West Virginia Department of Environmental Protection

Jim Justice
Governor

Division of Air Quality

Austin Caperton
Cabinet Secretary

Permit to Modify

R13-2914F

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:

MarkWest Liberty Midstream & Resources LLC
Sherwood Gas Plant
017-00034

_____

William F. Durham
Director

Issued: DRAFT

This permit will supercede and replace Permit R13-2914E issued on March 16, 2017.

Facility Location:	218 Swisher Lane West Union, Doddridge County, West Virginia
Mailing Address:	1515 Arapahoe St. Tower 1, Suite 1600 Denver, CO 80202-2137
Facility Description:	Natural Gas Processing Plant
SIC/NAICS Codes:	1311/211112
UTM Coordinates:	526.92 km Easting • 4,346.89 km Northing • Zone 17
Latitude/Longitude:	39.27146/-80.68710
Permit Type:	Modification
Description of Change:	Modification to make various changes at the facility including: (1) updating the Emission Units Table 1.0 to remove equipment no longer at the facility, including small existing *de minimis* tanks for clarity, including various miscellaneous/fugitive emissions, and updating emission unit designations; (2) updating piping component counts and associated fugitive emissions; (3) updating various emission factors and flare volume throughpouts; (4) and making various changes to compliance demonstration language to accommodate site specific equipment/processes.

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 application. Commencement date of any operation authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

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1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
CM-1001	CM-1001	Caterpillar G3616 LE Compressor Engine C-151 Compressor SN: BLB00753	2012	4,735 hp	Oxidation Catalyst
CM-1002	CM-1002	Caterpillar G3616 LE Compressor Engine C-152 Compressor SN: BLB00752	2012	4,735 hp	Oxidation Catalyst
CM-2001	CM-2001	Caterpillar G3608 LE Compressor Engine Compressor SN:BEN00765	2012	2,370 hp	Oxidation Catalyst
DH-001	DH-001	TEG Dehydration Unit Still Vent	2012	120 MMscfd	Flare
		Flash Tank			Reboiler fuel/RCRC
RB-001	RB-001	TEG Dehydration Unit Reboiler	2012	2.0 MMBTU/hr	None
FL-DH	FL-DH	Dehydration Unit Flare	2012	0.70 scf/min	NA
FS-762	FS-762	Main Process/Emergency Flare	2015	68,600 scf/min	NA
TNK-001	TNK-001	4 Storage Tanks (1-500 bbl gunbarrel tank, 3-400 bbl condensate/water tanks)	2012	See Description	VRU
H-751	H-751	Stabilization Heater II	2017	6.35 MMBtu/hr	None
Pressure Vessels	Pressure Vessels	4 - 70,000 gallon NGL Tanks	2012	4@70,000 gallons	Pressure Vessels
Sherwood 1 Extraction Train					
H-711	H-711	Mole Sieve Regeneration Heater	2012	7.86 MMBTU/hr	None
H-771	H-771	Hot Oil Heater	2012	28.25 MMBTU/hr	None
Sherwood 2 Extraction Train					
H-2711	H-2711	Mole Sieve Regeneration Heater	2013	7.86 MMBTU/hr	None
Sherwood 3 Extraction Train					
H-3711	H-3711	Mole Sieve Regeneration Heater	2013	7.86 MMBTU/hr	None
Sherwood 4 Extraction Train					
H-4711	H-4711	Mole Sieve Regeneration Heater	2013	18.0 MMBTU/hr	IFGR w/LowNOx Burner
H-4712	H-4712	Hot Oil Heater	2014	6.60 MMBTU/hr	None

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Sherwood 5 Extraction Train					
H-5711	H-5711	Mole Sieve Regeneration Heater	2014	18.00 MMBTU/hr	IFGR w/LowNOx Burner
Sherwood 6 Extraction Train					
H-6711	H-6711	Mole Sieve Regeneration Heater	2015	18.00 MMBTU/hr	IFGR w/LowNOx Burner
H-6712	H-6712	Hot Oil Heater	2015	6.60 MMBTU/hr	None
Sherwood 7 Extraction Train					
H-7711	H-7711	Mole Sieve Regeneration Heater	2015	18.00 MMBTU/hr	IFGR w/LowNOx Burner
Sherwood 8 Extraction Train					
H-8711	H-8711	Mole Sieve Regeneration Heater	2015	18.00 MMBTU/hr	IFGR w/LowNOx Burner
H-8712	H-8712	Hot Oil Heater	2015	7.20 MMBTU/hr	None
Sherwood 9 Extraction Train					
H-9711	H-9711	Mole Sieve Regeneration Heater	2016	18.00 MMBTU/hr	IFGR w/LowNOx Burner
DeEthanizer Unit					
D1-H-782	D1-H-782	DeEthanizer HMO Process Heater Configured with 8 burners w/Maximum Heat Release of 14.9 MMBtu/hr for each burner	2015	119.2* MMBTU/hr	FGR w/Low NOx Burner
D1-H-741	D1-H-741	DeEthanizer Regeneration Heater	2015	12.53	None
Tank Farm					
MT-1	MT-1	Methanol Tank	2012	500 gal	None
MT-2	MT-1	Methanol Tank	2012	500 gal	None
MT-3	MT-1	Methanol Tank	2012	500 gal	None
MT-4	MT-1	Methanol Tank	2012	500 gal	None
MT-5	MT-1	Methanol Tank	2012	500 gal	None
MT-6	MT-1	Methanol Tank	2012	500 gal	None
MT-7	MT-1	Methanol Tank	2012	500 gal	None
MT-8	MT-1	Methanol Tank	2012	500 gal	None
GT-1	GT-1	Gasoline Tank	2012	500 gal	None
DT-1	DT-1	Diesel Tank	2012	500 gal	None

