

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-08300017-2018**
Application Received: **April 18, 2017**
Plant Identification Number: **03-054-083-00017**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Glady Compressor Station**
Mailing Address: **1700 MacCorkle Avenue SE, Charleston, WV 25314**

Revised: N/A

Physical Location: Glady, Randolph County, West Virginia
UTM Coordinates: 615.52 km Easting • 4,293.19 km Northing • Zone 17
Directions: From US Route 33 East, turn right on Secondary Route 27 at Alpena. Proceed approximately 10 miles to Glady, turn left on Route 22 and travel approximately 1 mile to the station located on the left side of road.

Facility Description

The Glady Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of three (3) 1,320 hp, Ingersoll-Rand 48KVS, 4SLB reciprocating engines, one (1) 325 hp, Waukesha F2895GL, 4SRB reciprocating engine/generator, one (1) 608 hp, Waukesha VGF-H24GLD, 4SLB reciprocating engine/generator, one (1) 312 mmscf/day Barnhart Tech TEG dehydration unit, one (1) 5.74 mmBtu/hr NATCO SVH-3 dehydrator flare, two (2) 15.0 mmBtu/hr NATCO line heaters, two (2) 1.0 mmBtu/hr NATCO SB/18-14 TEG reboilers, and one (1) 1.512 mmBtu/hr Peerless Model # 211A-10-N heating system boiler.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions ¹	2016 Actual Emissions ²
Carbon Monoxide (CO)	163.88	122.6
Nitrogen Oxides (NO _x)	1,128.23	427.6
Particulate Matter (PM _{2.5})	3.51	Unavailable
Particulate Matter (PM ₁₀)	3.51	0.28
Total Particulate Matter (TSP)	3.51	1.47
Sulfur Dioxide (SO ₂)	1.73	0.11
Volatile Organic Compounds (VOC)	33.99	17.9
Hazardous Air Pollutants	Potential Emissions	2016 Actual Emissions
Acetaldehyde	1.50	Unavailable
Benzene	2.18	2.0
Ethylbenzene	0.69	Unavailable
Ethylene Glycol	<0.01	Unavailable
Formaldehyde	8.93	3.47
Hexane	0.52	0.08
Toluene	2.29	2.13
Xylene (Mixed Isomers)	1.04	0.97
Total HAPs	18.86	8.65

- As compared to the 2012 permit, the potential emissions of CO, NO_x, and PM have been revised for this renewal. The changes are based upon (i) using lean burn NO_x emission factors instead of rich burn for engine G1; (ii) prior use of an incorrect CO emission factor for G3; and (iii) utilizing current AP-42 PM emission factors for the compressor engines.*
- Actual emissions are from the State and Local Emissions Inventory System (SLEIS) Summary Report Total Emissions by Source for 2016.*

Title V Program Applicability Basis

This facility has the potential to emit 163.88 tpy of CO, and 1,128.23 tpy of nitrogen oxides. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Columbia Gas Transmission, LLC's Gladys Compressor Station is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2 45CSR6 45CSR10 45CSR11 45CSR13 WV Code § 22-5-4 (a) (14) 45CSR16 45CSR30 45CSR34 40 C.F.R. Part 60, Subpart Dc 40 C.F.R. Part 61 40 C.F.R. Part 63, Subpart ZZZZ 40 C.F.R. Part 82, Subpart F	PM emissions from Indirect Heat Exchangers Open burning prohibited. SO ₂ emissions from Indirect Heat Exchangers Standby plans for emergency episodes. Permits for construction/modification The Secretary can request any pertinent information such as annual emission inventory reporting. NSPS requirements Operating permit requirement. Emission Standards for HAPs Steam generating units NSPS Asbestos inspection and removal RICE MACT Ozone depleting substances
State Only:	45CSR4 45CSR17	No objectionable odors. Control of Fugitive Particulate Matter

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit <i>(if any)</i>
R13-2218C	03/11/2003	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

- I. **45CSR2 – To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.** The applicable requirements for BLR1, BLR2, BLR5, HTR3 and HTR4 have been primarily included in renewal permit section 4.0. Each of the potentially affected emission units are analyzed below for applicability of the rule requirements.

Reboilers

The TEG Dehy Reboilers BLR1 and BLR2 are subject to the 45CSR§2-3.1. opacity standard (condition 4.1.1.), but are exempt from the mass rate limit and other testing and MRR requirements in rule sections 4, 5, 6, 8, and 9 due to their heat input being less than 10 MMBtu/hr in accordance with 45CSR§2-11.1.

Heating System Boiler

The heating system boiler BLR5 is subject to the 45CSR§2-3.1. opacity standard (condition 4.1.1.), but is exempt from the mass rate limit and other testing and MRR requirements due to its heat input being less than 10 MMBtu/hr in accordance with 45CSR§2-11.1.

Line Heaters

The line heaters HTR3 and HTR4 are both subject to opacity and mass rate requirements in 45CSR§§2-3.1. and 4.1.b. The opacity standard has been written as permit condition 4.1.1. The PM mass limit for each is $(15 \text{ MMBtu/hr}) \times (0.09) = 1.35 \text{ lb/hr}$. However, both units are also subject to the underlying NSR permit limit, which for each is 0.21 lb/hr. Therefore, a streamlining note has been added in permit condition 7.1.1. In addition, the natural gas-fired line heaters are exempt from 45CSR§§2-8.1.a. (opacity monitoring and mass rate stack testing) and 8.2. (monitoring plans) in accordance with the exemption in 45CSR§2-8.4.b.

- II. **45CSR6 – Control of Pollution from Combustion of Refuse.** The flare FLLP3 is subject to the mass rate limit and opacity standards in subsections 4.1., 4.3., and 4.4. of this rule. These requirements have been included in the renewal operating permit as further discussed below.

