

August 12, 2016

#### BY: U.S. CERTIFIED MAIL, RETURN RECEIPT REQUESTED

9590 9401 0103 5168 7643 32

William F. Durham
Director, Division of Air Quality
WVDEP
601 57<sup>th</sup> Street
Charleston, WV 25304

RE: <u>Dominion Transmission, Inc. – Title V Renewal Application</u> Sweeney Compressor Station – R30-04100012-2012

Dear Mr. Durham:

Enclosed please find the Title V Renewal Application for Dominion Transmission, Inc.'s (DTI) Sweeney Compressor Station, Permit No. R30-04100012-2012. The enclosure consists of one hard copy and two cd copies of the application that includes all attachments.

As part of the Title V renewal application, the equipment list has been updated based on recent updates to the Sweeney Station:

- Equipment removed from the facility:
  - o CPR01 Waukesha XAHU-5746X Emergency Air Compressor (50 hp)
  - HTR01 Parkersburg IH3000 Pipeline Heater (3.0 MMBtu/hr)
  - BLR01 Weil-McLain Boiler (3.74 MMBtu/hr)
  - o TK04 65 gal Horizontal Aboveground Storage Tank (Methanol)
  - TK08 4,200 gal Vertical Aboveground Storage Tank (Triethylene Glycol)
  - TK09 4,200 gal Vertical Aboveground Storage Tank (Ethylene Glycol)
- Equipment added to the facility:
  - BLR02 Cleaver Brooks Boiler (3.5 MMBtu/hr)
  - TK10 2,000 gal Horizontal Aboveground Storage Tank (Produced Fluids)
  - TK11 1,000 gal Horizontal Aboveground Storage Tank (Produced Fluids)
  - o TK12 455 gal Horizontal Aboveground 7-Chambered Storage Tank (Lube Oil)
  - o TK13 1,000 gal Horizontal Aboveground Storage Tank (Triethylene Glycol)
  - TK14 4,000 gal Horizontal Aboveground Storage Tank (Distillate Oil)

- · Correction to equipment at the facility:
  - TK07 This tank was previously listed as a produced fluids tank, but the correct description is a distillate oil tank.
  - FL02 The flare previously had a design capacity of "99% efficiency". We request to change this to "4.0 MMBtu/hr".

In addition, as part of the renewal application, we request the following change to the Title V permit:

Section 6.0 – Auxiliary Generators (AUX03 and AUX04)

We request that NESHAP Subpart ZZZZ non-emergency "remote" requirements be spelled out and included in the Title V permit for auxiliary generators AUX03 and AUX04 as they are remote engines under the NESHAP. As a result, the other NESHAP requirements for these engines would be removed.

Sections 6.0 and 7.0 – NESHAP Subpart ZZZZ Requirements

We request that the NESHAP Subpart ZZZZ requirements be spelled out and included in the Title V permit (instead of just referenced in the Title V permit) to improve clarity and ensure compliance. Therefore, all requirements for the facility will be in one permit (Title V).

If you require any additional information, please contact Rebekah Remick at (804) 273-3536 or via email at Rebekah.J.Remick@dom.com.

Sincerely,

Amanda B. Tornabene

Director, Energy Infrastructure Environmental Services

# SWEENEY COMPRESSOR STATION DOMINION TRANSMISSION, INC. APPLICATION FOR TITLE V OPERATING PERMIT RENEWAL TITLE V OPERATING PERMIT NO: R30-04100012-2012

Dominion Transmission, Inc. Sweeney Compressor Station 1835 Fink Creek Road Camden, WV 26338

**AUGUST 2016** 

## DOMINION TRANMISSION, INC. SWEENEY COMPRESSOR STATION

#### TITLE V OPERATING PERMIT RENEWAL APPLICATION

#### **TABLE OF CONTENTS**

Title V Permit Application Checklist for Administrative Completeness Cross Reference

Section 1: Introduction

Section 2: Title V Renewal Permit Application – General Forms

#### **ATTACHMENTS**

Attachment A: Area Map

Attachment B: Plot Plan

Attachment C: Process Flow Diagrams

Attachment D: Title V Equipment Table

Attachment E: Emission Unit Forms

Attachment G: Air Pollution Control Device Form

\*\*Note: There are no Attachments F and H for this permit application.

## TITLE V PERMIT APPLICATION CHECKLIST FOR ADMINISTRATIVE COMPLETENESS

Requirement	Application
One signed copy of the application (per WVDEP email correspondence 4/16/15)	Enclosed – Section 2
Correct number of copies of the application on separate CDs or diskettes, (i.e. at least one disc per copy)	Enclosed – 2 CDs
*Table of Contents (needs to be included but not for administrative completeness)	Table of Contents
Facility Information	Section 1/Section 2
Description of process and products, including NAICS and SIC codes, and including alternative operating scenarios	Section 1 / Section 2: TV Renewal Application Form Section #14
Area map showing plant location	Attachment A
Plot plan showing buildings and process areas	Attachment B
Process flow diagram(s), showing all emission units, control equipment, emission points, and their relationships	Attachment C
Identification of all applicable requirements with a description of the compliance status, the methods used for demonstrating compliance, and a Schedule of Compliance Form (ATTACHMENT F) for all requirements for which the source is not in compliance	Not Applicable
Listing of all active permits and consent orders (if applicable)	Section 2: TV Renewal Application Form Section #21

Facility-wide emissions summary	Section 2: TV Renewal Application Form Section #23
Identification of Insignificant Activities	Section 2: TV Renewal Application Form Section #24
ATTACHMENT D – Title V Equipment Table completed for all emission units at the facility except those designated as insignificant activities	Attachment D
ATTACHMENT E – Emission Unit Form completed for each emission unit listed in the Title V Equipment Table (ATTACHMENT D) and a Schedule of Compliance Form (ATTACHMENT F) for all requirements for which the emission unit is not in compliance	Attachment E Attachment F not applicable
ATTACHMENT G – Air Pollution Control Device Form completed for each control device listed in the Title V Equipment Table (ATTACHMENT D)	Attachment G
ATTACHMENT H – Compliance Assurance Monitoring (CAM) Plan Form completed for each new control device for which the "Is the device subject to CAM?" question is answered "Yes" on the Air Pollution Control Device Form (ATTACHMENT G)	Attachment H not applicable
General Application Forms signed by a Responsible Official	Enclosed – Section 2
Confidential Information submitted in accordance with 45CSR31	Not Applicable

## **SECTION 1**

Introduction

#### INTRODUCTION:

Sweeney Station is a natural gas storage and compressor station used to pump natural gas into and out of a storage pool for Dominion Transmission, Inc. in West Virginia. Included in the Sweeney Station Title V permit is Dry Fork II M&R, a natural gas dehydration, measuring, and pressure regulating facility. Both are located in Camden, Lewis County, WV.

Sweeney Station has the potential to emit in excess of 100 tons per year of nitrogen oxides (NOx), carbon monoxide (CO), and volatile organic compounds (VOC). The station is classified as a major stationary source under West Virginia Department of Environmental Protection (WVDEP) Regulation (45 CSR Part 30) and is subject to the Title V Operating Permit provisions of Part 30. Sweeney Station is an area source of hazardous air pollutants (HAPs) since the potential to emit is less than 10 tons per year for individual HAPs and less than 25 tons per year of combined HAPs.

The last Title V Operating Permit renewal application was submitted in July 2011, and the renewed Title V Operating Permit was issued on June 12, 2012, with an expiration date of June 12, 2017. Sweeney Station is also subject to the underlying State Operating Permit (Rule 13 Permit No: R13-2498B). The Title V operating permit is for the operation of four (4) 1,350 hp natural gas fired reciprocating engines (EN01 – EN04), one (1) glycol dehydrator system (DEHY02) with a flare (FL02), one (1) dehydration unit reboiler (RBR02), two (2) 813 hp non-emergency auxiliary generators (AUX03 and AUX04), one (1) boiler (BLR02), and eleven (11) above ground storage tanks of various sizes (TK01 – TK03, TK05 – TK07, and TK10 – TK14).

#### PROCESS DESCRIPTION

Sweeney Station is a storage and compressor facility that services a natural gas storage pool and pipeline system. The compressor engines (EN01 – EN04) at the facility receive natural gas, flowing through a valve on the pipeline and at alternate times during the year, injects or withdraws natural gas from an underground storage pool. Prior to exiting the facility through the pipeline, the compressed natural gas is processed by the dehydration unit (DEHY02). The dehydration unit removes moisture and impurities from the gas stream.

The dehydration process (which is located at Dry Fork II M&R) begins with the compressed natural gas entering the unit and then being passed through a triethylene glycol dehydration system consisting of a contactor bed, a reboiler (RBR02), and associated equipment. As a result of this process, the natural gas is stripped of moisture and impurities, along with a small amount of hydrocarbons. The wet gas enters the contactor where moisture and some hydrocarbons are absorbed into the lean glycol. The glycol, which has become rich with absorbed moisture and some hydrocarbons, is regenerated in the still column (DEHY02) using the heat generated from the natural gas-fired reboiler (RBR02) to liberate the moisture and hydrocarbon vapors. The regenerator vapors are vented to the flare (FL02) to combust the hydrocarbons; thereby, reducing overall emissions and odor. The compressed, dehydrated gas then enters the pipeline.

Listed below is a description of the equipment located at the Sweeney Station:

Four (4) 1,350 hp Cooper GMVA-10 natural gas-fired reciprocating engines/integral compressors

Emission unit ID: EN01 – EN04
Emission point ID: EN01 – EN04

Two (2) 813 hp Caterpillar G3512 non-emergency auxiliary generators

Emission unit ID: AUX03 and AUX04
Emission point ID: AUX03 and AUX04

One (1) 3.5 MMBtu/hr natural gas-fired boiler

Emission unit ID: BLR02Emission point ID: BLR02

One (1) 1.47 MMBtu/hr natural gas-fired dehydration unit reboiler

Emission unit ID: RBR02Emission point ID: RBR02

One (1) 320 MMscf wet gas/day glycol dehydration system

Emission unit ID: DEHY02Emission point ID: DEHY02

One (1) still flare

Emission unit ID: FL02Emission point ID: 2E

One (1) 10,000 gallon vertical aboveground lube oil storage tank

Emission unit ID: TK01Emission point ID: TK01

One (1) 10,000 gallon vertical aboveground lube oil storage tank

Emission unit ID: TK02Emission point ID: TK02

One (1) 5,000 gallon horizontal aboveground ethylene glycol storage tank

Emission unit ID: TK03Emission point ID: TK03

One (1) 2,520 gallon vertical aboveground used oil storage tank

Emission unit ID: TK05Emission point ID: TK05

One (1) 300 gallon horizontal aboveground used oil storage tank

Emission unit ID: TK06Emission point ID: TK06

One (1) 2,520 gallon vertical aboveground distillate oil storage tank

Emission unit ID: TK07Emission point ID: TK07

One (1) 2,000 gallon horizontal aboveground produced fluids storage tank

Emission unit ID: TK10Emission point ID: TK10

One (1) 1,000 gallon horizontal aboveground produced fluids storage tank

Emission unit ID: TK11Emission point ID: TK11

One (1) 455 gallon horizontal aboveground lube oil 7-chambered storage tank

Emission unit ID: TK12Emission point ID: TK12

One (1) 1,000 gallon horizontal aboveground triethylene glycol storage tank (located at Dry Fork II M&R)

Emission unit ID: TK13Emission point ID: TK13

One (1) 4,000 gallon horizontal aboveground distillate oil storage tank (located at Dry Fork II M&R)