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
DT-2	DT-2	Diesel Tank	2012	500 gal	None
TK-825	TK-825	Floor Drain Storage Tank	2012	4,200 gal	None
TK-826	TK-826	Lube Oil Storage Tank	2012	4,200 gal	None
TK-824	TK-824	Floor Drain Storage Tank	2012	4,200 gal	None
TK-2821	TK-2821	Methanol Storage Tank	2012	3,780 gal	None
TK-2941	TK-2941	Lube Oil Storage Tank	2012	1,000 gal	None
TK-2896	TK-2896	Floor Drain Storage Tank	2012	500 gal	None
TK-2950	TK-2950	Propane Storage Tank	2012	500 gal	None
		Truck Loading Condensate	2012		Vapor Return line to VRU
CC	CC	Crankcase Emissions	2012	NA	NA
RP	RP	Rod Packing Emissions	2012	NA	NA
FUG-001	FUG-001	Fugitive Leaks	2012-2014	NA	NA

* - Normal Maximum Heat Release Rate of the burners
FGR - Flue Gas Recirculation
IFGR - Integrated Flue Gas Recirculation
RCRC – Recycle or recompression
VRU – Vapor Recovered Unit

1.1. Control Devices

Emission Point ID	Control Device	Emission Unit	Pollutant	Control Efficiency
CM-1001 CM-1002	Oxidation Catalyst	Caterpillar G3616 LE Compressor Engines	Carbon Monoxide	95 %
			Volatile Organic Compounds	75 %
			Formaldehyde	90 %
CM-2001	Oxidation Catalyst	Caterpillar G3608 Compressor Engine	Carbon Monoxide	95 %
			Volatile Organic Compounds	75 %
			Formaldehyde	90 %
FL-DH	Dehy Flare	TEG Dehydration Unit Still Vent	Volatile Organic Compounds	98 %
			Total Hazardous Air Pollutants	98 %
FS-762	Flare	Main Process/Emergency Flare (Unit Blowdown & Maintenance Purposes)	Volatile Organic Compounds	98 %
			Total Hazardous Air Pollutants	98 %
TNK-001	Vapor Recovery Unit	Condensate Storage Tanks	Volatile Organic Compounds	98 %
			Total Hazardous Air Pollutants	98 %

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
CBI	Confidential Business Information
CEM	Continuous Emission Monitor
CES	Certified Emission Statement
C.F.R. *or* CFR	Code of Federal Regulations
CO	Carbon Monoxide
C.S.R. *or* CSR	Codes of State Rules
DAQ	Division of Air Quality
DEP	Department of Environmental Protection
dscm	Dry Standard Cubic Meter
FOIA	Freedom of Information Act
HAP	Hazardous Air Pollutant
HON	Hazardous Organic NESHAP
HP	Horsepower
lbs/hr	Pounds per Hour
LDAR	Leak Detection and Repair
M	Thousand
MACT	Maximum Achievable Control Technology
MDHI	Maximum Design Heat Input
MM	Million
MMBtu/hr *or* mmbtu/hr	Million British Thermal Units per Hour
MMCF/hr *or* mmcf/hr	Million Cubic Feet per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAPS	National Emissions Standards for Hazardous Air Pollutants
NO_X	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
$PM_{2.5}$	Particulate Matter less than 2.5 µm in diameter
PM_{10}	Particulate Matter less than 10µm in diameter
Ppb	Pounds per Batch
Pph	Pounds per Hour
Ppm	Parts per Million
Ppm_V or ppmv	Parts per Million by Volume
PSD	Prevention of Significant Deterioration
Psi	Pounds per Square Inch
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
TAP	Toxic Air Pollutant
TPY	Tons per Year
TRS	Total Reduced Sulfur
TSP	Total Suspended Particulate
USEPA	United States Environmental Protection Agency
UTM	Universal Transverse Mercator
VEE	Visual Emissions Evaluation
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquids

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 R13-2914E. 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 R13-2914, R13-2914A, R13-2914B, R13-2914C, R13-2914D, R13-2914E, R13-2914F 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.]

3.1.7. The fuel gas (residue gas) for the facility shall not exceed the following on a rolling 12-month basis:

a. Total VOCs content of the gas greater than 1% by weight.

b. Hydrogen sulfide or total sulfur compounds greater than 4 grain per 100 cubic feet of gas.

3.2. Monitoring Requirements

3.2.1. The permittee shall analysis the fuel gas for the facility once per month. Such analysis shall determine the net heating value, percentage of VOC in the fuel gas. Such analysis shall be maintained in accordance with Condition 3.4.1.

3.2.2. For the purpose of demonstrating compliance with Conditions 3.1.7., 5.1.2.c., and 5.1.3.h.vi., the permittee shall conduct gas sampling at a point that is representative of the incoming field gas and analyzing the sample to determine the hydrogen sulfide content of the sample. At the minimum, such sampling and analysis shall be conducted once per year and thereafter. Once per year shall mean between 11 months to 13 months from the previous gas sampling. Records of such monitoring shall be maintained in accordance with Condition 3.4.1. of this permit.
[45 CSR §10-8.3.a.]

