

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10300006-2017**
Application Received: **January 13, 2016**
Plant Identification Number: **10300006**
Permittee: **Dominion Transmission, Inc.**
Facility Name: **Hastings Compressor Station**
Mailing Address: **925 White Oaks Blvd.,
Bridgeport, WV 26330**

Physical Location: Pine Grove, Wetzel County, West Virginia
UTM Coordinates: 528.09 km Easting • 4377.66 km Northing • Zone 17
Directions: From Clarksburg take Route 20 North approximately 37 miles to
Hastings Station on left side of the road.

Facility Description

Hastings Compressor Station is a natural gas facility covered by Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. This facility (compressor station) includes three adjacent facilities covered by one Title V permit:

- 1) Hastings Station (underlying permit - R13-3249B) – production facility,
- 2) Mockingbird Hill Station (underlying permit - R13-2555C) – transmission facility,
- 3) Lewis Wetzel Station (underlying permit - R13-2870A) – transmission facility.

It consists of the following equipment: two (2) 500 HP Cooper GMXE-6 engines, one (1) 3,550 HP Caterpillar Model G3612TA Compressor Engine, one (1) 530 HP Cummins Model KTA19G Auxiliary Generator, one (1) 128 HP Generac Model QT080 Emergency Generator, one (1) 80 HP and two (2) 87 HP Capstone Microturbines, one (1) 8,175 HP Solar Taurus 60 Turbine, one (1) 1.25 MMBtu/hr and one (1) 4.5 MMBtu/hr natural gas fired boilers, one (1) 7.5 mmscf/day glycol dehydration unit with flare, one (1) 0.55 MMBtu/hr reboiler, one (1) 10.0 MMBtu/hr pipeline heater, and thirteen (13) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2015 Actual Emissions
Carbon Monoxide (CO)	135.12	45.28
Nitrogen Oxides (NO _x)	264.59	221.56
Particulate Matter (PM _{2.5})	13.51	0.03
Particulate Matter (PM ₁₀)	13.51	3.79
Total Particulate Matter (TSP)	15.47	4.72
Sulfur Dioxide (SO ₂)	1.14	0.21
Volatile Organic Compounds (VOC)	58.02	95.87*

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2015 Actual Emissions
Hastings Station HAPs**	3.91	3.72
Mockingbird Hill Station HAPs**	0.3	0.17
Lewis Wetzel Station HAPs**	10.65	0.88
Total HAPs	14.86	4.77

Speciated Significant HAPs*	Potential Emissions	2015 Actual Emissions
Acetaldehyde	1.29	0.353
Acrolein	0.90	0.352
Benzene	0.21	0.175
Ethylbenzene	0.03	0.016
Formaldehyde***	10.54	2.527
n-Hexane	0.41	0.447*
Toluene	0.38	0.301
Xylene	0.54	0.598*

Some of the above HAPs may be counted as PM or VOCs.

* These 2015 actual emissions are based on the old DEHY, therefore they are above PTE levels based on the new DEHY (permitted on March 8, 2016 via significant modification SM02)

** Included in Total HAPs above

*** Formaldehyde PTE for Lewis Wetzel Station is 8.3 TPY

Title V Program Applicability Basis

This facility has the potential to emit 264.59 tons/year of NO_x and 135.12 tons/year of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Dominion Transmission, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Opacity Requirements for boilers
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur requirements for fuel burned
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Pre-construction permit
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40CFR60
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards For Hazardous Air Pollutants
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	40 C.F.R. Part 60, Subpart KKKK	Standards of Performance for Stationary Combustion Turbines
	40 C.F.R. Part 60, Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. Part 63, Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities
40 C.F.R. Part 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
State Only:	45CSR4	No objectionable odors.
	45CSR17	Control fugitive particulate matter

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2555C	May 2, 2016	
R13-2870A	August 30, 2012	
R13-3249B	May 2, 2016	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

The following modifications were done to the permit since its previous renewal:

