

West Virginia Department of Environmental Protection
Division of Air Quality

Earl Ray Tomblin
Governor

Randy C. Huffman
Cabinet Secretary

Permit to Operate



Pursuant to
Title V
of the Clean Air Act

Issued to:
Cranberry Pipeline Corporation
Heizer Compressor Station
R30-07900046-2016



William F. Durham
Director

Issued: December 12, 2016 • Effective: December 26, 2016
Expiration: December 12, 2021 • Renewal Application Due: June 12, 2021

Permit Number: **R30-07900046-2016**
Permittee: **Cranberry Pipeline Corporation**
Facility Name: **Heizer Compressor Station**
Mailing Address: **900 Lee Street East, Suite 1500**
Charleston, WV 25301

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location:	Poca, Putnam County, West Virginia
Mailing Address:	900 Lee Street East, Suite 1500, Charleston, WV 25301
Telephone Number:	(304) 984-0078
Type of Business Entity:	Corporation
Facility Description:	Natural Gas Transmission Facility
SIC Codes:	4922; 1311
UTM Coordinates:	432.48 km Easting • 4263.99 km Northing • Zone 17

Permit Writer: Natalya V. Chertkovsky-Veselova

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.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

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1.0 Emission Units and Active R13, R14, and R19 Permits

1.1 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device
1S*	001-02	Reciprocating Engine/Integral Compressor; Cooper Bessemer GMV-8-TF; 2SLB	1967	880 hp	None
2S*	001-03	Reciprocating Engine/Integral Compressor, Clark HMB-8; 2SLB	1967	440 hp	None
4S*	001-04	Reboiler Vent	1968/2009	0.25 MMBtu/hr	None
5S*	001-04	TEG Dehydration Unit; Natco; TEG Dehydrator Vent	1968/2009	30 MMscf/day	BTEX Eliminator (1C)
AT01	001-05	Drip Gas Gathering Tank	1968/2006	2,100 gallons	None
Tank 2	001-09	Engine Oil Tank No. 1	2006	3,000 gallons	None
Tank 3	001-10	Engine Oil Tank No. 2	2006	1,050 gallons	None
Tank 4	001-11	Antifreeze Tank	2006	1,050 gallons	None
Control Devices					
BTEX Eliminator (1C)	001-04	JATCO No. 5-96 BTEX Eliminator	2010	98% (VOCs & HAPs)	N/A

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

1.2 Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-2694E	December 3, 2015

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.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

2.2 Acronyms

CAAA	Clean Air Act Amendments	NSPS	New Source Performance Standards
CBI	Confidential Business Information	PM	Particulate Matter
CEM	Continuous Emission Monitor	PM₁₀	Particulate Matter less than 10µm in diameter
CES	Certified Emission Statement	pph	Pounds per Hour
C.F.R. or CFR	Code of Federal Regulations	ppm	Parts per Million
CO	Carbon Monoxide	PSD	Prevention of Significant Deterioration
C.S.R. or CSR	Codes of State Rules	psi	Pounds per Square Inch
DAQ	Division of Air Quality	SIC	Standard Industrial Classification
DEP	Department of Environmental Protection	SIP	State Implementation Plan
FOIA	Freedom of Information Act	SO₂	Sulfur Dioxide
HAP	Hazardous Air Pollutant	TAP	Toxic Air Pollutant
HON	Hazardous Organic NESHAP	TPY	Tons per Year
HP	Horsepower	TRS	Total Reduced Sulfur
lbs/hr or lb/hr	Pounds per Hour	TSP	Total Suspended Particulate
LDAR	Leak Detection and Repair	USEPA	United States Environmental Protection Agency
m	Thousand	UTM	Universal Transverse Mercator
MACT	Maximum Achievable Control Technology	VEE	Visual Emissions Evaluation
mm	Million	VOC	Volatile Organic Compounds
mmBtu/hr	Million British Thermal Units per Hour		
mmft³/hr or mmcf/hr	Million Cubic Feet Burned per Hour		
NA or N/A	Not Applicable		
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		
NO_x	Nitrogen Oxides		

2.3. Permit Expiration and Renewal

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
- a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.
 - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
 - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.
[45CSR§30-6.4.]

2.7. Minor Permit Modifications

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.
[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.
[45CSR§30-6.5.b.]