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), 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:

If to the DAQ:
Director
WVDEP
Division of Air Quality
601 57th Street
Charleston, WV 25304-2345

DAQ Compliance and Enforcement[1]:
DEPAirQualityReports@wv.gov

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

[1] 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 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. Specific Requirements for the Compressor Engines

4.1. Limitations and Standards

4.1.1. The following conditions and requirements are specific to the internal combustion engines identified as CM-1001 and CM-1002 and the connected compressors:

a. Emissions from each engine shall not exceed the following:

i. NO_x emissions from the engine shall not exceed 82 ppmvd at 15 percent O_2. The mass rate of NO_x emissions from each engine shall not exceed 5.22 pounds per hour and 22.86 tpy.

ii. CO emissions from engine shall not exceed 270 ppmvd at 15 percent O_2. The mass rate of CO emissions from each engine shall not exceed 1.46 pounds per hour and 6.40 tpy.

iii. VOC emissions from the engine shall not exceed 86 ppmvd at 15 percent O_2. Formaldehyde is excluded from this VOC limit. The mass rate of VOC emissions shall not exceed 1.67 pounds per hour and 7.32 tpy.
[40 CFR §60.4333(e) & Table 1 to Subpart JJJJ of Part 60—NO_X, CO, and VOC Emission Standards for Stationary Non-Emergency SI Engines ≥100 HP (Except Gasoline and Rich Burn LPG), Stationary SI Landfill/Digester Gas Engines, and Stationary Emergency Engines >25 HP]

iv. Formaldehyde emissions from each engine shall not exceed 0.42 pounds per hour and 1.83 tpy.

b. Each engine shall be equipped with an oxidation catalyst air pollution control device.

c. Each engine shall be equipped with an air to fuel controller. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.
[40 CFR §60.4243(g)]

d. Each engine shall be equipped with a non-resettable hour meter.

e. Compliance with the mass emission limits in item a of this condition is satisfied by compiling with Condition 4.1.4. and not exceeding the following concentrations during performance testing:

i. NO_x concentration of 57.6 ppmvd at 15% O_2.

ii. CO concentration of 26.0 ppmvd at 15% O_2.

iii. VOC concentration of 18.9 ppmvd at 15% O_2

f. The permittee shall replace the rod packing in each affected compressor once every 26,000 hours of operation.
[40 CFR §60.5385(a)(1)]

4.1.2. The following conditions and requirements are specific to the internal combustion engines identified as CM-2001:

a. Emissions from the engine shall not exceed the following:

i. NO_x emissions from the engine shall not exceed 82 ppmvd at 15 percent O_2. The mass rate of NO_x emissions shall not exceed 2.61 pounds per hour and 11.44 tpy.

ii. CO emissions from engine shall not exceed 270 ppmvd at 15 percent O_2. The mass rate of CO emissions shall not exceed 0.73 pounds per hour and 3.20 tpy

iii. VOC emissions from the engine shall not exceed 86 ppmvd at 15 percent O_2. Formaldehyde is excluded from this VOC limit. . The mass rate of VOC emissions shall not exceed 1.46 pounds per hour and 6.41 tpy.
[40 CFR §60.4333(e) & Table 1 to Subpart JJJJ of Part 60—NO_X, CO, and VOC Emission Standards for Stationary Non-Emergency SI Engines ≥100 HP (Except Gasoline and Rich Burn LPG), Stationary SI Landfill/Digester Gas Engines, and Stationary Emergency Engines >25 HP]

iv. Formaldehyde emissions from each engine shall not exceed 0.16 pounds per hour and 0.69 tpy.

b. Each engine shall be equipped with an oxidation catalyst air pollution control device.

c. Each engine shall be equipped with an air to fuel controller. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.
[40CFR§60.4243(g)]

d. Each engine shall be equipped with a non-resettable hour meter.

e. Compliance with the mass emission limits in item a of this condition is satisfied by compiling with Condition 4.1.4. and not exceeding the following concentrations during performance testing:

i. NO_x concentration of 56.5 ppmvd at 15% O_2.

ii. CO concentration of 26.0 ppmvd at 15% O_2.

iii. VOC concentration of 33.0 ppmvd at 15% O_2

f. The permittee shall replace the rod packing in each affected compressor once every 26,000 hours of operation.
[40 CFR §60.5385(a)(1)]

4.1.3. The permittee shall only operate these engines using fuel gas, except during emergency operation at which the permittee may operate them using propane for a maximum of 100 hours per year.
[40CFR§60.4243(e)]

4.1.4. Requirements for Use of Oxidization Catalysts

a. 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;

b. The permittee shall check the air/fuel ratio and adjust in accordance to the manufacturer's specifications. The permittee shall maintain these records for five (5) years. The permittee shall monitor the temperature to the inlet of the catalyst and in accordance with manufacturer's specifications a high temperature alarm shall shut off the engine before thermal deactivation of the catalyst occurs. The permittee shall also inspect for thermal deactivation of the catalyst before restarting the engine;

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.

4.1.5. **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 maintain a maintenance plan of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
[40 CFR §60.4243(b)(2)(ii)]

4.2.2. The permittee shall monitored and record the hours of operation through the non-resettable hour meter for each engine on a monthly basis and record the number of hours the engine operated using propane. Records of such monitoring shall be maintained in accordance with Condition 3.4.1.
[40CFR§60.4245(b)]

4.3. Testing Requirements

4.3.1. The permittee must conduct performance testing on engines CM-1001, CM-1002, and CM-2001 once every 8,760 hours of operation or once every three years, whichever comes first. Such testing shall be conducted in accordance with the applicable procedures in 40 CFR §60.4244 and Condition 3.3.1. Records of such testing shall be maintained in accordance with Condition 3.4.1.
[40CFR§60.4243(b)]

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. For each compressor connected to Engines CM-1001 and CM1002, the permittee shall maintain records of the following in accordance with Condition 3.4.1.

i. Record the cumulative number of hours of operation since initial startup or the previous replacement of the reciprocating compressor rod packing, whichever is later

ii. Record of the date of the most recent replacement of the rod packing.
[40 CFR §60.5385(c)(3)]

4.4.5. The permittee shall maintain records of the monitoring as required in Condition 4.1.4. for each engine in accordance with Condition 3.4.1.