Mass Rate Limit

According to 10/5/2017 technical correspondence, the density of the gas is 0.656 kg/m^3 . This value can be converted to imperial units for the equation in 45CSR§6-4.1. as follows:

$$\text{Density} = (0.656 \text{ kg/m}^3) \times [(0.0254 \text{ m/in}) \times (12 \text{ in/ft})]^3 \times (2.20462 \text{ lb/kg}) = 0.041 \text{ lb/ft}^3$$

The heating value of the gas is $1,020 \text{ Btu/ft}^3$ and the flare design capacity is 5.74 MMBtu/hr ; therefore, the volumetric flow rate is $(5.74 \text{ MMBtu/hr}) / (1,020 \text{ Btu/ft}^3) = 5,628 \text{ ft}^3/\text{hr}$. Multiplying the volumetric flow rate by the density yields $(5,628 \text{ ft}^3/\text{hr}) \times (0.041 \text{ lb/ft}^3) = 231 \text{ lb/hr}$. This weight rate has been used in the equation specified by 45CSR§6-4.1., which results in 0.63 lb/hr of PM and has been included in renewal permit condition 7.1.6. It is expected that combustion of natural gas will not result in significant formation of PM, and therefore compliance with this limit is achieved by combusting natural gas. Moreover, R13-2218C, requirement A.1., limits PM_{10} emissions to 0.02 pph and 0.05 tpy ; therefore, a streamlining note has been added to permit condition 7.1.1.

Opacity Limitations

The 20% opacity limitation in 45CSR§6-4.3. is applicable, but is streamlined by the more stringent standard of no visible emissions in requirement A.3.b. of R13-2218C (Title V permit condition 7.1.3.b.). Streamlining language has been utilized for the Title V condition, and accounts for the applicability of the 40% opacity standard for startups prescribed in 45CSR§6-4.4. in condition 7.1.6.

- III. **45CSR10 – To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.** This rule establishes mass rate and concentration limits for fuel burning units and manufacturing process source operations as defined in the rule. Each of the potentially affected emission units are analyzed below for applicability and non-applicability of the rule requirements.

Line Heaters

The 15 MMBtu/hr line heaters HTR3 and HTR4 are both subject to the mass rate requirements in 45CSR§10- 3.3.f. since they are Type ‘b’ fuel burning units in Priority Classification III that do not qualify for the exemption in 45CSR§10-10.1. for units with a heat input less than 10 MMBtu/hr. As such, the SO₂ limit for each line heater is $(3.2) \times (15 \text{ MMBtu/hr}) = 48 \text{ lb/hr}$. However, both units are also subject to the underlying NSR permit limit, which for each is 0.01 lb/hr. Therefore, a streamlining note has been added in permit condition 7.1.1. Since the line heaters combust only natural gas, they are not subject to the testing and MRR requirements in section 8 of the rule in accordance with 45CSR§10-10.3. HTR3 and HTR4 are not source operations as defined in 45CSR§10-2.19.; therefore, 45CSR§10-4.1. is not applicable.

Non-applicability of Rule to Other Emission Units. There are no applicable 45CSR10 requirements for the emission units listed below. Since the line heaters HTR3 and HTR4 are subject to 45CSR10 requirements, the sources below have not been specifically listed in the permit shield section 3.7.2. The permit shield section is typically used to list rules and regulations that could potentially apply, but for certain reasons do not apply to any emission unit at the facility.

- *Engines.* WVDAQ has determined that 45CSR10 does not apply to gas-fired reciprocating internal combustion engines.
- *Reboilers.* The TEG Dehy Reboilers BLR1 and BLR2 are exempt from the mass rate limit and other testing and MRR requirements in rule sections 3 and 6 through 8 due to their heat input being less than 10 MMBtu/hr in accordance with 45CSR§10-10.1. BLR1 and BLR2 are not source operations as defined in 45CSR§10-2.19.; therefore, 45CSR§10-4.1. is not applicable.
- *Heating System Boiler.* The heating system boiler BLR5 is exempt from the mass rate limit and other testing and MRR requirements in rule sections 3 and 6 through 8 due to its heat input being less than 10 MMBtu/hr in accordance with 45CSR§10-10.1. BLR5 is not a source operation as defined in 45CSR§10-2.19.; therefore, 45CSR§10-4.1. is not applicable.

- IV. **45CSR13, Permit No. R13-2218C.** The requirements of this underlying NSR permit have been incorporated into the renewal operating permit as described in the following table.

R13-2218C	Title V	Discussion
Specific Requirements		
A.1.	7.1.1.	The emission limitations of this requirement have been incorporated into the renewal permit. Rather than splitting the limits on H3 and H4 and writing them in section 4 of the permit, a reference condition has been written in section 4 to the requirements pertaining to HTR3 and HTR4 in condition 7.1.1. The same has been done in section 6 for the limits on G3.
A.2.	7.1.2.	The requirement has been written in the renewal permit.
A.3.	7.1.3.	The requirement has been written in the renewal permit for the flare FLLP3, which is the only control device permitted in R13-2218C. A streamlining note has been added for the visible emissions requirements in condition 7.1.3.b.

R13-2218C	Title V	Discussion
A.4.	7.1.4.	The requirement has been written in the renewal permit section 7 since this is where the R13-2218C requirements are set forth. However, since this is a facility-wide requirement a reference to 7.1.4. has been written in the facility-wide section of the permit as condition 3.1.10.
A.5.	7.1.5.	The requirement has been written in section 7 of the renewal permit since section 6 is only for RICE MACT requirements.
A.6.	7.1.8.	The requirement has been written in the renewal permit. A reference to it has been included as permit condition 4.1.4.
A.7.	7.1.9.	The requirement has been written in the renewal permit. A reference to it has been included as permit condition 4.1.4.
Other Requirements		
B.1.	7.3.1.	The test method provisions for G3, H3, and H4 have been written in the renewal permit.
B.2.	7.3.2.	The test protocol provisions have been written in the renewal permit.
B.3.	7.3.3.	The compliance demonstration methodology has been written in the renewal permit.
B.4.	7.4.1.	The recordkeeping requirements for the flare have been written in the renewal permit.
B.5.	7.4.2.	The recordkeeping for the flare design and operating requirements in condition 7.1.3. has been written in the renewal permit.
B.6.	7.4.3.	The record retention requirement has been written in the renewal permit. Since this requirement applies only to records required by the NSR permit, the language in this first sentence has been modified to clarify this.
B.7.	4.1.1. 4.1.2. 4.1.3.	The requirement has been cited in the permit for the 45CSR2 requirements.
B.8.	7.1.6.	The requirement has been written in the renewal permit. A streamlining note has been added since the no visible emissions requirement in condition 7.1.3.b. is more stringent than the 45CSR6 opacity limitations in condition 7.1.6.
B.9.	7.1.1.	<p>Requirement B.9. sets out sections 4.1. and 5.1. of 45CSR10 as being applicable to emission units at the facility. As demonstrated in the discussion of 45CSR10 above, none of the emission units are source operations; therefore, 45CSR§10-4.1. is not applicable. According to 10/5/2017 technical correspondence, the gas stored and transmitted at the Gladys Compressor Station is all pipeline quality natural gas, which has relatively low sulfur content, typically less than 0.2 grains per 100 cubic feet of gas. Since none of the emission units at the station combust a process gas stream with hydrogen sulfide concentration greater than 50 grains per 100 cubic feet of gas, then 45CSR§10-5.1. is not applicable.</p> <p>However, requirement B.9. states that the pertinent sections of 45CSR10 are not limited to 45CSR§§10-4.1 and 5.1., thereby implying that other sections in 45CSR10 may apply to sources at the station. Since the mass rate limit from 45CSR§10-3.3.f. is applicable to the line heaters HTR3 and HTR4, and condition</p>