2.9. Emissions Trading

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:
- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
 - b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
 - c. The change shall not qualify for the permit shield.
 - d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
 - e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9.]

2.11. Operational Flexibility

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

[45CSR§30-5.8]

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

[45CSR§30-5.8.a.]

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

- 2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

- 2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.
- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
 - b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
 - c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

- 2.13.1. 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; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

- 2.14.1. 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;
 - 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.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

- 2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:
- a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
 - b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

- 2.16.1. It shall not be a defense for a permittee in an enforcement action that it would 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.

[45CSR§30-5.1.f.2.]

2.17. Emergency

- 2.17.1. An "emergency" means any situation arising from sudden and reasonably 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.

[45CSR§30-5.7.a.]

- 2.17.2. 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 45CSR§30-5.7.c. are met.

[45CSR§30-5.7.b.]

- 2.17.3. 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. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, 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, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

[45CSR§30-5.7.d.]

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.

[45CSR§30-5.2.a.]

- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

- 2.19.1. 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 modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required 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.

[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

- 2.20.1. 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.

[45CSR§30-4.2.]

2.21. Permit Shield

- 2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically

identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.
[45CSR§30-5.6.a.]

2.21.2. Nothing in this permit shall alter or affect the following:

- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
- b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

2.22.1. 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 defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.

[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.

[45CSR§30-5.1.e.]

2.24. Property Rights

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

[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
- b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.

- c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

[45CSR§30-5.1.d.]

- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.

[45CSR§30-5.1.a.2.]

3.0 Facility-Wide Requirements

3.1 Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person 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 or allow 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. [40 C.F.R. §61.145(b) and 45CSR34]
- 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. **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]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality. [W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

[40 C.F.R. 82, Subpart F]

- 3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.

[40 C.F.R. 68]

- 3.1.9. No person shall cause, suffer, allow or permit fugitive particulate matter to be discharged beyond the boundary lines of the property on which the discharge originates or at any public or residential location, which causes or contributes to statutory air pollution.

[45CSR§17-3.1. State-Enforceable Only]

- 3.1.10. **Minor Source of Hazardous Air Pollutants (HAP).** HAP emissions from the affected facility shall be less than 10 tons/year of any single HAP or 25 tons/year of any combination of HAPs. Compliance with this Section shall ensure that the affected facility is a minor HAP source.

The permittee shall not cause, suffer, allow or permit aggregate emissions of hazardous air pollutants (HAPs) to exceed the potential to emit (pounds per hour and tons per year) recorded with the permittee's application, R13-2694.

[45CSR13, R13-2694, 4.1.11 and 6.1.2]

3.2. Monitoring Requirements

- 3.2.1. None.

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, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are 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.
- 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 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.
 3. A statement of compliance or non-compliance with each permit or rule condition.

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

3.4. Recordkeeping Requirements

- 3.4.1. **Monitoring information.** 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.

[45CSR§30-5.1.c.2.A; 45CSR13, R13-2694, 4.3.1]

- 3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.

[45CSR§30-5.1.c.2.B.]

- 3.4.3. **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§30-5.1.c. State-Enforceable only.]

- 3.4.4. **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.

[45CSR13, R13-2694, 4.3.2]

- 3.4.5. **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.

[45CSR13, R13-2694, 4.3.3]

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.

[45CSR§§30-4.4. and 5.1.c.3.D.]

- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
[45CSR§30-5.1.c.3.E.]
- 3.5.3. Except for the electronic submittal of the annual certification to the USEPA as required in 3.5.5 below, 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, mailed first class or by private carrier with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

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

Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

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

- 3.5.4. **Certified emissions statement.** 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.
[45CSR§30-8.]
- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The annual certification to the USEPA shall be submitted in electronic format only. It shall be submitted by e-mail to the following address: R3_APD_Permits@epa.gov. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.
[45CSR§30-5.3.e.]
- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.
[45CSR§30-5.1.c.3.A.]
- 3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

3.5.8. Deviations.

- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
 1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
 2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
 3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
 4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

- b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

[45CSR§30-5.1.c.3.B.]

- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

[45CSR§30-4.3.h.1.B.]

3.6. Compliance Plan

- 3.6.1. N/A

3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.

- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

45CSR14	Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration. This facility's potential emissions are below 250 tons per year. Therefore, this rule does not apply.
45CSR19	Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution Which Cause or Contribute to Nonattainment. This facility is in an attainment area.
45CSR27	To Prevent and Control the Emissions of Toxic Air Pollutants. Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment "used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight."
40 C.F.R. 60 Subpart GG	Standards of Performance for Stationary Gas Turbines. There are no turbines at the Heizer Compressor Station.
40 C.F.R. 60 Subpart Dc	The reboiler at this facility is below 10 million BTU/hr, thus this subpart does not apply per 40 C.F.R. § 60.40c.
40 C.F.R. 60 Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. All tanks storing volatile organic liquids are below 75 m ³ in capacity.
40 C.F.R. 60 Subpart KKK	Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants. Heizer station is not engaged in the extraction of natural gas from field gas or in the fractionation of mixed natural gas liquids to natural gas products.
40 C.F.R. 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO ₂ Emissions. There are no sweetening units at the Heizer station.
40 C.F.R. 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines. There are no turbines at the Heizer Compressor Station.
40 CFR 63 Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. This facility is a transmission facility, therefore this subpart does not apply.
40 CFR 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities. This facility is not a major source of HAPs, therefore this subpart does not apply to this facility.
40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. This facility is not a major source of HAPs, therefore this subpart does not apply to this facility according to 40 C.F.R. § 63.7485.

3.8. Emergency Operating Scenario

- 3.8.1. For emergency situations which interrupt the critical supply of natural gas to the public, and which pose a life threatening circumstance to the customer, the permittee is allowed to temporarily replace failed engine(s) as long as all of the following conditions are met:

- a. The replacement engine(s) is only allowed to operate until repair of the failed engine(s) is complete, but under no circumstance may the replacement engine(s) operate in excess of sixty (60) days;
- b. Both the replacement engine(s) and the repaired failed engine(s) shall not operate at the same time with the exception of any necessary testing of the repaired engine(s) and this testing may not exceed five (5) hours;
- c. Potential hourly emissions from the replacement engine(s) are less than or equal to the potential hourly emissions from the engine(s) being replaced;

- d. Credible performance emission test data verifying the emission rates associated with the operation of the substitute engine shall be submitted to the Director within five (5) days;
- e. The permittee must provide written notification to the Director within five (5) days of the replacement. This notification must contain:
 - i. Information to support the claim of life threatening circumstances to justify applicability of this emergency provision;
 - ii. Identification of the engine(s) being temporarily replaced;
 - iii. The design parameters of the replacement engine(s) including, but not limited to, the design horsepower and emission factors;
 - iv. Projected duration of the replacement engine(s); and
 - v. The appropriate certification by a responsible official.

[45CSR§30-12.7]

4.0. Source Specific Requirements [Emission Point ID(s) 001-02, 001-03, 001-04, 001-05]

4.1. Limitations and Standards

4.1.1. Emissions from the facility shall not exceed the following:

Source	CO		NO _x		PM ¹		SO ₂		VOCs	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Cooper Comp Engine (1S)	2.47	9.26	20.28	76.05	0.31	1.16	0.01	0.02	0.77	2.88
Clark Comp. Engine (2S)	1.24	5.41	10.14	44.42	0.16	0.68	0.01	0.01	0.39	1.69
Reboiler Vent (4S)	0.04	0.16	0.05	0.19	--	--	--	--	0.30	1.28
Glycol Dehydration Unit (5S)	--	--	--	--	--	--	--	--	0.07	0.31
Fugitives	--	--	--	--	--	--	--	--	0.13	0.56
Storage Tank (AT01)	--	--	--	--	--	--	--	--	0.34	1.48
Facility-Wide Totals →	3.75	14.83	30.47	120.66	0.47	1.84	0.02	0.03	2.00	8.20

¹Filterable + Condensable.

Source	Benzene	Ethylbenzene	Toluene	Xylene	Hexane	Formaldehyde
	tpy	tpy	tpy	tpy	tpy	tpy
Comp. Eng. (1S)	0.05	0.01	0.03	0.01	0.02	1.33
Comp. Eng. (2S)	0.03	0.01	0.02	0.01	0.01	0.78
Reboiler Vent (4S)	0.15	--	0.05	--	0.02	--
Dehy Unit (5S) ¹	0.03	0.01	0.01	0.01	0.01	--
Fugitives	0.01	0.01	0.01	0.01	--	--
Tank (AT01)	0.01	--	0.01	0.01	0.17	--
Total	0.28	0.04	0.13	0.05	0.23	2.11
Total HAPs	3.67					

¹Vented through 4S when fuel gas system is in operation.

