

# Fact Sheet



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

Permit Number: **R30-05100125-2019**  
Application Received: **November 5, 2018**  
Plant Identification Number: **03-054-05100125**  
Permittee: **MarkWest Liberty Midstream & Resources, L.L.C.**  
Facility Name: **Majorsville Gas Plant**  
Mailing Address: **1515 Arapahoe Street, Denver, CO 80202-2137**

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Physical Location:	Dallas, Marshall County, West Virginia
UTM Coordinates:	540.95 km Easting • 4,423.83 km Northing • Zone 17
Directions:	From Dallas, head south on Dallas Pike Road toward Dallas Street. Turn right onto Number 2 Ridge Road (1.4 mi), turn left onto Warton Hill Road (341 ft), take the first right to stay on Warton Hill Road (2.6 mi), turn right onto Calis Majorsville Road (0.2 mi), destination is on the right.

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### Facility Description

The permittee owns and operates the Majorsville Gas Plant. The facility has a capacity of 1,500 million standard cubic feet per day (mmscfd) of wet natural gas. The plant is used as a gathering station for gas wells throughout southwest Pennsylvania and West Virginia. Upon entering the plant, the gas is sent through a molecular sieve which is designed to remove liquids from the gas stream. Heaters are used to regenerate the molecular sieve on a regular basis to remove the water and hydrocarbons. After the molecular sieve, the gas will be cooled through a cryogenic plant with mechanical refrigeration which serves to remove propane and heavier hydrocarbons in the gas stream. The natural gas liquids from the new plant then pass through a stabilizer to remove any carryover methane and ethane in the liquid stream. The remaining gas stream (mostly methane and ethane) passes through the de-ethanizers, so that ethane can be separated and recovered from the gas stream. The ethane is then transferred via pipeline to market. The remaining natural gas will pass through the existing compressor engines or one of the electric driven compressors prior to entering the downstream pipeline to market. Electric pumps are located on site to transfer the recovered liquids to another facility for disposal or further processing.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions <sup>1</sup></b>	<b>2018 Actual Emissions <sup>2</sup></b>
Carbon Monoxide (CO)	117.93	98.86
Nitrogen Oxides (NO <sub>x</sub> )	116.78	101.1
Particulate Matter (PM <sub>2.5</sub> )	15.79	13.88
Particulate Matter (PM <sub>10</sub> )	15.79	13.88
Total Particulate Matter (TSP)	15.79	13.88
Sulfur Dioxide (SO <sub>2</sub> )	2.08	1.15
Volatile Organic Compounds (VOC)	88.23	15.16
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions <sup>1</sup></b>	<b>2018 Actual Emissions <sup>2</sup></b>
Formaldehyde	5.63	2.41
n-Hexane	3.42	2.97
Benzene	0.10	0.02
Ethyl Benzene	0.01	< 0.01
Toluene	0.09	0.02
Xylenes	0.04	0.01
Total HAPs	13.24	5.70

<sup>1</sup> Except for particulate matter and the speciated HAPs other than formaldehyde, the potential emissions are from the Engineering Evaluation for permit R13-2818H. The values in the Engineering Evaluation are greater than those provided in the Title V permit application.

<sup>2</sup> Except for Toluene, actual emissions are from the State and Local Emissions Inventory System (SLEIS), Summary Report Total Emissions by Source, and represent emissions from January 1, 2018 through December 31, 2018. According to 5/24/2019 technical correspondence from the permittee, toluene emissions reported in the 2018 SLEIS report were off by a factor of ten for the gas-fired engines. The correct actual emissions of toluene are provided in the table above.

### Title V Program Applicability Basis

This facility has the potential to emit 117.62 tpy of CO and 116.69 tpy of NO<sub>x</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, MarkWest Liberty Midstream & Resources, L.L.C.'s Majorsville Gas Plant 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	PM from Fuel Burning Units
	45CSR2A	Testing and MRR under 45CSR2
	45CSR6	Open burning prohibited.
	45CSR10	Emissions of sulfur oxides
	45CSR11	Standby plans for emergency episodes
	45CSR13	Construction/modification permits
	45CSR16	Standards of Performance for New Stationary Sources
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement
	45CSR34	Emission Standards for HAPs
	40 C.F.R. 60 Subpart Db	NSPS for Steam Generating Units after June 19, 1984
	40 C.F.R. 60 Subpart Dc	NSPS for Small Steam Generating Units after June 9, 1989
	40 C.F.R. 60 Subpart KKK	NSPS for Equipment Leaks of VOC from Natural Gas Processing Plants after January 20, 1984, and on or before August 23, 2011.
	40 C.F.R. 60 Subpart IIII	NSPS for Stationary Compression Ignition Internal Combustion Engines
	40 C.F.R. 60 Subpart JJJJ	NSPS for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. 60 Subpart OOOO	NSPS for Crude Oil & Natural Gas Facilities after August 23, 2011, and on or before September 18, 2015
	40 C.F.R. 60 Subpart OOOOa	NSPS for Crude Oil & Natural Gas Facilities after September 18, 2015
40 C.F.R. Part 61	Asbestos inspection and removal	
40 C.F.R. 63 Subpart ZZZZ	Reciprocating Internal Combustion Engine MACT	
40 C.F.R. Part 82, Subpart F	Ozone depleting substances	
State Only:	45CSR4	No objectionable odors
	45CSR17	Prevention and Control of Fugitive PM

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 (if any)
R13-2818H	11/28/2017	

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," which may be downloaded from DAQ's website.

