Antero Midstream

VIA FedEx

January 31, 2020

William F. Durham
Director
WV Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

RE: Initial Operating Permit Application
Middlebourne IV Compressor Station
Tyler County, West Virginia
Plant ID No. 095-00084

Dear Mr. Durham,

Antero Midstream ("Antero") is submitting one (1) original paper copy and two (2) electronic copies of an Initial Operating Permit Application for the existing Middlebourne IV Compressor Station authorized by Permit No. 13-3380B. This operating permit application is being submitted within 12 months of the commencement of the operation of the authorized sources, as required in Permit 13-3380B.

If you have any questions or require further information, please do not hesitate to contact me at (303) 357-7344 or jresnick@anteroresources.com.

Sincerely,

Jena Resnick
Sr. Manager, Environmental & Regulatory Compliance

Enclosures

cc: Luz Slauter, Env & Reg Manager, Antero, lslauter@anteroresources.com
Nicki Neyrey, Project Manager, Spirit Environmental, nneyrey@spiritenv.com

Initial Operating Permit Application

Middlebourne IV Compressor Station

Tyler County, West Virginia

January 2020

PREPARED FOR:

Antero Midstream LLC

Denver, Colorado

SPIRIT PROJECT: 19363.00A

FOR SPIRIT ENVIRONMENTAL:

Nicole Neyrey

Holli Wiliamson

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1626 Wazee St, Suite 2A
Denver, CO 80202

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1.0 Introduction

1.1 Project Overview

Antero Midstream LLC ("Antero") owns and operates the Middlebourne IV Compressor Station ("the Site") in Tyler County, West Virginia, authorized under Permit No. R13-3380B. The total site-wide potential to emit ("PTE") for volatile organic compounds ("VOCs"), carbon monoxide ("CO"), and nitrogen oxides ("NOx") exceed the 100 ton per year ("tpy") threshold for major sources; therefore, the site is subject to 45 Code of State Rules ("CSR") 30, Operating Permits.

Antero respectfully submits the enclosed Initial Operating Permit Application for the Middlebourne IV Compressor Station. This operating permit application is being submitted within 12 months of the commencement of the operation of the authorized sources, as required in Permit 13-3380B.

1.2 Site Location

The Middlebourne IV Compressor Station is located in Tyler County, less than two (2) miles south of Middlebourne, West Virginia. Latitude / Longitude: 39.475471° / -80.910001°

1.3 Process Description

Gas from surrounding pipelines enters the facility through receivers and associated slug catcher. From there, the gas is metered and routed through a scrubber and filter separator. Any produced liquids from the scrubber or separator are sent to the 500 barrel ("bbl") settling tank (Unit ID: T04). Gas from the filter separator is sent to one (1) of 18 compressor engines (C-100 through C-1800). The 18 compressor engines consist of 15 2,500 horsepower ("hp") Caterpillar G3608 lean burn compressor engines (Unit IDs: C-100 through C-1500) controlled with oxidation catalysts (1C through 12C and 18C through 20C), and three (3) 2,500 hp Waukesha P9394GSI rich burn compressor engines (C-1600 through C-1800) controlled with NSCR catalysts (21C through 23C). Fuel gas for the compressor engines will be treated prior to the engines by a fuel conditioning skid with one (1) 0.5 million British Thermal Units per hour ("MMBtu/hr") heater (Unit ID: FUEL1) and one (1) 0.75 MMBtu/hr heater (Unit ID: FUEL2) to allow more complete combustion. Produced fluids are routed to the settling tank, and compressed gas is routed first to the shared contact tower and then diverted to one (1) of the three (3) triethylene glycol ("TEG") dehydrator regeneration systems.

Each TEG dehydrator regenerator and flash tank (DEHY1 and DFLSH1, DEHY2 and DFLSH2, and DEHY3 and DFLSH3) contains a 225 million standard cubic feet per day (MMscf/day) regenerator, 225 MMscf/day flash gas tank, and 1.5 MMbtu/hr reboiler (DREB1, DREB2, and DREB3). Primarily, vent gas from the flash gas tank will be routed to the unit's reboiler (DREB1, DREB2, and DREB3) and used as fuel. In the case where the flash tank gas cannot be used by the reboiler due to excess gas or the reboiler being offline, the gas will be routed to the storage tanks and onto the VRU. The vent gas off of the regenerator will be routed to the dedicated thermal oxidizer (TO-1, TO-2, and TO-3). The thermal oxidizers each have a control efficiency of 98%. Emissions from the reboilers will be routed to the atmosphere.

Produced fluids from the dehydrators are routed to the settling tank (Unit ID: T04). The dry gas from the dehydration process is either routed to a fuel gas scrubber, metered and routed to the compressors as fuel gas, or metered and sent to plant discharge.

All produced fluids enter one (1) 500 bbl settling tank (Unit ID: T04) where the fluids settle out as either condensate or produced water. The produced water goes to five (5) 400 bbl produced water tanks (Unit IDs: T05 through T07 and T10 through T11) and the condensate goes to five (5) 400 bbl condensate tanks (Unit IDs: T01 through T03 and T08 through T09). Flashing mostly occurs at the settling tank as the fluids stabilize in the settling tank before going to the other storage tanks. All eleven (11) tanks are connected to two (2) VRUs (Unit IDs: VRU-100 and VRU-200) where tank vapors are collected and recycled back into the gas system right before the initial filter scrubber. A third VRU (Unit ID: VRU-300) is also connected to the tanks as a backup unit. The produced fluids are trucked out via tanker trucks as needed (Unit ID: LDOUT1). Truck loading vapors are sent to the reboiler (Unit IDs: DREB1, DREB2, or DREB3) or thermal oxidizers for the dehydration system (TO-1, TO-2, or TO-3). The combined capture and control efficiency of the truck loading vapors will be 93.1%. The anticipated production is 450 bbls per day of condensate and 135 bbls per day of produced water.

One (1) microturbine generator (GEN1) rated at 800 kilowatt-electric (''kWe") and two (2) certified natural gas generators (GEN2 and GEN3) rated at 649 hp PSI Industrial 21.9L will be used at the facility for power generation support. The 800 kWe generator is comprised of four (4) smaller units, each rated at 200 kWe that can be operated individually. The generator is permitted at 8,760 hours per year of operation for maximum operational flexibility.

Fugitive emissions from component leaks (Unit ID: FUG) and emissions from pigging venting or blowdown events (Unit ID: VENT1) also occur. There will also be insignificant auxiliary storage tanks located at the facility (Unit IDs: TK-100 through TK-111).

2.0 General Forms

The following attachments are included with this application.

1. Checklist for Administrative completeness
2. Section 1 – General Information
3. Section 2 – Applicable Requirements
4. Section 3 – Facility-Wide Emissions
5. Section 4 – Insignificant Activities
6. Section 5 – Emission Units, Control Devices, and Emission Points
7. Section 6 – Certification of Information

TITLE V PERMIT APPLICATION CHECKLIST
FOR ADMINISTRATIVE COMPLETENESS

A complete application is demonstrated when all of the information required below is properly prepared, completed and attached. The items listed below are required information which must be submitted with a Title V permit application. Any submittal will be considered incomplete if the required information is not included.*	
☒	Two signed copies of the application (at least one must contain the original "*Certification*" page signed and dated in blue ink)
☒	Correct number of copies of the application on separate CDs or diskettes, (i.e. at least one disc per copy)
☒	*Table of Contents (needs to be included but not for administrative completeness)
☒	Facility information
☒	Description of process and products, including NAICS and SIC codes, and including alternative operating scenarios
☒	Area map showing plant location
☒	Plot plan showing buildings and process areas
☒	Process flow diagram(s), showing all emission units, control equipment, emission points, and their relationships
☒	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
☒	Listing of all active permits and consent orders (if applicable)
☒	Facility-wide emissions summary
☒	Identification of Insignificant Activities
☒	ATTACHMENT D - Title V Equipment Table completed for all emission units at the facility except those designated as insignificant activities
☒	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 G - Air Pollution Control Device Form completed for each control device listed in the Title V Equipment Table (ATTACHMENT D)
☐	ATTACHMENT H – Compliance Assurance Monitoring (CAM) Plan Form completed for each control device for which the "Is the device subject to CAM?" question is answered "Yes" on the Air Pollution Control Device Form (ATTACHMENT G)
☒	General Application Forms signed by a Responsible Official
☐	Confidential Information submitted in accordance with 45CSR31

WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th 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 Secretary of State's Office):** Antero Midstream LLC	**2. Facility Name or Location:** Middlebourne IV Compressor Station
3. DAQ Plant ID No.: 095-00084	**4. Federal Employer ID No. (FEIN):** 46-5517375

5. **Permit Application Type:**

☒ **Initial Permit** When did operations commence? **01/31/2019**
☐ Permit Renewal What is the expiration date of the existing permit? **N/A**
☐ Update to Initial/Renewal Permit Application

6. Type of Business Entity: ☐ Corporation ☐ Governmental Agency ☒ **LLC** ☐ Partnership ☐ Limited Partnership	**7. Is the Applicant the:** ☐ Owner ☐ Operator ☒ **Both** If the Applicant is not both the owner and operator, please provide the name and address of the other party. _____ _____ _____
8. Number of onsite employees: 0	

9. Governmental Code:

☒ **Privately owned and operated; 0**
☐ Federally owned and operated; 1
☐ State government owned and operated; 2
☐ County government owned and operated; 3
☐ Municipality government owned and operated; 4
☐ District government owned and operated; 5

10. Business Confidentiality Claims

Does this application include confidential information (per 45CSR31)? ☐ Yes ☒ **No**

If yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's *"PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY"* guidance.

11. Mailing Address		
Street or P.O. Box: 1615 Wynkoop Street		
City: Denver	**State:** CO	**Zip:** 80202
Telephone Number: (720) 990-5530	**Fax Number:**	

12. Facility Location		
Street: Wick Rd	**City:** Middlebourne	**County:** Tyler
UTM Easting: 507.741 km	**UTM Northing:** 4369.546 km	**Zone:** ☒ **17** or ☐ 18
Directions: From Middlebourne, WV, drive southwest on WV-18/Main St. Turn right onto Bridgeway Road. Drive for 0.1 miles and turn left onto Middlebourne-Wick/Wick Road. After 1.4 miles the facility will be on the right.		
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? ☒ Yes ☐ No		**If yes, name the affected state(s).** Ohio and Pennsylvania
Is facility located within 100 km of a Class I Area[1]? ☐ Yes ☒ No **If no, do emissions impact a Class I Area[1]?** ☐ Yes ☒ No		**If yes, name the area(s).**

[1] *Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.*

13. Contact Information		
Responsible Official: Robert Krcek		**Title:** VP Midstream
Street or P.O. Box: 1615 Wynkoop Street		
City: Denver	**State:** CO	**Zip:** 80202
Telephone Number: (303) 357-6432	**Fax Number:**	
E-mail address: rkrcek@anteroresources.com		
Environmental Contact: Jena Resnick		**Title:** Sr. Env and Reg Manager
Street or P.O. Box: 1615 Wynkoop Street		
City: Denver	**State:** CO	**Zip:** 80202
Telephone Number: (303) 357-7344	**Fax Number:**	
E-mail address: jresnick@anteroresources.com		
Application Preparer: Nicole Neyrey		**Title:** Project Manager
Company: Spirit Environmental, LLC		
Street or P.O. Box: 1626 Wazee Street, Suite 2A		
City: Denver	**State:** CO	**Zip:** 80202
Telephone Number: (720) 500-3715	**Fax Number:** (281) 664-2491	
E-mail address: nneyrey@spiritenv.com		

14. Facility Description

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 Gathering / Boosting	Compressed and Dehydrated Natural Gas	211120	1311

Provide a general description of operations.

The Middlebourne IV Compressor Station separates, compresses, and dries gas off the inlet pipeline stream. The station includes fifteen (15) compressor engines with oxidation catalysts, three (3) compressor engines with NSCR catalysts, three (3) generators, three (3) 225 MMscfd dehydrators with three (3) reboilers, five (5) 400-bbl condensate tanks, five (5) 400-bbl produced water tanks, one (1) 500-bbl settling tank, one (1) 0.5 MMBtu/hr fuel conditioning heater, one (1) 0.75 MMBtu/hr fuel conditioning heater, three (3) thermal oxidizers, three (3) VRU units, liquid loadout operations, fugitive component emissions, and auxiliary tanks.

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."

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. 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) – HH and ZZZZ**	☐ Nonattainment NSR (45CSR19)
☒ **Section 111 NSPS – JJJJ and OOOOa**	☐ 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 - Odors	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☐ **C**ompliance **A**ssurance **M**onitoring (40CFR64)
☐ CAIR NO_x Annual Trading Program (45CSR39)	☐ CAIR NO_x Ozone Season Trading Program (45CSR40)
☐ CAIR SO_2 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. **Please reference SUPPLEMENT S1-Regulatory Discussion for details on negative applicability.**
☒ 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*).

Permit R13-3380B Requirements:

2.11 *Inspection and Entry* – allow any authorized representative of the Secretary to: enter the premises at all reasonable times, have access to and copy records, and perform inspections, sampling and monitoring as needed

2.12 *Emergency* – definition and affirmative defense instructions

3.1.1 *Open burning [45CSR§6-3.l.]* – open burning of refuse is prohibited expect as noted in 45 CSR §6-3.1

3.1.3 *Asbestos [40 CFR §61.145(b) and 45 CSR §34]*– search and removal requirements

3.1.5 *Permanent shutdown [45CSR§13-10.5.]* – definition of permanent shutdown source

3.5.4.1 *Operating Fee[45CSR§30]* – Annual fees are required

3.5.5 *Emission Inventory* – as requested by the Secretary, emissions inventories shall be required

4.1.2 *Operation and Maintenance of Air Pollution Control Equipment [45CSR§13-5.11.]* – to the extent practicable, the permittee shall: install, maintain, and operate all pollution control and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with a more stringent limit.

4.1.4 *Limitation and Standards [45CSR§13]* – emission units and sources at the facility are limited to those identified in Table 1.0 of this permit or any de minimus sources identified under Table 45-13B

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more information.

☒ Permit Shield

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.)

Permit R13-3380B Requirements:

2.6 *Duty to Provide Information* – upon request by the Secretary, furnish required documentation

2.7 *Duty to Supplement and Correct Information* – promptly submit left out supplemental facts or corrected information to the Secretary

2.12.3 *Emergency* – affirmative defense recordkeeping

2.14 *Suspension of Activities* – notification shall be submitted within two (2) calendar weeks of passing the sixtieth (60) day of the suspension period

2.18 *Startup Notification* – shall be submitted within thirty (30) calendar days after startup

3.1.2 *Open burning exemptions* – notification requirements for exemptions listed in in 45 CSR §6-3.1

3.1.3 *Asbestos [40 CFR §61.145(b) and 45 CSR §34]*– notification shall be submitted ten (10) working days prior to the commencement of any asbestos removal and copies sent to the appropriate agencies

3.1.5 *Permanent shutdown [45CSR§13-10.5.]* – submit information to the Secretary to contradict permanent shutdown status

3.1.6 *Standby Plan for reducing Emissions [45CSR§11-5.2.]* – upon request by the Secretary, prepare standby plans for reducing emissions

3.3.1 *Stack Testing Requirements [WV Code §22-5-4(a)(14-15) and 45CSR§13]* – perform stack tests as required by this section, submit testing protocols to the Secretary at least thirty (30) days prior to any testing, submit notification to the Secretary at least fifteen (15) days prior to any testing, submit stack test results within sixty (60) days of completion

3.4.1 *Recordkeeping* – Records, including monitoring data, support information (calibration and maintenance records), reports, and notifications shall be kept for five (5) years.

3.5.1 *Responsible Official* – Submit a certification by the RO for any application form, report, or compliance certification required by this permit

3.5.4.1 *Operating Fee[45CSR§30]* – Submit certified emissions statement and pay fees in accordance with the submittal requirements of the Division of Air Quality. Maintain receipt records.

3.5.5 *Emission Inventory* – as requested by the Secretary, prepare and submit an emission inventory for the previous year

4.1.1 *Record of Monitoring* – maintain records of monitoring information according to this section

4.1.4 *Record of Malfunctions of Air Pollution Control Equipment* – maintain records of the occurrence and duration of any malfunction or operational shutdown during which excess emissions occurred

6.4.5 Maintain records of PTE HAP calculations for the entire affected facility, including compressor engines and ancillary equipment to demonstrate compliance with section 6.1.4.

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more information.

Are you in compliance with all facility-wide applicable requirements? ☒ **Yes** ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

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)*
R13-3380B	**11/08/2019**	**N/A**

22. Inactive Permits/Obsolete Permit Conditions		
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 (including fugitives)
Carbon Monoxide (CO)	**140.55**
Nitrogen Oxides (NO_X)	**142.11**
Lead (Pb)	**N/A**
Particulate Matter ($PM_{2.5}$)[1]	**17.48**
Particulate Matter (PM_{10})[1]	**17.89**
Total Particulate Matter (TSP)	**19.71**
Sulfur Dioxide (SO_2)	**0.98**
Volatile Organic Compounds (VOC)	**199.32**
Hazardous Air Pollutants[2]	Potential Emissions (including fugitives)
Benzene	**0.85**
Toluene	**1.92**
Ethylbenzene	**0.18**
Xylenes	**0.71**
n-Hexane	**3.33**
Acetaldehyde	**5.17**
Acrolein	**3.31**
Methanol	**1.85**
Formaldehyde	**8.63**
Total HAPs	**27.22**
Regulated Pollutants other than Criteria and HAP	Potential Emissions (including fugitives)
CO_2e	**245,149**

[1] $PM_{2.5}$ and PM_{10} are components of TSP.
[2] 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. Insignificant Activities (Check all that apply)	
☒	1.	Air compressors and pneumatically operated equipment, including hand tools.
☒	2.	Air contaminant detectors or recorders, combustion controllers or shutoffs.
☒	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.
☐	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.
☐	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_2 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.
☐	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_x, SO_2, 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: **Two (2) 2,000-gallon Compressor Skid Oily Water Tanks** **Two (2) 4,000-gallon Used oil Tanks** **Two (2) 1,000-gallon TEG Make-up Tanks** **Two (2) 2,000-gallon Compressor Coolant Tanks** **Two (2) 2,000-gallon Engine Lube Oil Tanks** **Two (2) 2,000-gallon Compressor Lube Oil Tanks** **Total criteria pollutant emissions for the sources above are < 1 lb/hr and 10,000 lbs/year**

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: **Two (2) 2,000-gallon Compressor Skid Oily Water Tanks** **Two (2) 4,000-gallon Used oil Tanks** **Two (2) 1,000-gallon TEG Make-up Tanks** **Two (2) 2,000-gallon Compressor Coolant Tanks** **Two (2) 2,000-gallon Engine Lube Oil Tanks** **Two (2) 2,000-gallon Compressor Lube Oil Tanks** **Total HAP emissions for the sources above are < 0.1 lb/hr and 1,000 lbs/year**
☐	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.
☐	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.
☒	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. 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.
☐	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.
☐	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.

Section 5: Emission Units, Control Devices, and Emission Points

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**.

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

*Note: This Certification must be signed by a responsible official. The **original**, signed in **blue ink**, must be submitted with the application. Applications without an **original** 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.

Responsible official (type or print)

Name: **Robert Krcek**	Title: **VP Midstream**

Responsible official's signature:

Signature: _____ Signature Date: 01/29/2020

(Must be signed and dated in blue ink)

Note: 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 www.dep.wv.gov/daq, requested by phone (304) 926-0475, and/or obtained through the mail.