4.5. Reporting Requirements

4.5.1. The permittee shall submit annual compliance reports that indicates compliance with Condition 4.1.1.f. and 40 CFR §60.5385(a)(1) from the compressors connected to engines to the Director and Administrator in accordance with Conditions 3.5.1. and 3.5.3. The reporting period of such reports shall begin on October 15 and ends on October 14. Submission of reports must be made within 90 days from the end of the reporting period. The permittee may submit one report for multiple affected facilities under Subpart OOOO to Part 60. Such reports shall include the following information:

i. The company name and address of the affected facility

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.

v. The records as required in Condition 4.4.4. for each affected compressor.
[40 CFR §60.5420(b) and (b)(4)(ii)]

5.0. Specific Requirements for Production Gas Dehydration Unit

5.1. Limitations and Standards

5.1.1. The permittee shall install, operate and maintain the production gas dehydration unit in accordance with the following requirements:

a. For the purposes of limiting emissions of benzene from the still vent of the regenerator to less than 1.0 ton per year, the permittee shall limit throughput of gas through the unit as stated in item b of this condition and route the still vent into a closed vent system to a control device.

b. The maximum amount of wet natural gas processed through the dehydration unit shall not exceed 120 MMscf per day. Compliance with this limit shall be determined using the daily throughput averaged on a monthly basis.

c. The flash tank off gas of the dehydration unit shall either be routed into a closed vent system to the pilot light and burner of the reboiler as fuel gas or recycled for recompression while the dehydration unit is in operation.

d. Vapors from the regenerator still vent shall be vented into a closed vent system which is routed to a control device that is identified as Dehydration Flare. Such control vent system shall be maintained in such a manner to be free of leaks. A leaking component is defined as a measured instrument reading greater than 500 ppm above background or by visual inspection. Monitor of the closed vent system shall be conducted in accordance with Condition 8.2.2.
[40 CFR §60.5400(a), §60.482-11a(g)]

5.1.2. The permittee shall operate and maintain the reboiler for the dehydration unit in accordance with the following emission limitations and operating parameters.

a. Emissions of VOC from the emission point RB-001 shall not exceed 0.66 pounds per hour. Annual VOC emissions shall not exceed 2.89 tons per year on a 12-month rolling total.

b. Total hazardous air pollutants (HAPs), which include BTEX, from emission point RB-001 shall not exceed 0.02 pounds per hour. Annual Total HAP emissions from RB-001 shall not exceed 0.1 tons per year on a 12-month rolling total.

c. Sulfur dioxide emissions from RB-001 shall not exceed 0.19 pounds per hour. Compliance with this emission limit is satisfied by limiting the hydrogen sulfide (H_2S) loading of the incoming natural gas to the facility to be no greater than 4.0 grains of H2S per 100 cubic feet of natural gas or 65 ppm of H_2S by volume.
[45 CSR §10-5.1.]

d. The permittee shall operate and maintain the reboiler in a manner to minimize emissions. Such operation of the flare shall constitute the following:

i. The pilot light for the reboiler shall be lit at all times when glycol is circulating in the dehydration unit. The fuel source for the pilot light shall be the flash tank off gas of the dehydrator or fuel (residue) gas.

ii. Visible emissions from emission point RB-001shall 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.c.iii.
[45 CSR §2-3.1]

iii. The reboiler shall only be fueled with fuel gas that meets the requirements of Condition 3.1.7., flash tank off gas, or any combination of these two fuels.

5.1.3. The Dehydration flare shall be designed and operated in accordance with the following:

a. The flare shall be a non-assisted flare.

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.
[45 CSR §6-4.3]

c. The flare shall be operated, with a flame present at all times whenever emissions may be vented to them.

d. The net heating value of the effluent going to the flare shall be 7.45 MJ/scm (300 Btu/scf) or greater.

e. The flare tip exit velocity shall not exceed 60 feet per second.

f. The total emissions from the flare shall not exceed the following limits:

i. Emissions of NO_x shall not exceed 0.50 pounds per hour and 2.17 tpy.

ii. Emissions of CO shall not exceed 2.19 pounds per hour and 9.58 tpy.

iii. Emissions of VOC shall not exceed 2.02 pounds per hour and 8.84 tpy.

iv. Emissions of SO_2 shall not exceed 0.19 pounds per hour. Compliance with this emission limit is satisfied by limiting the hydrogen sulfide (H2S) loading of the incoming natural gas to the dehydration unit to be no greater than 4.0 grains of H_2S per 100 cubic feet of natural gas or 65 ppm of H_2S by volume.
[45 CSR §10-5.1.]

v. Total HAPs shall not exceed 0.33 pounds per hour and 1.47 tpy.

5.1.4. **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.]

5.2. Monitoring Requirements

5.2.1. The permittee shall monitor and record the following parameters for the purpose of demonstrating compliance with Conditions 5.1.1., and 5.1.3.:

a. The throughput of wet natural gas processed through the dehydration unit on a daily basis, days the dehydration unit operated, and annual 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. 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)]

e. Records of such monitoring shall be maintained in accordance with Condition 3.4.1.