R13-2218C	Title V	Discussion
		7.1.1. contains this applicable 45CSR10 requirement, then the underlying requirement B.9. has been included in the citation of authority in condition 7.1.1.
B.10.	None	The applicable 45CSR13 requirements are included in the NSR permit requirements, which have been incorporated into the renewal Title V as specified in this table.
General Requirements		
C1, C2	None	No operating permit conditions are warranted for these general NSR permit terms and conditions.
C3	7.1.7.	The requirement has been incorporated into the renewal permit.
C4	3.3.1.	The requirement has been cited in the renewal permit.
C5 through C10	None	No operating permit conditions are warranted for these general NSR permit terms and conditions.

- V. **45CSR16 – Standards of Performance for New Stationary Sources.** This rule establishes and adopts standards of performance for new stationary sources promulgated by the United States Environmental Protection Agency pursuant to section 111(b) of the federal Clean Air Act, as amended. This rule codifies general procedures and criteria to implement the standards of performance for new stationary sources set forth in 40 CFR Part 60. Therefore, the citation of authority for every requirement from 40 C.F.R. Part 60 will have an accompanying citation of 45CSR16.
- VI. **45CSR17 – To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.** The purpose of this rule is to prevent and control particulate matter air pollution from materials handling, preparation, storage and other sources of fugitive particulate matter. In the renewal application the permittee suggested a new condition setting out the standard in 45CSR§17-3.1. The permittee stated in 11/16/2017 technical correspondence that this requirement was suggested primarily for gravel roadways and parking lots that may have fugitive dust generated from truck traffic onsite. This writer contacted the facility’s DAQ inspector, Mr. Dan Bauerle, who stated that he has never noted any noticeable fugitive particulate matter being generated on at least six visits to the site since approximately 2009. While 45CSR§17-3.1. is an applicable standard, and should be in section 3.1., the requirements in 45CSR§17-3.2. may become required by the Director when a person is found in violation of this rule. Since at the time of writing this 2018 renewal permit the permittee has not been found in violation, and the Director has not required the permittee to perform any requirement in 45CSR§17-3.2., it is unnecessary to include the language of 45CSR§17-3.2. Refer to permit condition 3.1.9.
- VII. **45CSR34 – Emission Standards for Hazardous Air Pollutants.** In the 2012 renewal, State rule 45CSR34 was not cited with the applicable MACT requirements since the facility is an area source of HAPs, and was excluded per 45CSR§34-4.1.d. of the June 16, 2011 version of the rule. However, since the last renewal, 45CSR34 has been revised and Subpart ZZZZ is no longer an exception for rule applicability; therefore, the rule has been cited with all applicable Subpart ZZZZ requirements in the renewal permit.

VIII. **40 C.F.R. 60 Subpart Dc- Standards of Performance for Steam Generating Units** – The line heaters HTR3 and HTR4 remain subject to this regulation, and the following applicable requirements have been retained for the renewal permit in conditions 4.4.1. and 4.4.2., respectively.

- §60.48c(g)(2) - Record and maintain records of the amount of each fuel combusted during each calendar month.
- §60.48c(i) – Maintain records for 2 years.

The reboilers BLR1 and BLR2, and heating system boiler BLR5 are each less than 10 MMBtu/hr heat input; hence, Subpart Dc is not applicable to these sources (cf. §60.40c(a)). BLR4 was also less than 10 MMBtu/hr, but has been removed from service according to technical correspondence received from the permittee on 10/5/2017.

IX. **40 C.F.R. 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.** The facility is an area source (i.e., non-major) of HAPs. All the specific requirements of Subpart ZZZZ were incorporated into the 2012 operating permit. However, this subpart was modified by USEPA during the current operating permit term, and the revisions affect the requirements applicable to the compressor engines 16801, 16802, and 16803. In addition, the 608-hp electric generator engine 168G3 is affected by the revisions. Since these four engines are subject to the same Subpart ZZZZ requirements, their requirements have been incorporated into section 6.0 of the renewal permit as discussed below in section “a.”. The smaller electric generator 168G1 was listed in the current permit with a design capacity of 336-hp. The permittee noted in the application that it should be 325-hp. This change does not affect the applicability of any Subpart ZZZZ requirements, which have been incorporated into section 5.0 of the renewal permit as discussed below in section “b.”

- a. **Remote Stationary RICE – Compressor Engines and 608-hp Electric Generator Engine.** The compressor engines and the 608-hp electric generator engine are subject to the same requirements in Subpart ZZZZ; therefore, they have been discussed and analyzed together in the following paragraphs and Table ZZZZ-1.

Compressor Engines (Em. Unit IDs: 16801, 16802, 16803)

Each engine identified as emission units 16801, 16802, and 16803, drive an integral compressor potentially at 8,760 hours per year; therefore, they are considered non-emergency engines. The units are spark ignition (SI) 4-stroke lean burn (4SLB) RICE each rated at 1,320 hp and all were constructed in 1965. None of the RICE are currently equipped with an air pollution control device. Each engine is an *Existing stationary RICE* since it meets the criteria of §63.6590(a)(1)(iii). The engines do not meet any of the criteria for limited requirements or NSPS requirements in §§63.6590(b) and (c), respectively.