[45CSR13, R13-2694, 4.1.1]

4.1.2. Compressor Engine 1S shall not operate more than 8,760 hours per year based on a rolling 12 month total.

[45CSR13, R13-2694, 4.1.2]

4.1.3. Compressor Engine 2S shall not operate more than 8,760 hours per year based on a rolling 12 month total.

[45CSR13, R13-2694, 4.1.3]

- 4.1.4. **Maximum Throughput Limitation.** The maximum wet natural gas throughput to the glycol dehydration absorption column/contactor shall not exceed 30 MMscf/day.
[45CSR13, R13-2694, 4.1.4]
- 4.1.5. **Maximum Design Heat Input.** The maximum design heat input for the BS&B Glycol Reboiler shall not exceed 0.25 MMBTU/hr.
[45CSR13, R13-2694, 4.1.5]
- 4.1.6. For purposes of determining potential HAP emissions at transmission and storage facilities to comply with the requirements in Section 3.1.10 and 4.1.1, the methods specified in 40 C.F.R. 63, Subpart HHH shall be used. For purposes of determining potential HAP emissions at production-related facilities, the methods specified in 40 CFR 63, Subpart HH (i.e. excluding compressor engines from HAP PTE) shall be used.
[45CSR13, R13-2694, 4.1.6 and 6.1.3]
- 4.1.7. The glycol dehydration unit/still column (5S) shall be equipped with a fully functional JATCO BTEX Elimination System (1C) at all times. This system shall be made up of a double pipe still vent condenser connected to a closed vent fuel gas system. The JATCO BTEX Elimination System (1C) shall be operated according to manufacturer's specifications, and shall be housed in an enclosed structure in order to prevent the unit from freezing.
[45CSR13, R13-2694, 4.1.7]
- 4.1.8. Throughput of liquids to tank AT01 shall not exceed 2,100 gallons per year based on a rolling 12 month total.
[45CSR13, R13-2694, 4.1.8]
- 4.1.9. The reboiler (4S) shall be designed and operated in accordance with the following:
- a. The vapors/overheads from the still column shall be routed through a closed vent system to the reboiler at all times excluding startups when there is a potential that vapors (emissions) can be generated from the still column.
 - b. The reboiler shall only be fired with supplemental gas vapors from the still column and rich TEG separator. Natural gas may be used as supplemental fuel.
 - c. The vapors/overheads from the still column and flash tank shall be introduced as the primary fuel or with the primary fuel in front of or with the natural gas.
[45CSR13, R13-2694, 6.1.4]
- 4.1.10. No person shall cause, suffer, allow or permit the emission into the open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 parts per million by volume from existing source operations, except as provided in 45CSR§10-4.1.a through 45CSR§10-4.1.e.

Note: A source that combusts:

1. pipeline quality natural gas or
2. field gas with a maximum sulfur content of 20 grains of sulfur per 100 standard cubic feet shall be deemed in compliance with this requirement.

[45CSR§10-4.1] [001-04]

- 4.1.11 No person shall cause, suffer, allow or permit the combustion of any refinery process gas stream or any other process gas stream that contains hydrogen sulfide in a concentration greater than 50 grains per 100 cubic feet of gas except in the case of a person operating in compliance with an emission control and mitigation plan approved by the Director and U. S. EPA. In certain cases very small units may be considered exempt from this requirement if, in the opinion of the Director, compliance would be economically unreasonable and if the contribution of the unit to the surrounding air quality could be considered negligible.

Note: A source that combusts:

1. pipeline quality natural gas or
2. field gas with a maximum H₂S content of 0.25 grains per 100 cubic feet of gas shall be deemed in compliance with this requirement.