Emission unit ID: TK14Emission point ID: TK14

### **SECTION 2**

Title V Operating Permit Renewal Application – General Forms



#### WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL **PROTECTION**

### **DIVISION OF AIR QUALITY**

601 57<sup>th</sup> Street SE Charleston, WV 25304

Phone: (304) 926-0475

www.dep.wv.gov/daq

#### INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information			
1. Name of Applicant (As registered with the WV	2. Facility Name or Location:		
Secretary of State's Office):	Sweeney Station		
Dominion Transmission, Inc.			
3. DAQ Plant ID No.:	4. Federal Employer ID No. (FEIN):		
0 4 1 — 0 0 0 1 2	5 5 0 6 2 9 2 0 3		
5. Permit Application Type:			
☐ Initial Permit When did or	perations commence? 1956		
	expiration date of the existing permit? 6/12/2017		
Update to Initial/Renewal Permit Application			
	7 Taba Amalana Alan		
6. Type of Business Entity:	7. Is the Applicant the:		
☐ Corporation ☐ Governmental Agency ☐ LLC	Owner Operator Both		
Partnership Limited Partnership	If the Applicant is not both the owner and operator,		
8. Number of onsite employees:	please provide the name and address of the other		
11	party.		
11			
	<del></del>		
	<del></del>		
9. Governmental Code:			
	County government owned and operated; 3		
Federally owned and operated; 1	Municipality government owned and operated; 4		
State government owned and operated; 2	District government owned and operated; 5		
state government owned and operated, 2	District government owned and operated, 5		
10. Business Confidentiality Claims			
Does this application include confidential informatio	n (per 45CSR31)? Yes No		
If yes, identify each segment of information on each justification for each segment claimed confidential, in accordance with the DAQ's "PRECAUTIONARY NO	ncluding the criteria under 45CSR§31-4.1, and in		

11. Mailing Address				
Street or P.O. Box: 925 White Oaks Blvd.				
City: Bridgeport		State: WV		<b>Zip:</b> 26330
<b>Telephone Number:</b> (681) 842-3000	)	<b>Fax Number:</b> (681) 8	342-3323	
12. Facility Location				
Street: 1835 Fink Creek Road	City: Camden		County: Lewis	
UTM Easting: 530.50 km	UTM Northin	<b>ag:</b> 4,328.80 km	<b>Zone:</b> ⊠ 17 or □ 18	
<b>Directions:</b> From I-79 North to the Weston/Buckhannon exit (Exit 99). Take Route 33 to Weston. Go straight through two stoplights and at the third light (at Main Street) turn left. Go one block to 2 <sup>nd</sup> Street, next light, and turn right, following Route 33 West. Travel approximately 6 miles to Camden. Turn right on County Route 9 and go 6.3 miles to County Route 6 (on left) and go 1.7 miles. Station is on the left side of the road, across a small bridge.				
Portable Source?  Yes	No			
Is facility located within a nonattainment area?  Yes No If yes, for what air pollutants?				
Is facility located within 50 miles of another state?				
Is facility located within 100 km of a Class I Area¹? ☐ Yes ☐ No  If yes, name the area(s).  Otter Creek Wilderness Area  If no, do emissions impact a Class I Area¹? ☐ Yes ☐ No			, ,	
<sup>1</sup> Class I areas include Dolly Sods and Otter Face Wilderness Area in Virginia.	Creek Wilderness A	reas in West Virginia, and SI	henandoah N	National Park and James River

13. Contact Information			
Responsible Official: Brian C Sheppard		<b>Title:</b> Vice President, Pipeline Operations	
Street or P.O. Box: 925 White Oaks Blvd.			
City: Bridgeport	State: WV	<b>Zip:</b> 26330	
<b>Telephone Number:</b> (681) 842-3733	Fax Number: (681) 842-332	23	
E-mail address: Brian.C.Sheppard@dom.com			
Environmental Contact: Rebekah Remick		Title: Environmental Consultant	
Street or P.O. Box: 5000 Dominion Blvd.			
City: Glen Allen	State: VA	<b>Zip:</b> 23060	
<b>Telephone Number:</b> (804) 273-3536	Fax Number: (804) 273-2964		
E-mail address: Rebekah.J.Remick@dom.com			
Application Preparer: Rebekah Remick Title: Environmental Consulta			
Company: Dominion Resources, Inc.			
Street or P.O. Box: 5000 Dominion Blvd.			
City: Glen Allen	State: VA	<b>Zip:</b> 23060	
<b>Telephone Number:</b> (804) 273-3536	Fax Number: (804) 273-296	4	
E-mail address: Rebekah.J.Remick@dom.com			

14. Facility Descri	ption
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List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Natural Gas Compressor Station	N/A	486120	4922

#### Provide a general description of operations.

Sweeney Station is a storage and compressor facility that services a natural gas storage pool and pipeline system. The compressor engines (EN01-EN04) at the facility receive natural gas flowing through a valve on the pipeline and, at alternate times during the year, injects or withdraws natural gas from an underground storage pool. Prior to exiting the facility through the pipeline, the compressed natural gas is processed by the dehydration unit (DEHY02). The dehydration unit removes moisture and impurities from the gas stream.

- 15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.
- 16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to "Plot Plan Guidelines."
- Provide a detailed Process Flow Diagram(s) showing each process or emissions unit as ATTACHMENT
   Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

#### Section 2: Applicable Requirements

18. Applicable Requirements Summary				
Instructions: Mark all applicable requirements.				
□ SIP	☐ FIP			
Minor source NSR (45CSR13)	☐ PSD (45CSR14)			
NESHAP (45CSR34)	Nonattainment NSR (45CSR19)			
Section 111 NSPS	Section 112(d) MACT standards			
Section 112(g) Case-by-case MACT	☐ 112(r) RMP			
Section 112(i) Early reduction of HAP	Consumer/commercial prod. reqts., section 183(e)			
Section 129 Standards/Reqts.	Stratospheric ozone (Title VI)			
Tank vessel reqt., section 183(f)	Emissions cap 45CSR§30-2.6.1			
NAAQS, increments or visibility (temp. sources)	45CSR27 State enforceable only rule			
□ 45CSR4 State enforceable only rule	Acid Rain (Title IV, 45CSR33)			
☐ Emissions Trading and Banking (45CSR28)	Compliance Assurance Monitoring (40CFR64)			
☐ CAIR NO <sub>x</sub> Annual Trading Program (45CSR39)	CAIR NO <sub>x</sub> Ozone Season Trading Program (45CSR40)			
☐ CAIR SO <sub>2</sub> Trading Program (45CSR41)				
19. Non Applicability Determinations				

### List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

45 CSR 10 - Compressor engines (EN01 - EN04) have been excluded from the applicability of  $SO_2$  and  $H_2S$  limits. WVDAQ determined that 45 CSR 10 is not applicable to compressor engines.

40 CFR 60 Subpart JJJJ – The compressor engines (EN01 – EN04) and auxiliary generators (AUX03 and AUX04) are not subject to this subpart since they were manufactured before the applicability date.

40 CFR 60 Subpart OOOO – This subpart does not apply to the facility since the facility does not have gas wells, centrifugal compressors, reciprocating compressors, and/or pneumatic controllers constructed, modified, or reconstructed after August 23, 2011. None of the newly installed tanks onsite meet the applicability requirements in 40 CFR 60.5365(e).

40 CFR 60 Subpart OOOOa – This subpart does not apply to the facility since the facility does not have gas wells, centrifugal compressors, reciprocating compressors, and/or pneumatic controllers constructed, modified, or reconstructed after September 18, 2015. None of the newly installed tanks onsite meet the applicability requirements in 40 CFR 60.5365a(e).

40 CFR 63 Subpart HH – The facility is not considered to be within the natural gas production source category since it does not meet the definition of "facility," (i.e. the facility is categorized as a natural gas transmission and storage facility). Therefore, the requirements of this subpart do not apply.

40 CFR 63 Subpart HHH – While the facility is a transmission and storage facility, it is not a major source of HAP. Therefore, the requirements of this subpart do not apply.

40 CFR 63 Subpart DDDDD – The reboiler (RBR02) is not subject to this subpart since it is exempt by §63.7491(h) and facility is not major source of HAPs.

40 CFR 63 Subpart JJJJJJ – The reboiler (RBR02) is not applicable to this subpart since it is considered a "process heater," which is excluded from the definition of "boiler" in §63.11237.

40 CFR 64 – The dehy unit (DEHY02) is not subject to CAM since the R13-2498B permit specifies a "continuous compliance determination method" condition (e.g. continuously monitoring the flare using a thermocouple to detect the presence of a flame) which was included in the Title V permit, CAM does not apply (exemption per 64.2(b)(1)(vi)). In addition, the engines do not have any controls; therefore, in accordance with 64.2(a), CAM is not applicable to the engines.



Permit Shield

#### 20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements).

45 CSR 6-3.1 – Open burning prohibited (TV 3.1.1)

45 CSR 6-3.2 – Open burning exemption (TV 3.1.2)

40 CFR Part 61 and 45 CSR 15 - Asbestos inspection and removal (TV 3.1.3)

45 CSR 4-3.1 – No objectionable odors (TV 3.1.4)

45 CSR 11-5.2 – Standby plans for emergency episodes (TV 3.1.5)

WV Code 22-5-4 (a) (14) – Annual emission inventory reporting (TV 3.1.6)

40 CFR Part 82 Subpart F – Ozone depleting substances (TV 3.1.7)

40 CFR Part 68 – Risk Management Plan (TV 3.1.8)

45 CSR 17-3.1 – Fugitive Particulate Matter (TV 3.1.9)

45 CSR 13 – Minor source of HAPs (TV 3.1.10; R13-2498B 4.1.2)

45 CSR 13 - Operation and maintenance of air pollution control equipment (TV 3.1.11; R13-2498B 4.1.21)

45 CSR 13 – Permit suspended or revoked (TV 3.1.12; R13-2498B 4.1.22)



For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
45 CSR 6-3.1 – The permittee shall prohibit open burning (TV 3.1.1)
45 CSR 6-3.2 – The permittee shall notify if open burning occurs (TV 3.1.1)
40 CFR Part 61 and 45 CSR 15 – Prior to demolition/construction buildings will be inspected for asbestos (TV
3.1.3)
45 CSR 11 – Upon request by the Secretary, the permittee shall prepare a standby plan (TV 3.1.5)
WV Code 22-5-4 (a) (14) – The permittee shall submit annual emission inventory reporting (TV 3.1.6)
40 CFR Part 82 Subpart F – The permittee will prohibit maintenance, service, or repair of appliances containing
ozone depleting substances (TV 3.1.7)
40 CFR Part 68 – Should the permittee become subject to 40 CFR Part 68, a RMP shall be submitted (TV 3.1.8)
45 CSR 17 – The permittee will limit fugitive particulate matter emissions from the facility by burning only
pipeline quality natural gas (TV 3.1.9)
45 CSR 13 – The permittee will maintain minor source of HAPs status, and will use GLYCalc to calculate HAP
emissions for the dehydration unit (TV 3.1.10 and 3.3.2; R13-2498B 4.1.2 and 4.3.3)
45 CSR 13 and WV Code 22-5-4 (a) (14-15) – Testing Requirements (TV 3.3.1)
45 CSR 30 – Recordkeeping Requirements (TV 3.4)
45 CSR 30-5.1.c.2.A and 13 – The permittee shall keep records of monitoring information (TV 3.4.1; R13-2498B
4.4.1)
45 CSR 4-3.1 – Permittee shall maintain records of all odor complaints received (TV 3.4.3)
45 CSR 13 – Records of maintenance of air pollution control equipment (TV 3.4.4; R13-2498B 4.4.2)
45 CSR 13 – Records of malfunctions of air pollution control equipment (TV 3.4.5; R13-2498B 4.4.3)
45 CSR 13 – Records of potential to emit (PTE) calculations for the entire facility (TV 3.4.6; R13-2498B 4.4.10)
45 CSR 30 – Reporting Requirements (TV 3.5)
45 CSR 30-8 – The permittee shall submit a certified emissions statement and pay fees on an annual basis (TV
3.5.4)
45 CSR 30-5.3.e – The permittee shall submit annual compliance certifications (TV 3.5.5)
45 CSR 30-5.1.c.3.A – The permittee shall submit semi-annual monitoring reports (TV 3.5.6)
Are you in compliance with all facility-wide applicable requirements?   Yes   No
If no, complete the <b>Schedule of Compliance Form</b> as <b>ATTACHMENT F</b> .