1. SM01 (issued November 27, 2012) - this significant modification was related to the Mockingbird Hill Station and based on permit R13-2555B. It covered installation of Generac Model QT080 80 kW, 128 hp, 4-stroke lean-burn natural gas-fired engine (002-06, AUX06). The purpose of the emergency generator is to provide local power when power from the grid is interrupted and is limited to 500 hours of use per year. The engine family (CGNXB06.82NL) is certified by USEPA as in compliance with the standards under 40 CFR 60, Subpart JJJJ. This change didn't affect the function or process of the facility. This significant modification also included changes covered by permit R13-2870A related to Lewis Wetzel Station. The model name of the 530 HP auxiliary generator AUX05 was changed by the manufacturer from KTA19SLB to KTA19G (without any changes in emissions or processes).
2. SM02 (issued March 8, 2016) - this significant modification included changes covered by permit R13-3249 related to Hastings Compressor Station. It included the replacement of the following old equipment:
 - Natco Dehydration Unit (Emission Unit 004-01),
 - Dehydration Unit Flare (Emission Unit DEHY),
 - Natco Reboiler (Emission Unit 005-02).The new replacement equipment included:
 - Inegral TEG Dehydration Unit, 7.5 MMscf/day (Emission Unit 004-02),
 - Questor Technologies Q50 enclosed combustion device with a heat input of 2 MMBtu/hr (Emission Unit DEHY1),
 - Diverse Energy Systems 550 RECON reboiler with a heat input of 0.55 MMBtu/hr (Emission Unit 005-06).
3. MM01 and AA01 (issued August 16, 2016) - this minor modification and administrative amendment included changes covered by permits R13-2555C and R13-3249B and related to Hastings and Mockingbird Hill Stations:
 - a. Since the Generac QT080 Auxillary Emergency Generator (AUX06), previously listed under Mockingbird Hill Station, physically is located closer to the Hastings Station, its requirements were moved from the permit R13-2555B to the permit R13-3249A.

- b. As the result of failures of the microturbines AUX02 and AUX03 powerheads, they were replaced with the new powerhead units in 2015 and 2011 respectively. It increased power output for 7 hp for each unit, and caused PTE increase. Corresponding changes were done to the permit.

In addition, the following revisions were done during this permitting action:

1. Emission Units Table 1.1 was revised – Auxiliary Generator AUX01 and Tanks TK1, TK4, and TK5 were removed from Hastings Station; Heater HTR01 was moved from Hastings Station to Carnegie Warehouse location (added); new Tanks TK1 through TK6 were added to Lewis Wetzel Station; also, several corrections were made to equipment IDs and installation dates, and engines EN01, EN02, EN03 and AUX05 descriptions were added.
2. Section 6.0 was revised to delete requirements applicable to Auxiliary Generator AUX01 which was removed from the station. Also, condition 6.1.1 (requirements of 40 C.F.R. 63 Subpart ZZZZ) was updated according to latest 40 C.F.R. 63 Subpart ZZZZ revision. Old condition 6.2.1 (40 C.F.R. 63 Subpart ZZZZ § 63.6635) was found not applicable to engines EN01 and EN02, and was deleted because these engines must comply only with “work or management practices”, not with “emission or operating limitations”. Also, condition 6.3.1 was added to include testing requirements of 40 C.F.R. 60 Subpart JJJJ applicable to engine AUX06, and condition 6.4.2 (40 C.F.R. 60 Subpart JJJJ § 60.4245) was updated according to latest 40 C.F.R. 60 Subpart JJJJ revision.
3. Requirement 8.1.8 – “Table 1 to Subpart JJJJ of Part 60—NO_x, CO, and VOC Emission Standards” applicable for EN03 and AUX05 per § 60.4233(e) was added. Emission limits in this Table correspond to the following emission limits in lbs/hr:

Emission Point ID	NO _x		CO		VOC	
	g/HP-hr	lbs/hr	g/HP-hr	lbs/hr	g/HP-hr	lbs/hr
EN03	1.0	7.83	2.0	15.65	0.7	5.48
AUX05	2.0	2.34	4.0	4.68	1.0	1.17

These emission limits are less stringent than emission limits in requirements 8.1.3 and 8.1.4, therefore compliance with limits in 8.1.3 and 8.1.4 will demonstrate compliance with the Subpart JJJJ Table 1 limits.

Also, applicable requirements of 40 C.F.R. 60 Subpart JJJJ §60.4243(a) were added to this condition and §60.4243(d) was updated.

4. Requirement 8.4.1 - the following condition was added to the existing recordkeeping requirement in order to demonstrate compliance with the requirement 8.1.5: ”As per 8.1.5.b, the permittee shall keep records of all warnings or indications to the operator and/or all occasions when the engine operations were ceased”.
5. Requirement 9.1.4 – added R13-2870A condition 6.1.2 (45CSR§2-3.2) that previously was determined not applicable for boiler BLR05 (4.5 MMBtu). Per 45CSR§2-11.1 a boiler under 10 MMBtu is exempt only from sections 45CSR§§2 - 4, 5, 6, 8 and 9, therefore 45CSR§2-3.2 is applicable.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

1. Part 60 Subpart JJJJ “*Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*” is not applicable to turbine TUR02 because it is a combustion turbine, and doesn’t meet the definition of an internal combustion engine:

“§ 60.4248 What definitions apply to this subpart?”