5.2.2. For the purpose of demonstrating proper operation of the Dehydration Flare as stated in Condition 5.1.3.b., the permittee shall conduct a visible emission observation using Section 11 of Method 22 for one hour once every calendar quarter in which the flare was in service. 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, visible emissions were observed for more than 2 minutes, then the permittee shall follow the 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.

5.3. Testing Requirements

5.3.1. In order to demonstrate compliance with the flare opacity requirements of 5.1.3.b., the permittee shall conduct a Method 22 opacity test for at least two hours within 180 days after issuance of this permit. 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. Such testing shall be conducted in accordance with Condition 3.3.1.

5.4. Recordkeeping Requirements

5.4.1. **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.

5.4.2. **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.

5.4.3. The permittee shall maintain records of the analysis that is used to indicate compliance is in accordance with items a. and b. of Conditions 4.1.1. 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)]

6.0. Specific Requirements Process Heaters

6.1. Limitations and Standards

6.1.1. Maximum Design Heat Input. The maximum design heat input (MDHI) for each of the heaters shall not exceed the following:

Table 6.1.1. – List Heaters

Emission Unit ID#	Heater Description	MDHI (MMBTU/hr)	Annual Heat Input (MMBtu/yr)
H-711	Mole Sieve Regeneration Heater[1]	7.86	68,853.60
H-2711	Mole Sieve Regeneration Heater[1]	7.86	68,853.60
H-3711	Mole Sieve Regeneration Heater[1]	7.86	68,853.60
H-771	Hot Oil Heater	28.25	247,470.00
H-4711	Mole Sieve Regeneration Heater[2]	18.00	157,680.00
H-5711	Mole Sieve Regeneration Heater[2]	18.00	157,680.00
H-6711	Mole Sieve Regeneration Heater[2]	18.00	157,680.00
H-7711	Mole Sieve Regeneration Heater[2]	18.00	157,680.00
H-8711	Mole Sieve Regeneration Heater[2]	18.00	157,680.00
H-9711	Mole Sieve Regeneration Heater[2]	18.00	157,680.00
H-6712	Hot Oil Heater	6.60	57,816.00
H-4712	Hot Oil Heater	6.60	57,816.00
H-8712	Hot Oil Heater	7.20	63,072.00
H-751	Stabilization Heater	6.35	55,626.00
D1-H-782	DeEthanizer HMO Heater[3]	119.2	1,044,192.00
D1-H-741	DeEthanizer Regen Heater[2]	12.23	107,134.80
Total Maximum Design Heat Input		312.06	2,840,430.00

1 - Denotes the heater is a process heater per 45 CSR §2-26.
2 - Denotes the heater is a process heater per 45 CSR §2-26 and 40 CFR §60.41c.
3 - Denotes the unit is a process heater per 45 CSR §2-26 and 40 CFR §60.41c and 40 CFR §60.41b.

6.1.2. The following heaters shall not exhibit visible emissions greater than 10 percent opacity on a six-minute block average: H-751, H-771, H-4712, H-6712 and H-8712.
[45CSR§2-3.1.]

6.1.3. The permittee shall not exceed the following limits of annual emissions from combined heaters listed in Table 6.1.1.

a. Emissions of NOx shall not exceed 49.04 tpy.

b. Emissions of CO shall not exceed 62.21 tpy.

c. Emissions of VOCs shall not exceed 7.71 tpy.

Compliance with these emissions limits shall be satisfied by complying with Conditions 6.1.4., 6.1.5., and 6.1.6.

6.1.4. All of the fuel burning units listed in Table 6.1.1. shall be limited to using residue gas that complies with the requirements of Condition 3.1.7. Complying with this condition satisfies compliance with Condition 6.1.2. the use of residue gas in these emission units satisfies compliance with the limitations of 45CSR§2-3.1., 45CSR§2-4.1.b., and 45CSR§10-3.1.e.
[45CSR§2A-3.1.a., 45CSR§10-10.3., and 45CSR§10A-3.1.b.]

6.1.5. The permittee shall conduct tune-up of all the heaters that are listed in Table 6.1.1. that have a MDHI of 5.0 MMBtu/hr or greater once every three years in accordance with the following:

a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (permittee may delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;

b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;

c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);

d. Optimize total emissions of CO to a concentration not to exceed 50 ppm. This optimization should be consistent with the manufacturer's specifications, which includes the manufacturer's NOx concentration specification of not to exceed 30 ppm, expect for Heaters H-6712 H-4712, H-8712, which is not exceed a NO_x concentration of 33 ppm.

e. Measure the concentrations in the effluent stream of NO_x and CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

6.1.6. The annual heat input of each heater listed in Table 6.1.1. shall not exceed the value as listed in the table for the corresponding heater. Compliance with this limit shall be conducted on 12 month rolling total.

6.2. Monitoring Requirements

6.2.1. For each month, the permittee shall record the hours of operation and amount of fuel gas consumed by heaters listed in Table 6.1.1., and shall calculate the rolling yearly total of total heat input from the heaters. The permittee may record the total amount of fuel gas consume by the heaters and other emission units on a combined basis. For other emission units not listed but fuel usage include on the fuel meter, the permittee shall monitor the hour of operation of these sources to account for their fuel usage as well. Such records shall be maintained in accordance with Condition 3.4.1. of this permit.
[40 CFR §60.48c(g)(2) and 45CSR§2A-7.1.a.1.]

6.3. Testing Requirements

[Reserved]

6.4. Recordkeeping Requirements

6.4.1. The permittee shall keep the following records in accordance Condition 3.4.1.. This includes but is not limited to the following information during the tune-up as required in Condition 6.1.5.:

a. The concentrations of CO and NO_x in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater; and

b. A description of any corrective actions taken as a part of the tune-up.