Electric Generator Engine (Em. Unit ID: 168G3)

The engine drives an electric generator and is not an emergency engine. Application Attachment E specifies a maximum operating schedule of 8,760 hr/yr for 168G3, which is due to no electric utility service at the location of the compressor station. This unit is a spark ignition (SI) 4-stroke lean burn (4SLB) engine rated at 608 hp, and was constructed in 1998. The engine is an *Existing stationary RICE* since it meets the criteria of §63.6590(a)(1)(iii). The engine does not meet any of the criteria for limited requirements or NSPS requirements in §§63.6590(b) and (c), respectively.

Remote Stationary RICE Determination

In the suggested permit language (Appendix B in the renewal application), the permittee indicated that these engines (16801, 16802, 16803, and 168G3) are *Remote stationary RICE* as defined in 40 C.F.R. §63.6675. By utilizing Google Earth™ (imagery date 11/19/2013), on 9/14/2017 this writer reviewed the location of the facility, the pipeline that it serves, and the surrounding buildings and determined that the stationary RICE are located on a pipeline segment that meets both criteria in paragraphs (2)(i) and (ii) of the definition of *Remote stationary RICE*. In 10/5/2017 technical correspondence, the permittee provided attachments to assist in confirming exactly where the pipelines are in relation to the houses near the station, which supports the determination that the engines are *Remote stationary RICE*.

As *Remote stationary RICE* the engines are subject to requirements in Table 2d, Item 8, for non-emergency, non-black start 4SLB remote stationary RICE > 500 HP. The requirements are maintenance work practices at a frequency of 2,160 hours of operation or annually, whichever comes first. In addition, §63.6603(f) requires the permittee to evaluate the status of their stationary RICE every 12 months, and to maintain records of the initial and annual evaluation of the status of the affected engine. If an evaluation indicates that the RICE no longer meets the definition of *Remote stationary RICE*, then it must comply with other applicable requirements in Subpart ZZZZ.

The previous operating permit renewal specified requirements for carbon monoxide (CO) that are no longer applicable to the compressor engines due to the revision of Subpart ZZZZ. The version of the regulation (Federal Register / Vol. 75, No. 161, Friday, August 10, 2010) that was current when the 2012 renewal was issued specified no requirements in Table 2d (existing stationary RICE located at area source of HAP emissions) for remote stationary RICE. In the 2012 renewal, the applicable requirement was item 8 for non-emergency, non-black start 4SLB stationary RICE > 500 HP, which limited the concentration of CO in the exhaust or to reduce CO emissions by a specified percentage. The CO limitations, and associated compliance demonstration requirements, have been removed for this renewal permit, and have been replaced by the applicable work practice standards specified by the current version of Subpart ZZZZ (Federal Register / Vol. 78, No. 20, Wednesday, January 30, 2013). This is also the reason there is no longer a plan to install and utilize air pollution control devices (i.e., catalysts) on the engines.

Incorporation of Applicable Requirements into the Title V Permit Renewal

Table ZZZZ-1 below contains an analysis of the applicability of Subpart ZZZZ to the compressor engines (16801, 16802, and 16803) and the 608-hp electric generator engine (168G3) based upon the *Remote stationary RICE* applicability determination and other pertinent design characteristics of the engines.

Table ZZZZ-1

Section	Condition	Discussion
Compliance Date		
§63.6595(a)(1)	6.1.1.	The engines are considered “an existing stationary SI RICE located at an area source of HAP emissions.” Therefore, the compliance date is October 19, 2013.
Emission and Operating Limitations		
§§63.6600 through 63.6602	None	This section is not applicable since the engines are not located at a major source of HAP.
§63.6603(a)	6.1.2.	This section is applicable since the engines are existing stationary RICE located at an area source. In particular, Item #8 in Table 2d to Subpart ZZZZ is applicable.

Section	Condition	Discussion
		<p>DAQ considers the startup requirements in the third column of Table 2d to apply to all engine types/applications in items 1 through 13 of Table 2d, as opposed to being limited to non-emergency, non-black start CI stationary RICE less than 300-hp in the first row/item of Table 2d. DAQ recognizes that in this case, non-startup emission limitations are not applicable; therefore, this phrase has been excluded from the requirement in the third column of the table in the permit condition. Moreover, the fact that the third column in Table 2d mentions emission limitations while the engine described in row/item 1 of Table 2d is not subject to emission limitations, implies that EPA intends for the startup requirement to apply to all engines specified in Table 2d.</p> <p>The footnote to the table has been revised to exclude the reference to §63.6625(i) since it pertains to compression ignition (CI) engines.</p>
§63.6603(b)	None	This section is not applicable since the engines are not CI RICE.
§63.6603(c)	None	This section is not applicable since the engines are not CI RICE located on an offshore vessel.
§63.6603(d)	None	This section is not applicable since the engines are not CI RICE.
§63.6603(e)	None	This section is not applicable since the engines are not CI RICE.
§63.6603(f)	6.4.1.	This section is applicable since the engines currently meet the definition of <i>Remote stationary RICE</i> in §63.6675. Specifically, §63.6603(f) requires the permittee to evaluate the remote status of their stationary RICE every 12 months, and to maintain records of the initial and annual evaluation of the status of the affected engines.
§63.6604	None	This section is not applicable since the engines are spark ignition (SI) type.
General Compliance Requirements		
§§63.6605(a) and (b)	6.1.3.	§63.6605(a) is applicable since the engines are subject to “operating limitations, and other requirements” in Subpart ZZZZ. Non-applicable language regarding emission limitations has been excluded from the condition. The general duty requirement in §63.6605(b) is applicable.
Testing and Initial Compliance Requirements		
§63.6610	None	This section is not applicable since the engines are not subject to Subpart ZZZZ emission limitations and are not located at a major source of HAP.
§63.6611	None	This section is not applicable since the engines are not subject to Subpart ZZZZ emission limitations, are existing, and are not located at a major source of HAP.