Stationary internal combustion engine means any internal combustion engine, except combustion turbines, that converts heat energy into mechanical work and is not mobile... Stationary ICE include reciprocating ICE, rotary ICE, and other ICE, except combustion turbines.”

2. Part 63 Subpart ZZZZ “*National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*” is not applicable to auxiliary generators AUX02, AUX03 and AUX04 because they are all micro-turbines, not reciprocating engines.
3. Part 60 Subparts KKKK “*Standards of Performance for Stationary Combustion Turbines*” and Subpart GG “*Standards of Performance for Stationary Gas Turbines*” are not applicable to auxiliary generators/micro-turbines AUX02, AUX03 and AUX04 because they are below applicable size threshold (10 MMBTU/hr).
4. Part 60, Subpart GG “*Standards of Performance for Stationary Gas Turbines*” is not applicable to turbine TUR02 because it was installed in 2008 (after February 18, 2005). Therefore, it is subject to Subpart KKKK which is applicable to units constructed after February 18, 2005.
5. Part 63, Subpart HH “*National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities*” is not applicable to Mockingbird Hill and Lewis Wetzel Stations because they are transmission facilities.
6. Part 63 Subpart HHH “*National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities*” is not applicable because facility is not a major source of HAPs.
7. Part 63 Subpart DDDDD “*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*” is not applicable to the boilers and heater because each of them are located at minor sources of HAPs.
8. Part 63 Subpart JJJJJ “*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*” is not applicable to boilers, re-boiler and a heater because of the following reasons stated in the table below:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Part 63 Subpart JJJJJJ Applicability
005-01*	HTR01	Heater; Natco 96x30	1977	10.0 MMBtu/hr	Doesn't meet "hot water heater" or "boiler" definition in §63.11237
005-06*	RBR02	Reboiler for glycol regenerator	2016	0.55 MMBtu/hr	Meets definition of "process heater", which is excluded from the definition of "boiler" in §63.11237
005-04*	BLR02	Boiler; Cleaver Brooks MTF700-1250-50	2004	1.25 MMBtu/hr	Gas-fired boiler, exempt per § 63.11195(e)
005-05*	BLR05	Bryan Model RV 450W-FDG Boiler	2011	4.5 MMBtu/hr	Gas-fired boiler, exempt per § 63.11195(e)

* This equipment burns or combusts pipeline quality natural gas only.

9. 40 C.F.R. 64 - Engines EN01, EN02, AUX02, AUX03, AUX04, AUX05, AUX06 do not have any controls, and their emissions are below Title V Major Source applicability thresholds, therefore, CAM is not applicable.

Engine EN03 has emission limits set forth in requirement 8.1.3 and a control device (Catalytic Converter CC1) with control efficiencies as follows:

Control Device	Emission Unit	Pollutant	Control Efficiency
Catalytic Converter CC1 (Oxidation and Reduction)	3,550 hp Caterpillar 3612 Compressor Engine	Carbon Monoxide	30 %
		Volatile Organic Compounds	40 %
		Formaldehyde	40 %

Uncontrolled emissions of CO and VOC are estimated below Title V Major Source applicability thresholds, therefore, CAM for CO and VOC emissions is not applicable.

Uncontrolled emissions of Formaldehyde are estimated at 13.71 TPY based on maximum controlled emission rate of 8.23 TPY and CC1 control efficiency of 40% (i.e. above Title V Major Source applicability threshold of 10 TPY for individual HAP), so EN03 fits definition of PSEU for formaldehyde. Current permit condition 8.1.5 "Requirements for Use of Catalytic Reduction Devices" obligates the company to use a "closed-loop automatic feedback controller to ensure emissions of regulated pollutants do not exceed potential to emit for any engine/SCR combination". Per this requirement "The closed-loop automatic feedback controller shall provide proper and efficient operation of the engine, ammonia injection and SCR device, monitor emission levels downstream of the catalyst element and limit ammonia slip to less than 10 ppm; The 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". Requirement 8.2.1 addresses monitoring of the Catalytic Converter CC1 via "maintaining proper operation of automatic feedback controller" and "following operating and maintenance recommendations of the catalyst element manufacturer". Once the operator of the automatic feedback controller receives the warning/indication, specified in condition 8.1.5, the operator fixes the problem and returns the engine back to normal as per 8.2.1. Requirement 8.4.1 addresses recordkeeping for "all warnings or indications