6.5. Reporting Requirements

[Reserved]

7.0. Specific Requirements for the Storage Tanks

7.1. Limitations and Standards

7.1.1. Combined total VOC emissions from the storage tanks (4 Storage Tanks (1-500 bbl gunbarrel tank, 3-400 bbl condensate/water tanks)) shall not exceed 9.6 tpy. Compliance with this limit shall be satisfied by compliance with Condition 7.1.2.

7.1.2. The permittee shall install and operate prior to start-up of the storage tanks a vapor recovery unit (VRU) system while any of the respective vessels (1-500 bbl gunbarrel tank & 3-400 bbl condensate/water tanks) are in service, which include vessels that are empty but not degassed, and recompress the vapors back into a pipeline segment. Such VRU system, which includes the closed vent system and storage vessels, shall meet the following requirements:
[40 CFR §60.5365(e)(3)]

a. The cover and all openings on the cover (e.g., access hatches, sampling ports, pressure relief valves and gauge wells) shall form a continuous impermeable barrier over the entire surface area of the liquid in the storage vessel or wet seal fluid degassing system.
[40 CFR §60.5411(b)(1)]

b. Each cover opening shall be secured in a closed, sealed position (e.g., covered by a gasketed lid or cap) whenever material is in the unit on which the cover is installed except during those times when it is necessary to use an opening as follows:

i. To add material to, or remove material from the unit (this includes openings necessary to equalize or balance the internal pressure of the unit following changes in the level of the material in the unit);

ii. To inspect or sample the material in the unit;

iii. To inspect, maintain, repair, or replace equipment located inside the unit; or

iv. To vent liquids, gases, or fumes from the unit through a closed-vent system designed and operated in accordance with the requirements of 40 CFR §60.5411(a) or (c) to a control device or to a process.
[40 CFR §60.5411(b)(2)]

c. Each storage vessel thief hatch shall be equipped, maintained and operated with a weighted mechanism or equivalent, to ensure that the lid remains properly seated. The permittee must select gasket material for the hatch based on composition of the fluid in the storage vessel and weather conditions.
[40 CFR §60.5411(b)(3)]

d. The closed vent system shall be designed to route all gases, vapors, and fumes emitted from the material in the storage vessels to a control device that meets the requirements specified in §60.5412(c) and (d), or to a process.
[40 CFR §60.5411(c)(1)]

e. The permittee must design and operate a closed vent system with no detectable emissions, as determined using olfactory, visual and auditory inspections. Each closed vent system that routes emissions to a process must be operational 98 percent of the year or greater. Such system shall meet the requirements of Condition 8.1.2.
[40 CFR §§60.5411(c) & (c)(2)]

f. The permittee must meet the requirements specified in 40 CFR §60.5411(c)(3)(i) and (ii) of this section if the closed vent system contains one or more bypass devices that could be used to

divert all or a portion of the gases, vapors, or fumes from entering the control device or to a process.
[40 CFR §60.5411(c)(3)]

i. The permittee must properly install, calibrate, maintain, and operate a flow indicator at the inlet to the bypass device that could divert the stream away from the control device or process to the atmosphere that sounds an alarm, or, initiates notification via remote alarm to the nearest field office, when the bypass device is open such that the stream is being, or could be, diverted away from the control device or process to the atmosphere; or
[40 CFR §60.5411(c)(3)(i)(A)]

ii. The permittee must secure the bypass device valve installed at the inlet to the bypass device in the non-diverting position using a car-seal or a lock-and-key type configuration.
[40 CFR §60.5411(c)(3)(i)(B)]

g. Low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and safety devices are not subject to the requirements of 40 CFR §60.5411(c)(3)(i).
[40 CFR §60.5411(c)(3)(ii)]

7.2. Monitoring Requirements

7.2.1. The permittee shall monitor any by-pass device of the closed vent system by installing a continuous monitoring system that indicates opening a by-pass device and records date and length of time the device was open. Such records shall be maintained in accordance with Condition 3.4.1.

7.2.2. The permittee shall monitor and record monthly and rolling twelve month totals of liquid throughput during truck loading operations and the hours the compressor for the VRU system operated. Compliance with the 98% operational time in Condition 7.1.2.e. is based on the time the VRU system was operational divided by the number of hours that any of the vessels were in service over a 12-month rolling period. Such records shall be maintained in accordance with Condition 3.4.1.

7.3. Testing Requirements

[Reserved]

7.4. Recordkeeping Requirements

7.4.1. The permittee shall maintain a record of the amount of liquid unloaded from the vessels on a monthly basis. Such records shall be maintained in accordance with Condition 3.4.1.

7.4.2. The vapor recovery system will comply with the recordkeeping requirements of §60.486 and §60.635(b). Such records shall be maintained in accordance with Condition 3.4.1.

7.5. Reporting Requirements

[Reserved]

8.0. Specific Requirements Gas Processing Units & LDAR Program

8.1. Limitations and Standards

8.1.1. LDAR requirements are given in the following:

a. All groups of equipment located within Plants I though VI and the inlet station that are in VOC service are subject to the applicable LDAR requirements as given in 40 CFR 60, Subpart OOOO. All groups of equipment located within Plants VII, VIII, and the DeEthanizer that are in VOC service are subject to the applicable LDAR requirements as given in 40 CFR 60, Subpart OOOOa;

b. In addition to applicable Subpart OOOO or Subpart OOOOa requirements, to enforce the LDAR control percentages used to calculate potential fugitive VOC/HAP emissions from the process and piping components, the permittee shall meet the LDAR requirements as given in the attached (Appendix A) Texas Commission on Environmental Quality (TCEQ) document that sets specific requirements for the TCEQ 28VHP program; and

c. Non-control valves that are identified as "chronic leaker" shall be replaced with a Certified Low-leaking Valve or repack with Low-leaking Packing that is commercially available during the next schedule process turnaround once the value has been identified as a "chromic leaker". A "chronic leaker" is defined as any non-control valve which leaks above 10,000 ppm or any visible emission that may otherwise be invisible to the naked eye using an OGII after three attempts at repair.