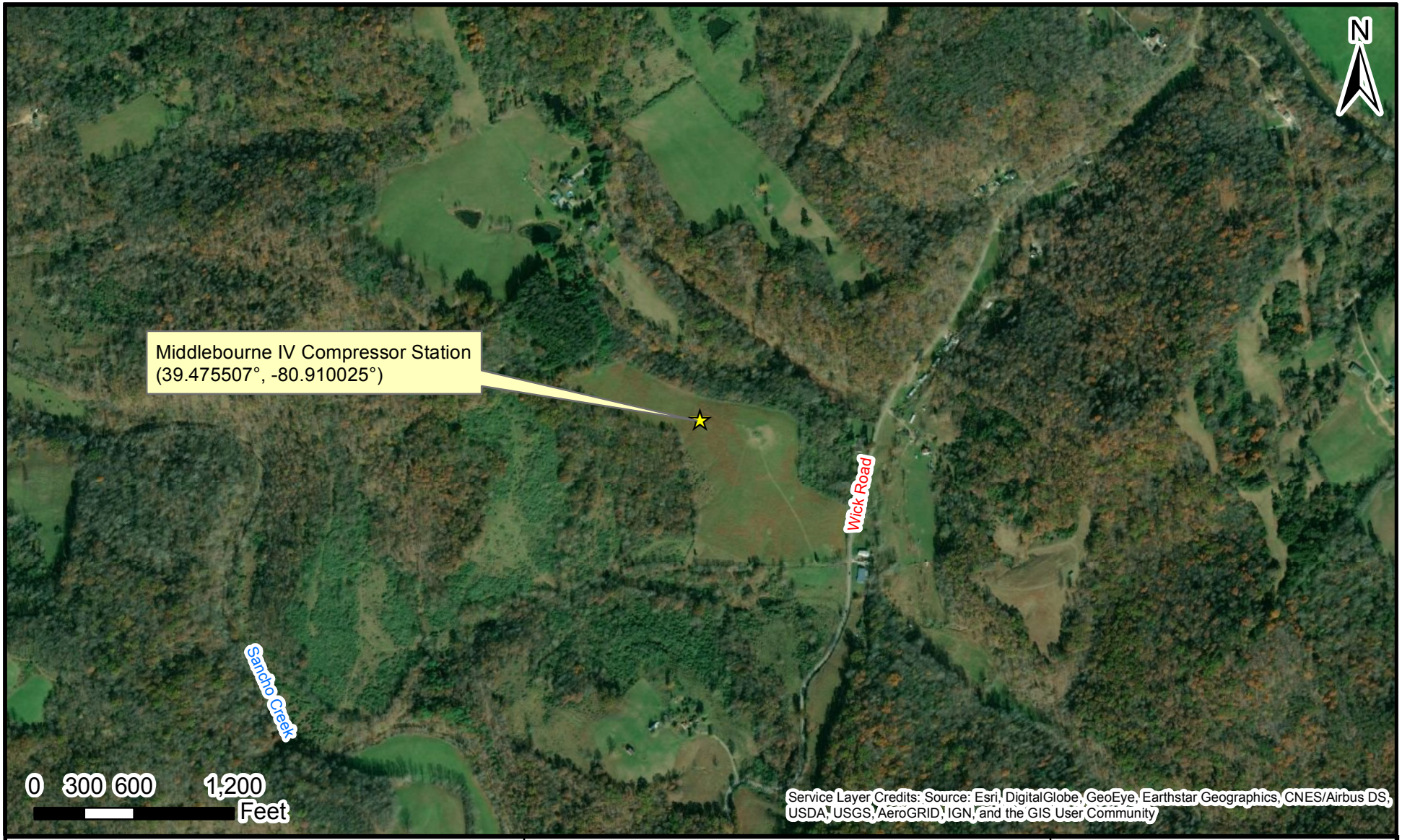
3.0 Attachments

The following attachments are included with this renewal.

1. Attachment A – Area Maps
2. Attachment B – Plot Plan
3. Attachment C – Process Flow Diagram
4. Attachment D – Equipment Table
5. Attachment E – Emission Unit Forms
6. Attachment F – Schedule of Compliance Form (NA)
7. Attachment G – Air Pollution Control Device Forms
8. Attachment H – Compliance Assurance Monitoring Form (NA)

ATTACHMENT A

Area Maps



Legend

☆ Middlebourne IV Compressor Station

MIDDLEBOURNE IV COMPRESSOR STATION
AERIAL MAP
ANTERO MIDSTREAM LLC
TYLER COUNTY, WEST VIRGINIA

SPIRIT ENVIRONMENTAL

1626 Wazee Street Suite 2A
Denver, CO 80202

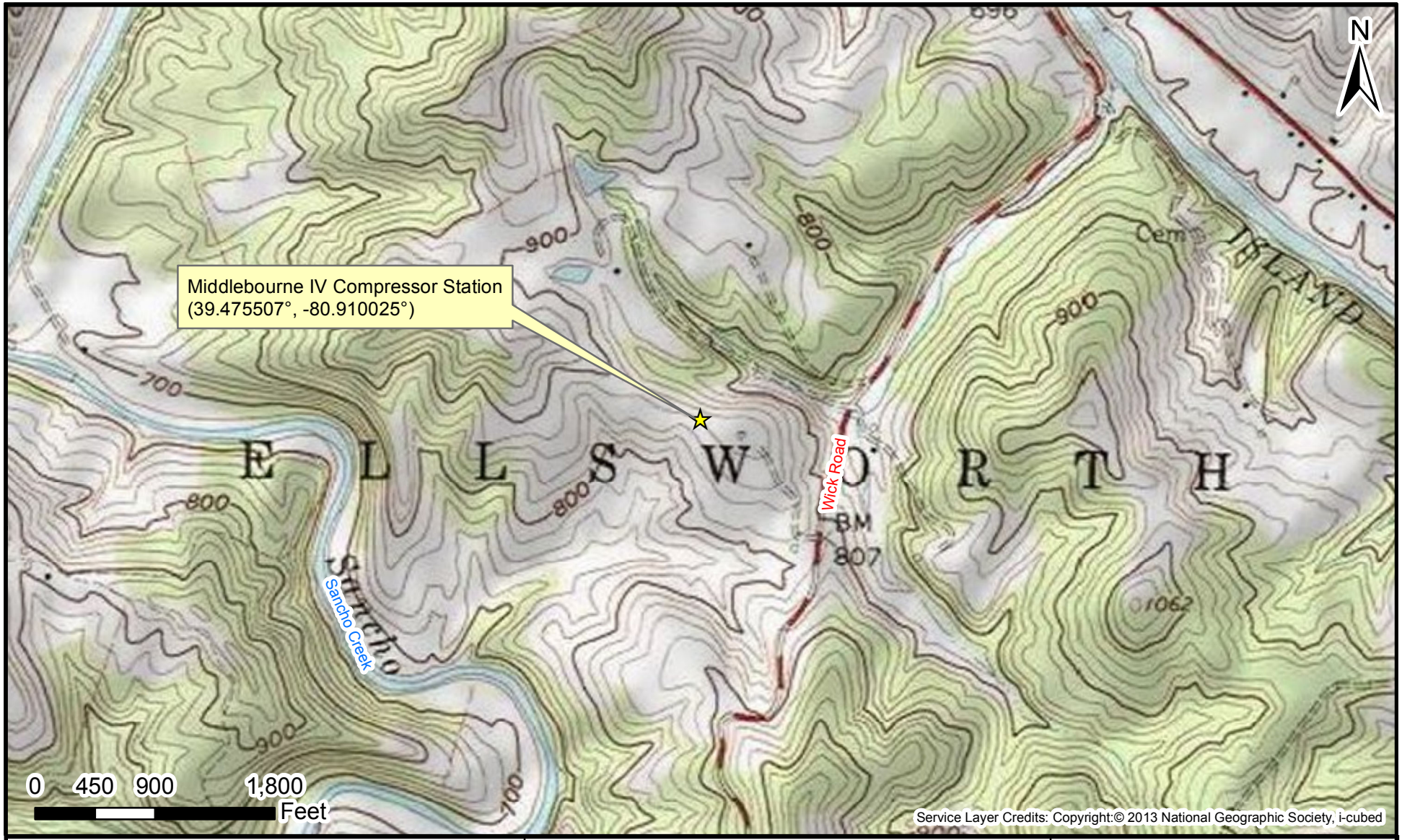
Figure No.: 1

Date: 1/9/2020

Project No.: 19363.00A

Drawn By: AHasse

Note: This is not an official land survey.
Coordinate System: NAD 1983 2011State Plane
West Virginia North FIPS 4701



Legend

☆ Middlebourne IV Compressor Station

MIDDLEBOURNE IV COMPRESSOR STATION
TOPOGRAPHIC MAP
ANTERO MIDSTREAM LLC
TYLER COUNTY, WEST VIRGINIA

SPIRIT ENVIRONMENTAL
1626 Wazee Street Suite 2A
Denver, CO 80202

Figure No.: 2

Date: 1/9/2020

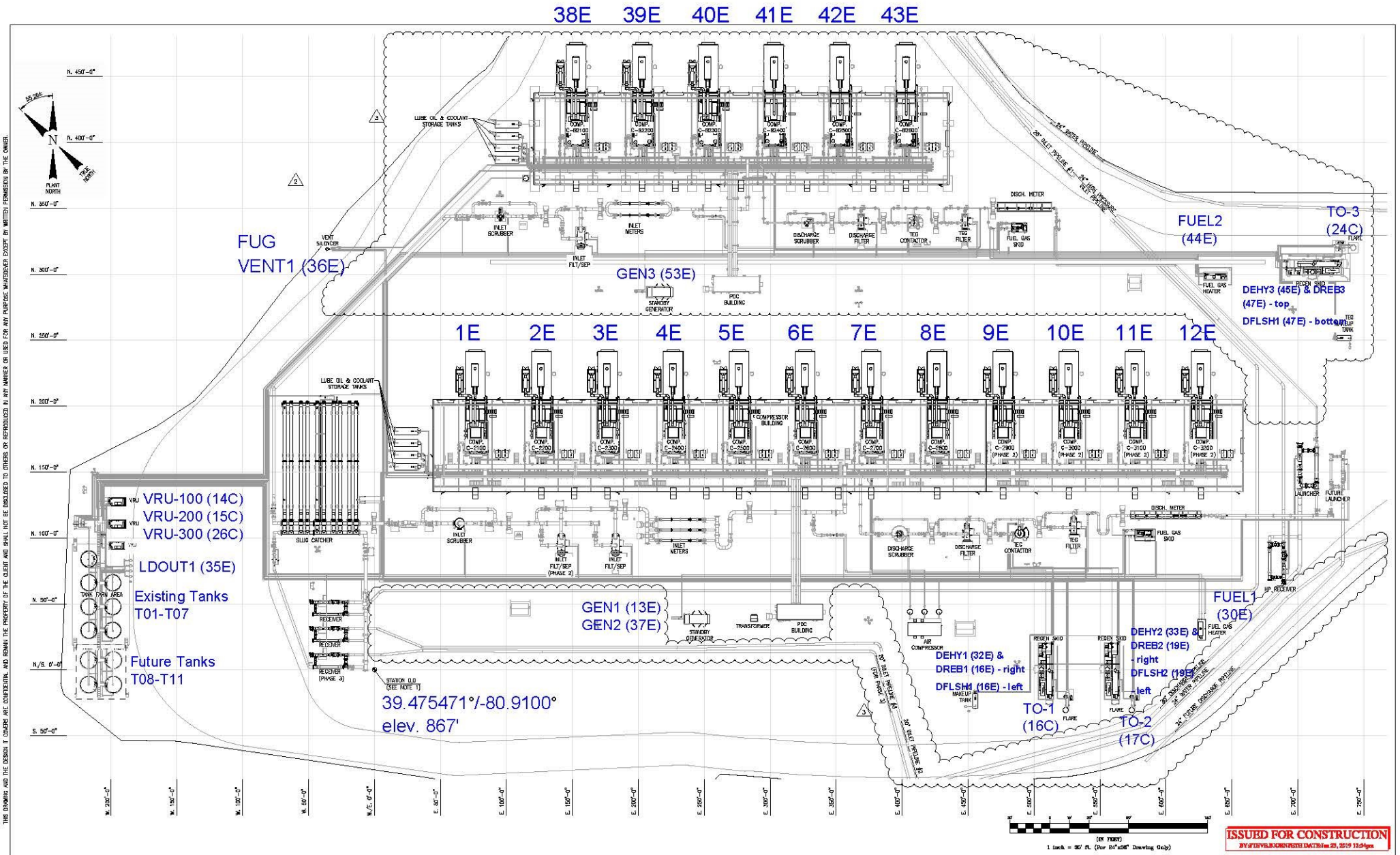
Project No.: 19363.00A

Drawn By: AHasse

Note: This is not an official land survey.
Coordinate System: NAD 1983 2011State Plane
West Virginia North FIPS 4701

ATTACHMENT B

Plot Plan



THIS DRAWING AND THE DESIGN IT DEPICTS ARE CONFIDENTIAL AND REMAIN THE PROPERTY OF THE CLIENT AND SHALL NOT BE DISCLOSED TO OTHERS OR REPRODUCED IN ANY MANNER OR USED FOR ANY PURPOSE WHATSOEVER EXCEPT BY WRITTEN PERMISSION OF THE OWNER.

ISSUED FOR CONSTRUCTION
BY:STEVE.BJORNSETH DATE:Jan 23, 2019 12:54pm

NOTES
1. ALL NORTHINGS AND EASTINGS ARE BASED OFF SITE BENCHMARK OF: N. 356306.82, E. 1570467.14 EQUAL TO PLANT BENCHMARK OF: N 0+00, E 0+00, ELEVATION BASED OFF FINISHED GRADE AT COMPRESSOR BUILDING OF 856'-8" EQUAL TO 100'-0" PLANT ELEVATION. 1
2. CONTRACTOR TO FIELD VERIFY TIE-IN LOCATIONS PRIOR TO FABRICATION.
3. SMALL BORE PIPING 3" & UNDER TO BE FIELD ROUTED BY CONTRACTOR.

REFERENCE DRAWINGS

REV.	REVISION	DATE	DRAWN	CHKD.	APPD.
3	REVISED FOR PHASE 3, ISSUED FOR CONSTRUCTION	1/28/19	SJB	VC	KRS
2	REVISED ISSUED FOR CONSTRUCTION	8/17/18	SJB	CPT	KRS
1	REVISED ISSUED FOR CONSTRUCTION	6/7/18	SJB	CPT	KRS
0	ISSUED FOR CONSTRUCTION	5/16/18	SJB	CPT	KRS

THIS DOCUMENT WAS ORIGINALLY ISSUED AND SEALED BY KENNETH R. SKIDMORE, REGISTRATION NUMBER 18571 (WEST VIRGINIA) ON 28-JAN-2019, AND THE ORIGINAL DOCUMENT IS STORED AT WOOD GROUP MUSTANG IN DENVER, CO.

DRAWING APPROVAL

	SIGNATURE	DATE
DRAWN	SJB	6/18/18
CHECKED	CPT	6/18/18
PLANNING APPROVAL	KRS	6/18/18
CLIENT APPROVAL		
CLIENT PROJECT NUMBER		

PROJECT NUMBER 110815

CLIENT: Antero Midstream Partners LP

WOOD GROUP

Middlebourne IV Compressor Station

TYLER COUNTY, WEST VIRGINIA

DRAWING TITLE: EQUIPMENT GENERAL ARRAGNMENT PLOT PLAN (PHASE 1, 2 & 3)

WGM No. 110815-PIP-DPL-1000

SCALE 1"=80'-0"

DWG. NO. 110815-PIP-DPL-1000

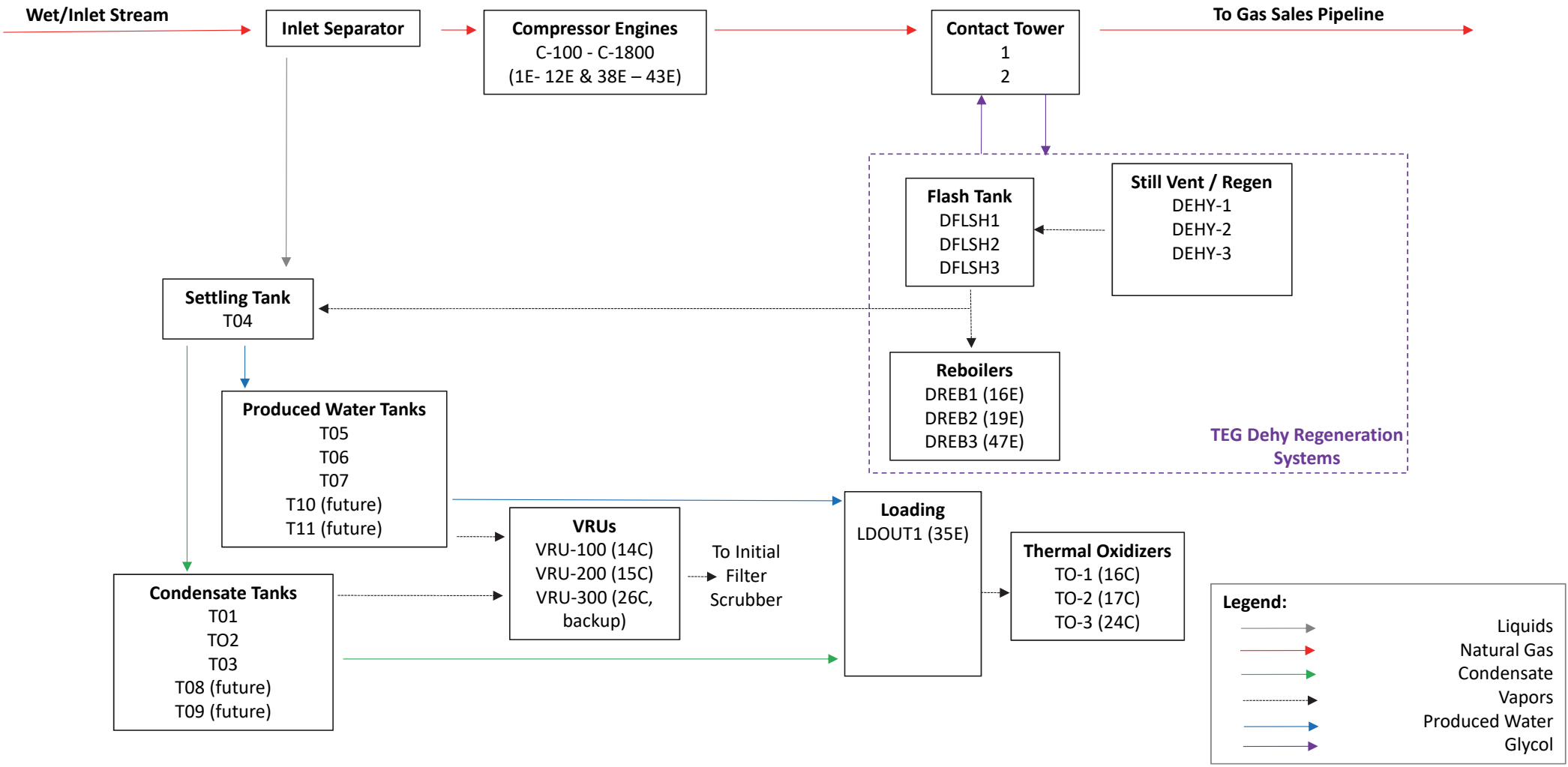
REV. 3

FILE PATH: R:\2016 PROJECTS\110815 ANTERO FERRELL CS\04 DELIVERABLES WIP\PIP-PIPING\DRAWINGS\110815-PIP-DPL-1000.DWG BY:STEVE.BJORNSETH DATE:Jan 23, 2019 12:54pm

ATTACHMENT C

Process Flow Diagram

Generalized Conceptual Summary Process Flow Diagram



ATTACHMENT D

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)

