

West Virginia Department of Environmental Protection
Earl Ray Tomblin
Governor

Division of Air Quality

Randy C. Huffman
Cabinet Secretary

Permit to Construct



R13-3252

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:

**Equitrans Limited Partnership
Burnsville Compressor Station
077-00006**

William F. Durham
Director

Issued: Draft

Facility Location: 243 Kanawha Ave
Burnsville, Braxton County, West Virginia
Mailing Address: P.O. Box 191
Burnsville, WV 26335
Facility Description: Production Gas Compression Station
NAICS Codes: 486210
UTM Coordinates: 529.40 km Easting • 4,301.40 km Northing • Zone 17
Permit Type: Construction
Description of Change: This action is for the replacement flare that controls the still vent of the existing dehydration unit.

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.

The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

Table of Contents

1.0. Emission Units 4

2.0. General Conditions..... 5

 2.1. Definitions5

 2.2. Acronyms.....5

 2.3. Authority.....6

 2.4. Term and Renewal6

 2.5. Duty to Comply6

 2.6. Duty to Provide Information.....6

 2.7. Duty to Supplement and Correct Information.....7

 2.8. Administrative Update7

 2.9. Permit Modification.....7

 2.10. Major Permit Modification7

 2.11. Inspection and Entry7

 2.12. Emergency7

 2.13. Need to Halt or Reduce Activity Not a Defense8

 2.14. Suspension of Activities8

 2.15. Property Rights8

 2.16. Severability9

 2.17. Transferability.....9

 2.18. Notification Requirements9

 2.19. Credible Evidence.....9

3.0. Facility-Wide Requirements..... 10

 3.1. Limitations and Standards10

 3.2. Monitoring Requirements10

 3.3. Testing Requirements10

 3.4. Recordkeeping Requirements11

 3.5. Reporting Requirements12

4.0. Source-Specific Requirements..... 14

 4.1. Limitations and Standards14

 4.2. Monitoring Requirements15

 4.3. Testing Requirements17

 4.4. Recordkeeping Requirements17

 4.5. Reporting Requirements18

CERTIFICATION OF DATA ACCURACY..... 19

1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
DEHY	DEHY	Reboiler for glycol regenerator	1984	1.06 MMBtu/hr	None
TEG	FLARE	TEG Dehydration Unit with flash tank	1984	34 MMscf/day	FLARE
FLARE	FLARE	Elevated Flare – John Zink: EEF –U-4 Model 320-2	2014	1.02 MMBtu/hr	N/A

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

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM_{2.5}	Particulate Matter less than 2.5 μm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10μm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	Pph	Pounds per Hour
DAQ	Division of Air Quality	Ppm	Parts per Million
DEP	Department of Environmental Protection	Ppmv or ppmv	Parts per Million by Volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	Psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable	VOL	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	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 supersedes and replaces previously issued Permit R13-1801F. 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 R13-3252, 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 with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street
Charleston, WV 25304-2345

If to the 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

3.5.4. Operating Fee

- 3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 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. The limitations set forth in this condition are hereby established to ensure that the permittee operates and maintains the glycol dehydration unit (TEG) with associated control device (FLARE) that limit hazardous air pollutant emissions to below the major source threshold value of HAPs as defined in 40 CFR §63.761 (Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities) as follows:
- a. The maximum amount of wet natural gas processed through the dehydration unit shall not exceed 34 MMscf per day annual average.
 - b. The effluent generated by the flash tank of the dehydration unit shall be routed through a closed vent system to the fuel gas system or control device (FLARE) at all times while the dehydration unit is in operation.
 - c. The effluent generated by the still vent shall be routed through a closed vent system to the control device (FLARE) at all times while the dehydration unit is in operation.
 - d. The control device (FLARE) shall be operated and maintained in accordance with Condition 4.1.2.
 - e. The re-boiler shall be operated and maintained in accordance with Condition 4.1.3.
 - f. The closed vent system as required in this condition shall meet the following:
 - i. The system shall be constructed of hard piping.
 - ii. The system shall be constructed and maintained free of leaks. A leaking component is defined as a measured instrument reading greater than 500 ppm above background or by visual inspection.
 - iii. Detected leaks shall be repaired as soon as practicable with the first attempt at repair within 5 calendar days after detecting the leak. Repair shall be completed no later than 15 calendar days after the leak is detected.
[45 CSR §13-5.11.]
- 4.1.2. The permittee shall operate and maintain the control device (FLARE) for the dehydration unit in accordance with the following emission limitations and operating parameters.
- a. Emissions of VOC from FLARE shall not exceed 2.36 pounds per hour. Annual VOC emissions from the FLARE shall not exceed 10.34 tons per year.
 - b. Total hazardous air pollutants (HAPs), which include BTEX, from the flare shall not exceed 0.55 pounds per hour. Annual HAP emissions from the FLARE shall not exceed 2.41 tons per year.
 - c. Actual average benzene emissions from the flare shall not be equal to or exceed 1.0 tons per year.
[40 CFR 63.764(e)(1)(ii)]
 - d. Compliance determination with the emission limits in items a, b, and c of this condition shall be made by using GYCALC™ 3.0 or higher.

