

West Virginia Department of Environmental Protection

Harold D. Ward
Cabinet Secretary

Permit to Operate



Pursuant to
Title V
of the Clean Air Act

Issued to:
Cranberry Pipeline Corporation
Staten Run Compressor Station
R30-03900044-2024

Laura M. Crowder
Director, Division of Air Quality

Issued: [Date of issuance] • Effective: [Equals issue date plus two weeks]
Expiration: [5 years after issuance date] • Renewal Application Due: [6 months prior to expiration]

Permit Number: **R30-03900044-2024**
Permittee: **Cranberry Pipeline Corporation**
Facility Name: **Staten Run Compressor Station**
Permittee Mailing Address: **101 McQuiston Drive, Jackson Center, PA 16133**

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

Facility Location:	Montgomery, Kanawha County, West Virginia
Facility Mailing Address:	101 McQuiston Drive, Jackson Center, PA 16133
Telephone Number:	(304) 595-5015
Type of Business Entity:	LLC
Facility Description:	Natural Gas Production Facility
SIC Codes:	1311
UTM Coordinates:	471.779 km Easting • 4226.742 km Northing • Zone 17

Permit Writer: Natalya V. Chertkovsky-Veselova

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

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

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

1.1 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
RBV-1	001-04A	KW International TEG Dehydrator Reboiler	2011	0.75 MMBTU/hr	None
RSV-1 ¹	001-04A/	KW International TEG Still Column	2011	12 mmscf/day	1C
	001-04B	Dehydration Unit Flash Tank			
#1	001-02	Reciprocating Engine; Caterpillar 398-SI; 4 Stroke Rich Burn	1985	412 hp	None
#2	001-03	Reciprocating Engine; Caterpillar 398-SI; 4 Stroke Rich Burn	1985	412 hp	None
#5	001-006	Caterpillar G3306 NA, 4SRB, Compressor Engine	2022 ²	145 bhp	None
T02	T02	Used Oil Storage Tank	N/A	2,150 gallons	None
T03	T03	Pipeline Fluids Storage Tank	2011	2,100 gallons	None
T05	T05	Pipeline Liquids AST	2013	1,050 gallons	None
T06	T06	Pipeline Liquids AST	2013	1,050 gallons	None
T07	T07	TEG Storage Tank	2013	520 gallons	None
TL-1	TL-1	Pipeline Liquids-Truck Loading	1983	229,950 gallons/yr	None
CE-BD	Blowdowns	Compressor Engine Blowdown Venting Emissions	2013	1000 scf/event	None
EG-1	001-G1	Emergency Generator Onan 45kW Ford 300CI	1975	60 hp	None

¹Refer to 5.1.6(a) and (b) for the permitted configuration/control strategy of the Glycol Dehydration Unit.

²Manufacture Date: 03/19/1998

Control Device

Control Device	Emission Point ID	Control Device Description	Design Capacity	Year Installed
1C	001-04B	JATCO No. 5-96 BTEX Eliminator	Control Efficiency - 50% (VOCs & HAPs)	2011

1.2. Active R13, R14, and R19 Permits

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

Permit Number	Date of Issuance
R13-2863C	November 9, 2022

2.0 General Conditions

2.1 Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.39.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

2.2 Acronyms

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

2.3. Permit Expiration and Renewal

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

2.4. Permit Actions

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

2.5. Reopening for Cause

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

2.6. Administrative Permit Amendments

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

2.7. Minor Permit Modifications

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

2.8. Significant Permit Modification

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

2.9. Emissions Trading

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

2.10. Off-Permit Changes

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

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

[45CSR§30-5.9.]

2.11. Operational Flexibility

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

[45CSR§30-5.8]

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

[45CSR§30-5.8.a.]

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

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

[45CSR§30-5.8.c.]

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

[45CSR§30-2.40]

2.12. Reasonably Anticipated Operating Scenarios

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

[45CSR§30-5.1.i.]

2.13. Duty to Comply

- 2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

- 2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
 - d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

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

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

- 2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

[45CSR§30-5.1.f.2.]

2.17. Reserved

2.18. Federally-Enforceable Requirements

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

[45CSR§30-5.2.a.]

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

2.19. Duty to Provide Information

- 2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

- 2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

[45CSR§30-4.2.]

2.21. Permit Shield

- 2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.

[45CSR§30-5.6.a.]