Emission Point ID[1]	Control Device[1]	Emission Unit ID[1]	Emission Unit Description	Design Capacity	Year Installed/ Modified
1E	Ox Cat (1C)	C-100	Caterpillar G3608 Compressor Engine	2,500 hp	2018
2E	Ox Cat (2C)	C-200	Caterpillar G3608 Compressor Engine	2,500 hp	2018
3E	Ox Cat (3C)	C-300	Caterpillar G3608 Compressor Engine	2,500 hp	2018
4E	Ox Cat (4C)	C-400	Caterpillar G3608 Compressor Engine	2,500 hp	2018
5E	Ox Cat (5C)	C-500	Caterpillar G3608 Compressor Engine	2,500 hp	2018
6E	Ox Cat (6C)	C-600	Caterpillar G3608 Compressor Engine	2,500 hp	2018
7E	Ox Cat (7C)	C-700	Caterpillar G3608 Compressor Engine	2,500 hp	2018
8E	Ox Cat (8C)	C-800	Caterpillar G3608 Compressor Engine	2,500 hp	2018
9E	Ox Cat (9C)	C-900	Caterpillar G3608 Compressor Engine	2,500 hp	2018
10E	Ox Cat (10C)	C-1000	Caterpillar G3608 Compressor Engine	2,500 hp	2018
11E	Ox Cat (11C)	C-1100	Caterpillar G3608 Compressor Engine	2,500 hp	2018
12E	Ox Cat (12C)	C-1200	Caterpillar G3608 Compressor Engine	2,500 hp	2018
38E	Ox Cat (18C)	C-1300	Caterpillar G3608 Compressor Engine	2,500 hp	2018
39E	Ox Cat (19C)	C-1400	Caterpillar G3608 Compressor Engine	2,500 hp	2018
40E	Ox Cat (20C)	C-1500	Caterpillar G3608 Compressor Engine	2,500 hp	2018
41E	NSCR (21C)	C-1600	Waukesha P9394GSI Compressor Engine	2,500 hp	2018
42E	NSCR (22C)	C-1700	Waukesha P9394GSI Compressor Engine	2,500 hp	2018
43E	NSCR (23C)	C-1800	Waukesha P9394GSI Compressor Engine	2,500 hp	2018
13E	None	GEN1	Natural Gas Microturbine Generator	800 kWe	2018
37E	None	GEN2	Natural Gas PSI Generator #2	649 hp	2018
53E	None	GEN3	Natural Gas PSI Generator #3	649 hp	2018
14E	TO-1 (16C)	DEHY1	Dehydrator Still Vent #1	225 MMscfd	2018
15E	DREB1 (16E)	DFLSH1	Dehydrator Flash Tank #1	225 MMscfd	2018
16E	None	DREB1	Dehydration Reboiler #1	1.5 MMBtu/hr	2018
17E	TOC-2 (17C)	DEHY2	Dehydrator Still Vent #2	225 MMscfd	2018
18E	DREB2 (19E)	DFLSH2	Dehydrator Flash Tank #2	225 MMscfd	2018
19E	None	DREB2	Dehydration Reboiler #2	1.5 MMBtu/hr	2018

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)

Emission Point ID[1]	Control Device[1]	Emission Unit ID[1]	Emission Unit Description	Design Capacity	Year Installed/ Modified
45E	TO-3 (24C)	DEHY3	Dehydrator Still Vent #3	225 MMscfd	2018
46E	DREB3 (47E)	DFLSH3	Dehydrator Flash Tank #3	225 MMscfd	2018
47E	None	DREB3	Dehydration Reboiler #3	1.5 MMBtu/hr	2018
48E	VRU-100 to VRU-300 (14C, 15C, 26C) [a]	T01	Condensate Storage Tank #1	400 bbl (16,800 gal)	2018
48E	VRU-100 to VRU-300 (14C, 15C, 26C) [a]	T02	Condensate Storage Tank #2	400 bbl (16,800 gal)	2018
48E	VRU-100 to VRU-300 (14C, 15C, 26C) [a]	T03	Condensate Storage Tank #3	400 bbl (16,800 gal)	2018
26E	VRU-100 to VRU-300 (14C, 15C, 26C) [a]	T04	Condensate/Produced Water Settling Tank	500 bbl (21,000 gal)	2018
27E	VRU-100 to VRU-300 (14C, 15C, 26C) [a]	T05	Produced Water Storage Tank #1	400 bbl (16,800 gal)	2018
28E	VRU-100 to VRU-300 (14C, 15C, 26C) [a]	T06	Produced Water Storage Tank #2	400 bbl (16,800 gal)	2018
29E	VRU-100 to VRU-300 (14C, 15C, 26C) [a]	T07	Produced Water Storage Tank #3	400 bbl (16,800 gal)	2018
48E	VRU-100 to VRU-300 (14C, 15C, 26C) [a]	T08	Condensate Storage Tank #4	400 bbl (16,800 gal)	2018
49E	VRU-100 to VRU-300 (14C, 15C, 26C) [a]	T09	Condensate Storage Tank #5	400 bbl (16,800 gal)	2018
50E	VRU-100 to VRU-300 (14C, 15C, 26C) [a]	T10	Produced Water Storage Tank #4	400 bbl (16,800 gal)	2018
51E	VRU-100 to VRU-300 (14C, 15C, 26C) [a]	T11	Produced Water Storage Tank #5	400 bbl (16,800 gal)	2018

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)

Emission Point ID[1]	Control Device[1]	Emission Unit ID[1]	Emission Unit Description	Design Capacity	Year Installed/ Modified
30E	None	FUEL1	Fuel Conditioning Heater	0.5 MMBtu/hr	2018
44E	None	FUEL2	Fuel Conditioning Heater	0.75 MMBtu/hr	2018
35E	TO-1 to TO-3 (16C, 17C, 24C)	LDOUT1	Production Liquids Truck Loadout	585 bbl/day[b]	2018
32E	16C	TO-1	Thermal Oxidizer #1	6.0 MMBtu/hr	2018
33E	17C	TO-2	Thermal Oxidizer #2	6.0 MMBtu/hr	2018
52E	24C	TO-3	Thermal Oxidizer #3	6.0 MMBtu/hr	2018
36E	None	VENT1	Venting Episodes	Variable	2018
N/A	None	FUG	Fugitives	Variable	2018
TK-100	None	TK-100	Compressor Skid Oily Water Tank	2,000 gal	2018
TK-101	None	TK-101	Used oil Tank	4,000 gal	2018
TK-102	None	TK-102	TEG Make-up Tank	1,000 gal	2018
TK-103	None	TK-103	Compressor Coolant Tank	2,000 gal	2018
TK-104	None	TK-104	Engine Lube Oil Tank	2,000 gal	2018
TK-105	None	TK-105	Compressor Lube Oil Tank	2,000 gal	2018
TK-106	None	TK-106	Compressor Skid Oily Water Tank	2,000 gal	2018
TK-107	None	TK-107	Used oil Tank	4,000 gal	2018
TK-108	None	TK-108	TEG Make-up Tank	1,000 gal	2018
TK-109	None	TK-109	Compressor Coolant Tank	2,000 gal	2018
TK-110	None	TK-110	Engine Lube Oil Tank	2,000 gal	2018
TK-111	None	TK-111	Compressor Lube Oil Tank	2,000 gal	2018

[1]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.

[a] Working, breathing, and flashing losses are routed to Vapor Recovery Units for recirculation back into the process.
[b] 450 bbl/day Condensate and 135 bbl/day Produced Water

ATTACHMENT E

Emission Unit Forms

- 2,500 hp Caterpillar G3608 LB Compressor Engines (C-100 through C-1500)
- 2,500 hp Waukesha P9394GSI RB Compressor Engines (C-1600 through C-1800)
- 800 kWe Capstone C800 Standard Microturbine Generator (GEN1)
- 649 hp PSI Industrial 21.9L Natural Gas Generator (GEN2 and GEN3)
- Dehydrator Still Vents (DEHY1, DEHY2, DEHY3)
- Dehydrator Flash Tanks (DFLSH1, DFLSH2, DFLSH3)
- Dehydrator Reboiler (DREB1, DREB2, DREB3)
- Condensate Storage Tanks (T01, T02, T03, T08, T09)
- Condensate/Produced Water Settling Tank (T04)
- Produced Water Storage Tanks (T05, T06, T07, T10, T11)
- Fuel Conditioning Heaters (FUEL1, FUEL2)
- Liquid Loadout (LDOUT1)
- Venting Episodes (VENT1)
- Fugitives (FUG)

ATTACHMENT E - Emission Unit Form

Emission Unit Description- **Compressor Engines C-100 through C-1500 (each)**

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
C-100 through C-1500 (each)	Compressor Engine #1 through #15 (each)	Oxidation Catalyst (1C through 12C, 18C through 20C each)

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Four Stroke, Lean Burn Natural Gas-Fired Compressor Engine with Oxidation Catalyst

Manufacturer:	**Model number:**	**Serial number:**
Caterpillar	G3608	N/A

Construction date:	**Installation date:**	**Modification date(s):**
After 7/1/2007	2018	N/A

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
2,500 hp @ 1,000 rpm

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
N/A	N/A	8,760 hr/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel?	**If yes, is it?**
X Yes ___ No	___ Indirect Fired X Direct Fired

Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**
2,500 hp	N/A

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.

Raw Natural Gas 16,500 scf/hr 144.54 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	<0.01%	negligible	1,248 Btu/scf

Emissions Data	**C-100 through C-1500 (each)**
Criteria Pollutants	Potential Emissions
	PPH / TPY
Carbon Monoxide (CO)[1]	0.88 / 3.86
Nitrogen Oxides (NO_X)[1]	1.65 / 7.24
Lead (Pb)	N/A / N/A
Particulate Matter ($PM_{2.5}/PM_{10}$)[2]	0.17 / 0.75
Total Particulate Matter (TSP)[2]	0.17 / 0.75
Sulfur Dioxide (SO_2)[2]	0.010 / 0.044
Volatile Organic Compounds (VOC)[1]	1.60 / 7.00
Hazardous Air Pollutants	Potential Emissions
	PPH / TPY
1,3-Butadiene[2]	< 0.01 / 0.010
2-Methylnaphthalene[2]	< 0.01 / < 0.01
2,2,4-Trimethylpentane[2]	< 0.01 / 0.010
Acenaphthene[2]	< 0.01 / < 0.01
Acenaphthylene[2]	< 0.01 / < 0.01
Acetaldehyde[2]	0.073 / 0.32
Acrolein[2]	0.045 / 0.20
Benzene[2]	< 0.01 / 0.017
Benzo(b)fluoranthene[2]	< 0.01 / < 0.01
Benzo(e)pyrene[2]	< 0.01 / < 0.01
Benzo(g,h,i)perylene[2]	< 0.01 / < 0.01
Biphenyl[2]	< 0.01 / 0.01
Chrysene[2]	< 0.01 / < 0.01
Ethylbenzene[2]	< 0.01 / < 0.01
Fluoranthene[2]	< 0.01 / < 0.01
Fluorene[2]	< 0.01 / < 0.01
Formaldehyde[1]	0.11 / 0.48
Methanol[2]	0.022 / 0.10
Methylene Chloride[2]	< 0.01 / < 0.01
n-Hexane[2]	0.010 / 0.042
Naphthalene[2]	< 0.01 / < 0.01
PAH[2]	< 0.01 / < 0.01
Phenanthrene[2]	< 0.01 / < 0.01

Phenol[2]	< 0.01	< 0.01
Pyrene[2]	< 0.01	< 0.01
Tetrachloroethane[2]	< 0.01	< 0.01
Toluene[2]	< 0.01	0.016
Vinyl Chloride[2]	< 0.01	< 0.01
Xylenes[2]	< 0.01	< 0.01
Other HAPs[2]	< 0.01	0.020
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CO_2[1]	2,364	10,356
CH_4[1]	17.8	77.97
N_2O[3]	<0.01	0.017
CO_2e[4]	2,811	12,311

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

1. Values from Manufacturer specification sheet
2. AP-42, Chapter 3.2, Table 3.2-2
3. 40 CFR Part 98, Subpart C, Table C-2
4. 40 CFR Part 98, Subpart A, Table A-1, effective January 2014

Applicable Requirements **C-100 through C-1500 (each)**

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.

Permit R13-3380B Requirements:

5.1.1 Maximum hourly and annual emission limits. Please reference Emissions Data above for exact limits.

5.1.5 Emissions limits in section 5.1.1 apply at all times except during periods of MSS that are < 30 minutes per occurrence. Operate engines in a manner consistent with good air pollution control practices, including periods of MSS. Comply with Subpart JJJJ and ZZZZ.

5.1.6.a, c The compressor engines shall be equipped with oxidation catalysts and fitted with a closed-loop automatic air/fuel ratio feedback controller to ensure that the engine ignition system will cease operation in the case a situation which results in performance degradation or failure of the catalyst element.

5.1.6.d A written operation and maintenance ("O&M") plan is required

5.1.6.e No person shall knowingly: remove, bypass, defeat or render inoperative any air pollution control device subject to the requirements of this permit

10.1 The units must meet requirements in NSPS JJJJ

10.2 Maximum emission standards for NSPS JJJJ

10.4.4 Propane fuel can be used in emergency operations up to 100 hours per year

11.1 The units must meet requirements in NSPS Subpart OOOOa for reciprocating compressors

13.1 The units must meet the requirements of MACT ZZZZ by meeting the requirements of NSPS JJJJ

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

__X__ 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.)

Permit R13-3380B Requirements:

5.1.5 Engine MSS emissions shall be included in the 12-month rolling total emissions.

5.1.6.c Monitor the inlet catalyst temperature in accordance with manufacturer's specifications. If the engine shuts off due to high temperature, check for thermal deactivation of the catalyst before normal operations resume.

5.1.6.d Conduct periodic and annual maintenance according to the written O&M Plan

5.2.1 Maintain proper operation of the automatic air/fuel ratio controller or automatic feedback controller and follow O&M recommendation of the catalyst element manufacturer

5.3.1 Follow testing requirements as outlined in Section 3.3, 10.5, 11.2, and 11.3 of the permit.

5.4.1. Maintain maintenance records for the catalytic reduction device for five (5) years to demonstrate compliance with 5.1.6

5.5.1 Follow reporting requirements as outlined in Section 3.5, 10.6, and 11.4 of this permit.

Section 10: NSPS JJJJ

10.4.1.b.2. Keep a maintenance plan and records of conducted maintenance, conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first.

10.4.4 Maintain records of propane fuel use. If > 100 hours per year conduct a performance test to demonstrate compliance

10.4.6 Maintain and operate the AFR controller appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.

10.5.1 Performance tests must be conducted in accordance with 40 CFR §60.4244

10.6.1.a. Maintain records of: notifications, maintenance, and documentation the engine meets the emission standards

10.6.1.c. Submit initial notification in accordance with 40 CFR §60.4245(c)

10.6.1.d. Submit performance tests within sixty (60) days per 40 CFR §60.4245(d)

Section 11: NSPS OOOOa

11.1.1a Replace rod packing on or before the compressor has operated for 26,000 hours or 36 months
11.1.1.b Demonstrate initial compliance with standards that apply to reciprocating compressor affected facilities as required by §60.5410a(c)
11.1.1.c Demonstrate continuous compliance with standards that apply to reciprocating compressor affected facilities as required by §60.5410a(c)
11.1.1.d Perform reporting as required by §60.5420a(b)(1) and (4) and the recordkeeping as required by

§60.5420a(c)(3), (6) through (9), and (17), as applicable.

11.1, 11.2 & 11.3 Continuously monitor the hours of operation or number of months since last rod packing replacement

11.1, 11.2, 11.3, & 11.4 Submit Initial and Annual Reports in accordance with 40 CFR §60.5420a(b)(l), (4), and (9)

11.1, 11.2, 11.3, & 11.4 Maintain records of hours of operation or number of months since last rod packing replacement, date and time of rod packing replacement, and any deviations

11.4.1 No requirements according to 40 CFR §60.5420a(a)(1)

11.4.3 Maintain reporting and recordkeeping as required by 40 CFR §60.5420a(c)(3), (6)-(9), and (17), as applicable, to demonstrate compliance with 12.1.1.d

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

ATTACHMENT E - Emission Unit Form

Emission Unit Description- **(each)**	**Compressor Engines C-1600 through C-1800**	
Emission unit ID number: C-1600 through C-1800 (each)	**Emission unit name:** Compressor Engine #16 through #18 (each)	**List any control devices associated with this emission unit:** NSCR (21C-23C each)
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Four Stroke, Rich Burn Natural Gas-Fired Compressor Engine with NSCR		
Manufacturer: Waukesha	**Model number:** P9394GSI	**Serial number:** N/A
Construction date: After 7/1/2007	**Installation date:** 2018	**Modification date(s):** N/A
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 2,500 hp @ 1,000 rpm		
Maximum Hourly Throughput: N/A	**Maximum Annual Throughput:** N/A	**Maximum Operating Schedule:** 8,760 hr/yr
Fuel Usage Data **(fill out all applicable 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: 2,500 hp		**Type and Btu/hr rating of burners:** N/A
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. Raw Natural Gas 15,011 scf/hr 131.49 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	<0.01%	negligible	1,248 Btu/scf

Emissions Data	**C-1600 through C-1800 (each)**	
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)[1]	1.65	7.24
Nitrogen Oxides (NO_X)[1]	0.83	3.62
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}/PM_{10}$)[2]	0.36	1.58
Total Particulate Matter (TSP)[2]	0.36	1.58
Sulfur Dioxide (SO_2)[2]	0.011	0.048
Volatile Organic Compounds (VOC)[1]	0.25	1.09
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
1,3-Butadiene[2]	0.012	0.054
1,1,2,2-Tetrachloroethane[2]	< 0.01	< 0.01
Acetaldehyde[2]	0.019	0.083
Acrolein[2]	0.018	0.079
Benzene[2]	0.0108	0.047
Ethylbenzene[2]	< 0.01	< 0.01
Formaldehyde[1]	0.028	0.121
Methanol[2]	0.0209	0.091
Methylene Chloride[2]	< 0.01	< 0.01
PAH[2]	< 0.01	0.012
Toluene[2]	< 0.01	0.0167
Xylenes[2]	< 0.01	< 0.01
Other HAPs[2]	< 0.01	0.017
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CO_2[1]	2,497	10,936
CH_4[1]	0.85	3.74
N_2O[3]	<0.01	0.018
CO_2e[4]	2,519	11,035

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

1. Values from Manufacturer specification sheet
2. AP-42, Chapter 3.2, Table 3.2-3
3. 40 CFR Part 98, Subpart C, Table C-2
4. 40 CFR Part 98, Subpart A, Table A-1, effective January 2014

Applicable Requirements **C-1600 through C-1800 (each)**

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.

Permit R13-3380B Requirements:

5.1.2 Maximum hourly and annual emission limits. Please reference Emissions Data above for exact limits.

5.1.5 Emissions limits in section 5.1.2 apply at all times except during periods of MSS that are < 30 minutes per occurrence. Operate engines in a manner consistent with good air pollution control practices, including periods of MSS. Comply with Subpart JJJJ and ZZZZ.

5.1.6.b-c The compressor engines shall be equipped with non-selective catalytic and fitted with a closed-loop automatic air/fuel ratio feedback controller to ensure that the engine ignition system will cease operation in the case a situation which results in performance degradation or failure of the catalyst element.