Section	Condition	Discussion
§63.6612	None	While the engines are existing stationary RICE located at an area source of HAP emissions, none of the requirements in Tables 4 and 5 as referenced by §63.6612(a) are applicable to the engines. Furthermore, no Subpart ZZZZ performance testing is required; therefore, §63.6612(b) is not applicable.
§63.6615	None	This section is not applicable since the engines are not subject to Subpart ZZZZ emission limitations and associated performance testing.
§63.6620	None	This section is not applicable since the engines are not subject to Subpart ZZZZ emission limitations and associated performance testing.
§63.6625(a)	None	This section is not applicable since the engines are not subject to the requirements in Table 5 to Subpart ZZZZ and therefore has not elected to utilize a CEMS.
§63.6625(b)	None	This section is not applicable since the engines are not subject to the requirements in Table 5 to Subpart ZZZZ and therefore is not required to utilize a CPMS.
§63.6625(c)	None	This section is not applicable since the engines are existing and also do not fire landfill gas or digester gas.
§63.6625(d)	None	This section is not applicable since the engines are greater than 500-hp and are also located at an area source.
§63.6625(e)	None	The engines do not meet any of the criteria for each of the types of engines specified in §§63.6625(e)(1) through (10); therefore, this section is not applicable.
§63.6625(f)	None	The engines are not emergency type; therefore, this section does not apply.
§63.6625(g)	None	This section is not applicable since the engines are SI RICE.
§63.6625(h)	6.1.2.	This section is applicable to the engines since they are existing. This requirement is the same as that in the third column in Table 2d discussed above under §63.6603(a). Therefore, §63.6625(h) has been added to the citation of authority for that permit condition.
§63.6625(i)	None	This section is not applicable since the engines are not CI RICE.
§63.6625(j)	6.2.1.	<p>The engines are subject to the management practices in item 8 of Table 2d to Subpart ZZZZ. In the first statement of §63.6625(j), only items 5, 6, 7, 9, and 11 of Table 2d are listed. It would seem that the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d is not applicable. However, this writer has included the optional oil analysis program as being applicable for the following compelling reasons:</p> <ol style="list-style-type: none"> 1. In Table 2d, Item 8, the requirement to change the oil and filter every 2,160 hours of operation or annually is followed by the footnote that provides

Section	Condition	Discussion
		<p>for the optional oil analysis program in §63.6625(j). This footnote applies to all Table 2d requirements to change the oil and filter at a specified frequency.</p> <p>2. In the USEPA Fact Sheet¹ entitled “May 22, 2012 – Fact Sheet: Summary of Proposed Changes”, under Emission Limits and Monitoring, reads that this rulemaking will be “[r]eplacing emission limits with management practices for existing stationary four-stroke SI engines above 500 horsepower (HP) that are area sources of HAP where the engines are remote from human activity. The management practices include schedules for when to inspect and replace the engine oil and filter, spark plugs, hoses and belts.”</p> <p>3. In the USEPA Fact Sheet entitled “January 14, 2013 – Fact Sheet: Overview of the Final Amendments to the Emission Standards for Reciprocating Internal Combustion Engines”, under Amendments, the third bullet statement reads that “existing area source stationary SI 4-stroke engines above 500 HP that are not located in populated areas are subject to management practices”.</p> <p>It appears to be an oversight that item 8 in Table 2d was not added to the language in §63.6625(j) when the substantive requirement in Table 2d was changed from the CO limitation/reduction to management practices. Based upon the available sources cited above, it seems that it was USEPA’s intent to make the remote engines at area sources subject to management practices, which includes the optional oil analysis program; therefore, it has been included in the permit.</p>
§63.6630(a)	None	This section is not applicable since the engines are not subject to Subpart ZZZZ emission limitations and associated Table 5 requirements.
§63.6630(b)	None	This section is not applicable since the engines are not subject to Subpart ZZZZ emission limitations and associated performance testing.
§63.6630(c)	None	The NOCS requirement has been fulfilled and there are no ongoing requirements for the NOCS; therefore, no permit condition is warranted for this section.
§63.6630(d)	None	This section is not applicable since the engines are not four-stroke rich burn (4SRB).

¹ Fact Sheets for 40 C.F.R. 63 Subpart ZZZZ are located at <https://www.epa.gov/stationary-engines/fact-sheets-neshap-reciprocating-internal-combustion-engines> and were accessed by the writer on September 20, 2017.

Section	Condition	Discussion
§63.6630(e)	None	This section is not applicable since the engines are considered <i>Remote stationary RICE</i> at the time of issuance of this renewal operating permit.
Continuous Compliance Demonstration		
§§63.6635(a) through (c)	None	This section is not applicable since the engines are not subject to Subpart ZZZZ emission limitations and associated monitoring requirements.
§63.6640(a)	6.1.4.	Since the engines are subject to requirements of Table 2d (Item 8) of Subpart ZZZZ, this section requires continuous compliance with those requirements. This section refers to any applicable methods in Table 6 to Subpart ZZZZ. In Table 6, the requirements of Item 9 are applicable to the engines, and are therefore written as a permit condition.
§63.6640(b)	6.5.1.	This applicable requirement requires the permittee to report deviations from the applicable requirements of Table 2d to Subpart ZZZZ. Non-applicable language in the regulation has been excluded in this permit condition.
§63.6640(c)	None	This section is not applicable since the engines are considered <i>Remote stationary RICE</i> at the time of issuance of this renewal operating permit.
§63.6640(d)	None	This section is not applicable since the engines are not new, reconstructed, or rebuilt.
§63.6640(e)	6.5.2.	Since the engines do not meet any of the exemption criteria in this section, it is applicable, and a condition is written which will IBR Table 8 to Subpart ZZZZ.
§63.6640(f)	None	This section does not apply since the engines are non-emergency RICE.
Notifications		
§63.6645(a)	None	Since the engines meet the exemption criteria (i.e., an existing stationary RICE that is not subject to any numerical emission standards) of §63.6645(a)(5) the notifications under §63.6645(a) are not applicable.
§63.6645(b)	None	This section is not applicable since the engines are not located at a major source of HAP.
§63.6645(c)	None	This section is not applicable since the engine is existing and is not located at a major source of HAP.
§63.6645(d)	None	This section is not applicable since the engines are greater than 500 HP and are also not located at a major source of HAP.
§63.6645(e)	None	This section is not applicable since the engines are existing and located at an area source.
§63.6645(f)	None	This section is not applicable since the engines do not meet the criteria of §63.6590(b).
§63.6645(g)	None	This section is not applicable since the engines are not subject to Subpart ZZZZ emission limitations and associated performance testing.