21. Active Permits/Consent Orders		
Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit (if any)
R13-2498B	7/25/2011	N/A

Permit Number	Date of Issuance	Permit Condition Number
N/A		

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]		
Criteria Pollutants	Potential Emissions	
Carbon Monoxide (CO)	184.09	
Nitrogen Oxides (NO <sub>X</sub> )	1,092.01	
Lead (Pb)	N/A	
Particulate Matter (PM <sub>2.5</sub> ) <sup>1</sup>	7.78	
Particulate Matter (PM <sub>10</sub> ) <sup>1</sup>	7.78	
Total Particulate Matter (TSP)	10.48	
Sulfur Dioxide (SO <sub>2</sub> )	0.17	
Volatile Organic Compounds (VOC)	180.58	
Hazardous Air Pollutants <sup>2</sup>	Potential Emissions	
Acetaldehyde	1.63	
Acrolein	1.62	
Benzene	0.59	
Ethylbenzene	1.84	
Formaldehyde	5.95	
Hexane	0.12	
Toluene	0.44	
Xylene	1.13	
Regulated Pollutants other than Criteria and HAP	Potential Emissions	

 $<sup>{}^{1}</sup>PM_{2.5}$  and  $PM_{10}$  are components of TSP.

<sup>&</sup>lt;sup>2</sup>For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

#### Section 4: Insignificant Activities

24.	24. Insignificant Activities (Check all that apply)		
$\boxtimes$	1.	Air compressors and pneumatically operated equipment, including hand tools.	
	2.	Air contaminant detectors or recorders, combustion controllers or shutoffs.	
$\boxtimes$	3.	Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.	
$\boxtimes$	4.	Bathroom/toilet vent emissions.	
	5.	Batteries and battery charging stations, except at battery manufacturing plants.	
	6.	Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.	
	7.	Blacksmith forges.	
$\boxtimes$	8.	Boiler water treatment operations, not including cooling towers.	
	9.	Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.	
	10.	CO <sub>2</sub> lasers, used only on metals and other materials which do not emit HAP in the process.	
	11.	Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.	
$\boxtimes$	12.	Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.	
	13.	Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.	
	14.	Demineralized water tanks and demineralizer vents.	
	15.	Drop hammers or hydraulic presses for forging or metalworking.	
	16.	Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.	
	17.	Emergency (backup) electrical generators at residential locations.	
	18.	Emergency road flares.	
	19.	Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO <sub>x</sub> , SO <sub>2</sub> , VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units.	
		Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis:	

24.	24. Insignificant Activities (Check all that apply)		
	20.	Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.	
		Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:	
		<del></del>	
	21.	Environmental chambers not using hazardous air pollutant (HAP) gases.	
	22.	Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.	
	23.	Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.	
	24.	Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.	
	25.	Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.	
	26.	Fire suppression systems.	
$\boxtimes$	27.	Firefighting equipment and the equipment used to train firefighters.	
	28.	Flares used solely to indicate danger to the public.	
	29.	Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.	
	30.	Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.	
	31.	Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.	
	32.	Humidity chambers.	
	33.	Hydraulic and hydrostatic testing equipment.	
	34.	Indoor or outdoor kerosene heaters.	
$\boxtimes$	35.	Internal combustion engines used for landscaping purposes.	
	36.	Laser trimmers using dust collection to prevent fugitive emissions.	
	37.	Laundry activities, except for dry-cleaning and steam boilers.	
	38.	Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.	
	39.	Oxygen scavenging (de-aeration) of water.	
	40.	Ozone generators.	

24.	24. Insignificant Activities (Check all that apply)		
	41.	Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.)	
	42.	Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.	
	43.	Process water filtration systems and demineralizers.	
$\boxtimes$	44.	Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.	
	45.	Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.	
	46.	Routing calibration and maintenance of laboratory equipment or other analytical instruments.	
	47.	Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.	
	48.	Shock chambers.	
	49.	Solar simulators.	
$\boxtimes$	50.	Space heaters operating by direct heat transfer.	
	51.	Steam cleaning operations.	
	52.	Steam leaks.	
	53.	Steam sterilizers.	
	54.	Steam vents and safety relief valves.	
	55.	Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.	
	56.	Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.	
	57.	Such other sources or activities as the Director may determine.	
	58.	Tobacco smoking rooms and areas.	
	59.	Vents from continuous emissions monitors and other analyzers.	

#### 25. Equipment Table

Fill out the **Title V Equipment Table** and provide it as **ATTACHMENT D**.

#### 26. Emission Units

For each emission unit listed in the **Title V Equipment Table**, fill out and provide an **Emission Unit Form** as **ATTACHMENT E**.

For each emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**.

#### 27. Control Devices

For each control device listed in the **Title V Equipment Table**, fill out and provide an **Air Pollution Control Device Form** as **ATTACHMENT G**.

For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H**.

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance					
Not	This Certification must be signed by a responsible official. The <b>original</b> , signed in <b>blue ink</b> , must be submitted with the application. Applications without an <b>original</b> signed certification will be considered as incomplete.				
a. (	Certification of Truth, Accuracy and Completeness				
I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.					
b. (	Compliance Certification				
Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.					
Res	ponsible official (type or print)				
Nan	ne: Brian C. Sheppard  Title: Vice President, Pipeline Operations				
Responsible official's signature:  Signature: Signature Date: 08-09-16  (Must be signed and dated in blue ink)					
NY .	Discount of the state of the st				
	e: Please check all applicable attachments included with this permit application:				
	ATTACHMENT A: Area Map				
	ATTACHMENT B: Plot Plan(s)				
	ATTACHMENT C: Process Flow Diagram(s)				
	ATTACHMENT D: Equipment Table				
	ATTACHMENT E: Emission Unit Form(s)				
	ATTACHMENT F: Schedule of Compliance Form(s)				
	ATTACHMENT G: Air Pollution Control Device Form(s)				
	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)				

All of the required forms and additional information can be found and downloaded from, the DEP website at  $\underline{www.dep.wv.gov/daq}$ , requested by phone (304) 926-0475, and/or obtained through the mail.

