.3.1.
- (d) Each fugitive emissions monitoring plan must include the elements specified in paragraphs (d)(1) through (4) of this section, at a minimum, as applicable.
- (1) Sitemap.
  - (2) A defined observation path that ensures that all fugitive emissions components are within sight of the path. The observation path must account for interferences.
  - (3) If the permittee is using Method 21, the permittee's plan must also include a list of fugitive emissions components to be monitored and method for determining location of fugitive emissions components to be monitored in the field (e.g. tagging, identification on a process and instrumentation diagram, etc.).
  - (4) The permittee's plan must also include the written plan developed for all of the fugitive emission components designated as difficult-to-monitor in accordance with paragraph (g)(3)(i) of this section, and the written plan for fugitive emission components designated as unsafe-to-monitor in accordance with paragraph (g)(3)(ii) of this section.
- (e) Each monitoring survey shall observe each fugitive emissions component for fugitive emissions.
- (f) The permittee must conduct an initial monitoring survey within 60 days of the startup of a new compressor station for each new collection of fugitive emissions components at the new compressor station or by June 3, 2017, whichever is later. For a modified collection of fugitive components at a compressor station, the initial monitoring survey must be conducted within 60 days of the modification or by June 3, 2017, whichever is later.
- (g) A monitoring survey of each collection of fugitive emissions components at the compressor station must be performed at the frequencies specified in paragraphs (g)(1) of this section, with the exceptions noted in paragraphs (g)(2) and (3) of this section.
- (1) A monitoring survey of the collection of fugitive emissions components at the compressor station within a company-defined area must be conducted at least quarterly after the initial survey. Consecutive quarterly monitoring surveys must be conducted at least 60 days apart.
  - (2) Fugitive emissions components that cannot be monitored without elevating the monitoring personnel more than 2 meters above the surface may be designated as difficult-to-monitor. Fugitive emissions components that are designated difficult-to-monitor must meet the specifications of paragraphs (g)(2)(i) through (iv) of this section.
    - (i) A written plan must be developed for all of the fugitive emissions components designated difficult-to-monitor. This written plan must be incorporated into the fugitive emissions monitoring plan required by paragraphs (b), (c), and (d) of this section.
    - (ii) The plan must include the identification and location of each fugitive emissions component designated as difficult-to-monitor.
    - (iii) The plan must include an explanation of why each fugitive emissions component designated as difficult-to-monitor is difficult-to-monitor.

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- (iv) The plan must include a schedule for monitoring the difficult-to-monitor fugitive emissions components at least once per calendar year.
- (3) Fugitive emissions components that cannot be monitored because monitoring personnel would be exposed to immediate danger while conducting a monitoring survey may be designated as unsafe-to-monitor. Fugitive emissions components that are designated unsafe-to-monitor must meet the specifications of paragraphs (g)(3)(i) through (iv) of this section.
- (i) A written plan must be developed for all of the fugitive emissions components designated unsafe-to-monitor. This written plan must be incorporated into the fugitive emissions monitoring plan required by paragraphs (b), (c), and (d) of this section.
  - (ii) The plan must include the identification and location of each fugitive emissions component designated as unsafe-to-monitor.
  - (iii) The plan must include an explanation of why each fugitive emissions component designated as unsafe-to-monitor is unsafe-to-monitor.
  - (iv) The plan must include a schedule for monitoring the fugitive emissions components designated as unsafe-to-monitor.
- (4) The requirements of paragraph (g)(1) of this section are waived for any collection of fugitive emissions components at the compressor station located within an area that has an average calendar month temperature below 0°Fahrenheit for two of three consecutive calendar months of a quarterly monitoring period. The calendar month temperature average for each month within the quarterly monitoring period must be determined using historical monthly average temperatures over the previous three years as reported by a National Oceanic and Atmospheric Administration source or other source approved by the Administrator. The requirements of paragraph (g)(2) of this section shall not be waived for two consecutive quarterly monitoring periods.
- (h) Each identified source of fugitive emissions shall be repaired or replaced in accordance with paragraphs (h)(1) and (2) of this section. For fugitive emissions components also subject to the repair provisions of 40CFR§60.5416a(b)(9) through (12) and (c)(4) through (7), those provisions apply instead to those closed vent system and covers, and the repair provisions of paragraphs (h)(1) and (2) of this section do not apply to those closed vent systems and covers.
- (1) Each identified source of fugitive emissions shall be repaired or replaced as soon as practicable, but no later than 30 calendar days after detection of the fugitive emissions.
  - (2) If the repair or replacement is technically infeasible, would require a vent blowdown, a compressor station shutdown, or would be unsafe to repair during operation of the unit, the repair or replacement must be completed during the next compressor station shutdown, after an unscheduled, planned or emergency vent blowdown or within 2 years, whichever is earlier.
  - (3) Each repaired or replaced fugitive emissions component must be resurveyed as soon as practicable, but no later than 30 days after being repaired, to ensure that there are no fugitive emissions.
    - (i) For repairs that cannot be made during the monitoring survey when the fugitive emissions are initially found, the operator may resurvey the repaired fugitive emissions components using either Method 21 or optical gas imaging within 30 days of finding such fugitive emissions.
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- (ii) For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph must be taken of that component or the component must be tagged for identification purposes. The digital photograph must include the date that the photograph was taken, must clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture).
- (iii) Operators that use Method 21 to resurvey the repaired fugitive emissions components are subject to the resurvey provisions specified in paragraphs (h)(3)(iii)(A) and (B) of this section.
  - (A) A fugitive emissions component is repaired when the Method 21 instrument indicates a concentration of less than 500 ppm above background or when no soap bubbles are observed when the alternative screening procedures specified in section 8.3.3 of Method 21 are used.
  - (B) Operators must use the Method 21 monitoring requirements specified in paragraph (c)(8)(ii) of this section or the alternative screening procedures specified in section 8.3.3 of Method 21.
- (iv) Operators that use optical gas imaging to resurvey the repaired fugitive emissions components, are subject to the resurvey provisions specified in paragraphs (h)(3)(iv)(A) and (B) of this section.
  - (A) A fugitive emissions component is repaired when the optical gas imaging instrument shows no indication of visible emissions.
  - (B) Operators must use the optical gas imaging monitoring requirements specified in paragraph (c)(7) of this section.
- (i) Records for each monitoring survey shall be maintained as specified in section 10.4.2.
- (j) Annual reports shall be submitted for each collection of fugitive emissions components at the compressor station that include the information specified in 10.2.2.(5)(b). Multiple collection of fugitive emissions components at the compressor station may be included in a single annual report.