Section	Condition	Discussion
§63.6645(h)	None	This section is not applicable since the engines are not subject to Subpart ZZZZ emission limitations, performance testing, and associated requirements in Tables 4 and 5 of Subpart ZZZZ.
Reporting		
§63.6650(a)	None	This section requires compliance with any applicable reports specified in the items in Table 7 to Subpart ZZZZ. None of the reports (including Compliance reports) in Table 7 are applicable. Item 3 applies to engines that are not remote. Since the engines in this case are remote, item 3 does not apply. No permit condition is warranted from this section of Subpart ZZZZ.
§63.6650(b)	None	Since the reporting requirements in Table 7 to Subpart ZZZZ are not applicable, this section does not apply to the engines.
§63.6650(c)	None	This section specifies the content of Compliance reports. However, since Compliance reports required by Table 7 are not applicable, this section is not applicable.
§63.6650(d)	None	This section specifies additional content of Compliance reports. However, since Compliance reports required by Table 7 are not applicable, this section is not applicable.
§63.6650(e)	None	This section is not applicable since the engines are not subject to Subpart ZZZZ emission or operating limitations and are not required to utilize a CMS.
§63.6650(f)	6.5.3.	This section is an applicable requirement to report deviations (as defined in 40 C.F.R. §63.6675). This requirement is modified for coherence in the renewal permit.
§63.6650(g)	None	This section is not applicable since the engines are existing and do not fire landfill gas or digester gas.
§63.6650(h)	None	This section is not applicable since the engines are not emergency type.
Recordkeeping		
§63.6655(a)	None	This section applies to engines subject to Subpart ZZZZ emission and operating limitations. Since the engines are not subject to these limitations, this section is not applicable.
§63.6655(b)	None	This section is not applicable since the engines are not required by Subpart ZZZZ to utilize CEMS or CPMS.
§63.6655(c)	None	This section is not applicable since the engines are existing and do not fire landfill gas or digester gas.
§63.6655(d)	6.4.2.	This section is the recordkeeping requirement that corresponds to the continuous compliance demonstration specified by §63.6640(a). Rather than writing the same requirements again from Table 6, this requirement will reference permit condition 6.1.4.
§63.6655(e)	6.4.3.	This section is applicable since the engines meet the criteria in §63.6655(e)(3).

Section	Condition	Discussion
§63.6655(f)	None	This section is not applicable since the engines meet none of the criteria in §§63.6655(f)(1) and (2). That is, the engines are not emergency type.
§§63.6660(a), (b), and (c)	6.4.4.	These applicable requirements have been written in the permit.
General Provisions		
§63.6665	6.1.5.	The engines do not meet any of the exemption criteria of this section. A condition has been written that will IBR the applicable requirements of Table 8 to Subpart ZZZZ.

- b. **Engine 168G1.** This unit is a spark ignition (SI) 4-stroke rich burn (4SRB) non-emergency engine rated at 325-hp, and was constructed in 1992. The engine is an *Existing stationary RICE* since it meets the criteria of §63.6590(a)(1)(iii). The engine does not meet any of the criteria for limited requirements or NSPS requirements in §§63.6590(b) and (c), respectively. The engine has been discussed and analyzed in the following Table ZZZZ-2.

Table ZZZZ-2

Section	Condition	Discussion
Compliance Date		
§63.6595(a)(1)	5.1.1.	The engine is considered “an existing stationary SI RICE located at an area source of HAP emissions.” Therefore, the compliance date is October 19, 2013.
Emission and Operating Limitations		
§63.6600	None	This section is not applicable since the engine is rated less than 500 brake HP (bhp) and is located at an area source.
§63.6601	None	This section is not applicable since the engine is not 4SLB and is not located at a major source of HAP.
§63.6602	None	This section is not applicable since the engine is not located at a major source of HAP.
§63.6603(a)	5.1.2.	This section is applicable since the engine is located at an area source. In particular, only Item 10 in Table 2d to Subpart ZZZZ is applicable. None of the requirements in Table 2b of Subpart ZZZZ are applicable. Note: The applicable requirements of Table 2d, Item 10, are considered “Work Practice Requirements”. These are different from emission limitations and operating limitations described elsewhere in the regulation. Emission limitations are items such as reduction of carbon monoxide emissions and limiting the concentration of formaldehyde in the exhaust stream (cf. non-applicable Table 2a of the subpart). Operating limitations are items such as maintaining pressure drop across a catalyst, and maintaining exhaust gas temperature in a specified range (cf. non-applicable Table 2b of the subpart). However, work practices pertain to frequencies of oil changes, inspections of

Section	Condition	Discussion
		spark plugs and belts and hoses. The notes following Table 2d in the regulation affirm that these requirements are management practice requirements. Based upon these distinctions, all associated MRR requirements in the regulation that pertain to emission limits and operating limits will not be included in the permit since they are not applicable to the engine.
§63.6603(b)	None	This section is not applicable since the engine is not a CI RICE.
§63.6603(c)	None	This section is not applicable since the engine is not a CI RICE located on an offshore vessel.
§63.6603(d)	None	This section is not applicable since the engine is not a CI RICE.
§63.6603(e)	None	This section is not applicable since the engine is not a CI RICE.
§63.6603(f)	None	This section pertaining to <i>Remote stationary RICE</i> status evaluation is not applicable since the engine is less than 500-hp.
§63.6604	None	This section is not applicable since the engine is spark ignition.
General Compliance Requirements		
§§63.6605(a) and (b)	5.1.3.	§63.6605(a) is applicable since the engines are subject to “operating limitations, and other requirements” in Subpart ZZZZ. Non-applicable language regarding emission limitations has been excluded from the condition. The general duty requirement in §63.6605(b) is applicable.
Testing and Initial Compliance Requirements		
§63.6610	None	This section is not applicable since the engine is rated less than 500 brake HP and is located at an area source.
§63.6611	None	This section is not applicable since the engine is existing.
§63.6612	None	<p>§63.6612(a) is applicable since the engine is an existing stationary RICE at an area source. However, no specific requirements in §63.6612 apply to the engine, as is demonstrated below.</p> <p>§63.6612(a) refers to requirements in Tables 4 and 5 to Subpart ZZZZ. Item #2 in Table 4 is applicable to 4SRB stationary RICE that are complying with the requirement to reduce formaldehyde emissions. Similarly, Item #3 in Table 4 applies to any stationary RICE complying with the requirement to limit CO or formaldehyde in the exhaust stream. However, the engine is not subject to any Subpart ZZZZ requirement to reduce CO or formaldehyde emissions (as discussed above under Emission and Operating Limitations); therefore, testing under §63.6612(a) does not apply.</p>