5.1.6.d A written operation and maintenance ("O&M") plan is required

5.1.6.e No person shall knowingly: remove, bypass, defeat or render inoperative any air pollution control device subject to the requirements of this permit

10.1 The units must meet requirements in NSPS JJJJ

10.2 Maximum emission standards for NSPS JJJJ

10.4.4 Propane fuel can be used in emergency operations up to 100 hours per year

11.1 The units must meet requirements in NSPS Subpart OOOOa for reciprocating compressors

13.1 The units must meet the requirements of MACT ZZZZ by meeting the requirements of NSPS JJJJ

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

__X__ 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.)

Permit R13-3380B Requirements:

5.1.5 Engine MSS emissions shall be included in the 12-month rolling total emissions.

5.1.6.c Monitor the inlet catalyst temperature in accordance with manufacturer's specifications. If the engine shuts off due to high temperature, check for thermal deactivation of the catalyst before normal operations resume.

5.1.6.d Conduct periodic and annual maintenance according to the written O&M Plan

5.2.1 Maintain proper operation of the automatic air/fuel ratio controller or automatic feedback controller and follow O&M recommendation of the catalyst element manufacturer

5.3.1 Follow testing requirements as outlined in Section 3.3, 10.5, 11.2, and 11.3 of the permit.

5.4.1. Maintain maintenance records for the catalytic reduction device for five (5) years to demonstrate compliance with 5.1.6

5.5.1 Follow reporting requirements as outlined in Section 3.5, 10.6, and 11.4 of this permit.

Section 10: NSPS JJJJ

10.4.1.b.2. Keep a maintenance plan and records of conducted maintenance, conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first.

10.4.4 Maintain records of propane fuel use. If > 100 hours per year conduct a performance test to demonstrate compliance

10.4.6 Maintain and operate the AFR controller appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.

10.5.1 Performance tests must be conducted in accordance with 40 CFR §60.4244

10.6.1.a. Maintain records of: notifications, maintenance, and documentation the engine meets the emission standards

10.6.1.c. Submit initial notification in accordance with 40 CFR §60.4245(c)

10.6.1.d. Submit performance tests within sixty (60) days per 40 CFR §60.4245(d)

Section 11: NSPS OOOOa

11.1.1a Replace rod packing on or before the compressor has operated for 26,000 hours or 36 months
11.1.1.b Demonstrate initial compliance with standards that apply to reciprocating compressor affected facilities as required by §60.5410a(c)
11.1.1.c Demonstrate continuous compliance with standards that apply to reciprocating compressor affected facilities as required by §60.5410a(c)
11.1.1.d Perform reporting as required by §60.5420a(b)(1) and (4) and the recordkeeping as required by

§60.5420a(c)(3), (6) through (9), and (17), as applicable.

11.1, 11.2 & 11.3 Continuously monitor the hours of operation or number of months since last rod packing replacement

11.1, 11.2, 11.3, & 11.4 Submit Initial and Annual Reports in accordance with 40 CFR §60.5420a(b)(l), (4), and (9)

11.1, 11.2, 11.3, & 11.4 Maintain records of hours of operation or number of months since last rod packing replacement, date and time of rod packing replacement, and any deviations

11.4.1 No requirements according to 40 CFR §60.5420a(a)(1)

11.4.3 Maintain reporting and recordkeeping as required by 40 CFR §60.5420a(c)(3), (6)-(9), and (17), as applicable, to demonstrate compliance with 12.1.1.d

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description-		**Generator GEN1**
Emission unit ID number: GEN1	**Emission unit name:** NG Microturbine Generator	**List any control devices associated with this emission unit:** None
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Natural Gas-Fired Generator Engine		
Manufacturer: Capstone	**Model number:** C800 Standard	**Serial number:** N/A
Construction date: TBD	**Installation date:** 2018	**Modification date(s):** N/A
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 800 kWe		
Maximum Hourly Throughput: N/A	**Maximum Annual Throughput:** N/A	**Maximum Operating Schedule:** 8,760 hr/yr
Fuel Usage Data **(fill out all applicable 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: 800 kWe		**Type and Btu/hr rating of burners:** N/A
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. Raw Natural Gas 6,638 scf/hr 58.15 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	<0.01%	negligible	1,248 BTU/scf

Emissions Data		**GEN1**
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO) [1]	0.88	3.85
Nitrogen Oxides (NO_X) [1]	0.32	1.40
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}/PM_{10}$)[2]	0.054	0.24
Total Particulate Matter (TSP)[2]	0.054	0.24
Sulfur Dioxide (SO_2)[2]	0.028	0.12
Volatile Organic Compounds (VOC)[1]	0.08	0.35
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
1,3-Butadiene[3]	< 0.01	< 0.01
Acetaldehyde[3]	< 0.01	< 0.01
Acrolein[3]	< 0.01	< 0.01
Benzene[3]	< 0.01	< 0.01
Ethylbenzene[3]	< 0.01	< 0.01
Formaldehyde[3]	< 0.01	0.026
Naphthalene[3]	< 0.01	< 0.01
Propylene Oxide[3]	< 0.01	< 0.01
PAH[3]	< 0.01	< 0.01
Toluene[3]	< 0.01	< 0.01
Xylenes[3]	< 0.01	< 0.01
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CO_2[4]	966	4,232
CH_4[5]	0.018	0.080
N_2O[5]	< 0.01	< 0.01
CO_2e[6]	967	4,237

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

1. Manufacturer Specifications
2. AP-42, Chapter 3.2, Table 3.1-2a
3. AP-42, Chapter 3.2, Table 3.1-3
4. 40 CFR Part 98, Subpart C, Table C-1
5. 40 CFR Part 98, Subpart C, Table C-2
6. 40 CFR Part 98, Subpart A, Table A-1, effective January 2014

Applicable Requirements **GEN1**

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.

Permit R13-3380B Requirements:

5.1.3 Maximum hourly and annual emission limits. Please reference Emissions Data above for exact limits.

5.1.5 Emissions limits in section 5.1.3 apply at all times except during periods of MSS that are < 30 minutes per occurrence. Operate engines in a manner consistent with good air pollution control practices, including periods of MSS.

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

__X__ 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.)

Permit R13-3380B Requirements:

5.1.5 Engine MSS emissions shall be included in the 12-month rolling total emissions.

5.3.1 Follow testing requirements as outlined in Section 3.3 of the permit.

5.5.1 Follow reporting requirements as outlined in Section 3.5 of this permit.

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description-		**Generator GEN2, GEN3 (each)**
Emission unit ID number: GEN2, GEN3 (each)	**Emission unit name:** NG PSI Generator #2 - #3 (each)	**List any control devices associated with this emission unit:** None
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Natural Gas-Fired Generator Engine		
Manufacturer: PSI	**Model number:** Industrial 21.9L	**Serial number:** N/A
Construction date: After 7/1/2007	**Installation date:** 2018	**Modification date(s):** N/A
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 649 hp		
Maximum Hourly Throughput: N/A	**Maximum Annual Throughput:** N/A	**Maximum Operating Schedule:** 8,760 hr/yr
Fuel Usage Data **(fill out all applicable 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: 649 hp		**Type and Btu/hr rating of burners:** N/A
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. Raw Natural Gas 4,490 scf/hr 39.33 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	<0.01%	negligible	1,248 BTU/scf

Emissions Data		**GEN2, GEN3 (each)**
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO) [1]	2.86	12.53
Nitrogen Oxides (NO_X) [1]	1.43	6.27
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}/PM_{10}$)[2]	0.11	0.47
Total Particulate Matter (TSP)[2]	0.11	0.47
Sulfur Dioxide (SO_2)[2]	< 0.01	0.014
Volatile Organic Compounds (VOC)[1]	1.00	4.39
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
1,1,2,2-Tetrachloroethane[2]	< 0.01	< 0.01
1,3-Butadiene[2]	< 0.01	0.016
Acetaldehyde[2]	0.016	0.068
Acrolein[2]	0.015	0.064
Benzene[2]	< 0.01	0.039
Ethylbenzene[2]	< 0.01	< 0.01
Formaldehyde[2]	0.11	0.50
Methanol[2]	0.017	0.075
Methylene Chloride[2]	< 0.01	< 0.01
PAH[2]	< 0.01	< 0.01
Toluene[2]	< 0.01	0.014
Xylenes[2]	< 0.01	< 0.01
Other HAPs[2]	< 0.01	< 0.01
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CO_2[3]	654	2,863
CH_4[4]	0.012	0.054
N_2O[4]	< 0.01	< 0.01
CO_2e[5]	654	2,865

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

1. Emissions Certification
2. AP-42, Chapter 3.2, Table 3.2-3
3. 40 CFR Part 98, Subpart C, Table C-1
4. 40 CFR Part 98, Subpart C, Table C-2
5. 40 CFR Part 98, Subpart A, Table A-1, effective January 2014

Applicable Requirements **GEN2, GEN3**

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.

Permit R13-3380B Requirements:

5.1.4 Maximum hourly and annual emission limits. Please reference Emissions Data above for exact limits.

5.1.5 Emissions limits in section 5.1.4 apply at all times except during periods of MSS that are < 30 minutes per occurrence. Operate engines in a manner consistent with good air pollution control practices, including periods of MSS. Comply with Subpart JJJJ and ZZZZ.

10.1 The units must meet requirements in NSPS JJJJ

10.2 Maximum emission standards for NSPS JJJJ

10.4.4 Propane fuel can be used in emergency operations up to 100 hours per year

13.1 The units must meet the requirements of MACT ZZZZ by meeting the requirements of NSPS JJJJ

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

__X__ 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.)

Permit R13-3380B Requirements:

5.1.5 Engine MSS emissions shall be included in the 12-month rolling total emissions.

5.3.1 Follow testing requirements as outlined in Section 3.3 and 10.5 of the permit

5.5.1 Follow reporting requirements as outlined in Section 3.5 and 10.6 of this permit

Section 10: NSPS JJJJ

10.4.1.b.2. Keep a maintenance plan and records of conducted maintenance, conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first.

10.4.4 Maintain records of propane fuel use. If > 100 hours per year conduct a performance test to demonstrate compliance

10.5.1 Performance tests must be conducted in accordance with 40 CFR §60.4244

10.6.1.a. Maintain records of: notifications, maintenance, and documentation the engine meets the emission standards

10.6.1.c. Submit initial notification in accordance with 40 CFR §60.4245(c)

10.6.1.d. Submit performance tests within sixty (60) days per 40 CFR §60.4245(d) **Please Reference WCDEP-DAQ Permit R13-3380B** **and SUPPLEMENT S1-Regulatory Discussion**
Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No **If no, complete the Schedule of Compliance Form as ATTACHMENT F.**

ATTACHMENT E - Emission Unit Form

Emission Unit Description-		*TEG Dehydrator Unit Still Vents DEHY1, DEHY2, DEHY 3 (each)*
Emission unit ID number: DEHY1, DEHY2, DEHY3 (each)	**Emission unit name:** TEG Dehydrator Unit Still Vents (each)	**List any control devices associated with this emission unit:** Thermal Oxidizer (16C, 17C, 24C)
Provide a description of the emission unit (type, method of operation, design parameters, etc.): For each TEG Dehydrator Unit: The dehydrator still vents are controlled by a thermal oxidizer with at least 98% control efficiency.		
Manufacturer: TBD	**Model number:** TBD	**Serial number:** N/A
Construction date: TBD	**Installation date:** 2018	**Modification date(s):** N/A
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 225 MMscfd, each		
Maximum Hourly Throughput: N/A	**Maximum Annual Throughput:** 82,125 MMscf, each	**Maximum Operating Schedule:** 8,760 hr/yr
Fuel Usage Data **(fill out all applicable 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: N/A		**Type and Btu/hr rating of burners:** N/A
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. N/A		

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A			

Emissions Data	***DEHY1, DEHY2, DEHY 3 (each)***
Criteria Pollutants	Potential Emissions
	PPH / TPY
Carbon Monoxide (CO)	N/A / N/A
Nitrogen Oxides (NO_X)	N/A / N/A
Lead (Pb)	N/A / N/A
Particulate Matter ($PM_{2.5}/PM_{10}$)	N/A / N/A
Total Particulate Matter (TSP)	N/A / N/A
Sulfur Dioxide (SO_2)	N/A / N/A
Volatile Organic Compounds (VOC)[1]	1.37 / 6.02
Hazardous Air Pollutants	Potential Emissions
	PPH / TPY
Benzene[1]	0.027 / 0.12
Ethylbenzene[1]	0.011 / 0.048
n-Hexane[1]	0.057 / 0.25
Toluene[1]	0.11 / 0.50
Xylenes[1]	0.041 / 0.18
Regulated Pollutants other than Criteria and HAP	Potential Emissions
	PPH / TPY
CO_2[1]	1.68 / 7.36
CH_4[1]	2.11 / 9.24
CO_2e[2]	54.44 / 238.5

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

1. GRI-GLYCalc Output

Applicable Requirements ***DEHY1, DEHY2, DEHY3 (each)***

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.

Permit R13-3380B Requirements:

6.1.1 Dehydrator maximum daily throughput limit

6.1.3 The thermal oxidizers shall be designed and operated in accordance with this section

6.1.4 Thermal oxidizer maximum hourly and annual emission limits

6.2.1 The pilot shall be equipped with an alarm or remote alarm when the pilot is out

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

__X__ 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.)

Permit R13-3380B Requirements:

6.1.1 Dehydrator throughput shall be determined using a 12-month rolling total.

6.2.1 Continuously monitor the pilot flame, using a thermocouple or equivalent device, to show compliance with section 6.1.3.b

6.2.2 Monitor the throughput of dry natural gas to the dehydration system on a monthly basis for each unit

6.3.2 At the Director's request, demonstrate compliance with the HAP emission thresholds using GLYCalc

6.3.3 & 6.4.7 Determine actual average benzene emissions to demonstrate compliance with the one (1) tpy emission limit. Maintain records.

6.4.1 Maintain records of the times and duration of all periods which the pilot flame was absent to demonstrate compliance with section 6.1.3.b and 6.2.1

6.4.2 Maintain records of testing conducted in accordance with permit condition 6.3.2.

6.4.3 Document and maintain records required by sections 6.2 (monitoring) and 6.3 (testing)

6.4.4 Maintain records of the visible emissions opacity tests conducted in accordance with 6.3.1 to demonstrate compliance with section 6.1.3.f

6.4.5 Maintain records of PTE HAP calculations for the entire affected facility, including compressor engines and ancillary equipment to demonstrate compliance with section 6.1.4

6.4.6 Maintain records of dry natural gas throughput through the dehydration system to demonstrate compliance with section 6.1.1

6.4.8 Maintain all records required by section 6.4 for a period of five (5) years

6.5.1 If required by the Director to comply with section 6.3.3, submit a testing protocol at least thirty (30) days prior to any testing, submit notification at least fifteen (15) days prior to any testing, submit test results within sixty (60) days of completion, including supporting calculations and testing data

6.5.2 If deviations from the allowable visible emission requirements are discovered during observations using Method 9 or 22, report to the Director within ten (10) calendar days of the occurrence

6.5.3 If deviations from the thermal oxidizer design and operation criteria in section 6.1.3 occur, report to the Director within ten (10) calendar days of such deviation

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description-	*TEG Dehydrator Flash Tanks DFLSH1, DFLSH2, DFLSH3 (each)*	
Emission unit ID number: DFLSH1, DFLSH2, DFLSH3 (each)	**Emission unit name:** Dehydrator Flash Tanks (each)	**List any control devices associated with this emission unit:** Reboiler (16E, 19E, 47E) or VRU (14C, 15C, 26C) as backup
Provide a description of the emission unit (type, method of operation, design parameters, etc.): For each TEG Dehydrator Unit: Vent gas from the flash gas tank is routed to the reboiler and used as fuel. As an alternate, flash gas is routed to the storage tanks via the VRU compressors onsite.		
Manufacturer: TBD	**Model number:** TBD	**Serial number:** N/A
Construction date: TBD	**Installation date:** 2018	**Modification date(s):** N/A
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 225 MMscfd, each		
Maximum Hourly Throughput: N/A	**Maximum Annual Throughput:** 82,125 MMscf, each	**Maximum Operating Schedule:** 8,760 hr/yr
Fuel Usage Data **(fill out all applicable 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: N/A		**Type and Btu/hr rating of burners:** N/A
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. N/A		

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A			

Emissions Data	***DFLSH1, DFLSH2, DFLSH3 (each)***	
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	N/A	N/A
Nitrogen Oxides (NO_X)	N/A	N/A
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}/PM_{10}$)	N/A	N/A
Total Particulate Matter (TSP)	N/A	N/A
Sulfur Dioxide (SO_2)	N/A	N/A
Volatile Organic Compounds (VOC)[1]	0.35	1.52
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Benzene[1]	< 0.01	< 0.01
Ethylbenzene[1]	< 0.01	< 0.01
n-Hexane[1]	< 0.01	0.036
Toluene[1]	< 0.01	< 0.01
Xylenes[1]	< 0.01	< 0.01
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CO_2[1]	0.99	4.34
CH_4[1]	0.54	2.36
CO_2e[2]	14.46	63.35

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

1. GRI-GLYCalc Output

Applicable Requirements	*DFLSH1, DFLSH2, DFLSH3 (each)*

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.

Permit R13-3380B Requirements:

6.1.1 Dehydrator maximum daily throughput limit.

6.1.2 The recycled reboilers shall be designed and operated in accordance with this section

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

__X__ 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.)

Permit R13-3380B Requirements:

6.1.1 Dehydrator throughput shall be determined using a 12-month rolling total.

6.2.2 Monitor the throughput of dry natural gas to the dehydration system on a monthly basis for each unit

6.3.2 At the Director's request, demonstrate compliance with the HAP emission thresholds using GLYCalc

6.3.3 & 6.4.7 Determine actual average benzene emissions to demonstrate compliance with the one (1) tpy emission limit. Maintain records.

6.4.2 Maintain records of testing conducted in accordance with permit condition 6.3.2.

6.4.3 Document and maintain records required by sections 6.2 (monitoring) and 6.3 (testing)

6.4.5 Maintain records of PTE HAP calculations for the entire affected facility, including compressor engines and ancillary equipment to demonstrate compliance with section 6.1.4

6.4.6 Maintain records of dry natural gas throughput through the dehydration system to demonstrate compliance with section 6.1.1

6.4.8 Maintain all records required by section 6.4 for a period of five (5) years

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description-		***TEG Dehydrator Reboilers DREB1, DREB2, DREB3 (each)***
Emission unit ID number: DREB1, DREB2, DREB3 (each)	**Emission unit name:** TEG Dehydrator Reboilers (each)	**List any control devices associated with this emission unit:** None
Provide a description of the emission unit (type, method of operation, design parameters, etc.): For each Natural Gas-Fired Dehydrator Reboiler: Vent gas from the flash gas tank is routed to the reboiler and used as fuel.		
Manufacturer: TBD	**Model number:** TBD	**Serial number:** N/A
Construction date: TBD	**Installation date:** 2018	**Modification date(s):** N/A
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 1.5 MMBtu/hr, each		
Maximum Hourly Throughput: N/A	**Maximum Annual Throughput:** 12.9 MMscf/yr (each)	**Maximum Operating Schedule:** 8,760 hr/yr
Fuel Usage Data **(fill out all applicable 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: 1.5 MMBtu/hr, each		**Type and Btu/hr rating of burners:** 1.5 MMBtu/hr, each
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 12.9 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	<0.01%	negligible	1,248 Btu/scf

Emissions Data		***DREB1, DREB2, DREB3 (each)***
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO) [1]	0.12	0.54
Nitrogen Oxides (NO_X) [1]	0.15	0.64
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}/PM_{10}$)[2]	0.011	0.049
Total Particulate Matter (TSP) [2]	0.011	0.049
Sulfur Dioxide (SO_2) [2]	< 0.01	< 0.01
Volatile Organic Compounds (VOC)[2]	0.01	0.035
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde[3]	< 0.01	< 0.01
Total HAPs (including HCHO) [3]	< 0.01	0.012
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CO_2[4]	175.9	770.4
CH_4[5]	< 0.01	0.015
N_2O[5]	< 0.01	< 0.01
CO_2e[6]	176.1	771.2

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

1. AP-42, Chapter 1.4, Table 1.4-1
2. AP-42, Chapter 1.4, Table 1.4-2
3. AP-42, Chapter 1.4, Table 1.4-3
4. 40 CFR Part 98, Subpart C, Table C-1
5. 40 CFR Part 98, Subpart C, Table C-2
6. 40 CFR Part 98, Subpart A, Table A-1, effective January 2014

Applicable Requirements	*DREB1, DREB2, DREB3 (each)*

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.