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

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

[45CSR§30-5.6.c.]

2.22. Credible Evidence

- 2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.

[45CSR§30-5.3.e.3.B.]

2.23. Severability

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

[45CSR§30-5.1.e.]

2.24. Property Rights

- 2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.
[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

- 2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.
- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
 - b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
 - c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

[45CSR§30-5.1.d.]

- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.
[45CSR§30-5.1.a.2.]

3.0 Facility-Wide Requirements

3.1 Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person is prohibited except as noted in 45CSR§6-3.1. [45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause or allow any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. [45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them. [40 C.F.R. §61.145(b) and 45CSR34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public. [45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11. [45CSR§11-5.2]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality. [W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

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

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

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

[40 C.F.R. 68]

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

[45CSR13, R13-2863, Condition 4.1.2.]

3.2. Monitoring Requirements

- 3.2.1. N/A

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include

the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

- d. The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 1. The permit or rule evaluated, with the citation number and language.
 2. The result of the test for each permit or rule condition.
 3. A statement of compliance or non-compliance with each permit or rule condition.

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

3.4. Recordkeeping Requirements

- 3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:
 - a. The date, place as defined in this permit and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of the analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A.; 45CSR13, R13-2863, Condition 4.1.1]

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

[45CSR§30-5.1.c.2.B.]

- 3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

[45CSR§30-5.1.c. State-Enforceable only.]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
[45CSR§§30-4.4. and 5.1.c.3.D.]
- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
[45CSR§30-5.1.c.3.E.]
- 3.5.3. Except for the electronic submittal of the annual compliance certification and semi-annual monitoring reports to the DAQ and USEPA as required in 3.5.5 and 3.5.6 below, all notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class or by private carrier with postage prepaid to the address(es), or submitted in electronic format by e-mail as set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

DAQ:

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

US EPA:

Section Chief
U. S. Environmental Protection Agency, Region III
Enforcement and Compliance Assurance Division
Air, RCRA and Toxics Branch (3ED21)
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2852

DAQ Compliance and Enforcement¹:

DEPAirQualityReports@wv.gov

¹For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, Notice of Compliance Status reports, Initial Notifications, etc.

- 3.5.4. **Fees.** The permittee shall pay fees on an annual basis in accordance with 45CSR§30-8.
[45CSR§30-8.]
- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification. The annual certification shall be submitted in electronic format by e-mail to the following addresses:

DAQ:
DEPAirQualityReports@wv.gov

US EPA:
R3_APD_Permits@epa.gov

[45CSR§30-5.3.e.]

- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4. The semi-annual monitoring reports shall be submitted in electronic format by e-mail to the following address:

DAQ:
DEPAirQualityReports@wv.gov

[45CSR§30-5.1.c.3.A.]

- 3.5.7. **Reserved.**

- 3.5.8. **Deviations.**

- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:

1. Reserved.
2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or email. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

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

[45CSR§30-5.1.c.3.B.]

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

[45CSR§30-4.3.h.1.B.]

3.6. Compliance Plan

3.6.1. None.

3.7. Permit Shield

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

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

- a. 40 CFR 60 Subpart Dc – Standards of Performance for Steam Generating Units: The reboiler at this facility is less than 10 mmBtu/hr; hence Subpart Dc is not applicable in accordance with 40CFR§60.40c(a).
- b. 40 CFR 60 Subparts K, Ka – Standards of Performance for Storage Vessels for Petroleum Liquids: All tanks at the facility are below 40,000 gallons in capacity and are not subject as specified in 40CFR§§60.110(a) and 60.110a(a).
- c. 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels: All tanks at the facility are below 75m³ (19,813 gallons) in capacity and are not subject as specified in 40CFR§60.110b(a).
- d. 40 CFR 60 Subpart KKK – Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants: This compressor station is not engaged in the extraction or fractionation of natural gas liquids from field gas, the fractionation of mixed natural gas liquids to natural gas products, or both.
- e. 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines: There are no compression ignition engines at this facility.
- f. 40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines: All engines at the facility were constructed, reconstructed, or modified prior to the June 12, 2006 applicability date listed in 40CFR§60.4230(a)(4).
- g. 40 CFR 60 Subpart OOOO – Standards of Performance for 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: Storage Vessel requirements for pipeline liquids tanks T03, T05, & T06 were found not to be applicable because potential emissions are well below 6 tpy of VOC in accordance with 40CFR§60.5365(e). No other affected sources were identified at this site.
- h. 40 CFR 60 Subpart OOOOa – Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 and on or before December 6, 2022. The GHG and VOC requirements defined by this NSPS are not applicable to this site because there were no affected sources that commenced construction, modification, or

relocation after September 18, 2015 and on or before December 6, 2022 in accordance with 40CFR§60.5365a.