Section	Condition	Discussion
		§63.6612(b) applies in the case when testing has already been performed. This requirement is not applicable to the engine.
§63.6615	None	This section is not applicable since the engine is not subject to emission limitations and operating limitations under Subpart ZZZZ.
§§63.6620(a) through (i)	None	These sections are not applicable since the engine is not subject to emission limitations and operating limitations under Subpart ZZZZ.
§63.6625(a)	None	This section is not applicable since there is no CEMS required under Subpart ZZZZ for the engine.
§63.6625(b)	None	This section is not applicable since there is no CPMS required under Subpart ZZZZ for the engine.
§63.6625(c)	None	This section is not applicable since the engine does not fire landfill gas or digester gas.
§63.6625(d)	None	This section is not applicable since the engine is an existing 4SRB RICE at an area source.
§63.6625(e)	5.1.4.	The engine meets the criteria of §63.6625(e)(8), and is therefore required to comply with this section. The language of both §63.6625(e) and §63.6625(e)(8) have been combined for the permit condition.
§63.6625(f)	None	This section is not applicable since the engine is non-emergency type.
§63.6625(g)	None	This section is not applicable since the engine is not a CI RICE.
§63.6625(h)	5.1.2.	This section is applicable to the engine since it is existing. This requirement is the same as that in the third column in Table 2d discussed above under §63.6603(a). Therefore, §63.6625(h) has been added to the citation of authority for that permit condition.
§63.6625(i)	None	This section is not applicable since the engine is not a CI RICE.
§63.6625(j)	5.2.1.	The oil analysis program is an option mentioned in footnote 1 to Table 2d of Subpart ZZZZ for the applicable work practice standard. Although applicable item 10 of Table 2d is not listed in the first statement in §63.6625(j), it has been determined that the optional oil analysis program is applicable for the reasons discussed in Table ZZZZ-1 above for this rule section.
§63.6630(a)	None	This section is not applicable since the engine is not subject to Subpart ZZZZ emission limitations and associated Table 5 requirements.
§63.6630(b)	None	This section is not applicable since the engine is not subject to Subpart ZZZZ emission limitations and associated performance testing.
§63.6630(c)	None	The NOCS requirement has been fulfilled and there are no ongoing requirements for the NOCS; therefore, no permit condition is warranted for this section.

Section	Condition	Discussion
§63.6630(d)	None	Though the engine is four-stroke rich burn (4SRB), it is not subject to a Subpart ZZZZ requirement to reduce formaldehyde emissions; therefore, this section is not applicable.
§63.6630(e)	None	This section is not applicable since the engine is less than 500-hp.
Continuous Compliance Demonstration		
§§63.6635(a) through (c)	None	§63.6635(a) is not applicable since the engine is not subject to emission and operating limitations from Subpart ZZZZ. §§63.6635(b) and (c) are not applicable since the engine is not subject to any continuous monitoring under Subpart ZZZZ.
§63.6640(a)	5.1.5.	Since the engines are subject to requirements of Table 2d (Item 10) of Subpart ZZZZ, this section requires continuous compliance with those requirements. This section refers to any applicable methods in Table 6 to Subpart ZZZZ. In Table 6, the requirements of Item 9 are applicable to the engine, and are therefore written as a permit condition.
§63.6640(b)	5.5.1.	This applicable requirement requires the permittee to report deviations from the applicable requirements of Table 2d to Subpart ZZZZ. Non-applicable language in the regulation has been excluded in this permit condition.
§63.6640(c)	None	This section is not applicable since the engine is less than 500-hp.
§63.6640(d)	None	This section is not applicable since the engine is existing.
§63.6640(e)	5.5.2.	Since the engines do not meet any of the exemption criteria in this section, it is applicable, and a condition is written which will IBR Table 8 of Subpart ZZZZ.
§63.6640(f)	None	This section does not apply to the engine since it is a non-emergency stationary RICE.
Notifications		
§63.6645(a)	None	Since the engines meet the exemption criteria (i.e., an existing stationary RICE that is not subject to any numerical emission standards) of §63.6645(a)(5) the notifications under §63.6645(a) are not applicable.
§63.6645(b)	None	This section is not applicable since the engine is rated less than 500 brake HP and is located at an area source of HAP.
§63.6645(c)	None	This section is not applicable since the engine is existing and rated less than 500 brake HP.
§63.6645(d)	None	This section is not applicable since an initial notification is not required. Requirements for initial notification are in §63.9(b), which are not applicable.
§63.6645(e)	None	This section is not applicable since the engine is existing and is located at an area source.

Section	Condition	Discussion
§63.6645(f)	None	This section is not applicable since an initial notification is not required.
§§63.6645(g) and (h)	None	These sections are not applicable to the engine since performance tests under Subpart ZZZZ are not required.
Reporting		
§63.6650(a)	None	This section is not applicable to the engine since it does not meet any of the criteria in Table 7 to Subpart ZZZZ.
§63.6650(b)	None	Since the reporting requirements in Table 7 to Subpart ZZZZ are not applicable, this section does not apply to the engine.
§63.6650(c)	None	This section specifies the content of Compliance reports. However, since Compliance reports required by Table 7 are not applicable, this section is not applicable.
§63.6650(d)	None	This section specifies additional content of Compliance reports. However, since Compliance reports required by Table 7 are not applicable, this section is not applicable.
§63.6650(e)	None	This section is not applicable since the engines are not subject to Subpart ZZZZ emission or operating limitations and are not required to utilize a CMS.
§63.6650(f)	5.5.3.	This section is an applicable requirement to report deviations (as defined in 40 C.F.R. §63.6675). This requirement is modified for coherence in the renewal permit.
§63.6650(g)	None	This section is not applicable since the engines are existing and do not fire landfill gas or digester gas.
§63.6650(h)	None	This section is not applicable since the engine is not emergency type.
Recordkeeping		
§63.6655(a)	None	This section does not apply since the engine is not subject to emission and operating limitations.
§63.6655(b)	None	This section does not apply since neither CEMS nor CPMS are employed for the engine.
§63.6655(c)	None	This section is not applicable since the engine is existing and does not fire landfill gas or digester gas.
§63.6655(d)	5.4.1.	This section is the recordkeeping requirement that corresponds to the continuous compliance demonstration specified by §63.6640(a). Rather than writing the same requirements again from Table 6, this requirement will reference permit condition 5.1.5.
§63.6655(e)	5.4.2.	This section requires demonstration of continuous compliance using recordkeeping of the information required by §63.6625(e) and §63.6625(e)(3). The engine is existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to Subpart ZZZZ; therefore, it meets the criteria of §63.6655(e)(3). Hence, this recordkeeping requirement has been