Permit R13-3380B Requirements:
7.1.1 Maximum design heat input of reboilers. Please reference data above for exact limits.
7.1.2 No person shall cause, suffer, allow, or permit emission of smoke/PM greater than ten (10) percent opacity passed on a six minute block average *[45CSR§2-3.1.]*

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

__X__ 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.)

Permit R13-3380B Requirements:
7.2.1 At such reasonable times as the Secretary may designate, conduct Method 9 emission observations to demonstrate compliance with section 7.1.2
7.3.1 Conduct Method 9 tests or utilize measurements from continuous opacity monitoring systems approved by the Director to demonstrate compliance with section 8.1.2 *[45CSR§2-3.2.]*
7.4.1 Maintain records of all monitoring data required by section 7.2.1

7.5.1 If deviations from the allowable visible emission requirements are discovered during observations using Method 9 or 22, report to the Director within ten (10) calendar days of the occurrence

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description-		***Condensate Tanks T01, T02, T03, T08, T09 (each)***
Emission unit ID number: T01, T02, T03, T08, T09 (each)	**Emission unit name:** Condensate Tanks (each)	**List any control devices associated with this emission unit:** VRU (14C/15C/26C)
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Atmospheric Condensate Storage Tanks that are controlled with a VRU and recycled back into the process		
Manufacturer: TBD	**Model number:** TBD	**Serial number:** N/A
Construction date: TBD	**Installation date:** 2018	**Modification date(s):** N/A
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 400 barrels, each		
Maximum Hourly Throughput: N/A	**Maximum Annual Throughput:** 1,379,700 gal/yr (each)	**Maximum Operating Schedule:** 8,760 hr/yr
Fuel Usage Data **(fill out all applicable 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: N/A		**Type and Btu/hr rating of burners:** N/A
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. N/A		

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A			

Emissions Data		***T01, T02, T03, T08, T09 (each)***
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	N/A	N/A
Nitrogen Oxides (NO_X)	N/A	N/A
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}/PM_{10}$)	N/A	N/A
Total Particulate Matter (TSP)	N/A	N/A
Sulfur Dioxide (SO_2)	N/A	N/A
Volatile Organic Compounds (VOC) [1]	0.02	0.10
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Benzene[1]	< 0.01	< 0.01
Toluene[1]	< 0.01	< 0.01
Ethylbenzene[1]	< 0.01	< 0.01
Xylene[1]	< 0.01	< 0.01
n-Hexane[1]	< 0.01	<0.01
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CH_4[1]	N/A	<0.01
CO_2e[2]	N/A	0.15

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

1. Promax 4.0 Software Model Output
2. 40 CFR Part 98, Subpart A, Table A-1, effective January 2014

Applicable Requirements	*T01, T02, T03, T08, T09 (each)*

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.

Permit R13-3380B Requirements:

8.1.1 Route all VOC and HAP emissions from the tanks (Unit IDs: T01, T02, T03, T08, T09) to a VRU System with at least 98% efficiency

8.1.2 Install, maintain, and operate the VRUs and associated monitoring equipment in a manner consistent with safety and good air pollution control practices or more stringent limits *[45CSR§13-5.10.]*

8.1.3 Maximum annual throughput limits from the tanks combined (Unit IDs: T01, T02, T03, T08, T09). Please reference data above for exact limits.

8.1.5 *Additional VRU Requirements* – three (3) of the four (4) options must be utilized: install run status sensing equipment, install an automatic by-pass recycle system, install blanket gas with automatic throttling, and/or install a compressor with a variable drive

8.1.6 The VRUs shall be designed and operated in accordance with this section *[45CSR§13-5.10]*

8.1.7 The closed vent system shall be designed and operated in accordance with this section *[45CSR§13-5.10]*

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

__X__ 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.)

Permit R13-3380B Requirements:

8.2.1 Monitor throughput to the storage vessels (Unit IDs: T01, T02, T03, T08, T09) on a monthly basis

8.2.2 Monitor the VRUs in accordance with the plans and specifications and manufacturer's recommendations to demonstrate compliance with section 8.1.1

8.2.3a Conduct Initial AVO within 180 days of start-up, repair leaks as soon as practicable, grease requirements, delay of repair requirements

8.2.3b&c Conduct Annual AVO inspections (with visual bypass inspection) within 365 calendar days from date of previous inspection, repair leaks as soon as practicable, grease requirements, delay of repair requirements

8.2.3d&e Maintain a written plan for unsafe or difficult to inspect requirements that determines frequency of inspections*[45CSR§13-5.10]*

8.3.1. Maintain all records required by section 8.3 for five (5) years.

8.3.2 Maintain records of VRU equipment inspections and/or preventative maintenance procedures.

8.3.3 Maintain records according to this section of any malfunction or operational shutdown of the VRU during which excess emissions occur.

8.3.4 Maintain records of the aggregate throughput for the storage tanks on a monthly and 12-month rolling total for a period of five (5) years to demonstrate compliance with 8.1.3 and 8.1.4

8.3.5 Maintain a copy of all design records of the process, maintenance records of equipment and any downtime hours associated with the VRUs.

8.3.6 Maintain records of the additional monitoring required in section 8.1.5 to demonstrate compliance with the 98% control efficiency in section 8.1.1

8.3.7 Maintain initial compliance records, annual visual inspections, bypass inspections or each time the key is checked out or each time the alarm is sounded, each occurrence that the control device was bypassed, and unsafe or difficult to inspect designations to demonstrate compliance with the closed vent system monitoring requirements.

[45CSR§13-5.10]
8.4.1 At the Director's request, report deviations when the control device was operated outside of the parameters defined in the monitoring plan
8.4.2 Notify the director if VRU downtime in excess of 2% based on the 12-month rolling total within ten (10) calendar days.

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description-		***Condensate/Produced Water Settling Tank T04***
Emission unit ID number: T04	**Emission unit name:** Condensate/Produced Water Settling Tank	**List any control devices associated with this emission unit:** VRU (14C/15C/26C)
Provide a description of the emission unit (type, method of operation, design parameters, etc.): All produced fluids enter the settling tank where the fluids settle out as either condensate or produced water. The tank is controlled with a VRU and recycled back into the process. Flash emissions occur in this tank and condensate and produced water are separated and routed to their respective storage tanks.		
Manufacturer: TBD	**Model number:** TBD	**Serial number:** N/A
Construction date: TBD	**Installation date:** 2018	**Modification date(s):** N/A
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 500 barrels		
Maximum Hourly Throughput: N/A	**Maximum Annual Throughput:** 8,968,050 gal/yr	**Maximum Operating Schedule:** 8,760 hr/yr
Fuel Usage Data **(fill out all applicable 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: N/A		**Type and Btu/hr rating of burners:** N/A
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. N/A		

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A			

Emissions Data		***T04***
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	N/A	N/A
Nitrogen Oxides (NO_X)	N/A	N/A
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}/PM_{10}$)	N/A	N/A
Total Particulate Matter (TSP)	N/A	N/A
Sulfur Dioxide (SO_2)	N/A	N/A
Volatile Organic Compounds (VOC) [1]	1.44	6.29
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Benzene[1]	< 0.01	0.01
Toluene[1]	< 0.01	< 0.01
Ethylbenzene[1]	< 0.01	< 0.01
Xylene[1]	< 0.01	< 0.01
n-Hexane[1]	0.026	0.11
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CO_2e[2]	N/A	51

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

1. Promax 4.0 Software Model Output
2. 40 CFR Part 98, Subpart A, Table A-1, effective January 2014

Applicable Requirements ***T04***

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.

Permit R13-3380B Requirements:

8.1.1 Route all VOC and HAP emissions from the tank (Unit IDs: T04) to a VRU System with at least 98% efficiency

8.1.2 Install, maintain, and operate the VRUs and associated monitoring equipment in a manner consistent with safety and good air pollution control practices or more stringent limits *[45CSR§13-5.10.]*

8.1.3 Maximum annual throughput limits from the tank (Unit IDs: T04). Please reference data above for exact limits.

8.1.4 Maximum hourly and annual emission limits for the settling tank (Unit ID: T04). Please reference data above for exact limits.

8.1.5 *Additional VRU Requirements* – three (3) of the four (4) options must be utilized: install run status sensing equipment, install an automatic by-pass recycle system, install blanket gas with automatic throttling, and/or install a compressor with a variable drive

8.1.6 The VRUs shall be designed and operated in accordance with this section *[45CSR§13-5.10]*

8.1.7 The closed vent system shall be designed and operated in accordance with this section *[45CSR§13-5.10]*

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

__X__ 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.)

Permit R13-3380B Requirements:

8.2.1 Monitor throughput to the storage vessels (Unit IDs: T04) on a monthly basis

8.2.2 Monitor the VRUs in accordance with the plans and specifications and manufacturer's recommendations to demonstrate compliance with section 8.1.1

8.2.3a Conduct Initial AVO within 180 days of start-up, repair leaks as soon as practicable, grease requirements, delay of repair requirements

8.2.3b&c Conduct Annual AVO inspections (with visual bypass inspection) within 365 calendar days from date of previous inspection, repair leaks as soon as practicable, grease requirements, delay of repair requirements

8.2.3d&e Maintain a written plan for unsafe or difficult to inspect requirements that determines frequency of inspections*[45CSR§13-5.10]*

8.3.1. Maintain all records required by section 8.3 for five (5) years.

8.3.2 Maintain records of VRU equipment inspections and/or preventative maintenance procedures.

8.3.3 Maintain records according to this section of any malfunction or operational shutdown of the VRU during which excess emissions occur.

8.3.4 Maintain records of the aggregate throughput for the storage tanks on a monthly and 12-month rolling total for a period of five (5) years to demonstrate compliance with 8.1.3 and 8.1.4

8.3.5 Maintain a copy of all design records of the process, maintenance records of equipment and any downtime hours associated with the VRUs.

8.3.6 Maintain records of the additional monitoring required in section 8.1.5 to demonstrate compliance with the 98% control efficiency in section 8.1.1

8.3.7 Maintain initial compliance records, annual visual inspections, bypass inspections or each time the key is checked out or each time the alarm is sounded, each occurrence that the control device was bypassed, and unsafe or difficult to inspect designations to demonstrate compliance with the closed vent system monitoring requirements. *[45CSR§13-5.10]*
8.4.1 At the Director's request, report deviations when the control device was operated outside of the parameters defined in the monitoring plan
8.4.2 Notify the director if VRU downtime in excess of 2% based on the 12-month rolling total within ten (10) calendar days.

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description-		***Produced Water Tanks T05, T06, T07, T10, T11 (each)***
Emission unit ID number: T05, T06, T07, T10, T11 (each)	**Emission unit name:** Produced Water Tanks (each)	**List any control devices associated with this emission unit:** VRU (14C/15C/26C)
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Atmospheric Produced Water Storage Tanks that are controlled with a VRU and recycled back into the process		
Manufacturer: TBD	**Model number:** TBD	**Serial number:** N/A
Construction date: TBD	**Installation date:** 2018	**Modification date(s):** N/A
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 400 barrels, each		
Maximum Hourly Throughput: N/A	**Maximum Annual Throughput:** 413,910 gal/yr (each)	**Maximum Operating Schedule:** 8,760 hr/yr
Fuel Usage Data **(fill out all applicable 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: N/A		**Type and Btu/hr rating of burners:** N/A
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. N/A		

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A			

Emissions Data		***T05, T06, T07, T10, T11 (each)***
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	N/A	N/A
Nitrogen Oxides (NO_X)	N/A	N/A
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}/PM_{10}$)	N/A	N/A
Total Particulate Matter (TSP)	N/A	N/A
Sulfur Dioxide (SO_2)	N/A	N/A
Volatile Organic Compounds (VOC) [1]	< 0.01	< 0.01
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Benzene[1]	< 0.01	< 0.01
Toluene[1]	< 0.01	< 0.01
Ethylbenzene[1]	< 0.01	< 0.01
Xylene[1]	< 0.01	< 0.01
n-Hexane[1]	< 0.01	< 0.01
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CH_4[1]	N/A	< 0.01
CO_2e[2]	N/A	< 0.01

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

1. Promax 4.0 Software Model Output
2. 40 CFR Part 98, Subpart A, Table A-1, effective January 2014

Applicable Requirements *T05, T06, T07, T10, T11 (each)*

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.

Permit R13-3380B Requirements:

8.1.1 Route all VOC and HAP emissions from the tanks (Unit IDs: T05-T07 & T10-T11) to a VRU System with at least 98% efficiency

8.1.2 Install, maintain, and operate the VRUs and associated monitoring equipment in a manner consistent with safety and good air pollution control practices or more stringent limits *[45CSR§13-5.10.]*

8.1.3 Maximum annual throughput limits from the tanks combined (Unit IDs: T05-T07 & T10-T11). Please reference data above for exact limits.

8.1.5 *Additional VRU Requirements* – three (3) of the four (4) options must be utilized: install run status sensing equipment, install an automatic by-pass recycle system, install blanket gas with automatic throttling, and/or install a compressor with a variable drive

8.1.6 The VRUs shall be designed and operated in accordance with this section *[45CSR§13-5.10]*

8.1.7 The closed vent system shall be designed and operated in accordance with this section *[45CSR§13-5.10]*

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

__X__ 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.)

Permit R13-3380B Requirements:

8.2.1 Monitor throughput to the storage vessels (Unit IDs: T05-T07 & T10-T11) on a monthly basis

8.2.2 Monitor the VRUs in accordance with the plans and specifications and manufacturer's recommendations to demonstrate compliance with section 8.1.1

8.2.3a Conduct Initial AVO within 180 days of start-up, repair leaks as soon as practicable, grease requirements, delay of repair requirements

8.2.3b&c Conduct Annual AVO inspections (with visual bypass inspection) within 365 calendar days from date of previous inspection, repair leaks as soon as practicable, grease requirements, delay of repair requirements

8.2.3d&e Maintain a written plan for unsafe or difficult to inspect requirements that determines frequency of inspections*[45CSR§13-5.10]*

8.3.1. Maintain all records required by section 8.3 for five (5) years.

8.3.2 Maintain records of VRU equipment inspections and/or preventative maintenance procedures.

8.3.3 Maintain records according to this section of any malfunction or operational shutdown of the VRU during which excess emissions occur.

8.3.4 Maintain records of the aggregate throughput for the storage tanks on a monthly and 12-month rolling total for a period of five (5) years to demonstrate compliance with 8.1.3 and 8.1.4

8.3.5 Maintain a copy of all design records of the process, maintenance records of equipment and any downtime hours associated with the VRUs.

8.3.6 Maintain records of the additional monitoring required in section 8.1.5 to demonstrate compliance with the 98% control efficiency in section 8.1.1

8.3.7 Maintain initial compliance records, annual visual inspections, bypass inspections or each time the key is checked out or each time the alarm is sounded, each occurrence that the control device was bypassed, and unsafe or difficult to inspect designations to demonstrate compliance with the closed vent system monitoring requirements. *[45CSR§13-5.10]*

8.4.1 At the Director's request, report deviations when the control device was operated outside of the parameters defined in the monitoring plan

8.4.2 Notify the director if VRU downtime in excess of 2% based on the 12-month rolling total within ten (10) calendar days.

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description-		*Fuel Conditioning Heater FUEL1*
Emission unit ID number: FUEL1	**Emission unit name:** Fuel Conditioning Heater	**List any control devices associated with this emission unit:** None
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Fuel conditioning skid with a 0.5 MMBtu/hr heater to allow for more complete combustion of fuel at the compressor engines		
Manufacturer: TBD	**Model number:** TBD	**Serial number:** N/A
Construction date: TBD	**Installation date:** 2018	**Modification date(s):** N/A
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 0.5 MMBtu/hr		
Maximum Hourly Throughput: N/A	**Maximum Annual Throughput:** 4.68 MMscf/yr	**Maximum Operating Schedule:** 8,760 hr/yr
Fuel Usage Data **(fill out all applicable 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: 0.5 MMBtu/hr		**Type and Btu/hr rating of burners:** 0.5 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 4.68 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	<0.01%	negligible	1,248 Btu/scf

Emissions Data		***FUEL1***
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO) [1]	0.045	0.20
Nitrogen Oxides (NO_X) [1]	0.053	0.23
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}/PM_{10}$)[2]	< 0.01	0.018
Total Particulate Matter (TSP) [2]	< 0.01	0.018
Sulfur Dioxide (SO_2) [2]	< 0.01	< 0.01
Volatile Organic Compounds (VOC)[2]	< 0.01	0.013
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde[3]	< 0.01	< 0.01
Total HAPs (including HCHO) [3]	< 0.01	< 0.01
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CO_2[4]	59	257
CH_4[5]	< 0.01	< 0.01
N_2O[5]	< 0.01	< 0.01
CO_2e[6]	59	257

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

1. AP-42, Chapter 1.4, Table 1.4-1
2. AP-42, Chapter 1.4, Table 1.4-2
3. AP-42, Chapter 1.4, Table 1.4-3
4. 40 CFR Part 98, Subpart C, Table C-1
5. 40 CFR Part 98, Subpart C, Table C-2
6. 40 CFR Part 98, Subpart A, Table A-1, effective January 2014

Applicable Requirements	*FUEL1*

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.

Permit R13-3380B Requirements:
7.1.1 Maximum design heat input. Please reference data above for exact limits.
7.1.2 No person shall cause, suffer, allow, or permit emission of smoke/PM greater than ten (10) percent opacity passed on a six-minute block average *[45CSR§2-3.1.]*

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

__X__ 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.)

Permit R13-3380B Requirements:
7.2.1 At such reasonable times as the Secretary may designate, conduct Method 9 emission observations to demonstrate compliance with section 7.1.2
7.3.1 Conduct Method 9 tests or utilize measurements from continuous opacity monitoring systems approved by the director to demonstrate compliance with section 7.1.2 *[45CSR§2-3.2.]*
7.4.1 Maintain all monitoring data required by permit condition 7.1.2.
7.5.1 If deviations from the allowable visible emission requirements are discovered during observations using Method 9 or 22, report to the Director within ten (10) calendar days of the occurrence

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description-		***Fuel Conditioning Heater FUEL2***
Emission unit ID number: FUEL2	**Emission unit name:** Fuel Conditioning Heater	**List any control devices associated with this emission unit:** None
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Fuel conditioning skid with a 0.75 MMBtu/hr heater to allow for more complete combustion of fuel at the compressor engines		
Manufacturer: TBD	**Model number:** TBD	**Serial number:** N/A
Construction date: TBD	**Installation date:** 2018	**Modification date(s):** N/A
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 0.75 MMBtu/hr		
Maximum Hourly Throughput: N/A	**Maximum Annual Throughput:** 7.16 MMscf/yr	**Maximum Operating Schedule:** 8,760 hr/yr
Fuel Usage Data **(fill out all applicable 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: 0.75 MMBtu/hr		**Type and Btu/hr rating of burners:** 0.75 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 7.16 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	<0.01%	negligible	1,248 Btu/scf

Emissions Data		***FUEL2***
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO) [1]	0.069	0.30
Nitrogen Oxides (NO_X) [1]	0.082	0.36
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}/PM_{10}$)[2]	< 0.01	0.027
Total Particulate Matter (TSP) [2]	< 0.01	0.027
Sulfur Dioxide (SO_2) [2]	< 0.01	< 0.01
Volatile Organic Compounds (VOC)[2]	< 0.01	0.020
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde[3]	< 0.01	< 0.01
Total HAPs (including HCHO) [3]	< 0.01	< 0.01
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CO_2[4]	88	385
CH_4[5]	< 0.01	< 0.01
N_2O[5]	< 0.01	< 0.01
CO_2e[6]	88	386

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

1. AP-42, Chapter 1.4, Table 1.4-1
2. AP-42, Chapter 1.4, Table 1.4-2
3. AP-42, Chapter 1.4, Table 1.4-3
4. 40 CFR Part 98, Subpart C, Table C-1
5. 40 CFR Part 98, Subpart C, Table C-2
6. 40 CFR Part 98, Subpart A, Table A-1, effective January 2014

Applicable Requirements ***FUEL2***

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.