to the operator and/or all occasions when the engine operations were ceased” by the feedback controller. Therefore, these requirements document continued operation of the catalytic converter CC1 within the control device parameters that reasonably assure compliance with the formaldehyde emission limits, as well as they indicate excursions from the proper control device parameters. These measures are considered a continuous compliance determination method, and therefore EN03 formaldehyde emissions are exempt from the CAM requirements per §64.2(b)(1)(vi).

The dehydration unit (Emission Unit 004-02) is subject to 40 C.F.R. 63 Subpart HH standards, therefore per §64.2(b)(1)(i) it is exempt from requirements of CAM.

10. The following R13-2870A requirements were not included in the permit:

- a) 7.1.1 through 7.1.4 (40 C.F.R. 60 Subpart JJJJ §§60.4230(a), (c), (e) and (f)) because they are statements of applicability, and not applicable requirements;
- b) 7.2.2 (40 C.F.R. 60 Subpart JJJJ §60.4233(f)) and 7.3.3 (40 C.F.R. 60 Subpart JJJJ §60.4236(e)) - because they are not applicable to the engines EN03 and AUX05 since these are new engines, not modified or reconstructed;
- c) 7.4.1(b)(1) (40 C.F.R. 60 Subpart JJJJ §60.4243(b)(2)(i)) – not applicable to engines greater than 500 HP.
- d) 7.4.2 (40 C.F.R. 60 Subpart JJJJ §60.4243(c)) and 7.4.6 (40 C.F.R. 60 Subpart JJJJ §60.4243(h)) – not applicable to engines with emission standards specified in §60.4233(e) (requirement 8.1.8).

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: November 23, 2016
Ending Date: December 23, 2016

Point of Contact

All written comments should be addressed to the following individual and office:

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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

1. During the public comment period we received **comments from Dominion Transmission Inc.** (letter dated December 22, 2016). The comments and our responses are included below.

Comment 1:

Page 2, Equipment Table: As stated in the Title V renewal application, we request to correct the following information in the equipment table:

- Hastings Station – The capacity of TK2 is 5,000 gallons.
- Mockingbird Hill Station – The install dates for TK2 and TK3 is 2004.

Response: Corrected tank information.

Comment 2:

Page 15, Condition 3.1.10 and Page 17, Condition 3.4.4: We request to remove these conditions for the specific sources identified from the facility-wide section (Section 3) and move them to their respective source-specific sections of the permit as they are source-specific requirements.

Response: Condition 3.1.10 was removed from the facility-wide section (Section 3), and was included as the following source-specific conditions: 4.1.3, 7.1.9 and 9.1.5. As the result, old requirement 3.1.11 was re-numbered to 3.1.10. Condition 3.4.4 was removed from the facility-wide section (Section 3), and was included as source-specific conditions 7.4.1 and 9.4.1.

Comment 3:

Page 19, Condition 3.7.2: We request to include all non-applicable requirements as stated in the Title V renewal application (Section 19 of the WV General Form).

Response: Non-applicable requirements were included with the Permit Shield section (requirement 3.7.2). This also resulted in revision of the fact sheet Non-Applicability Determinations Section, item 8, for reboiler RBR02. Per §63.11237, the reboiler RBR02 was re-defined from “gas-fired boiler” to “process heater” since it “transfers heat indirectly to a heat transfer material (e.g. glycol or a mixture of glycol and water) for use in a process unit, instead of generating steam. Process heaters are devices in which the combustion gases do not come into direct contact with process material”. 40 CFR 63 Subpart JJJJJ still isn’t applicable to the RBR02 since it doesn’t apply to process heaters.

Comment 4:

Page 31, Condition 6.1.1: We request to delete the following as neither of the compressor engines (EN01 and EN02) have a catalyst:

~~“These deviations must be reported according to the requirements in §63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.”~~

Response: Revised as requested.

Comment 5:

Page 35, Condition 6.1.4: We request to delete item (g) from this condition as the emergency generator (AUX06) does not have a catalyst.

Response: Revised as requested.

Comment 6:

Page 35, Condition 6.3.1: We request to delete this entire permit condition as performance testing is not required for the emergency generator (AUX06).