- e. Particulate matter emissions from the flare shall not exceed 0.01 pounds per hour. Compliance with this limit is satisfied by complying with requirements of Condition 4.1.2.f.
[45 CSR §6-4.3.]
 - f. The effluent routed to FLARE shall not contain hydrogen sulfide greater than 50 grains per 100 cubic feet of gas. Compliance with this limit is satisfied by limiting the hydrogen sulfide (H₂S) loading of the incoming natural gas to the facility to no greater than 100 ppmv.
[45 CSR §10-5.1.]
 - g. The permittee shall operate and maintain FLARE in a manner that minimizes VOC and volatile HAP emissions. Such operation of the control device shall constitute the following:
 - i. FLARE shall not exhibit any visible emissions, except for periods not to exceed a total of 5 minutes during two consecutive hours.
[45 CSR §6-4.3.]
 - ii. The pilot flame for FLARE shall be lit at all times when the dehydration unit is operating. The fuel source for the pilot light shall be either natural gas, flash tank off gas, or a combination of the two fuels.
 - iii. The flare shall not be operated with an exit velocity at the tip greater than 60 feet per second.
 - iv. The net heating value of the effluent routed to the flare shall not be less than 200 Btu per standard cubic feet. Compliance with this requirement is satisfied by introducing fuel gas to the still vent effluent at a rate of no less than 500 scfh or the rate measured during the recent flare performance demonstration.
- 4.1.3. The permittee shall operate and maintain the reboiler (DEHY) for the dehydration unit in accordance with the following emission limitations and operating parameters.
- a. Visible emissions from the emission point DEHY shall not exceed 10% opacity on a 6-minute block average. Compliance with this requirement is satisfied by complying with the fuel type restriction in Condition 4.1.3.b.
[45 CSR §2-3.1]
 - b. The reboiler shall only be fueled with fuel gas, which can be either flash gas from the TEG Flash Tank, natural gas, or any mixture of these two fuels.
- 4.1.4. **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.]

4.2. Monitoring Requirements

- 4.2.1. The permittee shall monitor and record the following parameters for the purpose of demonstrating compliance with Conditions 4.1.1., 4.1.2., and 4.1.3.:
- a. The throughput of wet natural gas processed through the dehydration unit on a monthly basis, days the dehydration unit operated, and annual average natural gas flowrate.
[40 CFR §63.774(d)(1)]

- b. Determine actual annual average natural gas throughput (in terms of natural gas flowrate to the glycol dehydration unit per day) by converting the annual natural gas flowrate to a daily average by dividing the annual flowrate by the number of days per year the glycol dehydration unit processed natural gas.
[40 CFR §63.772(b)(1)(i)]
 - c. Identify any periods there was no flame present for the pilot of the flare when the dehydration unit was in operation.
 - d. Monitor daily and record the amount of fuel gas (supplemental fuel) introduced to the flare monthly. If such readings includes the fuel gas for the flare pilot light, then compliance with limitation of Condition 4.1.2.g.iv. is satisfied if the reading is at or exceeds the flow rate stipulated in Condition 4.1.2.g.iv. by 50 scfh.
 - e. Determination of the actual average benzene emissions from the dehydration unit shall be made using the model GRIGLYCalc™, 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).
[40 CFR §63.772(b)(2)(i) & 63.774(d)(1)(ii)]
 - f. Records of such monitoring shall be maintained in accordance with Condition 3.4.1.
- 4.2.2. For the purpose of demonstrating compliance with Condition 4.1.2.e., the permittee shall conduct gas sampling at a point that is representative of the incoming natural gas to the facility and analyzing the sample to determine the hydrogen sulfide content of the sample. At a minimum, such sampling and analysis shall be conducted once per calendar year. Records of such monitoring shall be maintained in accordance with Condition 3.4.1. of this permit.
[45 CSR §10-8.3.a.]
- 4.2.3. For the purpose of demonstrating proper operation of the flare, the permittee shall conduct a visible emission observation using Section 11 of Method 22 for one hour once every calendar quarter in which the dehydration unit operates with the first observation being conducted within 90 days after issuance of this permit and subsequent observations conducted once every calendar quarter thereafter. If during the first 30 minutes of the observation there were no visible emissions observed, the permittee may stop the observation.
- If at the end of the observation and visible emission were observed for more than 2.5 minutes, then the permittee shall follow manufacturer’s repair instructions, if available or best combustion engineering practice as outline in the unit inspection and maintenance plan. To return the flare to compliant operation, the permittee shall repeat the visible emission observation. Records of such monitoring and repair activities shall be maintained in accordance with Condition 3.4.1.
- 4.2.4. For the purposes of demonstrating compliance with the requirements of the closed vent system in Condition 4.1.1., the permittee shall conduct the following:
- a. Conduct an initial visual, olfactory, and auditory inspection for defects that could result in air emissions within 180 days after issuance of this permit. Defects include, but are not limited to, visible cracks, holes, or gaps in piping; loose connections; liquid leaks; or broken or missing caps or other closure devices.