- i. 40 CFR 63 Subpart HHH – National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities: This rule does not apply because this facility is not a natural gas transmission or storage facility transporting or storing natural gas prior to local distribution and is not a major source of HAP emissions, as specified in §63.1270(a).
- j. 40 C.F.R. 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters: This subpart does not apply to the facility since it is not a major source of HAPs as defined in 40CFR§63.7575.
- k. 40 C.F.R. 63 Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources: This subpart does not apply to the facility since the reboiler is fueled by natural gas as defined in 40CFR§63.11195(e).

4.0 BTEX Elimination System [Control Device ID(s): 1C]

4.1. Limitations and Standards

- 4.1.1. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate the JATCO BTEX Elimination System (1C) and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.10.; 45CSR13, R13-2863, Condition 4.1.3.]

4.2. Monitoring Requirements

- 4.2.1. N/A

4.3. Testing Requirements

- 4.3.1. N/A

4.4. Recordkeeping Requirements

- 4.4.1. **Record of Malfunctions of Air Pollution Control Equipment.** For the JATCO BTEX Elimination System (1C), the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- a. The equipment involved.
 - b. Steps taken to minimize emissions during the event.
 - c. The duration of the event.
 - d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

[45CSR§13-5.10.; 45CSR13, R13-2863, Condition 4.1.4.]

4.5. Reporting Requirements

- 4.5.1. N/A

4.6. Compliance Plan

- 4.6.1. None.

5.0 Natural Gas Dehydration Unit [emission point ID(s): 001-04A and 001-04B]

5.1. Limitations and Standards

- 5.1.1. Maximum Throughput Limitation. The maximum wet natural gas throughput to the glycol dehydration unit/still column shall not exceed 12 mmscf/day.
[45CSR13, R13-2863, Condition 5.1.1.]
- 5.1.2. Maximum Design Heat Input. The maximum design heat input for the KW International Glycol Reboiler shall not exceed 0.75 MMBTU/hr.
[45CSR13, R13-2863, Condition 5.1.2.]
- 5.1.3. The quantity of natural gas that shall be consumed in the 0.75 MMBtu/hr Glycol Reboiler (001-04A) shall not exceed 736 cubic feet per hour or 6.45 x 10⁶ cubic feet per year.
[45CSR13, R13-2863, Condition 5.1.3.]
- 5.1.4. Maximum emissions from the Glycol Reboiler (RBV-1) shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
NO_x	0.08	0.33
CO	0.07	0.28

[45CSR13, R13-2863, Condition 5.1.4.]

- 5.1.5. Maximum aggregate emissions from the Glycol Regenerator Still Vent (RSV-1) and the Glycol Dehydration Unit Flash Tank shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)⁽¹⁾	Maximum Annual Emissions (ton/year)⁽¹⁾
VOCs	2.52	11.05
Total HAPs	0.59	2.59
<i>n-Hexane</i>	0.12	0.52
<i>Benzene</i>	0.12	0.51
<i>Toluene</i>	0.22	0.93
<i>Ethylbenzene</i>	0.01	0.03
<i>Xylenes</i>	0.14	0.60

(1) As based on GRI-GLYCalc with a 20% safety factor.

[45CSR13, R13-2863, Condition 5.1.5.]

- 5.1.6. The operation of the glycol dehydration unit shall be in accordance with the following:
- a. The vapors/overheads from the still column shall be routed through a closed vent system to the flame zone of the reboiler at all times when the reboiler is in operation. At those times when the reboiler is not in operation and is unable to combust the vapors/exhaust, the vapors/exhaust shall be routed through the JATCO BTEX Elimination System prior to release from Emission Point 001-04B. Compliance with 5.1.6(a) will authorize the use of a maximum control efficiency of 75% on the uncontrolled emissions originating from the still column;
 - b. The vapors/overheads from the flash tank shall at all times be routed through a closed vent system to the JATCO BTEX Elimination System prior to release from Emission Point 001-04B. Compliance with permit condition 5.1.6(b) will authorize the use of a maximum control efficiency of 50% on the uncontrolled emissions originating from the flash tank;
 - c. The JATCO BTEX Elimination System (1C) shall be operated according to manufacturer's specifications and shall be housed in an enclosed structure in order to prevent the unit from freezing; and
 - d. The reboiler shall only be fired with vapors from the still column and natural gas may be used as supplemental fuel.