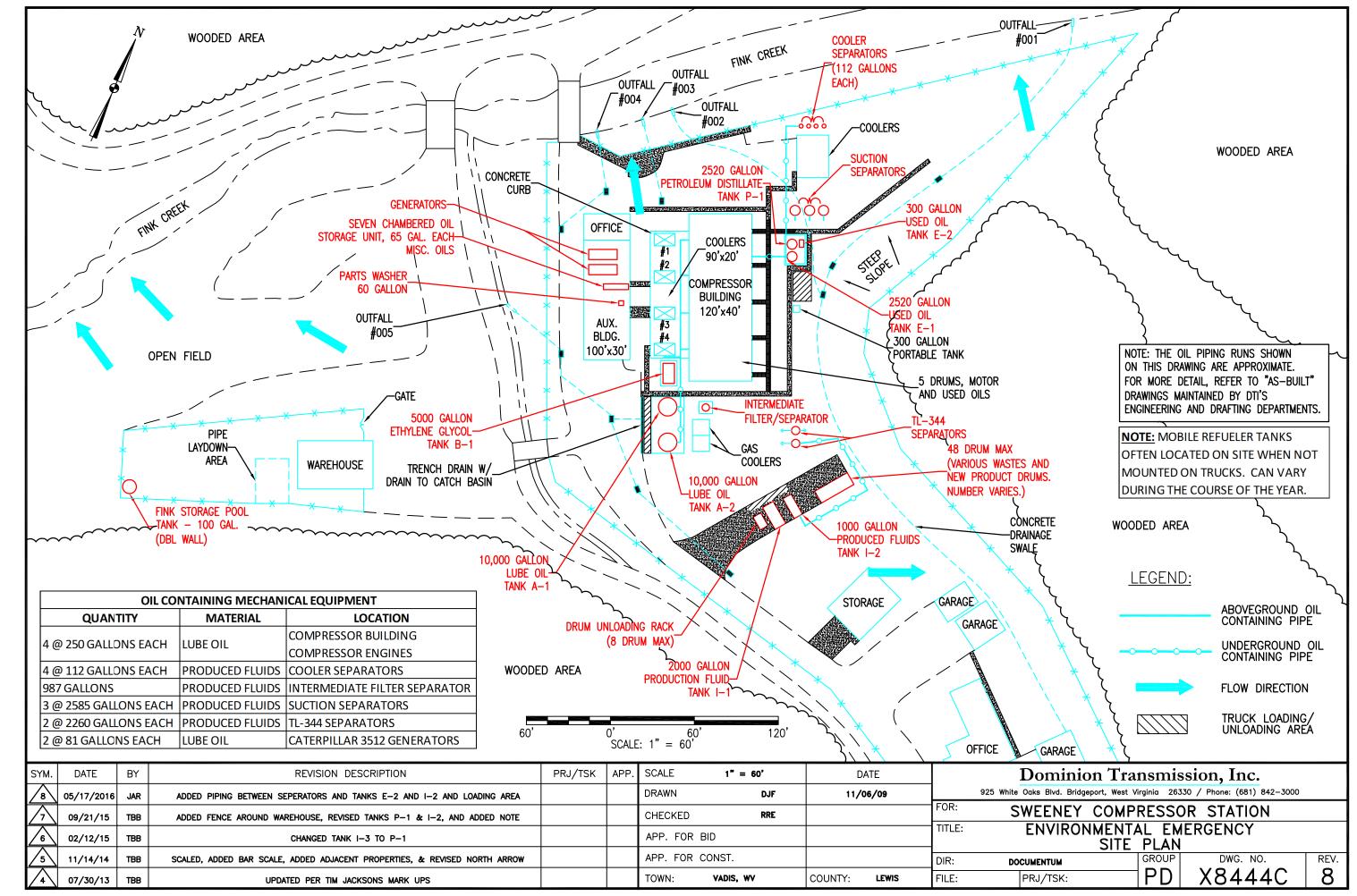
### **Attachment A**

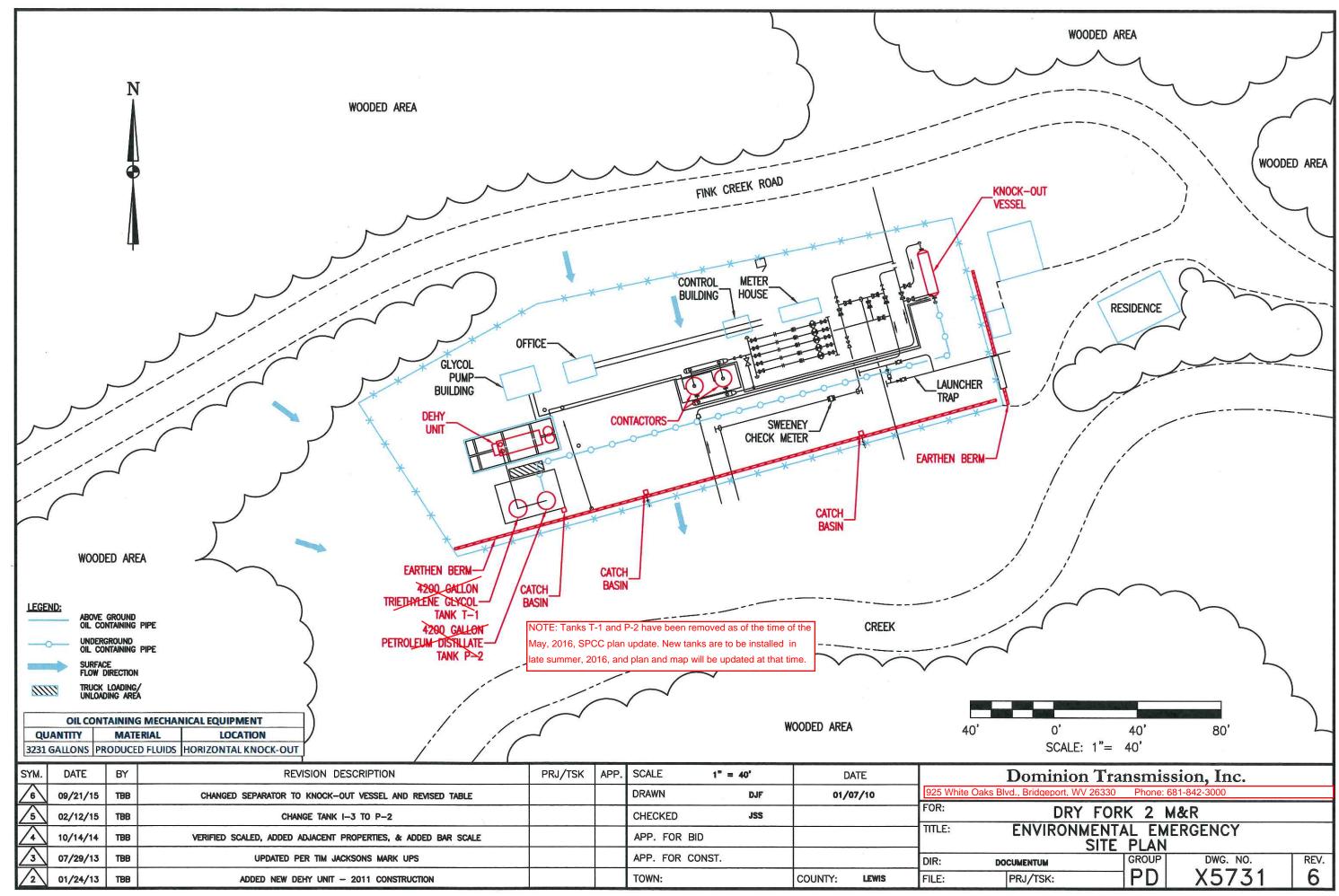
Area Map



### **Attachment B**

Plot Plan

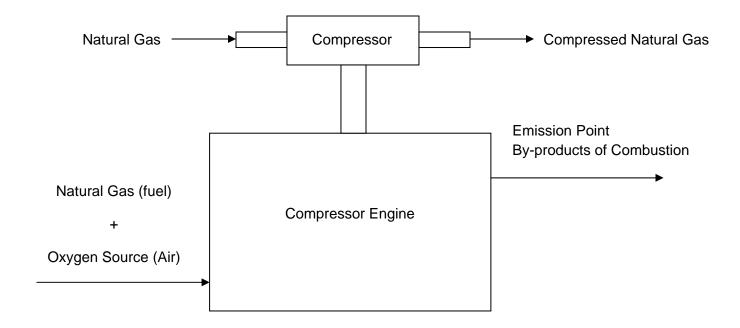




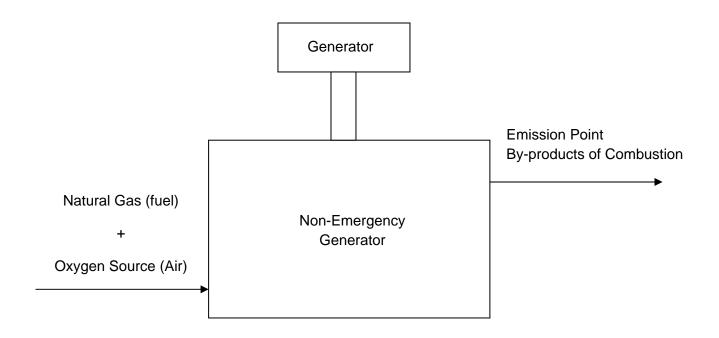
### **Attachment C**

**Process Flow Diagrams** 

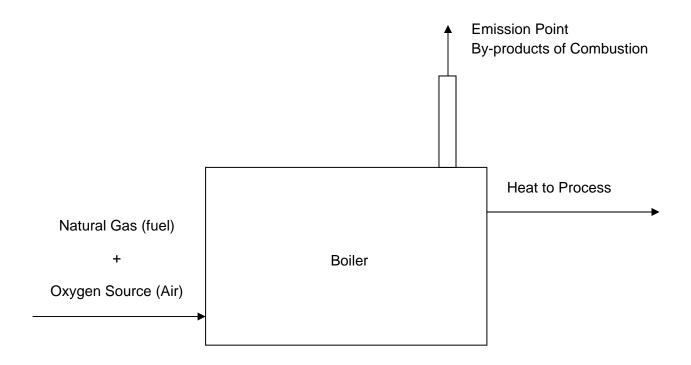
#### Compressor Engines (EN01 – EN04) Process Flow Diagram



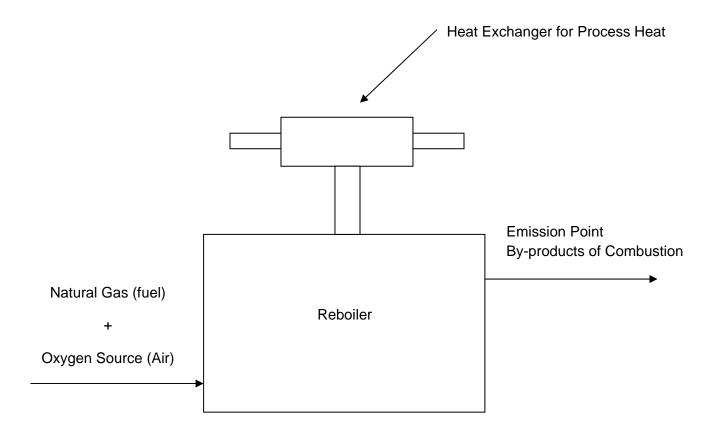
Non-Emergency Auxiliary Generators (AUX03 and AUX04) Process Flow Diagram



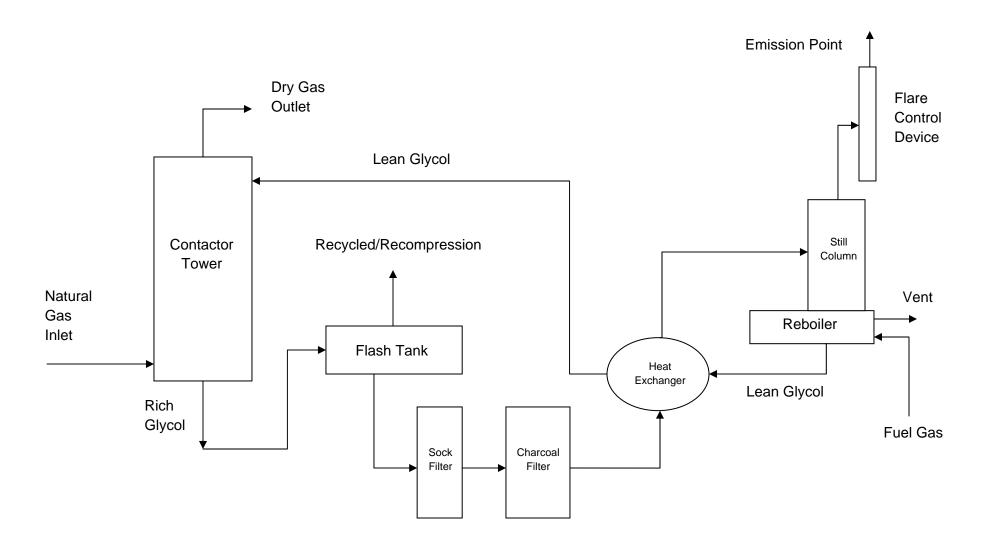
**Boiler (BLR02) Process Flow Diagram** 



### Reboiler (RBR02) Process Flow Diagram



#### Dehydration Unit (FL02, DEHY02, and RBR02) Process Flow Diagram



# **Attachment D**

Title V Equipment Table

### **ATTACHMENT D - Title V Equipment Table**

(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

insignificant activities in Section 4, item 24 of the General Forms)					
Emission Point ID <sup>1</sup>	Control Device <sup>1</sup>	Emission Unit ID <sup>1</sup>	Emission Unit Description	Design Capacity	Year Installed/ Modified
EN01	N/A	EN01	Reciprocating Engine/Integral Compressor; Cooper GMVA-10	1,350 hp	1956
EN02	N/A	EN02	Reciprocating Engine/Integral Compressor; Cooper GMVA-10	1,350 hp	1956
EN03	N/A	EN03	Reciprocating Engine/Integral Compressor; Cooper GMVA-10	1,350 hp	1956
EN04	N/A	EN04	Reciprocating Engine/Integral Compressor; Cooper GMVA-10	1,350 hp	1956
AUX03	N/A	AUX03	Non-Emergency Auxiliary Generator; Caterpillar G3512	813 hp	1996
AUX04	N/A	AUX04	Non-Emergency Auxiliary Generator; Caterpillar G3512	813 hp	1996
DEHY02	FL02	DEHY02	Dehydration Unit Still; Cameron	320 MMcf/day	2011
RBR02	N/A	RBR02	Dehydration Unit Reboiler; Cameron	1.47 MMBtu/hr	2011
FL02	N/A	2E	Dehydration Unit Still Flare; QTI Q100	4.0 MMBtu/hr	2011
TK01	N/A	TK01	Vertical Lube Oil Tank	10,000 Gallon	2002
TK02	N/A	TK02	Vertical Lube Oil Tank	10,000 Gallon	2002
TK03	N/A	TK03	Horizontal Ethylene Glycol Tank	5,000 Gallon	2002
TK05	N/A	TK05	Vertical Used Oil Tank	2,520 Gallon	2002
TK06	N/A	TK06	Horizontal Used Oil Tank	300 Gallon	2002
New units (an	d updates) to	o equipment	list:		
BLR02	N/A	BLR02	Boiler; Cleaver Brooks	3.5 MMBtu/hr	2016
TK07	N/A	TK07	Vertical Distillate Oil Tank	2,520 Gallon	2002
TK10	N/A	TK10	Horizontal Produced Fluids Tank	2,000 Gallon	2010
TK11	N/A	TK11	Horizontal Produced Fluids Tank	1,000 Gallon	2010
TK12	N/A	TK12	Horizontal Lube Oil 7-Chambered Tank	455 Gallon	Pre-2003
TK13	N/A	TK13	Horizontal Triethylene Glycol Tank	1,000 Gallon	2016
TK14	N/A	TK14	Horizontal Distillate Oil tank	4,000 Gallon	2016
Units that hav	e been remo	oved:			
CPR01	N/A	CPR01	Air Compressor; Waukesha XAHU-5746X, Emergency Use	50 hp	1956
HTR01	N/A	HTR01	Pipeline Heater; Parkersburg IH3000	3.0 MMBtu/hr	1961
BLR01	N/A	BLR01	Boiler; Weil-McLain	3.74 MMBtu/hr	1979