8.1.2. The closed vent system that is used to route any pressure relief devices in VOC service at the facility to control device Flare FS-762 or back to a process shall be installed, maintained and operated in accordance with the closed vent requirements under 40 CFR 60, Subpart OOOOa.

8.1.3. Flare FS-762 shall be designed and operated in accordance with the following:

a. The main flare shall be an air-assisted flare with a piggy-back to a non-assisted flare.
[40 CFR §60.18(c)(6) & §60.482-10a(d)]

b. Both flares 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.
[40 CFR §60.18(c)(1)]

c. Both flares shall be operated with a flame present at all times whenever emissions may be vented to them.
[40 CFR §60.18(c)(2)]

d. The net heating value of the effluent going to the flare shall be 1,000 Btu per scf or greater.
[40 CFR §§60.18(c)(3)(ii) & (c)(4)(ii)]

e. The main flare tip exit velocity shall not exceed 253.5 feet per second.
[40 CFR §60.18(c)(5)]

f. The piggy-back flare tip exit velocity shall not fall below 60 feet per second and not exceed 144 feet per second.
[40 CFR §60.18(c)(4)(ii)]

g. The maximum flow rate to the flare system shall not exceed 1.674 MMscf per hour and 168.09 MMscf per year.

h. The total emissions from the flare shall not exceed following limits:

i. Emissions of NOx shall not exceed 140.85 pounds per hour and 7.17 tpy.

ii. Emissions of CO shall not exceed 642.03 pounds per hour and 32.32 tpy.

iii. Emissions of VOC shall not exceed 12.50 tpy.

iv. Total HAPs shall not exceed 0.24 tpy.

8.1.4. **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.]

8.2. Monitoring Requirements

8.2.1. ***[Reserved]***

8.2.2. ***[Reserved]***

8.2.3. The permittee shall monitor and record the volumetric amount of effluent, which includes the purge gas, routed to Flare FS-762. Such records shall be maintained in accordance with Condition 3.4.1.

8.2.4. In order to demonstrate compliance with the requirements of 8.1.3.c, the permittee shall monitor the presence or absence of a flare pilot flame using a thermocouple or any other equivalent device.
[40 CFR §60.18(f)(2)]

8.2.5. For the purpose of demonstrating proper operation of the flare (FS-762), the permittee shall conduct a visible emission observation using Section 11 of Method 22 for one hour once every calendar quarter. 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, visible emissions were observed for more than 2.5 minutes, then the permittee shall follow the manufacturer's repair instruction, if available or best combustion engineering practice as outlined 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.

8.3. Testing Requirements

8.3.1. In order to demonstrate compliance with the flare opacity requirements of 8.1.3.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 180 days after initial startup. 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.
[40 CFR §60.18(f)(1)]

8.4. Recordkeeping Requirements

8.4.1. **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.

8.4.2. **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.

8.4.3. **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.

8.4.4. For demonstrating compliance with non-control valves that has been identified as a “chronic leaker” and replace or repacked with “Certified Low-Leaking Valves or Packing” in Condition 8.1.1(c), the permittee shall record the date of “chronic leaker” was replaced and documentation that the valve or packing is “Certified Low-Leaking Valves or Packing”. If the packing was replaced, the bolt torque specification applied to the packing nut or packing flange shall be recorded. Such documentation shall be one of the following:

a. A written guarantee that the valve or packing will not leak above 500 parts per million (ppm) for five (5) years;

b. A written guarantee, certification, or equivalent documentation that the valve or packing has been tested pursuant to generally-accepted good engineering practices and has been found to be leaking at no greater than 500 ppm; or

c. A written guarantee, certification, or equivalent documentation that the valve or packing has been designed not to leak, above 500 ppm.

The permittee shall maintain such records in accordance with Condition 3.4.1 except the retention of the records. The records shall be retained for five years pass the life of the valve.

8.5. Reporting Requirements

8.5.1. The permittee shall submit records of annual Method 21 screening as required in Condition 8.2.1.e.vi. to the Administrator via email CCC_AWP@EPA.GOV. The permittee shall maintain records of such submittal in accordance with Condition 3.4.1.
[40 CFR §60.18(i)(5)]

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[1] _____ _____
(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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[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.

APPENDIX A – TCEQ 28VHP PROGRAM REQUIREMENTS

Piping, Valves, Connectors, Pumps, Agitators, and Compressors - 28VHP

1. Except as may be provided for in the Special Conditions of this permit, the following requirements apply:

   A. The requirements of paragraphs F and G shall not apply (1) where the Volatile Organic Compound (VOC) has an aggregate partial pressure or vapor pressure of less than 0.044 pounds per square inch, absolute (psia) at 68°F or (2) operating pressure is at least 5 kilopascals (0.725 psi) below ambient pressure. Equipment excluded from this condition shall be identified in a list or by one of the methods described below to be made readily available upon request.

   The exempted components may be identified by one or more of the following methods:

   (1) piping and instrumentation diagram (PID);

   (2) a written or electronic database or electronic file;

   (3) color coding;

   (4) a form of weatherproof identification; or

   (5) designation of exempted process unit boundaries.