[45CSR13, R13-2863, Condition 5.1.6.]

- 5.1.7. The permittee is exempt from the requirements of 40CFR§63.764(d) if the criteria below is met, except that the records of the determination of these criteria must be maintained as required in 40CFR§63.774(d)(1).
- a. The actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram per year (1 ton/yr), as determined by the procedures specified in §63.772(b)(2) of this subpart.
[40CFR§63.764(e)(1)(ii)]

[45CSR34; 45CSR13, R13-2863, Condition 5.1.7.]

- 5.1.8. 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 greater than ten (10) percent opacity based on a six minute block average.
[45CSR§2-3.1]

5.2. Monitoring Requirements

- 5.2.1. In order to show compliance with permit condition 5.1.1., the permittee shall monitor the throughput of wet natural gas fed to the dehydration system on a monthly basis for the glycol dehydration unit (RSV-1).
[45CSR13, R13-2863, Condition 5.2.1.]
- 5.2.2. The permittee shall monitor the throughput of liquid gathered in storage from the condenser on a monthly basis.
[45CSR13, R13-2863, Condition 5.2.2.]

- 5.2.3. As the annual emission limits given in permit condition 5.1.4. are based on operating 8,760 hr/yr at a maximum design heat input capacity of 0.75 MM Btu/hr, there is no limit on the annual hours of operation or fuel usage for the Regeneration Gas Heater RBV-1 (001-04A).
[45CSR13, R13-2863, Condition 5.2.3.]
- 5.2.4. In order to show compliance with permit condition 5.1.6(c), the permittee shall monitor the temperature of the enclosed building in which the JATCO BTEX Elimination System (1C) is housed on a monthly basis.
[45CSR13, R13-2863, Condition 5.2.4.]
- 5.2.5. In order to demonstrate compliance with the benzene exemption provided under permit condition 5.1.7, the following parameters shall be measured at least once monthly, with the exception of wet gas composition, in order to define annual average values or, if monitoring is not practical, some parameters may be assigned default values as listed below.
- a. Natural Gas Flowrate
 - i. Number of days operated per year
 - ii. Monthly throughput (MMscf/month)
 - iii. Annual daily average (MMscf/day), and
 - iv. Maximum design capacity (MMscf/day)
 - b. Absorber temperature and pressure
 - c. Lean glycol circulation rate
 - d. Glycol pump type and maximum design capacity (gpm)
 - e. Flash tank temperature and pressure, if applicable
 - f. Stripping Gas flow rate, if applicable
 - g. Wet gas composition (upstream of the absorber – dehydration column) sampled in accordance with GPA method 2166 and analyzed consistent with GPA extended method 2286 as well as the procedures presented in the GRI-GLYCalc™ Technical Reference User Manual and Handbook V4
 - h. Wet gas water content (lbs H₂O/MMscf)
 - i. Dry gas water content (lbs H₂O/MMscf) at a point directly after exiting the dehydration column and before any additional separation points

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

- a. Dry gas water content can be assumed to be equivalent to pipeline quality at 7 lb H₂O/MMscf
- b. Wet gas water content can be assumed to be saturated
- c. Lean glycol water content if not directly measured may use the default value of 1.5 % water as established by GRI
- d. Lean glycol circulation rate may be estimated using the TEG recirculation ratio of 3 gal TEG / lb H₂O removed.

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

[45CSR34; 45CSR§13-5.10; 40CFR§63.772(b)(2); 45CSR13, R13-2863, Condition 5.2.5.]

- 5.2.6. The permittee shall monitor, once per 24 hour period, the temperature of the BTEX condenser exit gas using a thermocouple with thermal well insert into the center of the gas piping. The thermocouple shall have a minimum acceptable accuracy of ± 2.5 °F. An excursion is defined as a temperature greater than 125 °F. Excursions trigger a system inspection and corrective action.