Section	Condition	Discussion
		written in the permit. The regulation language “any of the following stationary RICE” in the last sentence has been replaced with the applicable language “an existing stationary RICE located at an area source of HAP emissions subject to the management practices in Table 2d to 40 C.F.R. 63 Subpart ZZZZ.”
§63.6655(f)	None	This section is non-applicable since the engine is non-emergency type.
§§63.6660(a), (b), and (c)	5.4.3.	These applicable requirements have been written in the permit.
General Provisions		
§63.6665	5.1.6.	The engine does not meet any of the exemption criteria of this section. A condition has been written that will IBR the applicable requirements of Table 8 to Subpart ZZZZ.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. **45CSR21 – To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds.** This facility is not located in one of the affected counties.
- b. **45CSR27 – To Prevent and Control the Emissions of Toxic Air Pollutants.** Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”
- c. **40 C.F.R. 60 Subparts K and Ka- Standards of Performance for Storage Vessels for Petroleum Liquids.** All tanks at Gladys station are below 40,000 gallons in capacity. Since the applicability criteria in §§60.110(a) and 60.110a(a) are not met, the regulations are not applicable.
- d. **40 C.F.R. 60 Subpart Kb—Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.** All tanks (except Tank A21) at Gladys station are less than 75 m³ in capacity. Since the vessels do not meet applicability criterion at §60.110b(a), the regulation does not apply to these tanks. The Title V permit R30-08300017-2012 describes Tank A25 as being 30,000-gal capacity and subject to the NSPS recordkeeping requirements. However, in 10/5/2017 technical correspondence, the permittee confirmed that Tank A25 is a 10,000-gal methanol tank, and is not subject to the regulation due to its capacity. The permittee confirmed in the correspondence that there are no 30,000-gal tanks other than A21. Tank A21 has a volume between 75 m³ and 150 m³, and according to the renewal application has a maximum true vapor pressure less than 3.5 kPa. As such, it meets the second set of criteria in §60.110b(b), which are excepted from applicability in §60.110b(a). The recordkeeping that was in the 2012 Title V permit was based upon §60.116b(b). However, this was incorrectly applied to the tanks as §60.116b(b) refers only to storage vessels specified in §60.110b(a). Since Tank A21 is not specified in §60.110b(a), but rather is an exception under §60.110b(b), then the recordkeeping in §60.116b(b) is not applicable to Tank A21 and has not been retained in this renewal permit.

- e. **40 C.F.R. 60Subpart KKK - *Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant.*** Gladys 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.
- f. **40 C.F.R. 60Subpart IIII - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.*** Gladys Compressor Station does not have any compression ignition internal combustion engines; therefore, it does not meet the applicability criteria in 40 C.F.R. §60.4200(a).
- g. **40 C.F.R. 60Subpart JJJJ - *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.*** All engines at the Gladys Compressor Station were constructed, reconstructed, or modified prior to the June 12, 2006 applicability date listed in 40 C.F.R. §§60.4230(a)(4) and (5).
- h. **40 C.F.R. 60Subpart 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.*** The Storage Vessel requirements defined for transmission sources are not applicable to this site because all vessels were constructed, commenced construction, prior to August 23, 2011 as stated in accordance with 40 C.F.R. §60.5365(e). No other affected sources were identified at this site due to not commencing construction, modification, or reconstruction after August 23, 2011, and on or before September 18, 2015.
- i. **40 C.F.R. 60Subpart OOOOa - *Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015.*** Construction commenced for all potentially affected sources at the site prior to September 18, 2015. Therefore, the GHG and VOC requirements defined by this NSPS are not applicable to this site since none of the sources meet the applicability criteria defined in 40 C.F.R. §60.5365a.
- j. **40 C.F.R. 63Subpart HH – *National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.*** This subpart applies to production facilities according to 40 C.F.R. §63.760. Since Gladys Compressor Station is a transmission facility, this subpart is not applicable.
- k. **40 C.F.R. 63Subpart HHH – *National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities.*** According to 40 C.F.R. §63.1270(a), this subpart applies to owners and operators of natural gas transmission and storage facilities that are major sources of hazardous air pollutants (HAP) emissions as defined in §63.1271. Since Gladys Compressor Station is not a major source of HAP, this subpart is not applicable.
- l. **40 C.F.R. 63Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.*** According to 40 C.F.R. §63.7485, this subpart applies to a boiler or process heater as defined in §63.7575 that is located at, or is part of, a major source of HAP. Since Gladys Compressor Station is not a major source of HAP, this subpart is not applicable.
- m. **40 C.F.R. 63Subpart JJJJJ – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.*** According to 40 C.F.R. §63.11193, this subpart applies to a boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195. Since the boilers at Gladys Compressor Station combust only natural gas, then they meet the exemption for a gas-fired boiler in §63.11195(e). Consequently, this subpart is not applicable.

- n. **40 C.F.R. Part 64 – Compliance Assurance Monitoring.** The TEG Dehydrator is subject to a pre-control major VOC emission limitation of 8.33 tpy and utilizes a flare operated in accordance with §60.18 (condition 7.1.3.) to meet this limit. However, the 2012 operating permit specifies a continuous compliance determination method, which is to monitor and record the presence of a pilot flame (condition 7.4.1.). Therefore, in accordance with 40 C.F.R. §64.2(b)(1)(vi), CAM is not applicable to this source. The remaining equipment at the facility do not utilize add on controls; therefore, in accordance with 40 C.F.R. §64.2(a)(2), CAM is not applicable to these sources.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: January 22, 2018
Ending Date: February 21, 2018

Point of Contact

All written comments should be addressed to the following individual and office:

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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

No comments were received from either the public or U.S. EPA.