## **10.2. Initial Compliance Demonstration**

- 10.2.1. The permittee must determine initial compliance with the standards for each affected facility using the requirements in paragraph (j) of this section. The initial compliance period begins on August 2, 2016, or upon initial startup, whichever is later, and ends no later than 1 year after the initial startup date for the permittee's affected facility or no later than 1 year after August 2, 2016. The initial compliance period may be less than one full year.
- 10.2.2. To achieve initial compliance with the fugitive emission standards for each collection of fugitive emissions components at the compressor station, the permittee shall comply with paragraphs (1) through (5) of this section.
  - (1) The permittee shall develop a fugitive emissions monitoring plan as required in 10.1.1.(b)(c) and (d).
  - (2) The permittee shall conduct an initial monitoring survey as required in 10.1.1.(f).
  - (3) The permittee shall maintain the records specified in 10.4.2.



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- (4) The permittee shall repair each identified source of fugitive emissions for each affected facility as required in 10.1.1(h).
  - (5) The permittee shall submit the initial annual report for each collection of fugitive emissions components at the compressor station that includes the information in (a) and (b) below.
    - (a) The general information specified in paragraphs (i) through (iv).
      - (i) The company name, facility site name associated with the affected facility, US Well ID or US Well ID associated with the affected facility, if applicable, and address of the affected facility. If an address is not available for the site, include a description of the site location and provide the latitude and longitude coordinates of the site in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983.
      - (ii) An identification of each affected facility being included in the annual report.
      - (iii) Beginning and ending dates of the reporting period.
      - (iv) A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
    - (b) For the collection of fugitive emissions components at the compressor station within the company-defined area, the records of each monitoring survey including the information specified in paragraphs (i) through (xii) of this section.
      - (i) Date of the survey.
      - (ii) Beginning and end time of the survey.
      - (iii) Name of operator(s) performing survey. If the survey is performed by optical gas imaging, the permittee shall note the training and experience of the operator.
      - (iv) Ambient temperature, sky conditions, and maximum wind speed at the time of the survey.
      - (v) Monitoring instrument used.
      - (vi) Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.
      - (vii) Number and type of components for which fugitive emissions were detected.
      - (viii) Number and type of fugitive emissions components that were not repaired as in accordance with section 10.1.1(h) (1) and (2) of this section.
      - (ix) Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored.
      - (x) The date of successful repair of the fugitive emissions component.
      - (xi) Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair.
      - (xii) Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding.

### 10.3. Continuous Compliance Demonstration

10.3.1. For each collection of fugitive emissions components at a compressor station, the permittee shall demonstrate continuous compliance with the fugitive emission standards specified in section 10.1.1. according to paragraphs (1) through (4) of this section.

- (1) The permittee shall conduct periodic monitoring surveys as required in 10.1.1.(g).
- (2) The permittee shall repair or replace each identified source of fugitive emissions as required in 10.1.1.(h).
- (3) The permittee shall maintain records as specified in 10.4.2.
- (4) The permittee shall submit annual reports for collection of fugitive emissions components at a compressor station as required in 10.4.1.

### 10.4. Notification, Recordkeeping and Reporting Requirements

10.4.1. *Reporting requirements.* The permittee shall submit annual reports containing the information specified in paragraphs (1) and (2). The permittee shall submit annual reports following the procedure specified in paragraph (3) of this section. The initial annual report is due no later than 90 days after the end of the initial compliance period as determined according to section 10.2. Subsequent annual reports are due no later than same date each year as the initial annual report. The permittee may submit one report for multiple affected facilities provided the report contains all of the information required as specified in paragraphs (1) and (2) of this section. Annual reports may coincide with title V reports as long as all the required elements of the annual report are included. The permittee may arrange with the Administrator a common schedule on which reports required by this part may be submitted as long as the schedule does not extend the reporting period.