[45CSR§10-5.1] [001-04]

- 4.1.12. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit (Reboiler Vent 4S) which is greater than ten (10) percent opacity based on a six minute block average.
[45CSR§2-3.1, 45CSR13, R13-2694, 4.1.9]
- 4.1.13. **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, 45CSR13, R13-2694, 4.1.10]
- 4.1.14. Tanks that are less than 20,000 gallons should not, as a general rule, have permitted emission limits. Section 1.0 of the permit will identify the size of the tank, any controls (such as a floating roof), and may include for tanks of 10,000 gallons or more the expected throughput or turnovers. Depending on the situation, setting a specific permit condition for maximum throughput, turnovers, or a vapor pressure for the tank is acceptable. Such situations would include tanks storing TAPs or HAPs, that are not subject to Rule 27 or a MACT but may be close to the thresholds for these rules. For a source subject to Rule 27 or a MACT storing the pollutant subject to the MACT or Rule 27 it may be appropriate to have emission limits for the regulated pollutant and the appropriate MRR to show compliance.
[45CSR13, R13-2694, 5.1.1]
- 4.1.15. **Maximum Tank Throughput Limitation.** For tanks subject to the maximum tank throughput limits, the maximum tank throughput for these tanks shall not exceed the throughput recorded with the permit application without effecting a modification or administrative update. Compliance with the Maximum Yearly Tank Throughput Limitation shall be determined using a twelve month rolling total. A twelve month rolling total shall mean the sum of the tank throughput at any given time during the previous twelve consecutive calendar months.
[45CSR13, R13-2694, 5.1.2]
- 4.1.16. **Regulated Pollutant Limitation.** The permittee shall not cause, suffer, allow or permit emissions of VOC and aggregate emissions of hazardous air pollutants (HAPs), from any tank listed in permit to exceed the potential to emit (pounds per hour and tons per year) recorded with the permittee's Application.
[45CSR13, R13-2694, 5.1.3]

4.2. Monitoring Requirements

- 4.2.1. In order to determine compliance with condition 4.1.2 of this permit, the permittee shall monitor and record the **number of hours of operation of Compressor Engine 1S** on a monthly basis.
[45CSR13, R13-2694, 4.3.4]
- 4.2.2. In order to determine compliance with condition 4.1.3 of this permit, the permittee shall monitor and record the number of **hours of operation of Compressor Engine 2S** on a monthly basis.
[45CSR13, R13-2694, 4.3.5]
- 4.2.3. In order to determine compliance with condition 4.1.4 of this permit, the permittee shall monitor and record the **throughput of natural gas fed through the dehydration** absorption column contactor on a monthly basis.
Compliance with the Maximum Throughput Limitation shall be determined using a twelve month rolling total. A twelve month rolling total shall mean the sum of the monthly throughput at any given time during the previous twelve consecutive calendar months.
[45CSR13, R13-2694, 4.3.6, 6.1.1 and 6.2]
- 4.2.4. In order to determine compliance with condition 4.1.8 of this permit, the permittee shall monitor and record the **throughput of liquids into Tank AT01** on a monthly basis.
[45CSR13, R13-2694, 4.3.7]
- 4.2.5. The permittee shall monitor the glycol inlet temperature, vapor outlet temperature, and the glycol inlet and vapor outlet temperature differential once per 24 hour period. The glycol inlet temperature and vapor outlet temperature shall be measured with thermometers installed at the glycol inlet piping and vapor outlet piping close to the condenser. The thermometers shall have a minimum acceptable accuracy of ± 2 °F. An excursion is defined as a vapor outlet temperature greater than 10 °F above the glycol inlet temperature. Excursions trigger a system inspection and corrective action.

All manufacturer's recommendations regarding periodic testing/checks for proper installation and operation of the thermometers shall be followed. Calibration and maintenance of the thermometers shall be conducted annually in accordance with manufacturer's specifications.
[45CSR§30-5.1.c; 40 C.F.R. §§64.6(c), 64.7(b), 64.7(c), 64.7(d)]
- 4.2.6. The permittee shall monitor the vapor pressure at the condenser outlet once per 24 hour period. The pressure at the condenser outlet shall be measured with a 0 – 15 ounce/sq. inch pressure gauge installed at the vapor outlet piping close to the condenser. The pressure gauge shall have a minimum acceptable accuracy of ± 1 ounce/sq. inch. An excursion is defined as a condenser outlet pressure that exceeds 2 ounce/sq. inch. Excursions trigger a system inspection and corrective action.