Permit R13-3380B Requirements:
7.1.1 Maximum design heat input. Please reference data above for exact limits.
7.1.2 No person shall cause, suffer, allow, or permit emission of smoke/PM greater than ten (10) percent opacity passed on a six-minute block average *[45CSR§2-3.1.]*

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

__X__ 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.)

Permit R13-3380B Requirements:
7.2.1 At such reasonable times as the Secretary may designate, conduct Method 9 emission observations to demonstrate compliance with section 7.1.2
7.3.1 Conduct Method 9 tests or utilize measurements from continuous opacity monitoring systems approved by the director to demonstrate compliance with section 7.1.2 *[45CSR§2-3.2.]*
7.4.1 Maintain all monitoring data required by permit condition 7.1.2.
7.5.1 If deviations from the allowable visible emission requirements are discovered during observations using Method 9 or 22, report to the Director within ten (10) calendar days of the occurrence

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description-		*Liquid Loadout LDOUT1*
Emission unit ID number: LDOUT1	**Emission unit name:** Production Liquids Truck Loadout	**List any control devices associated with this emission unit:** Reboiler (16E, 19E, 47E) or Thermal Oxidizer (16C, 17C, 24C) as backup
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Loadout of condensate and produced water from storage tanks		
Manufacturer: N/A	**Model number:** N/A	**Serial number:** N/A
Construction date: TBD	**Installation date:** 2018	**Modification date(s):** N/A
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 6,898,500 gal/yr of condensate and 2,069,550 gal/yr of produced water		
Maximum Hourly Throughput: 10,920 gal/hour condensate 10,920 gal/hour produced water	**Maximum Annual Throughput:** 8,968,050 gal/yr	**Maximum Operating Schedule:** 8,760 hr/yr
Fuel Usage Data **(fill out all applicable 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: N/A		**Type and Btu/hr rating of burners:** N/A
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. N/A		

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A			

Emissions Data		***LDOUT1***
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO) [1]	N/A	N/A
Nitrogen Oxides (NO_X) [1]	N/A	N/A
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}/PM_{10}$) [1]	N/A	N/A
Total Particulate Matter (TSP) [1]	N/A	N/A
Sulfur Dioxide (SO_2) [1]	N/A	N/A
Volatile Organic Compounds (VOC) [1]	4.24	1.33
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Benzene[1]	< 0.01	< 0.01
Toluene[1]	< 0.01	< 0.01
Ethylbenzene[1]	< 0.01	< 0.01
Xylene[1]	< 0.01	< 0.01
n-Hexane[1]	0.076	0.024
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CO_2e[1]	34	11

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

1. Promax 4.0 Software Model Output

Applicable Requirements ***LDOUT1***

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.

Permit R13-3380B Requirements:

9.1.1 Maximum annual throughput limit for condensate liquid loadout. Please reference data above for exact limits.

9.1.2 Maximum annual throughput limit for produced water liquid loadout. Please reference data above for exact limits.

9.1.3 The loadout racks shall be installed, maintained, and operated in accordance with this section

9.1.4 The produced water and condensate truck loading shall be operated in accordance with the plans and specifications filed in Permit Application R13-3380A, liquid loadout trucks will use the submerged-fill method.

9.1.5 Maximum VOC and HAP emissions from the product loadout rack (Unit ID: LDOUT1). Please reference data above for exact limits.

9.1.6 The control devices shall be designed and operated in accordance with this section

9.2.2 The pilot shall be equipped with an alarm or remote alarm when the pilot is out

Please Reference WCDEP-DAQ Permit R13-3380B
and SUPPLEMENT S1-Regulatory Discussion for more details.

__X__ 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.)

Permit R13-3380B Requirements:

9.2.1 Follow monitoring requirements as outlined in Section 3.2 of this permit

9.2.2 Continuously monitor the pilot flame, using a thermocouple or equivalent device, to show compliance with section 6.1.3.b

9.3.1 Conduct Method 22 test for at least two hours within one (1) year of initial startup to demonstrate compliance with section 6.1.3.f.

9.4.1 Maintain records required by section 9.3 for a period of five (5) years

9.4.2 Maintain records of the aggregate throughput for the product loadout rack on a monthly and rolling 12-month total

9.4.3 Maintain records of the times and duration of all periods which the pilot flame was absent

9.4.4 Document and maintain record required by sections 9.2 (monitoring) and 9.3 (testing)

9.4.5 Maintain all records required by section 9.4 for a period of five (5) years

9.5.1 Follow reporting requirements as outlined in Section 3.5 of the permit

9.5.2 If deviations from the allowable visible emission requirements are discovered during observations using Method 9 or 22, report to the Director within ten (10) calendar days of the occurrence

9.5.3 If deviations from the thermal oxidizer design and operation criteria in section 6.1.3 occur, report to the Director within ten (10) calendar days of such deviation

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description-		*Venting Episodes VENT1*
Emission unit ID number: VENT1	**Emission unit name:** Venting Episodes	**List any control devices associated with this emission unit:** None
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Emissions account for compressor blowdowns, compressor startups, plant shutdowns, and high and low pressure pigging events.		
Manufacturer: N/A	**Model number:** N/A	**Serial number:** N/A
Construction date: TBD	**Installation date:** 2018	**Modification date(s):** N/A
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): Estimated Events per Year: Compressor Blowdowns ~ 1,404 events/year Compressor Startups ~ 1,404 events/year Plant Shutdown ~ 2 events/year Low Pressure Pigging ~ 593 events/year High Pressure Pigging ~ 780 events/year		
Maximum Hourly Throughput: N/A	**Maximum Annual Throughput:** N/A	**Maximum Operating Schedule:** 8,760 hr/yr
Fuel Usage Data **(fill out all applicable 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: N/A		**Type and Btu/hr rating of burners:** N/A
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. N/A		

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A			

Emissions Data		***VENT1***
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	N/A	N/A
Nitrogen Oxides (NO_X)	N/A	N/A
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}/PM_{10}$)	N/A	N/A
Total Particulate Matter (TSP)	N/A	N/A
Sulfur Dioxide (SO_2)	N/A	N/A
Volatile Organic Compounds (VOC) [1]	N/A	37.98
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Benzene[1]	N/A	0.02
Toluene[1]	N/A	0.071
Ethylbenzene[1]	N/A	<0.01
Xylenes[1]	N/A	0.016
n-Hexane[1]	N/A	1.29
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CO_2[1]	N/A	0.75
CH_4[1]	N/A	122
CO_2e[2]	N/A	3,037

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

1. Engineering Estimates
2. 40 CFR Part 98, Subpart A, Table A-1, effective January 2014

Applicable Requirements ***VENT1***

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.

Permit R13-3380B Requirements:

14.1.1 Annual compressor blowdown event limits. Please reference data above for exact limits.

14.1.2 Annual compressor startup event limits. Please reference data above for exact limits.

14.1.3 Annual low-pressure pigging event limits. Please reference data above for exact limits.

14.1.4 Annual high-pressure pigging event limits. Please reference data above for exact limits.

Please Reference WCDEP-DAQ Permit R13-3380B
and SUPPLEMENT S1-Regulatory Discussion for more details.

__X__ 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.)

Permit R13-3380B Requirements:
14.2.1 Maintain records required by this section for a period of five (5) years
14.2.2 Maintain records of compressor blowdown and pigging events and estimated volume per event on a monthly and 12-month rolling total to demonstrate compliance with sections 14.1.1 – 14.1.4 of this permit
14.3.1 If deviations from the permit conditions 14.1.1 – 14.1.4 occur, report to the Director within ten (10) calendar days of such deviation

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description-		***Fugitives FUG***
Emission unit ID number: FUG	**Emission unit name:** Fugitives	**List any control devices associated with this emission unit:** None
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Emissions account for component fugitive leaks (flanges, valves, and compressor seals) and haul roads.		
Manufacturer: N/A	**Model number:** N/A	**Serial number:** N/A
Construction date: N/A	**Installation date:** 2018	**Modification date(s):** N/A
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): Estimated Events per Year: Haul Roads: Condensate Tank Trucks ~ 730 trips/year Haul Roads: Produced Water Tank Trucks ~ 365 trips/year Haul Roads: Passenger Trucks ~ 1,460 trips/year		
Maximum Hourly Throughput: N/A	**Maximum Annual Throughput:** N/A	**Maximum Operating Schedule:** 8,760 hr/yr
Fuel Usage Data **(fill out all applicable 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: N/A		**Type and Btu/hr rating of burners:** N/A
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. N/A		

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A			

Emissions Data		***FUG***
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	N/A	N/A
Nitrogen Oxides (NO_X)	N/A	N/A
Lead (Pb)	N/A	N/A
Particulate Matter ($PM_{2.5}/PM_{10}$) [1]	0.11	0.46
Total Particulate Matter (TSP) [1]	0.42	1.82
Sulfur Dioxide (SO_2)	N/A	N/A
Volatile Organic Compounds (VOC) [1]	2.97	13.01
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Benzene[1]	<0.01	<0.01
Toluene[1]	<0.01	0.021
Ethylbenzene[1]	<0.01	<0.01
Xylenes[1]	<0.01	<0.01
n-Hexane[1]	0.09	0.39
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CO_2[1]	N/A	0.30
CH_4[1]	N/A	10
CO_2e[2]	N/A	245

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

1. Engineering Estimates
2. 40 CFR Part 98, Subpart A, Table A-1, effective January 2014

Applicable Requirements ***FUG***

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.

Permit R13-3380B Requirements:

12.1.1 *NSPS OOOOa standards* – a leak is any visible emission from a fugitive component observed using an optical gas imaging or an instrument reading of 500 ppm or greater using Method 21.

Please Reference WCDEP-DAQ Permit R13-3380B
and SUPPLEMENT S1-Regulatory Discussion for more details.

__X__ 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.)

Permit R13-3380B Requirements:

12.1.1 LDAR Requirements

(a) Monitor all fugitive emission components in accordance with paragraphs (b)-(g) of this section. Keep records in accordance with paragraph (i) and report in accordance with paragraph (j)

(b)-(d) Develop written emissions monitoring plan in accordance with paragraph (c) and (d) of this section

(e)-(g) Each monitoring survey shall observe each fugitive component as defined in 40 CFR §60.5430a. The initial survey shall be conducted with sixty (60) days of startup of production then quarterly moving forward. Difficult or unsafe to inspect and winter requirements are also outlined.

(h) Repair timelines – as soon as practicable but no later than 30 calendar days after detection, resurvey of repairs as soon as practicable but no later than 30 calendar days after repair, delay of repair instructions, leak tagging instructions

(i) Maintain records of surveys shall as specified in 40 CFR §60.5420a(c)(15)

(j) Submit annual reports in accordance with 40 CFR §60.5420a(b)(7)

12.2.2 *Initial Compliance Demonstration* - develop fugitive monitoring plan, conduct initial monitoring, maintain records, repair leaks, and submit initial annual report

12.3.1 *Continuous Compliance Demonstration* - conduct periodic monitoring, repair leaks, maintain records, and submit annual reports

12.4.1 *Notification Requirements* – No requirements according to 40 CFR §60. 5420a(a)(1)

12.4.2 Submit annual reports as outlined in this section

12.4.3 Maintain records identified in 40 CFR §60.7(f) and as outlined in this section for five (5) years

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT F

Schedule of Compliance Form

ATTACHMENT F - Schedule of Compliance Form

Complete this section if you indicated noncompliance with any of the applicable requirements identified in the permit application. For each emission unit which is not in compliance, identify the applicable requirement, the reason(s) for noncompliance, a description of how the source will achieve compliance, and a detailed schedule of compliance. If there is a consent order that applies to this requirement, attach a copy to this form.

1. Applicable Requirement

Unit(s):	**Applicable Requirement:**

2. Reason for Noncompliance:

3. How will Compliance be Achieved?

4. Consent Order Number (if applicable):

5. Schedule of Compliance. Provide a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance, including a date for final compliance.

Remedial Measure or Action	Date to be Achieved

6. Submittal of Progress Reports.

Content of Progress Report:	**Report starting date:** MM/DD/YYYY **Submittal frequency:**

ATTACHMENT G

Air Pollution Control Device Forms

- Oxidation Catalysts for Caterpillar Engines (1C through 12C, 18C through 20C)
- NSCR Catalyst for Waukesha Engines (21C through 23C)
- Thermal Oxidizers (16C, 17C, and 24C)
- Dehydrator Reboilers (16E, 19E, and 47E)
- VRUs (14C, 15C, 26C)

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: Oxidation Catalysts: 1C through 12C and 18C through 20C	**List all emission units associated with this control device.** Compressor Engine #1 through #12: C-100 though C-1500 (1E through 12E and 38E through 40E)	
Manufacturer:	**Model number:**	**Installation date:**
Miratech	MECB-OX-SQ-1500-3600-350	2018

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	_X_ **Other: Oxidation Catalyst**
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
CO	N/A	94%
VOC	N/A	49%
HCHO	N/A	88%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Permit R13-3380B Requirements:

5.1.6.a, c The compressor engines shall be equipped with oxidation catalysts and fitted with a closed-loop automatic air/fuel ratio feedback controller to ensure that the engine ignition system will cease operation in the case a situation which results in performance degradation or failure of the catalyst element.

5.1.6.e No person shall knowingly: remove, bypass, defeat or render inoperative any air pollution control device subject to the requirements of this permit

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ **No**

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Unit does not meet the definition of a large Pollutant-Specific Emissions Unit (PSEU): a PSEU with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels. Therefore, CAM does not need to be addressed in the CAM Plan Submittal according to the initial application Basis of CAM Submittal instructions in Attachment H.

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

Permit R13-3380B Requirements:

5.1.6.d A written operation and maintenance ("O&M") plan is required

5.2.1 Maintain proper operation of the automatic air/fuel ratio controller or automatic feedback controller and follow O&M recommendation of the catalyst element manufacturer

5.4.1 Maintain maintenance records for the catalytic reduction device to demonstrate compliance with 5.1.6 of the permit.

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: NSCR Catalyst: 21C through 23C	**List all emission units associated with this control device.** Compressor Engine #16 through #18: C-1600 though C-1800 (41E through 43E)	
Manufacturer: TBD	**Model number:** TBD	**Installation date:** 2018

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	_**X**_ **Other: NSCR Catalyst**
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
CO	N/A	97.2%
VOC	N/A	63.4%
HCHO	N/A	90%
NOx	N/A	98.8%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Permit R13-3380B Requirements:

5.1.6.b-c The compressor engines shall be equipped with non-selective catalytic and fitted with a closed-loop automatic air/fuel ratio feedback controller to ensure that the engine ignition system will cease operation in the case a situation which results in performance degradation or failure of the catalyst element.

5.1.6.e No person shall knowingly: remove, bypass, defeat or render inoperative any air pollution control device subject to the requirements of this permit

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ **No**

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Unit does not meet the definition of a large Pollutant-Specific Emissions Unit (PSEU): a PSEU with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels. Therefore, CAM does not need to be addressed in the CAM Plan Submittal according to the initial application Basis of CAM Submittal instructions in Attachment H.

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

Permit R13-3380B Requirements:

5.1.6.d A written operation and maintenance ("O&M") plan is required

5.2.1 Maintain proper operation of the automatic air/fuel ratio controller or automatic feedback controller and follow O&M recommendation of the catalyst element manufacturer

5.4.1 Maintain maintenance records for the catalytic reduction device to demonstrate compliance with 5.1.6 of the permit.

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: Thermal Oxidizer: TO-1 through TO-3 (16C, 17C, and 24C)	**List all emission units associated with this control device.** TEG Dehydrator Still Vents: DEHY1, DEHY2, DEHY3 Production Liquids Truck Loadout: LDOUT1	
Manufacturer: TBD	**Model number:** TBD	**Installation date:** 2018

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	_**X**_ **Other (describe) Thermal Oxidizer**
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
VOC	N/A	98%
HAPs	N/A	98%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Permit R13-3380B Requirements:

6.1.3 The thermal oxidizers shall be designed and operated in accordance with this section – all vapors that are being controlled by thermal oxidizer shall be routed there at all times, flame shall be present at all times, residence time and chamber temperature requirements, operating whenever emissions are vented to them, no visible emissions (except for periods not to exceed 5 minutes during any 2 consecutive hours)

6.1.4 Thermal oxidizer maximum hourly and annual emission limits

6.2.1 & 9.2.2 The pilot shall be equipped with an alarm or remote alarm when the pilot is out

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes __ No **X Deferred**

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Unit does not meet the definition of a large Pollutant-Specific Emissions Unit (PSEU): a PSEU with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels. Therefore, CAM does not need to be addressed in the CAM Plan Submittal according to the initial application Basis of CAM Submittal instructions in Attachment H.

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

Permit R13-3380B Requirements:

6.2.1 & 9.2.2 Continuously monitor the pilot flame, using a thermocouple or equivalent device, to show compliance with section 6.1.3.b

6.3.1, **6.4.4, & 9.3.1** Conduct Method 22 test for at least two hours within one (1) year of initial startup to demonstrate compliance with section 6.1.3.f. Maintain records of opacity tests.

6.4.1 & 9.4.3 Maintain records of the times and duration of all periods which the pilot flame was absent to demonstrate compliance with section 6.1.3.b and 6.2.1

6.4.2 Maintain records of testing conducted in accordance with 6.3.2 to demonstrate compliance with section 6.1.3 and 6.3.2

6.4.3 Document and maintain records required by sections 6.2 (monitoring) and 6.3 (testing)

6.4.8 Maintain all records required by section 6.4 for a period of five (5) years

6.5.2 & 9.5.2 If deviations from the allowable visible emission requirements are discovered during observations using Method 9 or 22, report to the Director within ten (10) calendar days of the occurrence

6.5.3 & 9.5.3 If deviations from the thermal oxidizer design and operation criteria in section 6.1.3 occur, report to the Director within ten (10) calendar days of such deviation

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: TEG Dehydrator Unit Reboilers: DREB1 (16E), DREB2 (19E), DREB3(47E)	**List all emission units associated with this control device.** Dehydrator Flash Tanks: DFLSH1, DFLSH2, DFLSH3 Production Liquids Truck Loadout: LDOUT1	
Manufacturer: TBD	**Model number:** TBD	**Installation date:** 2018

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	**_X_ Other: Reboiler w/ TO backup**
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
VOC	N/A	98%
HAPs	N/A	98%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Permit R13-3380B Requirements:

6.1.2 The recycled reboilers shall be designed and operated in accordance with this section – vapors/overheads from the flash tanks shall be routed through a closed vent system to the reboiler at all times when there is a potential that vapors can be generated from the flash tank, reboiler shall only be fired with vapors from the flash tank (natural gas may be used as supplemental fuel), vapors shall be introduced to the flame zone of the reboiler, and when offline gas shall be sent to the thermal oxidizers

7.1.1 Maximum design heat input of reboilers.

7.1.2 No person shall cause, suffer, allow, or permit emission of smoke/PM greater than ten (10) percent opacity passed on a six minute block average [45CSR§2-3.1.]