Response: Revised as requested.

Comment 7:

Page 39, Condition 6.4.2: We request to delete the item (a)(4) as the emergency generator (AUX06) is a certified engine.

Response: This requirement was included in case the emergency generator (AUX06) is operating in a non-certified manner, otherwise this requirement wouldn't be applicable. Because of this reason, item (a)(4) will remain in the Title V permit.

Comment 8:

Page 44, Condition 7.5.2: We request to delete this condition as the turbine (TUR02) conducts annual/biennial testing and does not have a continuous monitoring system.

Response: Revised as requested.

Comment 9:

Pages 45-55, Section 8.0: We request to add in the following clarification language:

- Condition 8.1.5 – Reference that this condition is for EN03.

“[45CSR13, R13-2870, 5.1.5] (EN03)”

- Condition 8.1.8 (§60.4243(e)) – Reference that this condition is for EN03 and AUX05.

“[45CSR16; 40 CFR 60 Subpart JJJ §60.4243(e) and 45CSR13, R13-2870, 7.4.4] (EN03 and AUX05)”

- Condition 8.1.8 (§60.4243(g)) – Reference that this condition is for EN03.

“[45CSR16; 40 CFR 60 Subpart JJJJ §60.4243(g) and 45CSR13, R13-2870, 7.4.5] (EN03)”

Condition 8.2.1 – Reference that this condition is for EN03.

“[45CSR13, R13-2870, 5.2.1] (EN03)”

- Condition 8.3.2 – Reference that this condition is for EN03.

“[45CSR16; 40 CFR 60 Subpart JJJJ §60.4244(a) through (g) and 45CSR13, R13-2870, 7.5.1] (EN03)”

- Condition 8.5.2 – Reference that this condition is for EN03.

“[45CSR16; 40 CFR 60 Subpart JJJJ §60.4245(d) and 45CSR13, R13-2870, 7.6.1] (EN03)”

Response: Revised as requested.

Comment 10:

Page 46, Condition 8.1.8: We request to delete the following language in this condition as the compressor engine (EN03) and emergency generator (AUX05) were both manufactured after January 1, 2011:

~~“(e) Owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 75 KW (100 HP) (except gasoline and rich burn engines that use LPG) must comply with the emission standards in Table 1 to this subpart for their stationary SI ICE. For owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 100 HP (except gasoline and rich burn engines that use LPG) manufactured prior to January 1, 2011 that were certified to the certification emission standards in 40 CFR part 1048 applicable to engines that are not severe duty engines, if such stationary SI ICE was certified to a carbon monoxide (CO) standard above the standard in Table 1 to this subpart, then the owners and operators may meet the CO certification (not field testing) standard for which the engine was certified.”~~

Response: Revised as requested.

Comment 11:

Page 47, Condition 8.1.8: We request to delete item (h) in this condition as the compressor engine (EN03) and emergency generator (AUX05) are not required to meet this requirement.

Response: Revised as requested.

Comment 12:

Page 54, Condition 8.5.2: We request to delete this condition since this reporting requirement has already been addressed and completed.

Response: Revised as requested.

2. Also, on January 5, 2017 we received the following **comment from EPA’s** Senior Environmental Engineer Mr. Paul T. Wentworth:

“I have discussed the proposed methodology that serves as a continuous compliance with my colleagues. Although I have no comment on what they are proposing, I believe that the explanation in the Fact sheet needs to be beefed up based on the discussion in the CAM Rule preamble dated October 22,1997. I have excerpted it below:

“Another approach is to establish monitoring for the purpose of: (1) Documenting continued operation of the control measures within ranges of specified indicators of performance (such as emissions, control device parameters and process parameters) that are designed to provide a reasonable assurance of compliance with applicable requirements; (2) indicating any excursions from these ranges; and (3) responding to the data so that excursions are corrected.”

I think that prior to issuing the permit, the fact sheet should contain language that sufficiently addresses the criteria laid out in the preamble.

Response: As the result of this comment the Permit Shield condition 3.7.2.f and a Fact Sheet Non-Applicability Section (item 9) were revised to add additional explanation for CAM non-applicability to the engine EN03 formaldehyde emissions. Also, a typo was corrected in the item 9 of the Fact Sheet Non-Applicability Section as following: “Uncontrolled emissions of Formaldehyde are estimated at 13.71 ~~16.46~~ TPY based on maximum controlled emission rate of 8.23 TPY and CC1 control efficiency of 40%”.