All manufacturer's recommendations regarding periodic testing/checks for proper installation and operation of the pressure gauge shall be followed. Calibration and maintenance of the pressure gauge shall be conducted annually in accordance with manufacturer's specifications.
[45CSR§30-5.1.c; 40 C.F.R. §§64.6(c), 64.7(b), 64.7(c), 64.7(d)]
- 4.2.7. *Proper maintenance.* At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[45CSR§30-5.1.c; 40 C.F.R. §64.7(b)]

4.2.8. *Continued operation.* Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[45CSR§30-5.1.c; 40 C.F.R. §64.7(c)]

4.2.9. *Response to excursions or exceedances.*

- a. Upon detecting an excursion or exceedance, the owner or operation shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- b. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[45CSR§30-5.1.c; 40 C.F.R. §64.7(d)]

4.2.10. *Documentation of need for improved monitoring.* After approval of monitoring under 40 C.F.R. 64, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit to address then necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[45CSR§30-5.1.c; 40 C.F.R. §64.7(e)]

4.2.11. *Quality Improvement Plan (QIP)*

- a. Based on the results of a determination made under permit condition 4.2.9.b, the Administrator or the Director may require the owner or operator to develop and implement a QIP. If a QIP is required, then

it shall be developed, implemented, and modified as required according to 40 C.F.R. §§ 64.8(b) through (e). Refer to permit condition 4.5.1.b.iii for the reporting required when a QIP is implemented.

- b. If during a calendar quarter, five (5) percent or more of the 24 hour readings required under 4.2.5 and 4.2.6 indicate an excursion, the permittee shall develop and implement a QIP. The Director may waive this QIP requirement upon a demonstration that the cause(s) of the excursions have been corrected, or may require stack tests at any time pursuant to permit condition 3.3.1.

[40 C.F.R. §64.8; 45CSR§30-5.1.c]

- 4.2.12. The facility shall use GRI-GLYCalc V3 or higher to estimate annual actual emissions provided the dehydration system is accurately defined by monitoring and recording actual operating parameters associated with the required modeling inputs.

These parameters shall be measured at least quarterly, with the exception of wet gas composition, in order to define annual average values or, if monitoring is not practical, some parameters may be assigned default values in accordance with the stipulations listed below. Annual average operating parameter, shall be interpreted as the average result of periodic monitoring recorded a number of times throughout the calendar year, sufficient enough to reflect annual variation. Therefore, this term is operating parameter and site dependent.

The WV Division of Air Quality requires the following actual operating parameters be measured or assumed to equal the default values listed below in order to satisfy this monitoring requirement when using the Gas Analysis and Process Data, GLYCalc emission modeling method:

Note: if you are measuring and using actual wet or dry gas water content, then you should also be measuring the glycol recirculation rate rather than using the default TEG recirculation ratio.

- Natural Gas Flowrate:
 - number of days operated per year,
 - monthly throughput (MMscf/month),
 - annual daily average (MMscf/day), and
 - maximum design capacity (MMscf/day)
- Absorber temperature and pressure
- Lean glycol circulation rate
- Glycol pump type
- Flash tank temperature and pressure, if applicable
- Stripping Gas flow rate, if applicable
- Wet gas composition (upstream of the absorber – dehydration column) sampled in accordance with GPA method 2166 and analyzed consistent with GPA extended method 2286 as well as the procedures presented in the GRI-GLYCalc Technical Reference User Manual and Handbook V4.
- Wet gas water content (lbs H₂O/MMscf)
- Dry gas water content (lbs H₂O/MMscf) at a point directly after exiting the dehydration column and before any additional separation points

The following operating parameter(s) may be assigned default values when using GRI-GLYCalc:

- Dry Gas water content can be assumed to be equivalent to pipeline quality at 7 lb H₂O / MMscf.
- Wet gas water content can be assumed to be saturated
- Lean glycol water content if not directly measured may use the default value of 1.5 % water as established by GRI.

- Lean glycol circulation rate may be estimated using the TEG recirculation ratio of 3 gal TEG / lb H₂O removed.