All manufacturer's recommendations regarding periodic testing/checks for proper installation and operation of the thermocouple shall be followed. Calibration and maintenance of the thermocouple shall be conducted annually in accordance with manufacturer's specifications.

[45CSR§30-5.1.c; 40 C.F.R. §§64.6(c), 64.7(b), 64.7(c), 64.7(d)]

5.2.7. *Proper maintenance.* At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[45CSR§30-5.1.c; 40 C.F.R. §64.7(b)]

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

[45CSR§30-5.1.c; 40 C.F.R. §64.7(c)]

5.2.9. *Response to excursions or exceedances.*

a. Upon detecting an excursion or exceedance, the owner or operation shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

b. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[45CSR§30-5.1.c; 40 C.F.R. §64.7(d)]

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

then necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[45CSR§30-5.1.c; 40 C.F.R. §64.7(e)]

5.2.11. Quality Improvement Plan (QIP)

- a. Based on the results of a determination made under permit condition 5.2.9.b, the Administrator or the Director may require the owner or operator to develop and implement a QIP. If a QIP is required, then it shall be developed, implemented, and modified as required according to 40 C.F.R. §§ 64.8(b) through (e). Refer to permit condition 5.5.1.b.iii for the reporting required when a QIP is implemented.
- b. If during a calendar quarter, five (5) percent or more of the 24 hour readings required under 5.2.6 indicate an excursion, the permittee shall develop and implement a QIP. The Director may waive this QIP requirement upon a demonstration that the cause(s) of the excursions have been corrected, or may require stack tests at any time pursuant to permit condition 3.3.1.

[40 C.F.R. §64.8; 45CSR§30-5.1.c]

5.3. Testing Requirements

- 5.3.1. N/A

5.4. Recordkeeping Requirements

- 5.4.1. The permittee shall maintain a record of the wet natural gas throughput through the glycol dehydration unit/still column to demonstrate compliance with permit condition 5.1.1. Said records shall be maintained for a period of five (5) years on site or in a readily accessible off-site location maintained by the permittee. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

[45CSR13, R13-2863, Condition 5.3.1.]

- 5.4.2. The permittee shall maintain a record of the condensate gathered from the condenser to demonstrate compliance with permit condition 5.2.2. Said records shall be maintained for a period of five (5) years on site or in a readily accessible off-site location maintained by the permittee. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

[45CSR13, R13-2863, Condition 5.3.2.]

- 5.4.3. To demonstrate compliance with permit conditions 5.1.3 and 5.1.4, the permittee shall maintain records of the amount of natural gas consumed in the KW International Glycol Reboiler (001-04A). Said records shall be maintained on site or in a readily accessible off-site location maintained by the permittee for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records

submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

[45CSR13, R13-2863, Condition 5.3.3.]

5.4.4. To demonstrate compliance with permit condition 5.1.6, the permittee shall maintain records of the temperature of the enclosed building in which the JATCO BTEX Elimination System (1C) is housed. Said records shall be maintained on site or in a readily accessible off-site location maintained by the permittee for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

[45CSR13, R13-2863, Condition 5.3.4.]

5.4.5. For the purpose of demonstrating compliance with permit conditions 3.1.9., 5.1.5, and 5.1.6, the permittee shall maintain a record of all potential to emit (PTE) HAP calculations for the entire affected facility. These records shall include the natural gas compressor engines and ancillary equipment.

[45CSR13, R13-2863, Condition 5.3.5.]

5.4.6. An owner or operator of a glycol dehydration unit that meets the exemption criteria in 40CFR§§63.764(e)(1)(i) or 63.764(e)(1)(ii) shall maintain the following records for that glycol dehydration unit:

a. The actual average benzene emissions (in terms of benzene emissions per year) as determined in accordance with §63.772(b)(2).

[45CSR34; 40CFR§63.774(d)(1)(ii)]

5.4.7. Daily records of the temperature of the BTEX condenser exit gas, shall be maintained in accordance with 3.4.2. For each occurrence that the BTEX condenser exit gas temperature is above 125 °F, a record shall be maintained of all corrective actions taken.

[45CSR§30-5.1.c; 40 C.F.R. §64.9(b)]

5.4.8. The permittee shall maintain records documenting periodic testing/checks, calibration, and/or maintenance conducted on the thermocouple. These records shall include the type of testing/checks, calibration, and/or maintenance conducted, along with the date the procedure was performed. Records shall be maintained in accordance with 3.4.2.