- (1) The general information specified in paragraphs (1)(i) through (iv) of this section for all reports.
  - (i) The company name, facility site name associated with the affected facility and address of the affected facility. If an address is not available for the site, include a description of the site location and provide the latitude and longitude coordinates of the site in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983.
  - (ii) An identification of each affected facility being included in the annual report.
  - (iii) Beginning and ending dates of the reporting period.
  - (iv) A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (2) For the collection of fugitive emissions components at the compressor station within the company-defined area, the records of each monitoring survey including the information specified in section 10.2.2.(5)(b) paragraphs (i) through (xii). For the collection of fugitive emissions components at the compressor station, if a monitoring survey is waived under 10.1.1.(g)(4), the permittee must include in the annual report the fact that a monitoring survey was waived and the calendar months that make up the quarterly monitoring period for which the monitoring survey was waived.

- (3) You must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>.) You must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted.

10.4.2. *Recordkeeping requirements.* The permittee shall maintain the records identified as specified in (a) and (b) of this section. All records required by this subpart must be maintained either onsite or at the nearest local field office for at least 5 years. Any records required to be maintained by this subpart that are submitted electronically via the EPA's CDX may be maintained in electronic format.

- (a) The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records except as follows:
- (i) The Administrator or delegated authority, upon notification to the source, may require the owner or operator to maintain all measurements as required by paragraph (a) of this section, if the Administrator or the delegated authority determines these records are required to more accurately assess the compliance status of the affected source.
- (b) For the collection of fugitive emissions components at the compressor station, the records identified in paragraphs (b)(i) through (iii) of this section.
- (i) The fugitive emissions monitoring plan as required in 10.1.1.
- (ii) The records of each monitoring survey as specified in paragraphs (b)(ii)(A) through (I) of this section.
- (A) Date of the survey.
- (B) Beginning and end time of the survey.
- (C) Name of operator(s) performing survey. The permittee shall note the training and experience of the operator.
- (D) Monitoring instrument used.
- (E) When optical gas imaging is used to perform the survey, one or more digital photographs or videos, captured from the optical gas imaging instrument used for conduct of monitoring, of each required monitoring survey being performed. The digital photograph must include the date the photograph was taken and the latitude and longitude of the collection of fugitive emissions components at the compressor station imbedded within or stored with the digital file. As an alternative to imbedded latitude and longitude within the digital file, the digital photograph or video may consist of an image of the monitoring survey being performed with a separately operating GPS device within the same digital picture or video, provided the latitude and longitude output of the GPS unit can be clearly read in the digital image.

- (F) Fugitive emissions component identification when Method 21 is used to perform the monitoring survey.
- (G) Ambient temperature, sky conditions, and maximum wind speed at the time of the survey.
- (H) Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.
- (I) Documentation of each fugitive emission, including the information specified in paragraphs (b)(ii)(I)(1) through (12) of this section.
  - (1) Location.
  - (2) Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.
  - (3) Number and type of components for which fugitive emissions were detected.
  - (4) Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored.
  - (5) Instrument reading of each fugitive emissions component that requires repair when Method 21 is used for monitoring.
  - (6) Number and type of fugitive emissions components that were not repaired as required 10.1.1.(h).
  - (7) Number and type of components that were tagged as a result of not being repaired during the monitoring survey when the fugitive emissions were initially found as required in 10.1.1(h)(3)(ii).
  - (8) If a fugitive emissions component is not tagged, a digital photograph or video of each fugitive emissions component that could not be repaired during the monitoring survey when the fugitive emissions were initially found as required in 10.1.1.(h)(3)(ii). The digital photograph or video must clearly identify the location of the component that must be repaired. Any digital photograph or video required under this paragraph can also be used to meet the requirements under paragraph (b)(ii)(E) of this section, as long as the photograph or video is taken with the optical gas imaging instrument, includes the date and the latitude and longitude are either imbedded or visible in the picture.
  - (9) Repair methods applied in each attempt to repair the fugitive emissions components.
  - (10) Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair.
  - (11) The date of successful repair of the fugitive emissions component.
  - (12) Instrumentation used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding.
- (iii) For the collection of fugitive emissions components at the compressor station, if a monitoring survey is waived 10.1.1.(g)(4), the permittee shall maintain records of the

average calendar month temperature, including the source of the information, for each calendar month of the quarterly monitoring period for which the monitoring survey was waived.

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## CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached \_\_\_\_\_, representing the period beginning \_\_\_\_\_ and ending \_\_\_\_\_, and any supporting documents appended hereto, is true, accurate, and complete.

Signature<sup>1</sup> \_\_\_\_\_  
(please use blue ink) Responsible Official or Authorized Representative Date

Name & Title \_\_\_\_\_  
(please print or type) Name Title

Telephone No. \_\_\_\_\_ Fax No. \_\_\_\_\_

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<sup>1</sup> This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
  - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
  - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.