9.1.6 Recycled Reboilers shall be designed and operated in accordance with this section – product loadout rack vapors routed through a closed vent system to the reboiler at all times when there is potential for vapors to be generated from the flash tank, vapors shall be introduced to the flame zone of the reboiler, and when offline gas shall be sent to the thermal oxidizers

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes __ No **_X_ Deferred**

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Unit does not meet the definition of a large Pollutant-Specific Emissions Unit (PSEU): a PSEU with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels. Therefore, CAM does not need to be addressed in the CAM Plan Submittal according to the initial application Basis of CAM Submittal instructions in Attachment H.

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

Permit R13-3380B Requirements:

7.2.1 At such reasonable times as the Secretary may designate, conduct Method 9 emission observations to demonstrate compliance with section 7.1.2

7.3.1 Conduct Method 9 tests or utilize measurements from continuous opacity monitoring systems approved by the Director to demonstrate compliance with section 8.1.2 [45CSR§2-3.2.]

7.4.1 Maintain records of all monitoring data required by section 7.2.1

7.5.1 If deviations from the allowable visible emission requirements are discovered during observations using Method 9 or 22, report to the Director within ten (10) calendar days of the occurrence

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: Vapor Recovery Units: VRU-100 (14C), VRU-200 (15C), VRU-300(26C)	**List all emission units associated with this control device.** Hydrocarbon/Produced Water Tanks (T01 through T11)	
Manufacturer: TBD	**Model number:** TBD	**Installation date:** 2018

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	**_X_ Other: Vapor Recovery (VRU)**
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
VOC	98%	N/A
HAPs	98%	N/A

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

All eleven (11) tanks are connected to two (2) vapor recovery units (VRU-100 and VRU-200) where tank vapors are collected and recycled back into the gas system right before the initial filter scrubber. A third vapor recovery unit (VRU-300) is also connected to the tanks as a backup unit. A 98% capture efficiency was permitted.

Permit R13-3380B Requirements:

8.1.1 Route all VOC and HAP emissions from the tanks (Unit IDs: T01, T02, T03, T08, T09) to a VRU System with at least 98% efficiency

8.1.2 Install, maintain, and operate the VRUs and associated monitoring equipment in a manner consistent with safety and good air pollution control practices or more stringent limits *[45CSR§13-5.10.]*

8.1.5 *Additional VRU Requirements* – three (3) of the four (4) options must be utilized: install run status sensing equipment, install an automatic by-pass recycle system, install blanket gas with automatic throttling, and/or install a compressor with a variable drive

8.1.6 The VRUs shall be designed and operated in accordance with this section *[45CSR§13-5.10]*

8.1.7 The closed vent system shall be designed and operated in accordance with this section *[45CSR§13-5.10]*

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes **_X_ No closed loop system, however claiming 98% efficiency.**

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Unit does not meet the definition of a large Pollutant-Specific Emissions Unit (PSEU): a PSEU with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels. Therefore, CAM does not need to be addressed in the CAM Plan Submittal according to the initial application Basis of CAM Submittal instructions in Attachment H.

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

Permit R13-3380B Requirements:

8.2.2 Monitor the VRUs in accordance with the plans and specifications and manufacturer's recommendations to demonstrate compliance with section 8.1.1

8.3.1. Maintain all records required by section 8.3.

8.3.2 Maintain records of VRU equipment inspections and/or preventative maintenance procedures.

8.3.3 Maintain records according to this section of any malfunction or operational shutdown of the VRU during which excess emissions occur.

8.3.5 Maintain a copy of all design records of the process, maintenance records of equipment and any downtime hours associated with the VRUs.

8.3.6 Maintain records of the additional monitoring required in section 8.1.5 to demonstrate compliance with the 98% control efficiency in section 8.1.1

8.3.7 Maintain initial compliance records, annual visual inspections, bypass inspections or each time the key is checked out or each time the alarm is sounded, each occurrence that the control device was bypassed, and unsafe or difficult to inspect designations to demonstrate compliance with the closed vent system monitoring requirements. *[45CSR§13-5.11]*

8.4.1 At the Director's request, report deviations when the control device was operated outside of the parameters defined in the monitoring plan

8.4.2 Notify the director if VRU downtime in excess of 2% based on the 12-month rolling total within ten (10) calendar days

Please Reference WCDEP-DAQ Permit R13-3380B

and SUPPLEMENT S1-Regulatory Discussion for more details

ATTACHMENT H

Compliance Assurance Monitoring Form

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at http://www.epa.gov/ttn/emc/cam.html

CAM APPLICABILITY DETERMINATION

1) Does the facility have a PSEU (Pollutant-Specific Emissions Unit considered separately with respect to **EACH** regulated air pollutant) that is subject to CAM (40 CFR Part 64), which must be addressed in this CAM plan submittal? To determine applicability, a PSEU must meet **all** of the following criteria (*If No, then the remainder of this form need not be completed*): ☐ YES ☐ NO

a. The PSEU is located at a major source that is required to obtain a Title V permit;

b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is NOT exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
- Stratospheric Ozone Protection Requirements.
- Acid Rain Program Requirements.
- Emission Limitations or Standards for which a WVDEP Division of Air Quality Title V permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
- An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).

c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;

d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND

e. The PSEU is NOT an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit:

☐ RENEWAL APPLICATION. **ALL** PSEUs for which a CAM plan has NOT yet been approved need to be addressed in this CAM plan submittal.

☐ INITIAL APPLICATION (submitted after 4/20/98). **ONLY** large PSEUs (i. e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels) need to be addressed in this CAM plan submittal.

☐ SIGNIFICANT MODIFICATION TO LARGE PSEUs. **ONLY** large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, Only address the appropriate monitoring requirements affected by the significant modification.

4.0 Supplements

The following supplemental documents are included with this renewal.

1. Supplement S1 – Regulatory Discussion
2. Supplement S2 – Facility-wide Emissions Summary

SUPPLEMENT S1

Regulatory Discussion

Federal Regulations and Applicability Discussion

This section presents a review of the potentially applicable federal regulations:

- Title 40 CFR Part 60 – New Source Performance Standards ("NSPS")
- Title 40 CFR Part 61 – National Emission Standards for Hazardous Air Pollutants ("NESHAP")
- Title 40 CFR Part 63 – NESHAPs for Source Categories (aka "MACT")

Sub-part	Title 40 CFR Part 60, Standards of Performance for:	Rule Applicability Review	
A	General Provisions:	Y	This site is subject to a NSPS and is, therefore, subject to the general provisions of this subpart.
Db	Industrial-Commercial-Institutional Steam Generating Units	N	This site does not operate a steam generating unit > 100 MMBtu/hr; therefore, this subpart does not apply.
Dc	Small Industrial-Commercial-Institutional Steam Generating Units	N	This site does not operate a steam generating unit > 10 MMBtu/hr but < 100 MMBtu/hr; therefore, this subpart does not apply.
K	Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After 6/11/1973, and Prior to 5/19/1978	N	The storage tank(s) at the site did not commence construction, reconstruction, or modification after June 11, 1973 and prior to May 19, 1978; therefore, this subpart does not apply.
Ka	Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After 5/18/1978 and Prior to 7/23/1984	N	The storage tank(s) at the site did not commence construction, reconstruction, or modification after May 18, 1978 and prior to July 23, 1984; therefore, this subpart does not apply.
Kb	Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After 7/23/1984	N	The storage tank(s) at the site commenced construction after July 23, 1984; however, each tank has a storage capacity less than 1,589.874 m^3 and is used for petroleum or condensate stored prior to custody transfer; therefore, per §60.110b(d)(4) this subpart does not apply.
GG	Stationary Gas Turbines	N	Since the microturbine generator at the site will have a heat input rating less than 10 million Btu per hour, Subpart GG does not apply.
KKK	Equipment Leaks of VOC From Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After 1/20/1984, and on or Before 8/23/2011	N	This site does not meet the definition of natural gas processing plant as defined in 40 CFR §60.631; therefore, this subpart does not apply.
LLL	SO_2 Emissions From Onshore Natural Gas Processing for Which Construction, Reconstruction, or Modification Commenced after 1/20/1984, and on or before 8/23/2011	N	This site does not meet the definition of natural gas processing plant as defined in 40 CFR §60.631, does not operate an affected facility, and did not commence construction, reconstruction, or modification after January 20, 1984 and prior to August 23, 2011; therefore, this subpart does not apply.
IIII	Stationary Compression Ignition Internal Combustion Engine.	N	This site does not operate an affected facility under this subpart; therefore, this subpart does not apply.

Federal Regulations and Applicability Discussion

Sub-part	Title 40 CFR Part 60, Standards of Performance for:	Rule Applicability Review	
JJJJ	Stationary Compression Ignition Internal Combustion Engine.	Y	The stationary spark-ignited internal combustion engines at the site (Unit IDs: C-100 through C-1800, GEN2 thorugh GEN3) are non-emergency, ≥ 500 hp and were manufactured on or after July 1, 2007; therefore, are subject to this subpart per 60.4230(a)(4)(i). Antero will maintain compliance with the applicable testing, reporting, monitoring, and recordkeeping requirements of this subpart.
KKKK	Stationary Combustion Turbines	N	Since the microturbine generator at the site will have a heat input rating less than 10 million Btu per hour, this subpart does not apply.
OOOO	Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification, or Reconstruction Commenced after August 23, 2011, and on or before September 18, 2015	N	This site was constructed after September 18, 2015 and does not operate an affected facility under this subpart; therefore, this subpart does not apply.
OOOOa	Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015	Y	The site will potentially operate affected facilities, commencing construction, modification, or reconstruction after September 18, 2015; therefore, there are potential requirements under this subpart (per §60.5365a) for the following facilities covered by this subpart: • *Well affected facility*: A well affected facility is a single well that is hydraulically fractured or refractured. This site does not include any well affected facilities. There are no further requirements. • *Reciprocating compressors*: The on-site reciprocating compressors are an affected facility in compliance with the applicable requirements of this subpart. • *Pneumatic controller*: All on-site pneumatic controllers are electric or powered by compressed air, not natural gas-driven powered by pressurized natural gas; therefore, they are not affected facilities. • *Storage vessel with PTE > 6 tpy VOC*: Each storage tank at this site has PTE VOC emissions < 6 tpy as determined in accordance with this rule; therefore, they are not affected facilites. • *Pneumatic pump*: A pneumatic pump affected facility is a single natural gas-driven diaphragm pump. This site does not include any pneumatic pump affected facilities. • *The collection of fugitive emissions components at a compressor station is an affected facility*: This site is a compressor station (as defined in this rule); therefore, are an affected facility in compliance with the applicable requirements of this subpart. • All other potentially affected facilities listed in this rule are exempt if not located at an onshore natural gas processing plant. This site is not an onshore natural gas processing plant, as defined in §60.5430; therefore, there are no further requirements under this subpart.

Federal Regulations and Applicability Discussion

Sub-part	Title 40 CFR Part 61, NESHAP	Rule Applicability Review	
A	General Provisions	N	The site handles oil/condensate that may contain benzene, which is a regulated HAP under Part 61. Based on the evaluation of the potentially applicable subparts, there are no applicable requirements under 40 CFR Part 61.
V	National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	N	No sources at this site are intended to operate in volatile hazardous air pollutant service as defined in §61.241 of this subpart; therefore, this subpart does not apply.
Sub-part	**Title 40 CFR Part 63, NESHAP for Source Categories**	**Rule Applicability Review**	
A	General Provisions	Y	This site is subject to a MACT standard and is, therefore, subject to the general provisions of this subpart.
H	National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks	N	There are no facilities in organic HAP service (with at least 5% HAPs) at this site; therefore, this subpart does not apply.
HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities	Y	This site is an area source of HAPs as defined by this rule and operates a TEG dehydration unit, which is an affected source. The unit is exempt from the requirements of §63.764(d) for area source of HAPs per: • §63.764(e)(ii) – Actual annual average emissions of benzene from the glycol dehydration process vent to atmosphere are < 1.0 tpy. Records will be maintained according to 63.764(d)(1)
VV	National Emission Standards for Oil-Water Separators and Organic-Water Separators	N	This site does not operate an affected facility under this subpart; therefore, this subpart does not apply.
HHH	National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities	N	This site is not part of the natural gas transmission and storage phase; therefore, this subpart does not apply.
YYYY	National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines	Y	The combustion turbine (Unit ID: GEN1) is a lean premix gas-fired stationary turbine as defined by this rule; therefore, need only comply with the notification requirements in §63.6145.
EEEE	National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)	N	This site is defined by this subpart as an oil and natural gas production facility and is exempt from this subpart per §63.2334(c)(1).
ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	Y	The engines (Unit IDs: C-100 through C-1800, GEN2 through GEN3) are new stationary RICE located at an area source of HAPs and are an affected source. Per §63.6590(c)(1), the engines meet the requirements of this part by meeting the requirements of NSPS JJJJ.
DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters	N	This site is not a major source of HAPs as defined by this rule; therefore, this subpart does not apply.

State Regulations and Applicability and Discussion

Series	Title 45 Code of State Federal Rules for:	Rule Applicability Review	
2	To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers	Y	**§45-2-3.1 & 3.2** No person shall cause, suffer, allow, or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is darker in shade or appearance than ten (10) percent opacity based on a six minute block average. Compliance shall be determined using Method 9. **§45-2-11.1 Exemption** All fuel burning units having a heat input under ten (10) MMBTU/hr will be exempt from sections 4, 5, 6, 8 and 9. However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date.
6	Control of Air Pollution from Combustion of Refuse	N/A	**§45-6-3.1** The open burning of refuse will not occur.
10	Prevent and Control Air Pollution from the Emission of Sulfur Oxides	N	**§45-10-10.1 Exemption** Any fuel burning units having a design heat input under ten (10) MMBtu/hr will be exempt from section 3 and sections 6 through 8. However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date.
11	Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After 7/23/1984	Y	**§45-11-5.2** Any person responsible for the operation of a source of air pollutants not set forth under Section 5.1. of this Regulation shall, when requested by the Commission, prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Table I, II, and III of this Regulation.
13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, Permission to Commence Construction, and Procedures for Evaluation	Y	The site has obtained a construction permit and will meet the requirements in this section.
14	Permits for Construction and Major Modification of Major Stationary Sources for the Prevention of Significant Deterioration (PSD) of Air Quality	N	**§45-14** establishes a preconstruction permit program for the PSD Program under the Clean Air Act. According to Section 2.43 of this rule, a Major Stationary Source is defined as any of the twenty six named sources listed in 2.43a which emits or has the potential to emit 100 tons per year or more of any regulated pollutant. Although the Middlebourne IV Compressor Station will have the potential to emit over 100 tons per year of VOCs, it is not one of the twenty six named stationary sources and thus not defined a Major Stationary Source under the PSD Program by Section 2.43a. Additionally, Section 2.43b of this rule defines a Major Stationary Source as any stationary source which emits or has the potential to emit, 250 tons per year or more of any regulated pollutant. The Middlebourne IV Compressor Station does not have the potential to emit 250 tons per year or more of any regulated pollutant, thus is not a Major Stationary Source under the PSD Program and 45CSR14 does not apply.
16	Standards of Performance for New Stationary Sources Pursuant to 40 CFR, Part 60	Y	The site will meet the applicable NSPS requirements as adopted by West Virgina Department of Environmental Protection.
19	Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution Which Cause or Contribute to Nonattainment	N	The site is not a major source or modification for the purposes of 45 CSR 19.

State Regulations and Applicability and Discussion

Series	Title 45 Code of State Federal Rules for:	Rule Applicability Review	
20	Good Engineering Practice as Applicable to Stack Heights	Y	Antero will not seek credit greater than GEP in any future required dispersion modeling.
21	Regulation of Volatile Organic Compounds (VOC)	N	This rule does not apply because the subject facility is not located in Putnam County, Kanawha County, Cabell County, Wayne County, or Wood County.
22	Air Quality Management Fee Program	Y	Antero paid the appropriate fee with the initial construction permit application.
27	To Prevent and Control the Emissions of Toxic Air Pollutants	N	**§45-27-2.4 Exemption** The definition of Chemical Processing Unit states : it does not include 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.
28	Air Pollution Emissions Banking and Trading	N	This rule does not apply. Antero does not choose to participate in the voluntarily statewide air pollutant emissions trading program.
29	Emission Statements for VOC and NO_X	N	**§45-29-1 Exemption** This rule does not apply because subject facility is not located in Putnam, Kanawha, Cabell, Wayne, Wood, or Greenbrier Counties
30	Requirements for Operating Permits	Y	This rule establishes an air permitting program that is consistent with Title V of the Clean Air Act. According to Section 3.1.a.1, any major source as defined by the rule, shall not operate except in compliance with a permit issued under this rule on or after the effective date of the operating permit program. Section 2.26.b defines a major source as any stationary source that directly emits or has the potential to emit 100 tons per year or more of any pollutant subject to regulation. However, because a compressor station is not one of the 44 named sources under 2.26.b, fugitives do not need to be included when determining the 100 ton per year threshold. Potential emissions of VOCs from the Middlebourne IV Compressor Station will be over 100 tons per year not including fugitive emissions, so the Middlebourne IV Compressor Station is a major source as defined by this rule and applicable to 45CSR30. The Middlebourne IV Compressor Station is applying for a permit under this rule within 12 months of the commencement of operation.
34	Emission Standards for Hazardous Air Pollutants for Source Categories Pursuant to 40 CFR, Part 63	Y	The site will meet the applicable MACT requirements as adopted by West Virgina Department of Environmental Protection.
38	Provisions for Determination of Compliance with Air Quality Management Rules	N	**§45-38-3 Exemption** There are no rules enforceable by the Director that have undefinitive compliance determination procedures or such compliance determination procedures have not been authorized and adopted by West Virginia Department of Environmental Protection.