Title V Equipment Table (equipment\_table.doc)

TK04	N/A	TK04	Horizontal Methanol Tank	65 Gallon	2002
TK08	N/A	TK08	Vertical Triethylene Glycol Tank	4,200 Gallon	2002
TK09	N/A	TK09	Vertical Ethylene Glycol Tank	4,200 Gallon	2002

<sup>1</sup>For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

### **Attachment E**

**Emission Unit Forms** 

ATTACHMENT E - Emission Unit Form				
Emission Unit Description				
Emission unit ID number: AUX03	Emission unit name: AUX03 Non-Emergency Generator	List any control devices associated with this emission unit:		
Provide a description of the emission  Natural gas-fired non-emergency auxii	-	 esign parameters, etc	.):	
Manufacturer: Caterpillar	Model number: G3512	Serial number: 7NJ00205		
Construction date:  Installation date:  1996  Modification date(s):  N/A		):		
<b>Design Capacity (examples: furnace</b> 813 hp	s - tons/hr, tanks - gallons):			
Maximum Hourly Throughput: 8,943 scf/hr	Maximum Annual Throughput: 78.34 MMscf/yr	Maximum Operating Schedule: 8760 hrs/yr		
Fuel Usage Data (fill out all applicate	ole fields)			
Does this emission unit combust fuel	1? _XYes No	If yes, is it? Indirect Fired	_X_ Direct Fired	
Maximum design heat input and/or maximum horsepower rating: 813 hp Type and Btu/hr rating of burner 8.94 MMBtu/hr			ting of burners:	
List the primary fuel type(s) and if a the maximum hourly and annual fuel  Pipeline quality natural gas  - Maximum hourly fuel usage = Maximum annual fuel usage = Maximum	el usage for each. = 8,943 scf/hr	). For each fuel type	listed, provide	
Describe each fuel expected to be us	ed during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value	
Pipeline quality natural gas	20 gr sulfur/100 cf	N/A	1,000 Btu/cf	

Emissions Data			
Criteria Pollutants	Potential Emissions		
	PPH	TPY	
Carbon Monoxide (CO)	2.94	12.88	
Nitrogen Oxides (NO <sub>X</sub> )	3.58	15.68	
Lead (Pb)	N/A	N/A	
Particulate Matter (PM <sub>2.5</sub> )	0.08	0.37	
Particulate Matter (PM <sub>10</sub> )	0.08	0.37	
Total Particulate Matter (TSP)	0.17	0.76	
Sulfur Dioxide (SO <sub>2</sub> )	0.01	0.02	
Volatile Organic Compounds (VOC)	1.13	4.95	
Hazardous Air Pollutants	Potential Emissions		
	РРН	TPY	
Acetaldehyde	0.02	0.11	
Acrolein	0.02	0.10	
Benzene	0.01	0.06	
Ethylbenzene	< 0.01	< 0.01	
Formaldehyde	0.18	0.80	
Toluene	0.01	0.02	
Xylene	< 0.01	0.01	
Regulated Pollutants other than	Potential Emissions		
Criteria and HAP	РРН	TPY	

- CO, NOx, and VOC emission rates based on manufacturer specs.
- PM, SO2, and HAP emissions calculated from AP-42, Section 3.2, Natural Gas-Fired Reciprocating Engines, Table 3.2-1, 7/00

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
**Note: This unit is a non-emergency "remote" unit under NESHAP Subpart ZZZZ. Therefore, the requirements below are based off of that category and not of the conditions in the Title V permit (which are not for non-emergency remote units).
40 CFR Part 63 Subpart ZZZZ – NESHAP maintenance requirements 40 CFR Part 63 Subpart ZZZZ – NESHAP operating requirements 40 CFR Part 63 Subpart ZZZZ – NESHAP continuous compliance requirements 40 CFR Part 63 Subpart ZZZZ – NESHAP general requirements/provisions
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
40 CFR Part 63 Subpart ZZZZ – Change oil and filter, inspect spark plugs, and inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, or implement an oil analysis program (63.6595(a)(1), 63.6603, and Table 2d) 40 CFR Part 63 Subpart ZZZZ – Operate and maintain the RICE according to the manufacturer's instructions OR develop and follow your own maintenance plan (63.6625(e)(5), 63.6640(a), and Table 6) 40 CFR Part 63 Subpart ZZZZ – Evaluate the status of the RICE every 12 months to determine the remote status (63.6603(f)) 40 CFR Part 63 Subpart ZZZZ – Comply with all applicable general requirements/provisions (63.6605) 40 CFR Part 63 Subpart ZZZZ – Comply with all applicable recordkeeping requirements, which includes records of malfunctions and maintenance (63.6640, 63.6655, 63.10(b)(1))
Are you in compliance with all applicable requirements for this emission unit? _X_YesNo

If no, complete the Schedule of Compliance Form as ATTACHMENT  ${\bf F}.$ 

ATTACHMENT E - Emission Unit Form				
Emission Unit Description				
Emission unit ID number: AUX04	Emission unit name: AUX04 Non-Emergency Generator	List any control devices associated with this emission unit:		
Provide a description of the emission  Natural gas-fired non-emergency auxi	-	 esign parameters, etc	.):	
Manufacturer: Caterpillar	Model number: G3512	Serial number: 7NJ00206		
Construction date:  Installation date:  Modification date(s):  N/A		):		
<b>Design Capacity (examples: furnace</b> 813 hp	s - tons/hr, tanks - gallons):			
Maximum Hourly Throughput: 8,943 scf/hr	Maximum Annual Throughput: 78.34 MMscf/yr	Maximum Operating Schedule: 8760 hrs/yr		
Fuel Usage Data (fill out all applical	ole fields)			
Does this emission unit combust fuel	1? _XYes No	If yes, is it? Indirect Fired	_X_ Direct Fired	
Maximum design heat input and/or maximum horsepower rating: 813 hp  Type and Btu/hr rating of burner 8.94 MMBtu/hr			ting of burners:	
List the primary fuel type(s) and if a the maximum hourly and annual fuel  Pipeline quality natural gas  - Maximum hourly fuel usage - Maximum annual fuel usage	el usage for each. = 8,943 scf/hr	). For each fuel type	listed, provide	
Describe each fuel expected to be us	ed during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value	
Pipeline quality natural gas	20 gr sulfur/100 cf	N/A	1,000 Btu/cf	

Emissions Data			
Criteria Pollutants	Potential Emissions		
	PPH	TPY	
Carbon Monoxide (CO)	2.94	12.88	
Nitrogen Oxides (NO <sub>X</sub> )	3.58	15.68	
Lead (Pb)	N/A	N/A	
Particulate Matter (PM <sub>2.5</sub> )	0.08	0.37	
Particulate Matter (PM <sub>10</sub> )	0.08	0.37	
Total Particulate Matter (TSP)	0.17	0.76	
Sulfur Dioxide (SO <sub>2</sub> )	0.01	0.02	
Volatile Organic Compounds (VOC)	1.13	4.95	
Hazardous Air Pollutants	Potential Emissions		
	РРН	TPY	
Acetaldehyde	0.02	0.11	
Acrolein	0.02	0.10	
Benzene	0.01	0.06	
Ethylbenzene	< 0.01	< 0.01	
Formaldehyde	0.18	0.80	
Toluene	0.01	0.02	
Xylene	< 0.01	0.01	
Regulated Pollutants other than	Potential Emissions		
Criteria and HAP	РРН	TPY	

- CO, NOx, and VOC emission rates based on manufacturer specs.
- PM, SO2, and HAP emissions calculated from AP-42, Section 3.2, Natural Gas-Fired Reciprocating Engines, Table 3.2-1, 7/00

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
**Note: This unit is a non-emergency "remote" unit under NESHAP Subpart ZZZZ. Therefore, the requirements below are based off of that category and not of the conditions in the Title V permit (which are not for non-emergency remote units).
40 CFR Part 63 Subpart ZZZZ – NESHAP maintenance requirements 40 CFR Part 63 Subpart ZZZZ – NESHAP operating requirements 40 CFR Part 63 Subpart ZZZZ – NESHAP continuous compliance requirements 40 CFR Part 63 Subpart ZZZZ – NESHAP general requirements/provisions
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
40 CFR Part 63 Subpart ZZZZ – Change oil and filter, inspect spark plugs, and inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, or implement an oil analysis program (63.6595(a)(1), 63.6603, and Table 2d) 40 CFR Part 63 Subpart ZZZZ – Operate and maintain the RICE according to the manufacturer's instructions OR develop and follow your own maintenance plan (63.6625(e)(5), 63.6640(a), and Table 6) 40 CFR Part 63 Subpart ZZZZ – Evaluate the status of the RICE every 12 months to determine the remote status (63.6603(f)) 40 CFR Part 63 Subpart ZZZZ – Comply with all applicable general requirements/provisions (63.6605) 40 CFR Part 63 Subpart ZZZZ – Comply with all applicable recordkeeping requirements, which includes records of malfunctions and maintenance (63.6640, 63.6655, 63.10(b)(1))
Are you in compliance with all applicable requirements for this emission unit? _X_YesNo

If no, complete the Schedule of Compliance Form as ATTACHMENT  ${\bf F}.$ 

ATT	CACHMENT E - Emission Uni	it Form	
Emission Unit Description			
Emission unit ID number:	Emission unit name:	List any control devices associated	
BLR02	BLR02	with this emission u	ınit:
	Boiler	N/A	
Provide a description of the emission	on unit (type, method of operation, d	esign parameters, etc	.):
Natural gas-fired boiler			
Manufacturer:	Model number:	Serial number:	
Cleaver Brooks	FLX-700-350-160HW (460/3/60)- STD/CFG		
Construction date:	Installation date:	Modification date(s	s):
	2016	N/A	
Design Capacity (examples: furnac 3.5 MMBtu/hr	es - tons/hr, tanks - gallons):		
5.5 WIWIDIG/III	T	1	
Maximum Hourly Throughput: 0.0035 MMscf/hr	Maximum Annual Throughput: 30.66 MMscf/yr	Maximum Operation 8,760 hrs/yr	ng Schedule:
0.0033 IVIIVISCI/III	30.00 WIWISCI/ YI	8,700 ms/yr	
Fuel Usage Data (fill out all applica	ble fields)		
Does this emission unit combust fue	el? _X_Yes No	If yes, is it?	
		Indirect Fired	_XDirect Fired
Maximum design heat input and/or 3.5 MMBtu/hr	maximum horsepower rating:	Type and Btu/hr ra 0.0035 MMscf/hr	ting of burners:
List the primary fuel type(s) and if the maximum hourly and annual fu	applicable, the secondary fuel type(s nel usage for each.	s). For each fuel type	listed, provide
Pipeline quality natural gas  - Maximum hourly fuel usage - Maximum annual fuel usage			
Describe each fuel expected to be us	sed during the term of the permit.		
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Pipeline quality natural gas	20 gr sulfur/100 cf	N/A	1,000 Btu/cf