   B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute (ANSI), American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), or equivalent codes.

   C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical. New and reworked buried connectors shall be welded.

   D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Difficult-to-monitor and unsafe-to-monitor valves, as defined by Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115), shall be identified in a list to be made readily available upon request.

   The difficult-to-monitor and unsafe-to-monitor valves may be identified by one or more of the methods described in subparagraph A above. If an unsafe to monitor component is not considered safe to monitor within a calendar year, then it shall be monitored as soon as possible during safe to monitor times. A difficult to monitor component for which quarterly monitoring is specified may instead be monitored annually.

   E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Gas or hydraulic testing of the new and reworked piping connections at no less than operating pressure shall be performed prior to returning the components to service or they shall be monitored for leaks using an approved gas analyzer within 15 days of the components being returned to service. Adjustments shall be made as necessary to obtain leak-free performance. Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through.

Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, both valves shall be closed. If the isolation of equipment for hot work or the removal of a component for repair or replacement results in an open ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the permit holder must complete either of the following actions within that time period;

(6) a cap, blind flange, plug, or second valve must be installed on the line or valve; or

(7) the open-ended valve or line shall be monitored once for leaks above background for a plant or unit turnaround lasting up to 45 days with an approved gas analyzer and the results recorded. For all other situations, the open-ended valve or line shall be monitored once within the 72 hour period following the creation of the open ended line and monthly thereafter with an approved gas analyzer and the results recorded. For turnarounds and all other situations, leaks are indicated by readings of 500 ppmv and must be repaired within 24 hours or a cap, blind flange, plug, or second valve must be installed on the line or valve.

F. Accessible valves shall be monitored by leak checking for fugitive emissions at least quarterly using an approved gas analyzer. Sealless/leakless valves (including, but not limited to, welded bonnet bellows and diaphragm valves) and relief valves equipped with a rupture disc upstream or venting to a control device are not required to be monitored. If a relief valve is equipped with rupture disc, a pressure-sensing device shall be installed between the relief valve and rupture disc to monitor disc integrity.

A check of the reading of the pressure-sensing device to verify disc integrity shall be performed at least quarterly and recorded in the unit log or equivalent. Pressure-sensing devices that are continuously monitored with alarms are exempt from recordkeeping requirements specified in this paragraph. All leaking discs shall be replaced at the earliest opportunity but no later than the next process shutdown.

The gas analyzer shall conform to requirements listed in Method 21 of 40 CFR part 60, appendix A. The gas analyzer shall be calibrated with methane. In addition, the response factor of the instrument for a specific VOC of interest shall be determined and meet the requirements of Section 8 of Method 21. If a mixture of VOCs is being monitored, the response factor shall be calculated for the average composition of the process fluid. A calculated average is not required when all of the compounds in the mixture have a response factor less than 10 using methane. If a response factor less than 10 cannot be achieved using methane, then the instrument may be calibrated with one of the VOC to be measured or any other VOC so long as the instrument has a response factor of less than 10 for each of the VOC to be measured.

Replacements for leaking components shall be re-monitored within 15 days of being placed back into VOC service.

G. Except as may be provided for in the special conditions of this permit, all pump, compressor, and agitator seals shall be monitored with an approved gas analyzer at least quarterly or be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. Seal systems designed and operated to prevent emissions or seals equipped with an automatic seal failure detection and alarm system need not be monitored. These seal systems may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals

degassing to vent control systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.

H. Damaged or leaking valves or connectors found to be emitting VOC in excess of 500 parts per million by volume (ppmv) or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Damaged or leaking pump, compressor, and agitator seals found to be emitting VOC in excess of 2,000 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. A first attempt to repair the leak must be made within 5 days and a record of the attempt shall be maintained.

I. A leaking component shall be repaired as soon as practicable, but no later than 15 days after the leak is found. If the repair of a component would require a unit shutdown that would create more emissions than the repair would eliminate, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging within 15 days of the detection of the leak. A listing of all components that qualify for delay of repair shall be maintained on a delay of repairlist. The cumulative daily emissions from all components on the delay of repair list shall be estimated by multiplying by 24 the mass emission rate for each component calculated in accordance with the instructions in 30 TAC 115.782 (c)(1)(B)(i)(II). The calculations of the cumulative daily emissions from all components on the delay of repair list shall be updated within ten days of when the latest leaking component is added to the delay of repair list. When the cumulative daily emission rate of all components on the delay of repair list times the number of days until the next scheduled unit shutdown is equal to or exceeds the total emissions from a unit shutdown as calculated in accordance with 30 TAC 115.782 (c)(1)(B)(i)(I), the TCEQ Regional Manager and any local programs shall be notified and may require early unit shutdown or other appropriate action based on the number and severity of tagged leaks awaiting shutdown. This notification shall be made within 15 days of making this determination.

J. Records of repairs shall include date of repairs, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of instrument monitoring shall indicate dates and times, test methods, and instrument readings. The instrument monitoring record shall include the time that monitoring took place for no less than 95% of the instrument readings recorded. Records of physical inspections shall be noted in the operator's log or equivalent.

K. Alternative monitoring frequency schedules of 30 TAC " 115.352 - 115.359 or National Emission Standards for Organic Hazardous Air Pollutants, 40 CFR Part 63, Subpart H, may be used in lieu of Items F through G of this condition.

L. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable New Source Performance Standard (NSPS), or an applicable National Emission Standard for Hazardous Air Pollutants (NESHAPS) and does not constitute approval of alternative standards for these regulations.