[45CSR13, R13-2694, 4.3.8]

4.3. Testing Requirements

- 4.3.1. To show compliance with Section 4.1.10 and 4.1.11, the owner or operator may elect not to monitor the total sulfur content of the fuel combusted, if the gaseous fuel is demonstrated to meet the definition of natural gas in 40 C.F.R. § 60.331(u). The owner or operator shall use one of the following sources of information to make the required demonstration:

The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less and that the maximum hydrogen sulfide content of the fuel is 0.25 grains/100 scf or less; or representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf or exceed 0.25 grains of hydrogen sulfide/100 scf. At a minimum, representative fuel data specified in either section 2.3.1.4 or 2.3.2.4 of appendix D to 40 C.F.R.75 is required.

[45CSR§30-5.1.c]

- 4.3.2. Within 180 days of installation of the engine, the permittee shall perform testing of the Clark Superior Compressor Engine (2S) in accordance with Section 3.3.1 of this permit to determine compliance with the CO and NO_x emission limits of Section 4.1.1 of this permit.

[45CSR13, R13-2694, 4.2.2]

- 4.3.3. For the purpose of demonstrating compliance with visible emissions limitations set forth in 4.1.12, the permittee shall:

- a. Conduct an initial Method 22 visual emission observation on the reboiler vent to determine the compliance with the visible emission provisions. The permittee shall take a minimum of two (2) hours of visual emissions observations on the reboiler vent.
- b. Conduct Method 22 visible emission observations of the reboiler vent every 6 months to ensure proper operation for a minimum of ten (10) minutes per observation.
- c. In the event visible emissions are observed in excess of the limitations given under 4.1.12, the permittee shall take immediate corrective action.

[45CSR13, R13-2694, 4.2.3]

4.4. Recordkeeping Requirements

- 4.4.1. The permittee shall maintain a record of the wet natural gas throughput through the glycol dehydration unit to demonstrate compliance with section 4.1.4 and 4.2.3 of this permit. Said records shall be maintained for a period of five (5) years on site or in a readily accessible off-site location maintained by the permittee. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

[45CSR13, R13-2694, 6.3]

- 4.4.2. The permittee shall maintain records of all **visual emission observations** pursuant to the monitoring required under 4.3.3 including any corrective action taken.
[45CSR13, R13-2694, 4.3.9]
- 4.4.3. The permittee shall maintain records of all dates, times and duration that the **reboiler is bypassed**.
[45CSR13, R13-2694, 4.3.10]
- 4.4.4. Daily records of the glycol inlet temperature, vapor outlet temperature, and the temperature differential between the glycol inlet temperature and vapor outlet temperature shall be maintained in accordance with 3.4.2. For each occurrence that the vapor outlet temperature is greater than 10 °F above the glycol inlet temperature, a record shall be maintained of all corrective actions taken.
[45CSR§30-5.1.c; 40 C.F.R. §64.9(b)]
- 4.4.5. Daily records of the vapor pressure at the condenser outlet shall be maintained in accordance with 3.4.2. For each occurrence that the vapor pressure at the condenser outlet exceeds 2 ounce/sq. inch, a record shall be maintained of all corrective actions taken.
[45CSR§30-5.1.c; 40 C.F.R. §64.9(b)]
- 4.4.6. The permittee shall maintain records documenting periodic testing/checks, calibration, and/or maintenance conducted on the thermometers and pressure gauge. These records shall include the type of testing/checks, calibration, and/or maintenance conducted, along with the date the procedure was performed. Records shall be maintained in accordance with 3.4.2.
[45CSR§30-5.1.c; 40 C.F.R. §64.9(b)]
- 4.4.7. *General recordkeeping requirements for 40 C.F.R. Part 64 (CAM).* The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 (condition 4.2.11) and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
[40 C.F.R. § 64.9(b); 45CSR§30-5.1.c]
- 4.4.8. The permittee shall maintain a record of the tank throughput for tanks with maximum throughput limits, to demonstrate compliance with section 4.1.15 of this permit. Said records shall be maintained on site or in a readily accessible off-site location maintained by the registrant for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.
[45CSR13, R13-2694, 5.4.1]

4.5. Reporting Requirements

- 4.5.1. *General reporting requirements for 40 C.F.R. Part 64 (CAM)*
- a. On and after the date specified in 40 C.F.R. §64.7(a) by which the permittee must use monitoring that meets the requirements of 40 C.F.R. 64, the permittee shall submit monitoring reports to the DAQ in accordance with permit condition 3.5.6.
 - b. A report for monitoring under 40 C.F.R. 64 shall include, at a minimum, the information required under permit condition 3.5.8 and the following information, as applicable:

- i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- iii. A description of the actions taken to implement a QIP during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 C.F.R. § 64.9(a); 45CSR§30-5.1.c]

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

[45CSR13, R13-2694, 4.4.1]

4.6. Compliance Plan

- 4.6.1. N/A

5.0. RICE MACT Requirements for Compressor Engines [Emission Point ID(s) 001-02, 001-03]

5.1. Limitations and Standards

5.1.1. § 63.6595 When do I have to comply with this subpart?