Emissions Data			
Criteria Pollutants	Potential Emissions		
	РРН	TPY	
Carbon Monoxide (CO)	0.29	1.29	
Nitrogen Oxides (NO <sub>X</sub> )	0.35	1.53	
Lead (Pb)	N/A	N/A	
Particulate Matter (PM <sub>2.5</sub> )	< 0.01	0.03	
Particulate Matter (PM <sub>10</sub> )	< 0.01	0.03	
Total Particulate Matter (TSP)	0.03	0.12	
Sulfur Dioxide (SO <sub>2</sub> )	< 0.01	0.01	
Volatile Organic Compounds (VOC)	0.02	0.08	
Hazardous Air Pollutants	Potential Emissions		
	PPH	TPY	
Benzene	< 0.01	< 0.01	
Formaldehyde	< 0.01	< 0.01	
Hexane	< 0.01	0.03	
Toluene	< 0.01	< 0.01	
Regulated Pollutants other than	Potential Emissions		
Criteria and HAP	РРН	TPY	

- NOx and CO emission factors from AP-42, Section 1.4, Natural Gas Combustion, Table 1.4-1, 7/98
- PM, PM10, PM2.5, SO2, and VOC emission factors from AP-42, Section 1.4, Natural Gas Combustion, Table 1.4-2, 7/98
- HAP emission factors from AP-42, Section 1.4, Natural Gas Combustion, Tables 1.4-3, 4, 7/98

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
**Note: The new boiler (BLR02) has not been incorporated in the Title V yet, but it is assumed that the previous boiler (BLR01) conditions would apply as stated below:
45 CSR 2-3.1 and 13 – Opacity limit of 10% on a six minute block average (TV 4.1.1) 45 CSR 13 – The reboiler shall not exceed 1.47 MMBtu/hr (TV 4.1.2)
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
**Note: The new boiler (BLR02) has not been incorporated in the Title V yet, but it is assumed that the previous boiler (BLR01) conditions would apply as stated below:
45 CSR and 13 - Compliance with TV 4.1.1 is demonstrated by a Method 9, if required (TV 4.2.1)
Are you in compliance with all applicable requirements for this emission unit? _X_YesNo
If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATT	ACHMENT E - Emission Uni	t Form	
Emission Unit Description			
Emission unit ID number: DEHY02	Emission unit name: DEHY02 Glycol Dehydration Unit	List any control dev with this emission u FL02 Flare	
Provide a description of the emission	unit (type, method of operation, d	 esign parameters, etc.	):
Dehydration unit still column		,	,
Manufacturer: Cameron	Model number: SHV-3	Serial number:	
Construction date:	Installation date: 2011	Modification date(s N/A	):
<b>Design Capacity (examples: furnace</b> 320 MMscf/day	s - tons/hr, tanks - gallons):		
Maximum Hourly Throughput: 320 MMscf/day (daily)	Maximum Annual Throughput: 116,800 MMscf/yr	Maximum Operating Schedule: 8,760 hrs/yr	
Fuel Usage Data (fill out all applicat	ole fields)		
Does this emission unit combust fuel	?Yes _X_ No	If yes, is it?  Indirect Fired	Direct Fired
Maximum design heat input and/or maximum horsepower rating:  Type and Btu/hr rating of burn			ting of burners:
List the primary fuel type(s) and if a the maximum hourly and annual fuel Natural gas  - Maximum daily wet gas through Maximum annual wet gas through Maxim	el usage for each.	s). For each fuel type	listed, provide
Describe each fuel expected to be us	ed during the term of the permit.		
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A	N/A	N/A	N/A

Emissions Data		
Criteria Pollutants	Potential Emissions	
	РРН	TPY
Carbon Monoxide (CO)	N/A	N/A
Nitrogen Oxides (NO <sub>X</sub> )	N/A	N/A
Lead (Pb)	N/A	N/A
Particulate Matter (PM <sub>2.5</sub> )	N/A	N/A
Particulate Matter (PM <sub>10</sub> )	N/A	N/A
Total Particulate Matter (TSP)	N/A	N/A
Sulfur Dioxide (SO <sub>2</sub> )	N/A	N/A
Volatile Organic Compounds (VOC)	0.81	3.55
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Benzene	0.03	0.11
Ethylbenzene	0.42	1.82
n-Hexane	< 0.01	< 0.01
Toluene	0.05	0.22
Xylenes	0.24	1.06
Regulated Pollutants other than	Potential Emissions	
Criteria and HAP	PPH	TPY

Emission rates for the dehydration unit were obtained from GRI GLYCalc 4.0 with a 99% destruction efficiency from the flare.

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
45 CSR 13 – The maximum wet natural gas throughput shall not exceed 320 MMscf/day or 116,800 MMscf/yr, using a 12 month rolling total (TV 5.1.7; R13-2498B 4.1.3)
45 CSR 13 – The dehydration unit shall be equipped with a flare to control VOC emissions (TV 5.1.8; R13-2498B 4.1.7)
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)  45 CSR 13 – Wet gas throughput shall be monitored on a monthly basis; keep records (TV 5.4.6; R13-2498B 4.4.11)
45 CSK 15 Wet gas unoughput shall be mointoired on a monthly basis, keep records (1 v 5.4.0, K15 2470B 4.4.11)
Are you in compliance with all applicable requirements for this emission unit? _X_YesNo
If no, complete the <b>Schedule of Compliance Form</b> as <b>ATTACHMENT F</b> .

ATTACHMENT E - Emission Unit Form			
Emission Unit Description			
Emission unit ID number: EN01	Emission unit name: EN01	List any control dewith this emission u	
	Reciprocating Engine/Integral Compressor	N/A	
Provide a description of the emission	n unit (type, method of operation, d	esign parameters, etc	.):
Natural gas fired reciprocating engine,	integral compressor		
Manufacturer: Cooper	Model number: GMVA-10	Serial number: 44071	
Construction date:	Installation date: 1956	Modification date(s): N/A	
<b>Design Capacity (examples: furnace</b> 1,350 hp	s - tons/hr, tanks - gallons):	,	
Maximum Hourly Throughput: 0.0104 MMscf/hr	Maximum Annual Throughput: 91.06 MMscf/yr	<b>Maximum Operating Schedule:</b> 8,760 hrs/yr	
Fuel Usage Data (fill out all applical	ole fields)		
Does this emission unit combust fuel	? _X_Yes No	If yes, is it?	
		Indirect Fired	_X_Direct Fired
Maximum design heat input and/or maximum horsepower rating: 1,350 hp		<b>Type and Btu/hr rating of burners:</b> 7,700 Btu/hp-hr 0.0104 MMscf/hr	
List the primary fuel type(s) and if a the maximum hourly and annual fu		s). For each fuel type	listed, provide
Pipeline quality natural gas  - Maximum hourly fuel usage =  - Maximum annual fuel usage =			
Describe each fuel expected to be us	ed during the term of the permit.		
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Pipeline quality natural gas	20 gr sulfur/100 cf	N/A	1,000 Btu/cf

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	8.93	39.11
Nitrogen Oxides (NO <sub>X</sub> )	60.30	264.11
Lead (Pb)	N/A	N/A
Particulate Matter (PM <sub>2.5</sub> )	0.40	1.75
Particulate Matter (PM <sub>10</sub> )	0.40	1.75
Total Particulate Matter (TSP)	0.50	2.20
Sulfur Dioxide (SO <sub>2</sub> )	0.01	0.03
Volatile Organic Compounds (VOC)	6.79	29.74
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Acetaldehyde	0.08	0.35
Acrolein	0.08	0.35
Benzene	0.02	0.09
Ethylbenzene	< 0.01	< 0.01
Formaldehyde	0.25	1.09
Hexane	< 0.01	0.02
Toluene	0.01	0.04
Xylene		
Regulated Pollutants other than	Potential Emissions	
Criteria and HAP	PPH	TPY

- CO, NOx, and VOC emission rates based on manufacturer specs.
- PM10, PM2.5, SO<sub>2</sub>, and HAP emission factors based on AP-42 Section 3.2, Table 3.2-1, 8/00.
- Formaldehyde emission rate based on November 2006 engine testing data (0.248 lb/hr).

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
40 CFR Part 63 Subpart ZZZZ – NESHAP maintenance requirements (TV 7.1.1.a) 40 CFR Part 63 Subpart ZZZZ – NESHAP general requirements/provisions (TV 7.1.1.b and c) 40 CFR Part 63 Subpart ZZZZ – NESHAP continuous compliance requirements (TV 7.1.1.d)
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
40 CFR Part 63 Subpart ZZZZ – Change oil and filter, inspect spark plugs, and inspect all hoses and belts every 4,320 hours of operation or annually, whichever one first, or utilize an oil analysis program (TV 7.1.1.a and 7.2.1) 40 CFR Part 63 Subpart ZZZZ – Operate and maintain the RICE according to the manufacturer's instructions OR develop and follow your own maintenance plan (TV 7.1.1.d and 7.2.1) 40 CFR Part 63 Subpart ZZZZ – Minimize the engine's time spent at idling during startup, not to exceed 30 minutes (TV 7.2.1)
40 CFR Part 63 Subpart ZZZZ - Comply with all applicable recordkeeping requirements (TV 7.4.1) 40 CFR Part 63 Subpart ZZZZ - Keep records of maintenance on the stationary RICE (TV 7.4.1) 40 CFR Part 63 Subpart ZZZZ - Keep records of malfunctions on the stationary RICE (TV 7.4.1) 40 CFR Part 63 Subpart ZZZZ - Permit deviation reporting (TV 7.5.1 and 7.5.2)
Are you in compliance with all applicable requirements for this emission unit? _X_YesNo
If no, complete the <b>Schedule of Compliance Form</b> as <b>ATTACHMENT F</b> .

ATT	ACHMENT E - Emission Uni	t Form	
Emission Unit Description			
Emission unit ID number: EN02	Emission unit name: EN02 Reciprocating Engine/Integral	List any control dewith this emission under N/A	
	Compressor		
Provide a description of the emission  Natural gas fired reciprocating engine.		esign parameters, etc	.):
Manufacturer: Cooper	Model number: GMVA-10	Serial number: 44072	
Construction date:	Installation date: 1956	Modification date(s): N/A	
<b>Design Capacity (examples: furnace</b> 1,350 hp	s - tons/hr, tanks - gallons):		
Maximum Hourly Throughput: 0.0104 MMscf/hr	Maximum Annual Throughput: 91.06 MMscf/yr	Maximum Operating Schedule: 8,760 hrs/yr	
Fuel Usage Data (fill out all applical	ble fields)	T	
Does this emission unit combust fuel	1? _X_Yes No	If yes, is it? Indirect Fired	_X_Direct Fired
Maximum design heat input and/or maximum horsepower rating: 1,350 hp		Type and Btu/hr rating of burners: 7,700 Btu/hp-hr 0.0104 MMscf/hr	
List the primary fuel type(s) and if a the maximum hourly and annual fue		s). For each fuel type	listed, provide
Pipeline quality natural gas  - Maximum hourly fuel usage =  - Maximum annual fuel usage =			
Describe each fuel expected to be us	ed during the term of the permit.		
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Pipeline quality natural gas	20 gr sulfur/100 cf	N/A	1,000 Btu/cf

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	8.93	39.11
Nitrogen Oxides (NO <sub>X</sub> )	60.30	264.11
Lead (Pb)	N/A	N/A
Particulate Matter (PM <sub>2.5</sub> )	0.40	1.75
Particulate Matter (PM <sub>10</sub> )	0.40	1.75
Total Particulate Matter (TSP)	0.50	2.20
Sulfur Dioxide (SO <sub>2</sub> )	0.01	0.03
Volatile Organic Compounds (VOC)	6.79	29.74
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Acetaldehyde	0.08	0.35
Acrolein	0.08	0.35
Benzene	0.02	0.09
Ethylbenzene	< 0.01	< 0.01
Formaldehyde	0.25	1.09
Hexane	< 0.01	0.02
Toluene	0.01	0.04
Xylene		
Regulated Pollutants other than	Potential Emissions	
Criteria and HAP	PPH	TPY

- CO, NOx, and VOC emission rates based on manufacturer specs.
- PM10, PM2.5, SO<sub>2</sub>, and HAP emission factors based on AP-42 Section 3.2, Table 3.2-1, 8/00.
- Formaldehyde emission rate based on November 2006 engine testing data (0.248 lb/hr).