SUPPLEMENT S2

Facility-wide Emissions Summary

Emissions Summary Total

Company:	**Antero Midstream LLC**
Facility Name:	**Middlebourne IV Compressor Station**
Facility Location:	**Tyler County, West Virginia**

UNCONTROLLED POTENTIAL EMISSION SUMMARY

Source	NOx		CO		VOC		SO_2		PM-10		HAPs		Formaldehyde		CO_2e
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	tpy
Engines															
Compressor Engine 1	1.65	7.24	14.44	63.25	3.14	13.76	0.010	0.044	0.17	0.75	1.21	5.32	0.88	3.86	12,311
Compressor Engine 2	1.65	7.24	14.44	63.25	3.14	13.76	0.010	0.044	0.17	0.75	1.21	5.32	0.88	3.86	12,311
Compressor Engine 3	1.65	7.24	14.44	63.25	3.14	13.76	0.010	0.044	0.17	0.75	1.21	5.32	0.88	3.86	12,311
Compressor Engine 4	1.65	7.24	14.44	63.25	3.14	13.76	0.010	0.044	0.17	0.75	1.21	5.32	0.88	3.86	12,311
Compressor Engine 5	1.65	7.24	14.44	63.25	3.14	13.76	0.010	0.044	0.17	0.75	1.21	5.32	0.88	3.86	12,311
Compressor Engine 6	1.65	7.24	14.44	63.25	3.14	13.76	0.010	0.044	0.17	0.75	1.21	5.32	0.88	3.86	12,311
Compressor Engine 7	1.65	7.24	14.44	63.25	3.14	13.76	0.010	0.044	0.17	0.75	1.21	5.32	0.88	3.86	12,311
Compressor Engine 8	1.65	7.24	14.44	63.25	3.14	13.76	0.010	0.044	0.17	0.75	1.21	5.32	0.88	3.86	12,311
Compressor Engine 9	1.65	7.24	14.44	63.25	3.14	13.76	0.010	0.044	0.17	0.75	1.21	5.32	0.88	3.86	12,311
Compressor Engine 10	1.65	7.24	14.44	63.25	3.14	13.76	0.010	0.044	0.17	0.75	1.21	5.32	0.88	3.86	12,311
Compressor Engine 11	1.65	7.24	14.44	63.25	3.14	13.76	0.010	0.044	0.17	0.75	1.21	5.32	0.88	3.86	12,311
Compressor Engine 12	1.65	7.24	14.44	63.25	3.14	13.76	0.010	0.044	0.17	0.75	1.21	5.32	0.88	3.86	12,311
Compressor Engine 13	1.65	7.24	14.44	63.25	3.14	13.76	0.010	0.044	0.17	0.75	1.21	5.32	0.88	3.86	12,311
Compressor Engine 14	1.65	7.24	14.44	63.25	3.14	13.76	0.010	0.044	0.17	0.75	1.21	5.32	0.88	3.86	12,311
Compressor Engine 15	1.65	7.24	14.44	63.25	3.14	13.76	0.010	0.044	0.17	0.75	1.21	5.32	0.88	3.86	12,311
Compressor Engine 16	66.30	290.41	59.30	259.75	0.68	2.97	0.0110	0.048	0.36	1.58	0.50	2.18	0.28	1.21	11,114
Compressor Engine 17	66.30	290.41	59.30	259.75	0.68	2.97	0.0110	0.048	0.36	1.58	0.50	2.18	0.28	1.21	11,114
Compressor Engine 18	66.30	290.41	59.30	259.75	0.68	2.97	0.0110	0.048	0.36	1.58	0.50	2.18	0.28	1.21	11,114
Fuel Conditioning Heater 1	0.053	0.23	0.045	0.20	0.0029	0.013	0.00032	0.0014	0.0041	0.018	0.0010	0.0044	0.000040	0.00018	257
Fuel Conditioning Heater 2	0.082	0.36	0.069	0.30	0.0045	0.020	0.00049	0.0021	0.0062	0.027	0.0015	0.0067	0.000061	0.00027	386
Generators															
Natural Gas Generator - Capstone 1	0.32	1.40	0.88	3.85	0.080	0.35	0.028	0.12	0.054	0.24	0.0085	0.037	0.0059	0.026	4,237
Natural Gas Generator - PSI 1	1.43	6.27	2.86	12.53	1.00	4.39	0.0033	0.014	0.11	0.47	0.18	0.79	0.11	0.50	2,865
Natural Gas Generator - PSI 2	1.43	6.27	2.86	12.53	1.00	4.39	0.0033	0.014	0.11	0.47	0.18	0.79	0.11	0.50	2,865
Dehydrator															
TEG Dehydrator 1	---	---	---	---	86.11	377.16	---	---	---	---	12.95	56.71	---	---	14,517
TEG Dehydrator 2	---	---	---	---	86.11	377.16	---	---	---	---	12.95	56.71	---	---	14,517
TEG Dehydrator 3	---	---	---	---	86.11	377.16	---	---	---	---	12.95	56.71	---	---	14,517
Reboiler 1	0.15	0.64	0.12	0.54	0.0081	0.035	0.00088	0.0039	0.011	0.049	0.0028	0.012	0.00011	0.00048	771
Reboiler 2	0.15	0.64	0.12	0.54	0.0081	0.035	0.00088	0.0039	0.011	0.049	0.0028	0.012	0.00011	0.00048	771
Reboiler 3	0.15	0.64	0.12	0.54	0.0081	0.035	0.00088	0.0039	0.011	0.049	0.0028	0.012	0.00011	0.00048	771
Thermal Oxidizers															
Thermal Oxidizer 1	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Thermal Oxidizer 2	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Thermal Oxidizer 3	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Hydrocarbon Loading															
Truck Loadout	---	---	---	---	61.39	19.21	---	---	---	---	1.30	0.41	---	---	155
Venting Emissions															
Compressor Blowdown Emissions	---	---	---	---	---	16.49	---	---	---	---	---	0.61	---	---	1,318
Startup and Shutdown Emissions	---	---	---	---	---	8.64	---	---	---	---	---	0.32	---	---	691
Pigging Emissions	---	---	---	---	---	12.85	---	---	---	---	---	0.47	---	---	1,028
Fugitive Emissions															
Component Leak Emissions	---	---	---	---	2.97	13.01	---	---	---	---	0.099	0.43	---	---	245
Haul Road Dust Emissions	---	---	---	---	---	---	---	---	0.11	0.46	---	---	---	---	---
Storage Tanks															
Produced Water Tanks	---	---	---	---	0.00029	0.0013	---	---	---	---	7.82E-07	3.43E-06	---	---	0.088
Settler Tank	---	---	---	---	71.84	314.68	---	---	---	---	1.53	6.70	---	---	2,472
Condensate Tanks	---	---	---	---	5.76	25.24	---	---	---	---	0.13	0.56	---	---	35
Total Facility PTE =	**227.47**	**996.31**	**401.60**	**1,759.0**	**451.6**	**1,766.2**	**0.22**	**0.97**	**4.07**	**17.83**	**61.98**	**267.58**	**14.29**	**62.59**	**280,423**

Emissions Summary Total

Company:	**Antero Midstream LLC**
Facility Name:	**Middlebourne IV Compressor Station**
Facility Location:	**Tyler County, West Virginia**

CONTROLLED POTENTIAL EMISSION SUMMARY

Source	NOx		CO		VOC		SO_2		PM-10		HAPs		Formaldehyde		CO_2e
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	tpy
Engines															
Compressor Engine 1	1.65	7.24	0.88	3.86	1.60	7.00	0.010	0.044	0.17	0.75	0.28	1.24	0.11	0.48	12,311
Compressor Engine 2	1.65	7.24	0.88	3.86	1.60	7.00	0.010	0.044	0.17	0.75	0.28	1.24	0.11	0.48	12,311
Compressor Engine 3	1.65	7.24	0.88	3.86	1.60	7.00	0.010	0.044	0.17	0.75	0.28	1.24	0.11	0.48	12,311
Compressor Engine 4	1.65	7.24	0.88	3.86	1.60	7.00	0.010	0.044	0.17	0.75	0.28	1.24	0.11	0.48	12,311
Compressor Engine 5	1.65	7.24	0.88	3.86	1.60	7.00	0.010	0.044	0.17	0.75	0.28	1.24	0.11	0.48	12,311
Compressor Engine 6	1.65	7.24	0.88	3.86	1.60	7.00	0.010	0.044	0.17	0.75	0.28	1.24	0.11	0.48	12,311
Compressor Engine 7	1.65	7.24	0.88	3.86	1.60	7.00	0.010	0.044	0.17	0.75	0.28	1.24	0.11	0.48	12,311
Compressor Engine 8	1.65	7.24	0.88	3.86	1.60	7.00	0.010	0.044	0.17	0.75	0.28	1.24	0.11	0.48	12,311
Compressor Engine 9	1.65	7.24	0.88	3.86	1.60	7.00	0.010	0.044	0.17	0.75	0.28	1.24	0.11	0.48	12,311
Compressor Engine 10	1.65	7.24	0.88	3.86	1.60	7.00	0.010	0.044	0.17	0.75	0.28	1.24	0.11	0.48	12,311
Compressor Engine 11	1.65	7.24	0.88	3.86	1.60	7.00	0.010	0.044	0.17	0.75	0.28	1.24	0.11	0.48	12,311
Compressor Engine 12	1.65	7.24	0.88	3.86	1.60	7.00	0.010	0.044	0.17	0.75	0.28	1.24	0.11	0.48	12,311
Compressor Engine 13	1.65	7.24	0.88	3.86	1.60	7.00	0.010	0.044	0.17	0.75	0.28	1.24	0.11	0.48	12,311
Compressor Engine 14	1.65	7.24	0.88	3.86	1.60	7.00	0.010	0.044	0.17	0.75	0.28	1.24	0.11	0.48	12,311
Compressor Engine 15	1.65	7.24	0.88	3.86	1.60	7.00	0.010	0.044	0.17	0.75	0.28	1.24	0.11	0.48	12,311
Compressor Engine 16	0.83	3.62	1.65	7.24	0.25	1.09	0.0110	0.048	0.36	1.58	0.121	0.53	0.028	0.121	11,035
Compressor Engine 17	0.83	3.62	1.65	7.24	0.25	1.09	0.0110	0.048	0.36	1.58	0.121	0.53	0.028	0.121	11,035
Compressor Engine 18	0.83	3.62	1.65	7.24	0.25	1.09	0.0110	0.048	0.36	1.58	0.121	0.53	0.028	0.121	11,035
Fuel Conditioning Heater 1	0.053	0.23	0.045	0.20	0.0029	0.013	0.00032	0.0014	0.0041	0.018	0.0010	0.0044	0.000040	0.00018	257
Fuel Conditioning Heater 2	0.082	0.36	0.069	0.30	0.0045	0.020	0.00049	0.0021	0.0062	0.027	0.0015	0.0067	0.000061	0.00027	386
Generators															
Natural Gas Generator - Capstone 1	0.32	1.40	0.88	3.85	0.080	0.35	0.028	0.12	0.054	0.24	0.008	0.037	0.006	0.026	4,237
Natural Gas Generator - PSI 1	1.43	6.27	2.86	12.53	1.00	4.39	0.0033	0.014	0.11	0.47	0.18	0.79	0.11	0.50	2,865
Natural Gas Generator - PSI 2	1.43	6.27	2.86	12.53	1.00	4.39	0.0033	0.014	0.11	0.47	0.18	0.79	0.11	0.50	2,865
Dehydrator															
TEG Dehydrator 1	---	---	---	---	1.72	7.54	---	---	---	---	0.26	1.13	---	---	302
TEG Dehydrator 2	---	---	---	---	1.72	7.54	---	---	---	---	0.26	1.13	---	---	302
TEG Dehydrator 3	---	---	---	---	1.72	7.54	---	---	---	---	0.26	1.13	---	---	302
Reboiler 1	0.15	0.64	0.12	0.54	0.0081	0.035	0.00088	0.0039	0.011	0.049	0.0028	0.012	0.00011	0.00048	771
Reboiler 2	0.15	0.64	0.12	0.54	0.0081	0.035	0.00088	0.0039	0.011	0.049	0.0028	0.012	0.00011	0.00048	771
Reboiler 3	0.15	0.64	0.12	0.54	0.0081	0.035	0.00088	0.0039	0.011	0.049	0.0028	0.012	0.00011	0.00048	771
Flare															
Thermal Oxidizers															
Thermal Oxidizer 1	0.47	2.05	2.27	9.95	0.0033	0.015	0.00037	0.0016	0.0046	0.020	0.0011	0.0050	---	---	3,404
Thermal Oxidizer 2	0.47	2.05	2.27	9.95	0.0033	0.015	0.00037	0.0016	0.0046	0.020	0.0011	0.0050	---	---	3,404
Thermal Oxidizer 3	0.47	2.05	2.27	9.95	0.0033	0.015	0.00037	0.0016	0.0046	0.020	0.0011	0.0050	---	---	3,404
Hydrocarbon Loading															
Truck Loadout	---	---	---	---	4.24	1.33	---	---	---	---	0.090	0.028	---	---	11
Venting Emissions															
Compressor Blowdown Emissions	---	---	---	---	---	16.49	---	---	---	---	---	0.61	---	---	1,318
Startup and Shutdown Emissions	---	---	---	---	---	8.64	---	---	---	---	---	0.32	---	---	691
Pigging Emissions	---	---	---	---	---	12.85	---	---	---	---	---	0.47	---	---	1,028
Fugitive Emissions															
Component Leak Emissions	---	---	---	---	2.97	13.01	---	---	---	---	0.099	0.43	---	---	245.0
Haul Road Dust Emissions	---	---	---	---	---	---	---	---	0.11	0.46	---	---	---	---	---
Storage Tanks															
Produced Water Tanks	---	---	---	---	5.81E-06	2.55E-05	---	---	---	---	1.56E-08	6.85E-08	---	---	0.0033
Settler Tank	---	---	---	---	1.44	6.29	---	---	---	---	0.031	0.13	---	---	51
Condensate Tanks	---	---	---	---	0.12	0.50	---	---	---	---	0.0025	0.011	---	---	0.76
Total Facility PTE =	**32.45**	**142.11**	**32.09**	**140.55**	**40.77**	**199.32**	**0.22**	**0.98**	**4.08**	**17.89**	**5.98**	**27.22**	**1.97**	**8.63**	**245,149**

HAP Emissions Summary Total

Company:	**Antero Midstream LLC**
Facility Name:	**Middlebourne IV Compressor Station**
Facility Location:	**Tyler County, West Virginia**

CONTROLLED POTENTIAL EMISSION SUMMARY

Source	Benzene		Toluene		Ethylbenzene		Xylenes		n-Hexane		Acetaldehyde		Acrolein		Methanol	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Engines																
Compressor Engine 1	0.0038	0.017	0.0036	0.016	0.00035	0.0015	0.0016	0.0070	0.010	0.042	0.073	0.32	0.045	0.20	0.022	0.10
Compressor Engine 2	0.0038	0.017	0.0036	0.016	0.00035	0.0015	0.0016	0.0070	0.010	0.042	0.073	0.32	0.045	0.20	0.022	0.10
Compressor Engine 3	0.0038	0.017	0.0036	0.016	0.00035	0.0015	0.0016	0.0070	0.010	0.042	0.073	0.32	0.045	0.20	0.022	0.10
Compressor Engine 4	0.0038	0.017	0.0036	0.016	0.00035	0.0015	0.0016	0.0070	0.010	0.042	0.073	0.32	0.045	0.20	0.022	0.10
Compressor Engine 5	0.0038	0.017	0.0036	0.016	0.00035	0.0015	0.0016	0.0070	0.010	0.042	0.073	0.32	0.045	0.20	0.022	0.10
Compressor Engine 6	0.0038	0.017	0.0036	0.016	0.00035	0.0015	0.0016	0.0070	0.010	0.042	0.073	0.32	0.045	0.20	0.022	0.10
Compressor Engine 7	0.0038	0.017	0.0036	0.016	0.00035	0.0015	0.0016	0.0070	0.010	0.042	0.073	0.32	0.045	0.20	0.022	0.10
Compressor Engine 8	0.0038	0.017	0.0036	0.016	0.00035	0.0015	0.0016	0.0070	0.010	0.042	0.073	0.32	0.045	0.20	0.022	0.10
Compressor Engine 9	0.0038	0.017	0.0036	0.016	0.00035	0.0015	0.0016	0.0070	0.010	0.042	0.073	0.32	0.045	0.20	0.022	0.10
Compressor Engine 10	0.0038	0.017	0.0036	0.016	0.00035	0.0015	0.0016	0.0070	0.010	0.042	0.073	0.32	0.045	0.20	0.022	0.10
Compressor Engine 11	0.0038	0.017	0.0036	0.016	0.00035	0.0015	0.0016	0.0070	0.010	0.042	0.073	0.32	0.045	0.20	0.022	0.10
Compressor Engine 12	0.0038	0.017	0.0036	0.016	0.00035	0.0015	0.0016	0.0070	0.010	0.042	0.073	0.32	0.045	0.20	0.022	0.10
Compressor Engine 13	0.0038	0.017	0.0036	0.016	0.00035	0.0015	0.0016	0.0070	0.010	0.042	0.073	0.32	0.045	0.20	0.022	0.10
Compressor Engine 14	0.0038	0.017	0.0036	0.016	0.00035	0.0015	0.0016	0.0070	0.010	0.042	0.073	0.32	0.045	0.20	0.022	0.10
Compressor Engine 15	0.0038	0.017	0.0036	0.016	0.00035	0.0015	0.0016	0.0070	0.010	0.042	0.073	0.32	0.045	0.20	0.022	0.10
Compressor Engine 16	0.0108	0.047	0.0038	0.0167	0.000169	0.00074	0.00133	0.0058	---	---	0.0190	0.083	0.0179	0.079	0.0209	0.091
Compressor Engine 17	0.0108	0.047	0.0038	0.0167	0.000169	0.00074	0.00133	0.0058	---	---	0.0190	0.083	0.0179	0.079	0.0209	0.091
Compressor Engine 18	0.0108	0.047	0.0038	0.0167	0.000169	0.00074	0.00133	0.0058	---	---	0.0190	0.083	0.0179	0.079	0.0209	0.091
Fuel Conditioning Heater 1	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Fuel Conditioning Heater 2	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Generators																
Natural Gas Generator - Capstone 1	0.00010	0.00043	0.0011	0.0047	0.00026	0.0012	0.00053	0.0023	---	---	0.00033	0.0014	0.000053	0.00023	---	---
Natural Gas Generator - PSI 1	0.0088	0.039	0.0031	0.014	0.00014	0.00061	0.0011	0.0048	---	---	0.016	0.068	0.015	0.064	0.017	0.075
Natural Gas Generator - PSI 2	0.0088	0.039	0.0031	0.014	0.00014	0.00061	0.0011	0.0048	---	---	0.016	0.068	0.015	0.064	0.017	0.075
Dehydrator																
TEG Dehydrator 1	0.027	0.12	0.11	0.50	0.011	0.048	0.041	0.18	0.066	0.29	---	---	---	---	---	---
TEG Dehydrator 2	0.027	0.12	0.11	0.50	0.011	0.048	0.041	0.18	0.066	0.29	---	---	---	---	---	---
TEG Dehydrator 3	0.027	0.12	0.11	0.50	0.011	0.048	0.041	0.18	0.066	0.29	---	---	---	---	---	---
Reboiler 1	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Reboiler 2	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Reboiler 3	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Thermal Oxidizers																
Thermal Oxidizer 1	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Thermal Oxidizer 2	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Thermal Oxidizer 3	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Hydrocarbon Loading	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Hydrocarbon Loading																
Truck Loadout	0.001	0.0004	0.004	0.001	0.002	0.0007	0.006	0.002	0.08	0.02	---	---	---	---	---	---
Venting Emissions																
Compressor Blowdown Emissions	---	0.0086	---	0.031	---	0.00268	---	0.0072	---	0.56	---	---	---	---	---	---
Startup and Shutdown Emissions	---	0.0045	---	0.0161	---	0.00141	---	0.00375	---	0.29	---	---	---	---	---	---
Pigging Emissions	---	0.0067	---	0.0239	---	0.00209	---	0.0056	---	0.44	---	---	---	---	---	---
Fugitive Emissions																
Component Leak Emissions	0.0014	0.0062	0.0049	0.021	0.00075	0.0033	0.00197	0.0086	0.090	0.39	---	---	---	---	---	---
Haul Road Dust Emissions	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Storage Tanks																
Produced Water Tanks	8.22E-09	3.60E-08	4.86E-09	2.13E-08	9.36E-10	4.10E-09	1.40E-09	6.13E-09	2.27E-10	9.95E-10	---	---	---	---	---	---
Settler Tank	4.74E-04	2.08E-03	1.34E-03	5.86E-03	7.95E-04	3.48E-03	2.04E-03	8.94E-03	2.59E-02	1.14E-01	---	---	---	---	---	---
Condensate Tanks	2.89E-05	1.27E-04	9.13E-05	4.00E-04	6.05E-05	2.65E-04	1.44E-04	6.33E-04	2.22E-03	9.74E-03	---	---	---	---	---	---
Total Facility PTE =	**0.19**	**0.85**	**0.43**	**1.92**	**0.043**	**0.18**	**0.16**	**0.71**	**0.54**	**3.33**	**1.18**	**5.17**	**0.75**	**3.31**	**0.42**	**1.85**

This table was revised on 1/31/2020 to account for hydrocarbon loading controls.

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