- (a) *Affected sources.* (1) If you have an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations, operating limitations, and other requirements no later than October 19, 2013.
[45CSR34 and 40 C.F.R. §63.6595(a)(1)]

5.1.2. § 63.6603 What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

- (a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this subpart and the operating limitations in Table 2b to this subpart that apply to you.

Table 2d to Subpart ZZZZ of Part 63— Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

As stated in §§63.6603 and 63.6640, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

For each . . .	You must meet the following requirement, except during periods of startup . . .	During periods of startup you must . . .
6. Non-emergency, non-black start 2SLB stationary RICE	a. Change oil and filter every 4,320 hours of operation or annually, whichever comes first; ¹ b. Inspect spark plugs every 4,320 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 4,320 hours of operation or annually, whichever comes first, and replace as necessary.	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

¹ Sources have the option to utilize an oil analysis program as described in § 63.6625(j) in order to extend the specified oil change requirement in Table 2d of this subpart.

[45CSR34 and 40 C.F.R. §63.6603, Table 2d to 40 C.F.R. 63 Subpart ZZZZ]

5.1.3. § 63.6605 What are my general requirements for complying with this subpart?

- (a) You must be in compliance with the emission limitations, operating limitations, and other requirements in this subpart that apply to you at all times.
- (b) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make

any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[45CSR34, 40CFR§§63.6605(a) and (b)]

5.1.4. §63.6640 How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?

(a) You must demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.

Table 6 to Subpart ZZZZ of Part 63—Continuous Compliance With Emission Limitations, and Other Requirements.

As stated in §63.6640, you must continuously comply with the emissions and operating limitations and work or management practices as required by the following:

For each . . .	Complying with the requirement to . . .	You must demonstrate continuous compliance by . . .
9. existing non-emergency 2SLB stationary RICE located at an area source of HAP	a. Work or Management practices	i. Operating and maintaining the stationary RICE according to the manufacturer’s emission-related operation and maintenance instructions; or ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[45CSR34 and 40 C.F.R. §63.6640(a) and Table 6 of 40CFR63, Subpart ZZZZ]

5.1.5. Permittee shall comply with applicable general provisions specified in Table 8 of 40 C.F.R. 63, Subpart ZZZZ except 63.7(b) and (c), 63.8(e), f(4) and f(6), and 63.9(b)-(e), (g) and (h) which do not apply per 40 C.F.R. §63.6645(a)(5).

[45CSR34 and 40 C.F.R. §§63.6665 and 63.6645(a)(5)]

5.2. Monitoring Requirements

5.2.1. §63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?

(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:

- an existing non-emergency, non-black start 2SLB stationary RICE located at an area source of HAP emissions;

(h) If you operate an existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the

engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d to this subpart apply.

(j) If you own or operate a stationary SI engine that is subject to the work, operation or management practices in item 6 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

[45CSR34 and 40 C.F.R. §§63.6625(e)(5), (h) and (j)]

5.3. Testing Requirements

5.3.1. None.

5.4. Recordkeeping Requirements

5.4.1. §63.6655 What records must I keep?

(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE:

- an existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

[45CSR34 and 40 C.F.R. §63.6655(e)(3)]

5.5. Reporting Requirements

5.5.1. The permittee shall report each instance in which they did not meet each operating limitation in 5.1.2.a. These instances are deviations from the operating limitations in this subpart. These deviations must be reported according to the requirements in 40 C.F.R. §63.6650.

[45CSR34 and 40 C.F.R. §63.6640(b)]

5.5.2. The permittee shall report each instance in which they did not meet the requirements in Table 8 of this subpart that applies.

[45CSR34 and 40 C.F.R. §63.6640(e)]

5.6. Compliance Plan

5.6.1. None.