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
40 CFR Part 63 Subpart ZZZZ – NESHAP maintenance requirements (TV 7.1.1.a) 40 CFR Part 63 Subpart ZZZZ – NESHAP general requirements/provisions (TV 7.1.1.b and c) 40 CFR Part 63 Subpart ZZZZ – NESHAP continuous compliance requirements (TV 7.1.1.d)
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
40 CFR Part 63 Subpart ZZZZ – Change oil and filter, inspect spark plugs, and inspect all hoses and belts every 4,320 hours of operation or annually, whichever one first, or utilize an oil analysis program (TV 7.1.1.a and 7.2.1) 40 CFR Part 63 Subpart ZZZZ – Operate and maintain the RICE according to the manufacturer's instructions OR develop and follow your own maintenance plan (TV 7.1.1.d and 7.2.1) 40 CFR Part 63 Subpart ZZZZ – Minimize the engine's time spent at idling during startup, not to exceed 30 minutes (TV 7.2.1)
40 CFR Part 63 Subpart ZZZZ - Comply with all applicable recordkeeping requirements (TV 7.4.1) 40 CFR Part 63 Subpart ZZZZ - Keep records of maintenance on the stationary RICE (TV 7.4.1) 40 CFR Part 63 Subpart ZZZZ - Keep records of malfunctions on the stationary RICE (TV 7.4.1) 40 CFR Part 63 Subpart ZZZZ - Permit deviation reporting (TV 7.5.1 and 7.5.2)
Are you in compliance with all applicable requirements for this emission unit? _X_YesNo
If no, complete the <b>Schedule of Compliance Form</b> as <b>ATTACHMENT F</b> .

ATT	ACHMENT E - Emission Uni	t Form	
Emission Unit Description			
Emission unit ID number: EN03	Emission unit name: EN03 Reciprocating Engine/Integral	List any control dewith this emission un N/A	
	Compressor		
Provide a description of the emission  Natural gas fired reciprocating engine		esign parameters, etc	.):
Manufacturer: Cooper	Model number: GMVA-10	Serial number: 44073	
Construction date:	Installation date: 1956	Modification date(s): N/A	
<b>Design Capacity (examples: furnace</b> 1,350 hp	s - tons/hr, tanks - gallons):		
Maximum Hourly Throughput: 0.0104 MMscf/hr	Maximum Annual Throughput: 91.06 MMscf/yr	Maximum Operating Schedule: 8,760 hrs/yr	
Fuel Usage Data (fill out all applical	ble fields)	1	
Does this emission unit combust fuel	1? _X_Yes No	If yes, is it? Indirect Fired	_X_Direct Fired
Maximum design heat input and/or maximum horsepower rating: 1,350 hp		Type and Btu/hr rating of burners: 7,700 Btu/hp-hr 0.0104 MMscf/hr	
List the primary fuel type(s) and if a the maximum hourly and annual fu		s). For each fuel type	listed, provide
Pipeline quality natural gas  - Maximum hourly fuel usage =  - Maximum annual fuel usage =			
Describe each fuel expected to be us	ed during the term of the permit.		
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Pipeline quality natural gas	20 gr sulfur/100 cf	N/A	1,000 Btu/cf

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	8.93	39.11
Nitrogen Oxides (NO <sub>X</sub> )	60.30	264.11
Lead (Pb)	N/A	N/A
Particulate Matter (PM <sub>2.5</sub> )	0.40	1.75
Particulate Matter (PM <sub>10</sub> )	0.40	1.75
Total Particulate Matter (TSP)	0.50	2.20
Sulfur Dioxide (SO <sub>2</sub> )	0.01	0.03
Volatile Organic Compounds (VOC)	6.79	29.74
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Acetaldehyde	0.08	0.35
Acrolein	0.08	0.35
Benzene	0.02	0.09
Ethylbenzene	< 0.01	< 0.01
Formaldehyde	0.25	1.09
Hexane	< 0.01	0.02
Toluene	0.01	0.04
Xylene		
Regulated Pollutants other than	Potential Emissions	
Criteria and HAP	PPH	TPY

- CO, NOx, and VOC emission rates based on manufacturer specs.
- PM10, PM2.5, SO<sub>2</sub>, and HAP emission factors based on AP-42 Section 3.2, Table 3.2-1, 8/00.
- Formaldehyde emission rate based on November 2006 engine testing data (0.248 lb/hr).

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
40 CFR Part 63 Subpart ZZZZ – NESHAP maintenance requirements (TV 7.1.1.a) 40 CFR Part 63 Subpart ZZZZ – NESHAP general requirements/provisions (TV 7.1.1.b and c) 40 CFR Part 63 Subpart ZZZZ – NESHAP continuous compliance requirements (TV 7.1.1.d)
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
40 CFR Part 63 Subpart ZZZZ – Change oil and filter, inspect spark plugs, and inspect all hoses and belts every 4,320 hours of operation or annually, whichever one first, or utilize an oil analysis program (TV 7.1.1.a and 7.2.1) 40 CFR Part 63 Subpart ZZZZ – Operate and maintain the RICE according to the manufacturer's instructions OR develop and follow your own maintenance plan (TV 7.1.1.d and 7.2.1) 40 CFR Part 63 Subpart ZZZZ – Minimize the engine's time spent at idling during startup, not to exceed 30 minutes (TV 7.2.1)
40 CFR Part 63 Subpart ZZZZ - Comply with all applicable recordkeeping requirements (TV 7.4.1) 40 CFR Part 63 Subpart ZZZZ - Keep records of maintenance on the stationary RICE (TV 7.4.1) 40 CFR Part 63 Subpart ZZZZ - Keep records of malfunctions on the stationary RICE (TV 7.4.1) 40 CFR Part 63 Subpart ZZZZ - Permit deviation reporting (TV 7.5.1 and 7.5.2)
Are you in compliance with all applicable requirements for this emission unit? _X_YesNo
If no, complete the <b>Schedule of Compliance Form</b> as <b>ATTACHMENT F</b> .

ATT	ACHMENT E - Emission Uni	it Form	
Emission Unit Description			
Emission unit ID number: EN04	Emission unit name: EN04 Reciprocating Engine/Integral Compressor	List any control devices associated with this emission unit:	
Provide a description of the emission  Natural gas fired reciprocating engine	on unit (type, method of operation, de/integral compressor	esign parameters, etc	.):
Manufacturer: Cooper	Model number: GMVA-10	Serial number: 44074	
Construction date:	Installation date: 1956	Modification date(s): N/A	
<b>Design Capacity (examples: furnace</b> 1,350 hp	es - tons/hr, tanks - gallons):		
<b>Maximum Hourly Throughput:</b> 0.0104 MMscf/hr	Maximum Annual Throughput: 91.06 MMscf/yr	<b>Maximum Operating Schedule:</b> 8,760 hrs/yr	
Fuel Usage Data (fill out all applica	ble fields)	1	
Does this emission unit combust fue	el? _X_Yes No	If yes, is it? Indirect Fired	_X_Direct Fired
Maximum design heat input and/or 1,350 hp	maximum horsepower rating:	<b>Type and Btu/hr ra</b> 7,700 Btu/hp-hr 0.0104 MMscf/hr	ting of burners:
List the primary fuel type(s) and if the maximum hourly and annual fu	applicable, the secondary fuel type(s	s). For each fuel type	listed, provide
Pipeline quality natural gas  - Maximum hourly fuel usage =  - Maximum annual fuel usage =			
Describe each fuel expected to be us	sed during the term of the permit.		
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Pipeline quality natural gas	20 gr sulfur/100 cf	N/A	1,000 Btu/cf

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	8.93	39.11
Nitrogen Oxides (NO <sub>X</sub> )	60.30	264.11
Lead (Pb)	N/A	N/A
Particulate Matter (PM <sub>2.5</sub> )	0.40	1.75
Particulate Matter (PM <sub>10</sub> )	0.40	1.75
Total Particulate Matter (TSP)	0.50	2.20
Sulfur Dioxide (SO <sub>2</sub> )	0.01	0.03
Volatile Organic Compounds (VOC)	6.79	29.74
Hazardous Air Pollutants	Potenti	al Emissions
	PPH	TPY
Acetaldehyde	0.08	0.35
Acrolein	0.08	0.35
Benzene	0.02	0.09
Ethylbenzene	< 0.01	< 0.01
Formaldehyde	0.25	1.09
Hexane	< 0.01	0.02
Toluene	0.01	0.04
Xylene		
Regulated Pollutants other than	Potential Emissions	
Criteria and HAP	РРН	TPY

- CO, NOx, and VOC emission rates based on manufacturer specs.
- PM10, PM2.5, SO<sub>2</sub>, and HAP emission factors based on AP-42 Section 3.2, Table 3.2-1, 8/00.
- Formaldehyde emission rate based on November 2006 engine testing data (0.248 lb/hr).

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
40 CFR Part 63 Subpart ZZZZ – NESHAP maintenance requirements (TV 7.1.1.a) 40 CFR Part 63 Subpart ZZZZ – NESHAP general requirements/provisions (TV 7.1.1.b and c) 40 CFR Part 63 Subpart ZZZZ – NESHAP continuous compliance requirements (TV 7.1.1.d)
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
40 CFR Part 63 Subpart ZZZZ – Change oil and filter, inspect spark plugs, and inspect all hoses and belts every 4,320 hours of operation or annually, whichever one first, or utilize an oil analysis program (TV 7.1.1.a and 7.2.1) 40 CFR Part 63 Subpart ZZZZ – Operate and maintain the RICE according to the manufacturer's instructions OR develop and follow your own maintenance plan (TV 7.1.1.d and 7.2.1) 40 CFR Part 63 Subpart ZZZZ – Minimize the engine's time spent at idling during startup, not to exceed 30 minutes (TV 7.2.1)
40 CFR Part 63 Subpart ZZZZ - Comply with all applicable recordkeeping requirements (TV 7.4.1) 40 CFR Part 63 Subpart ZZZZ - Keep records of maintenance on the stationary RICE (TV 7.4.1) 40 CFR Part 63 Subpart ZZZZ - Keep records of malfunctions on the stationary RICE (TV 7.4.1) 40 CFR Part 63 Subpart ZZZZ - Permit deviation reporting (TV 7.5.1 and 7.5.2)
Are you in compliance with all applicable requirements for this emission unit? _X_YesNo
If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form			
Emission Unit Description			
Emission unit ID number:	Emission unit name:	List any control dev	
FL02	2E	N/A	
Flare			
Provide a description of the emission	n unit (type, method of operation, de	esign parameters, etc.	):
Dehydration Unit Flare			
Manufacturer: Questor	Model number: Q100	Serial number:	
Construction date:	Installation date: 2011	Modification date(s) N/A	):
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): Combustor Rating: 4.0 MMBtu/hr Pilot Burner: 0.05 MMBtu/hr			
Maximum Hourly Throughput: Fuel to pilot flame: 492 scf/hr	Maximum Annual Throughput: Fuel to pilot flame: 4.31 MMscf/yr	Maximum Operatin 8760 hrs/yr	g Schedule:
Fuel Usage Data (fill out all applical	ole fields)		
Does this emission unit combust fuel? X Yes No If yes, is it?			
		Indirect Fired	X Direct Fired
Maximum design heat input and/or maximum horsepower rating: Combustor Rating: 4.0 MMBtu/hr Pilot Burner: 0.05 MMBtu/hr		Type and Btu/hr rating of burners: Combustor Rating: 4.0 MMBtu/hr Pilot Burner: 0.05 MMBtu/hr	
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.			
Natural gas  - Maximum hourly fuel to pilot throughput = 492 scf/hr  - Maximum annual fuel to pilot throughput = 4.31 MMscf/yr			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural gas	20 gr sulfur/100 cf	N/A	1,000 Btu/cf