[45CSR§30-5.1.c; 40 C.F.R. §64.9(b)]

5.4.9. *General recordkeeping requirements for 40 C.F.R. Part 64 (CAM).* The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 (condition 5.2.11) and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

[40 C.F.R. § 64.9(b); 45CSR§30-5.1.c]

5.5. Reporting Requirements

5.5.1. *General reporting requirements for 40 C.F.R. Part 64 (CAM)*

- a. On and after the date specified in 40 C.F.R. §64.7(a) by which the permittee must use monitoring that meets the requirements of 40 C.F.R. 64, the permittee shall submit monitoring reports to the DAQ in accordance with permit condition 3.5.6.
- b. A report for monitoring under 40 C.F.R. 64 shall include, at a minimum, the information required under permit condition 3.5.8 and the following information, as applicable:
 - i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
 - ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
 - iii. A description of the actions taken to implement a QIP during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 C.F.R. § 64.9(a); 45CSR§30-5.1.c]

5.6. Compliance Plan

- 5.6.1. None.

6.0 Caterpillar G3306 NA Compressor Engine [emission point ID(s): 001-006]

6.1. Limitations and Standards

- 6.1.1. Maximum emissions from the 145 hp natural gas fired reciprocating engine, Caterpillar G3306 NA (#5) shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
NO _x	7.64	33.46
CO	0.58	2.52
VOCs	0.13	0.56
Formaldehyde	0.07	0.31

[45CSR13, R13-2863, Condition 6.1.1.]

- 6.1.2. The emission limitations specified in permit condition 6.1.1 shall apply at all times except during periods of start-up and shut-down provided that the duration of these periods does not exceed 30 minutes per occurrence. The permittee shall operate the engines in a manner consistent with good air pollution control practices for minimizing emissions at all times, including periods of start-up and shut-down. The emissions from start-up and shut-down shall be included in the twelve (12) month rolling total of emissions. The permittee shall comply with all applicable start-up and shut-down requirements in accordance with 40 CFR Part 63, Subpart ZZZZ.

[45CSR13, R13-2863, Condition 6.1.2.]

6.2. Monitoring Requirements

- 6.2.1. N/A

6.3. Testing Requirements

- 6.3.1. N/A

6.4. Recordkeeping Requirements

- 6.4.1. To demonstrate compliance with permit conditions 6.1.1 and 6.1.2, the permittee shall maintain records of the amount of natural gas consumed in the engine and the hours of operation of the engine. Said records shall be maintained on site or in a readily accessible off-site location maintained by the permittee for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

[45CSR13, R13-2863, Condition 6.2.1.]

6.5. Reporting Requirements

6.5.1. N/A

6.6. Compliance Plan

6.6.1. None.

7.0 Engines: 40CFR63, Subpart ZZZZ Requirements [emission point ID(s): 001-02, 001-03, 001-006, and 001-G1]

7.1. Limitations and Standards

7.1.1. What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

- a. If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must- comply with the requirements in Table 2d to this subpart and the operating limitations in Table 2b to this subpart that apply to you.
[45CSR34; 40 C.F.R. §63.6603(a)]
- b. **Table 2d to Subpart ZZZZ of Part 63—Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions**

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

For each . . .	You must meet the following requirement, except during periods of startup . . .	During periods of startup you must . . .
5. Emergency stationary SI RICE; black start stationary SI RICE; non-emergency, non-black start 4SLB stationary RICE >500 HP that operate 24 hours or less per calendar year; non-emergency, non-black start 4SRB stationary RICE >500 HP that operate 24 hours or less per calendar year. ² (001-G1)	<ul style="list-style-type: none"> a. Change oil and filter every 500 hours of operation or annually, whichever comes first;¹; b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. 	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.
10. Non-emergency, non-black start 4SRB stationary RICE ≤500 HP (001-02, 001-03, 001-006)	<ul style="list-style-type: none"> a. Change oil and filter every 1,440 hours of operation or annually, whichever comes first;¹ b. Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary. 	