- b. After the initial, subsequent annual visual, olfactory, and auditory inspections shall be conducted for defect that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in piping; loose connections; liquid leaks; or broken or missing caps or other closure devices.
 - c. Detected leaks shall be repaired in accordance timing stated in Condition 4.1.1f.iii.
 - d. Records of such inspections shall be maintained in accordance with 3.4.1.
 - e. The use of the procedures listed as Alternative Methods to Method 21 (i.e. soapy water) to determine a leak or a leak has been repaired is acceptable.
- 4.2.5. The permittee shall monitor the dehydration unit for equipment leaks in accordance with the following requirements:
- a. Conduct an initial visual, olfactory, and auditory inspection for defects that could result in air emissions within 180 days after issuance of this permit.
 - b. After the completion of the initial inspection, subsequent inspections shall be conducted in accordance with the following:
 - i. Visual inspection of the glycol circulating pumps for visual indicators of leaking seals once per month.
 - ii. Visual inspection of the pressure relief device on a monthly basis.
 - iii. Conduct a visual, olfactory, and auditory inspection for defects that could result in air emissions within 12 months of the previous inspection of the dehydration unit.
 - c. Detected leaks shall be repaired in accordance timing stated in Condition 4.1.4.
 - d. Records of such inspections and any repaired made shall be maintained in accordance with Condition 3.4.1.
 - e. The use of the procedures listed as Alternative Methods to Method 21 (i.e. soapy water) to determine a leak or a leak has been repaired is acceptable.

4.3. Testing Requirements

- 4.3.1. If the permittee elects to reestablish the minimum amount of fuel gas (supplemental fuel) as listed in Condition 4.1.2.g.iv., the permittee shall conduct a flare compliance assessment to demonstrate compliance with the flare requirements of Condition 4.1.2. 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, and in accordance with Condition 3.3.1. of this permit. Also, Test Method 18 may require the permittee to conduct Test Method 4 in conjunction with Test Method 18. During such testing, the dehydration unit shall be operating that would yield the lowest heat content from the still vent. Records of such assessment shall be maintained in accordance with Condition 3.4.1.

4.4. Recordkeeping Requirements

- 4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
 - a. The date, place as defined in this permit, and time of sampling or measurements;

- b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of the analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
- 4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
- 4.4.3. **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:
- a. The equipment involved.
 - b. Steps taken to minimize emissions during the event.
 - c. The duration of the event.
 - d. The estimated increase in emissions during the event.
- For each such case associated with an equipment malfunction, the additional information shall also be recorded:
- e. The cause of the malfunction.
 - f. Steps taken to correct the malfunction.
 - g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.
- 4.4.4. The permittee shall maintain records of the analysis that is used to indicate compliance is in accordance with items a. b. and f.iii. of Conditions 4.1.2. Such records shall include the source of data used in the analysis and be maintained in accordance with Condition 3.4.1.
[40 CFR 63.774(d)(2)(ii)]

4.5. Reporting Requirements

- 4.5.1. The permittee shall report to the Director any leaks of the closed vent system that were not repaired in accordance with Condition 4.1.1. Such report shall be included with the facility's semiannual or annual compliance report as required in 45 CSR 30.

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.

Signature¹ _____
(please use blue ink) Responsible Official or Authorized Representative Date

Name & Title _____
(please print or type) Name Title

Telephone No. _____ Fax No. _____

¹ 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.