Emissions Data		
Criteria Pollutants	Potential Emissions	
	РРН	TPY
Carbon Monoxide (CO)	0.03	0.15
Nitrogen Oxides (NO <sub>X</sub> )	0.48	2.09
Lead (Pb)	N/A	N/A
Particulate Matter (PM <sub>2.5</sub> )	N/A	N/A
Particulate Matter (PM <sub>10</sub> )	N/A	N/A
Total Particulate Matter (TSP)	N/A	N/A
Sulfur Dioxide (SO <sub>2</sub> )	N/A	N/A
Volatile Organic Compounds (VOC)	< 0.01	0.01
Hazardous Air Pollutants	Potential	l Emissions
	РРН	TPY
Benzene	N/A	N/A
Formaldehyde	N/A	N/A
n-Hexane	N/A	N/A
Toluene	N/A	N/A
Regulated Pollutants other than	Potential Emissions	
Criteria and HAP	РРН	TPY

- NOX and CO emission factor from Dominion Spec Sheet, 3/28/11
- VOC emission factor from AP-42 Section 1.4 (7/98)

Applicable Requirements		
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.		
Requirements are listed under Attachment G – Air Pollution Control Device Form.		
Permit Shield		
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)  Requirements are listed under Attachment G – Air Pollution Control Device Form.		
Are you in compliance with all applicable requirements for this emission unit? _X_YesNo		
If no, complete the <b>Schedule of Compliance Form</b> as <b>ATTACHMENT F</b> .		

ATTACHMENT E - Emission Unit Form			
Emission Unit Description			
Emission unit ID number: RBR02	Emission unit name: RBR02 Reboiler	List any control dev with this emission u N/A	
Provide a description of the emission unit (type, method of operation, design parameters, etc.):  Natural gas-fired reboiler			
Manufacturer: NATCO	Model number: 600/1000	Serial number:	
Construction date:	Installation date: 2011	Modification date(s	s):
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 1.47 MMBtu/hr			
Maximum Hourly Throughput: 1,417 cf/hr	Maximum Annual Throughput: 12.41 MMscf/yr	Maximum Operation 8,760 hrs/yr	ng Schedule:
Fuel Usage Data (fill out all applical	ble fields)	'	
Does this emission unit combust fuel? _X_Yes No		If yes, is it?  Indirect FiredX_Direct Fired	
Maximum design heat input and/or maximum horsepower rating: 1.47 MMBtu/hr		<b>Type and Btu/hr ra</b> 1.47 MMBtu/hr	ting of burners:
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.			
Natural Gas  - Maximum hourly fuel usage = 1,417 cf/hr  - Maximum annual fuel usage = 12.41 MMscf/yr			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Pipeline quality natural gas	20 gr sulfur/100 cf	N/A	1,000 Btu/cf

Emissions Data			
Criteria Pollutants	Potenti	Emissions	
	РРН	TPY	
Carbon Monoxide (CO)	0.10	0.44	
Nitrogen Oxides (NO <sub>X</sub> )	0.13	0.57	
Lead (Pb)	N/A	N/A	
Particulate Matter (PM <sub>2.5</sub> )	< 0.01	0.01	
Particulate Matter (PM <sub>10</sub> )	< 0.01	0.01	
Total Particulate Matter (TSP)	0.01	0.05	
Sulfur Dioxide (SO <sub>2</sub> )	< 0.01	< 0.01	
Volatile Organic Compounds (VOC)	0.06	0.26	
Hazardous Air Pollutants	Potential Emissions		
	РРН	TPY	
Benzene	< 0.01	< 0.01	
Formaldehyde	< 0.01	< 0.01	
n-Hexane	< 0.01	0.01	
Naphthalene	< 0.01	< 0.01	
Toluene	< 0.01	<0.01	
Regulated Pollutants other than	Potential Emissions		
Criteria and HAP	РРН	TPY	

- NOx, CO, and VOC emission factors from Dominion Spec Sheet 1/3/2011
- VOC, PM, PM10, PM2.5, and SO2 emission factors from AP-42, Section 1.4, Natural Gas Combustion, Table 1.4-2, 7/98
- HAP emission factors from AP-42, Section 1.4, Natural Gas Combustion, Tables 1.4-3, 4, 7/98

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
45 CSR 2-3.1 and 13 – Opacity limit of 10% on a six minute block average (TV 4.1.1; R13-2498B 4.1.4) 45 CSR 13 – The reboiler shall not exceed 1.47 MMBtu/hr (TV 4.1.2; R13-2839B 4.1.5)
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall
be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating
be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)  45 CSR and 13 – Compliance with TV 4.1.1 is demonstrated by a Method 9, if required (TV 4.2.1; R13-2498B)
be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)  45 CSR and 13 – Compliance with TV 4.1.1 is demonstrated by a Method 9, if required (TV 4.2.1; R13-2498B 4.2.1)

## **Attachment G**

Air Pollution Control Device Form

ATTACHMENT G - Air Pollution Control Device Form			
Control device ID number: FL02	List all emission units associated with this control device. DEHY02		
Manufacturer:	Model number:	Installation date:	
Questor	Q100	2011	
Type of Air Pollution Control Device:			
Baghouse/Fabric Filter Venturi Scrubber Multiclone			
Carbon Bed Adsorber	Packed Tower Scrubber	Single Cyclone	
Carbon Drum(s)	Carbon Drum(s) Other Wet Scrubber Cyclone Bank		
Catalytic Incinerator	Catalytic Incinerator Condenser Settling Chamber		
Thermal Incinerator _X_	Flare	Other (describe)	
Wet Plate Electrostatic Precipitator		Dry Plate Electrostatic Precipitator	
List the pollutants for which this device	ce is intended to control and the ca	pture and control efficiencies.	
Pollutant	Capture Efficiency	Control Efficiency	
VOC		99%	
Benzene		99%	
Ethylbenzene		99%	
n-Hexane		99%	
Toluene		99%	
Xylene		99%	
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.). QTI dehydration unit controlled flare 0.2 MMBtu/hr pilot burner			
Is this device subject to the CAM requ	pirements of 40 C.F.R. 64? Ye	s _X_ No	
If Yes, Complete ATTACHMENT H			
If No, <b>Provide justification.</b> The dehy unit (DEHY02) is not subject to CAM since it is subject to NESHAP Subpart HH, which has provisions for compliance monitoring established after 1990. Per 64.2(b)(1)(i), "emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act" are exempt from CAM. CAM was established to build in provisions for how compliance would be demonstrated for emission limits if not adequately covered by a NSPS or NESHAP rule.			
In addition, for VOC purposes, the dehy unit is not subject to CAM per 64.2(b)(1)(vi), which states "emission limitations or standards for which a part 70 or 71 permit specified a continuous compliance determination method, as defined in 64.1" is exempt from CAM. Since the R13 permit for the facility (R13-2498B) specifies a "continuous compliance determination method" condition (e.g continuously monitoring the flare using a thermocouple to detect the presence of a flame) and that R13 condition was rolled into the Title V permit, CAM does not apply.			

#### Describe the parameters monitored and/or methods used to indicate performance of this control device.

- 45 CSR 6-4.1 and 13- Particulate Matter emission limit (TV 5.1.1; R13-2498B 4.1.14)
- 45 CSR 6-4.3, 6-4.4, and 13 Opacity limit of 20%, except smoke less than 40% opacity for a period(s) aggregating no more than 8 minutes per start-up (TV 5.1.2 and 5.1.14; R13-2498B 4.1.15 and 4.1.16)
- 45 CSR 6-4.5 and 13 Incinerator particles in the open air requirements (TV 5.1.3; R13-2498B 4.1.17)
- 45 CSR 6-4.6 and 13 Incinerator odor prevention requirements (TV 5.1.4; R13-2498B 4.1.18)
- 45 CSR 10-4.1 Sulfur Dioxide emission limit (TV 5.1.5; R13-2498B 4.1.19)
- 45 CSR 10-5.1 Hydrogen Sulfide emission limit (TV 5.1.6; R13-2498B 4.1.20)
- 45 CSR 13 The flare shall be operated with a 99% control efficiency (TV 5.1.8; R13-2498B 4.1.7)
- 45 CSR 13 No visible emissions except for periods not to exceed a total of 5 minutes during any 2 hour period (TV 5.1.9, R13-2498B 4.1.12)
- 45 CSR 13 The pilot flame shall be present at all times when emissions may be vented to it (TV 5.1.10, R13-2498B 4.1.8)
- 45 CSR 13 Operation and design of the flare (TV 5.1.11, 5.1.12, and 5.1.13; R13-2498B 4.1.10, 4.1.11, and 4.1.9)

#### **Monitoring**

- 45 CSR 13 Monitor the presence or absence of the flare pilot flame using a thermocouple (TV 5.1.10 and 5.2.1; R13-2498B 4.1.8 and 4.2.2)
- 45 CSR 13 Conduct an initial Method 22 opacity test within one (1) year of permit issuance or initial startup of the flare, whichever is later (TV 5.2.2; R13-2498B 4.3.1)
- 45 CSR 30-5.1.c Monthly visual emission checks (TV 5.2.3)
- 45 CSR 13 Compliance with 5.1.5 shall be demonstrated by annual inlet wet gas sampling (TV 5.2.4; R13-2498B 4.3.4)
- 45 CSR 13 Compliance with 5.1.6 shall be demonstrated by annual inlet wet gas sampling (TV 5.2.5; R13-2498B 4.3.5)

#### Recordkeeping

- 45 CSR 30-5.1.c Records of the monthly visual emission checks (TV 5.4.1)
- 45 CSR 13 Records of the times and duration of all periods which the pilot flame was absent (TV 5.4.2; R13-2498B 4.4.5)
- 45 CSR 13 Records of the flare design evaluation (TV 5.4.3, R13-2498B 4.4.6)
- 45 CSR 13 Records of the annual inlet wet gas sampling (TV 5.4.4; R13-2498B 4.4.8)
- 45 CSR 13 Records of initial Method 22 opacity test (TV 5.4.5; R13-2498B 4.4.9)

### Reporting

- 45 CSR 13 Reporting of violations/deviations of visible emissions requirements (TV 5.5.1, R13-2498B 4.5.2)
- 45 CSR 13 Reporting of any deviation from the flare design and operation criteria (TV 5.5.2; R13-2498B 4.5.3)