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

² If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

[45CSR34; 40CFR§63.6625(h); Table 2d of 40CFR63, Subpart ZZZZ]

- c. The permittee shall meet all other applicable requirements given under 40 CFR 63, Subpart ZZZZ. **[45CSR13, R13-2863, Conditions 7.1.1. and 7.1.3. (001-006)]**
- 7.1.2. The permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. **[45CSR34; 40CFR§63.6625(e)]**
- 7.1.3. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. **[45CSR34; 40CFR§63.6625(j)]**
- 7.1.4. The permittee must comply with the following general requirements:
- a. You must be in compliance with the emission limitations, operating limitations, and other requirements in this subpart that apply to you at all times.
 - b. At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
- [45CSR34; 40CFR§63.6605]**
- 7.1.5. The permittee must comply with the General Provisions in Table 8 of 40CFR63, Subpart ZZZZ, except for the following general provisions from 40CFR63, which do not apply: 40CFR§§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h). **[45CSR34; 40CFR§§63.6645(a)(5) and 63.6665]**
- 7.1.6. The permittee must demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to 40CFR63, Subpart ZZZZ that apply to you according to methods specified in Table 6 to 40CFR63, Subpart ZZZZ.

For each . . .	Complying with the requirement to . . .	The permittee must demonstrate continuous compliance by . . .
9. Existing emergency and black start stationary RICE ≤500 HP located at a major source of HAP, existing non-emergency stationary RICE <100 HP located at a major source of HAP, existing emergency and black start stationary RICE located at an area source of HAP, existing non-emergency stationary CI RICE ≤300 HP located at an area source of HAP, existing non-emergency 2SLB stationary RICE located at an area source of HAP, existing non-emergency stationary SI RICE located at an area source of HAP which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, existing non-emergency 4SLB and 4SRB stationary RICE ≤500 HP located at an area source of HAP, existing non-emergency 4SLB and 4SRB stationary RICE >500 HP located at an area source of HAP that operate 24 hours or less per calendar year, and existing non-emergency 4SLB and 4SRB stationary RICE >500 HP located at an area source of HAP that are remote stationary RICE	a. Work or Management practices	i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions

[45CSR34; 40CFR§63.6640(a); Table 6 of 40CFR63, Subpart ZZZZ; 45CSR13, R13-2863, Condition 7.1.2.]

7.1.7. If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.

[45CSR34; 40CFR§63.6625(f)] (001-G1)

7.1.8. If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of 40 C.F.R.§63.6640. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of 40 C.F.R.§63.6640, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of 40 C.F.R. §63.6640, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) You may operate your emergency stationary RICE for the purpose specified in paragraph (f)(2)(i) of 40 C.F.R. §63.6640 for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of 40 C.F.R. §63.6640 counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local

government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

- (3) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph (f)(2) of 40 C.F.R. §63.6640. Except as provided in paragraphs (f)(4)(i) and (ii) of 40 C.F.R. §63.6640, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
 - (i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.
 - (ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
 - (A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
 - (B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - (C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
 - (D) The power is provided only to the facility itself or to support the local transmission and distribution system.
 - (E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

[45CSR34; 40CFR§§63.6640(f), (f)(1), (f)(2), and (f)(4)] (001-G1)

7.2. Monitoring Requirements

7.2.1. N/A

7.3. Testing Requirements

7.3.1. N/A

7.4. Recordkeeping Requirements

7.4.1. The permittee must keep the following records;

- a. The permittee must keep the records required in Table 6 of 40CFR63, Subpart ZZZZ to show continuous compliance with each emission or operating limitation that applies to the permittee.
- b. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's own maintenance plan.
- c. For emergency generator 001-G1, the permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purpose specified in §63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

[45CSR34; 40CFR§§63.6655(d), (e), (f) and (f)(2)]

7.5. Reporting Requirements

7.5.1. The permittee must report each instance in which the permittee did not meet the requirements in Table 8 to 40CFR63, Subpart ZZZZ that apply.

[45CSR34; 40CFR§63.6640(e)]

7.6. Compliance Plan

7.6.1. None.

8.0 Storage Tanks [emission point ID(s): T03, T05, T06]

8.1. Limitations and Standards

- 8.1.1. The maximum aggregate Pipeline Liquids throughput of storage tanks T03, T05, and T06 shall not exceed 230,000 gallons/year and the maximum aggregate annual VOC emissions from all tanks at the facility shall not exceed 0.96 tons/year.
[45CSR13, R13-2863, Condition 8.1.1.]
- 8.1.2. Tank size and material stored shall be limited as specified under Section 1.0 of this permit.
[45CSR13, R13-2863, Condition 8.1.2.]

8.2. Monitoring Requirements

- 8.2.1. None.

8.3. Testing Requirements

- 8.3.1. None.

8.4. Recordkeeping Requirements

- 8.4.1. For the purpose of demonstrating compliance with permit condition 8.1.1, the permittee shall maintain records of the maximum aggregate throughput of the storage tanks (T03, T05, and T06).
[45CSR13, R13-2863, Condition 8.2.1.]
- 8.4.2. All records required under permit condition 8.4.1. shall be maintained on site or in a readily accessible off-site location maintained by the permittee for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.
[45CSR13, R13-2863, Condition 8.2.2.]

8.5. Reporting Requirements

- 8.5.1. N/A

8.6. Compliance Plan

- 8.6.1. None.

9.0 Pipeline Liquids Truck Loadout [emission point ID(s): TL-1]

9.1 Limitations and Standards

9.1.1. The maximum quantity of pipeline liquids that shall be loaded from the facility shall not exceed 229,500 gallons per year. Compliance with this limit shall be demonstrated using a twelve month rolling total. A twelve month rolling total shall mean the sum of the monthly throughput at any given time during the previous twelve consecutive calendar months.

[45CSR13, R13-2863, Condition 9.1.1.]

9.1.2. All trucks shall be loaded using the submerged-fill method. The "submerged-fill method" shall, for the purposes of this permit, mean either bottom-filling or filling by extending the pipe to near the bottom of the tank, and as soon as is practicable, below the level of liquid.

[45CSR13, R13-2863, Condition 9.1.2.]

9.2 Monitoring Requirements

9.2.1. None.

9.3 Testing Requirements

9.3.1. None.

9.4 Recordkeeping Requirements

9.4.1. For the purpose of demonstrating compliance with permit condition 9.1.1, the permittee shall maintain records of the amount of pipeline liquids loaded.

[45CSR13, R13-2863, Condition 9.2.1.]

9.4.2. All records required under permit condition 9.4.1. shall be maintained on site or in a readily accessible off-site location maintained by the permittee for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

[45CSR13, R13-2863, Condition 9.2.2.]

9.5 Reporting Requirements

9.5.1. None.

9.6 Compliance Plan

9.6.1. N/A

10.0 Compressor Blowdowns and Fugitive Emissions [emission point ID(s): Blowdowns]

10.1. Limitations and Standards

10.1.1. The number of compressor blowdowns for Emission Unit #5 shall not exceed 52 per year. Compliance with this annual limitation shall be determined using a twelve (12) month rolling total. A twelve (12) month rolling total shall mean the sum of the events from the previous twelve (12) consecutive calendar months. However, in lieu of the blowdown limit given under permit condition 10.1.1., if the permittee can accurately determine the quantity of gas released during each event, the permittee may show compliance with permit condition 10.1.1. by limiting total annual gas released during blowdowns to less than 52,000 scf.

[45CSR13, R13-2863, Condition 10.1.1.]

10.1.2. The permittee shall install, maintain, and operate all above-ground piping, valves, pumps, etc. that service lines in the transport of potential sources of regulated air pollutants to prevent any substantive fugitive escape of regulated air pollutants. Any above-ground piping, valves, pumps, etc. that shows signs of excess wear and that have a reasonable potential for substantive fugitive emissions of regulated air pollutants shall be replaced, repaired, or removed.

[45CSR13, R13-2863, Condition 10.1.2.]

10.2. Monitoring Requirements

10.2.1. For the purposes of determining compliance with permit conditions 10.1.1. and 10.1.2., the permittee shall monitor and record the monthly and rolling twelve month records of the number of compressor blowdowns at the facility. The information shall include the duration, estimated volume of gas vented, and reason for event.

[45CSR13, R13-2863, Condition 10.2.1.]

10.3. Testing Requirements

10.3.1. None.

10.4. Recordkeeping Requirements

10.4.1. None.

10.5. Reporting Requirements

10.5.1. The permittee shall report all events recorded under permit condition 10.2.1 to the DAQ in writing as soon as practicable but no later than fifteen (15) days after the event.

[45CSR13, R13-2863, Condition 10.3.1.]

10.6. Compliance Plan

10.6.1. None.