### Determinations and Justifications

- 45CSR2 – TO PREVENT AND CONTROL PARTICULATE AIR POLLUTION FROM COMBUSTION OF FUEL IN INDIRECT HEAT EXCHANGERS.** This rule establishes emission limitations for smoke and particulate matter which are discharged from fuel burning units. The natural gas-fired heaters (H-741, H-781, H-2741, H-3741, H-4741, H-3781, H-1782, H-1741, H-5741, H-6741, H-7741, H-4781, H-7781, H-4782, H-D2782, H-D2741) meet the definitions of a Type 'b' "Fuel Burning Unit" in 45CSR§§2-2.10. and 2.10.b.

#### OPACITY STANDARD

Condition 5.1.3. incorporates the applicable opacity standard from 45CSR§2-3.1. set forth in NSR permit R13-2818H, condition 6.1.3.

45CSR§2-3.2 prescribes the methods of compliance with the opacity standard. This applicable requirement has been set forth in Title V condition 5.3.1. by incorporating underlying permit R13-2818H, requirement 6.3.1.

#### WEIGHT EMISSION STANDARD

In accordance with the exemption in 45CSR§2-11, section 4 of the rule does not apply to units less than 10 MMBtu/hr. Therefore, only units that are 10 MMBtu/hr and greater will be examined for the weight emission standard. Among the sixteen heaters, only the following are affected by the weight rate standard: H-781, H-3781, H-1782, H-D2782, H-1741, H-D2741, H-4781, H-7781, H-4782.

The heaters are subject to the particulate matter weight rate emission limitation for Type 'b' units (45CSR§2-4.1.b.) that is based on total design heat inputs for such units in million BTUs per hour. The total design heat inputs for the affected heaters (listed above) is the sum of the MDHIs permitted in R13-2818H, requirement 6.1.1., which is 341.16 MMBtu/hr. Thus, the PM weight rate limit is  $(0.09) \times (341.16 \text{ MMBtu/hr}) = 30.7 \text{ lb/hr}$  for the nine affected heaters.

By summing the potential PM emissions of the affected heaters provided in the application, potential PM emissions are 2.7 lb/hr. As such, there is approximately a 91% compliance margin while burning natural gas and operating at the MDHIs permitted in R13-2818H, 6.1.1. Since operating permits must include all applicable requirements, the 30.7 lb/hr limit has been added to Title V condition 5.1.1. in a streamlining note. Finally, 45CSR§2-4.1.b. has been added to the citation of authority.

#### MONITORING, TESTING, RECORDKEEPING, AND REPORTING (MTRR)

In accordance with the exemption in 45CSR§2-11, sections 4, 5, 6, 8 and 9 of the rule do not apply to units less than 10 MMBtu/hr. Therefore, only units that are 10 MMBtu/hr and greater will be examined for the MTRR requirements. Among the sixteen heaters, only the following are affected by sections 8 and 9: H-781, H-3781, H-1782, H-D2782, H-1741, H-D2741, H-4781, H-7781, H-4782.

45CSR§2-8.4.b. provides that fuel burning units that combust only natural gas shall be exempt from the requirements of 45CSR§§2-8.1.a. and 8.2., which are:

- 45CSR§2-8.1.a. is the requirement to perform periodic testing in accordance with Method 9, or a certified COMS, to comply with the opacity standard. Further, 45CSR§2-8.1.a. includes periodic PM stack testing to demonstrate compliance with the weight emission standard. Based upon the exemption in 45CSR§2-8.4.b., none of the heaters are subject to the Method 9 observations, COMS utilization, or periodic PM stack testing provisions in this rule.
- 45CSR§2-8.2. is the requirement to demonstrate compliance with the opacity standard as set forth in an approved monitoring plan for each emission unit. The permittee is not subject to this monitoring plan requirement per 45CSR§2-8.4.b.

45CSR§§2-8.3.a. and 8.3.b. are not applicable to any of the heaters since these sections pertain to information in monitoring plans, which are described in 45CSR§2-8.2., which is not applicable.

45CSR§2-8.3.c. is applicable to the units greater than or equal to 10 MMBtu/hr and requires the permittee to maintain records of the operating schedule and the quantity and quality of fuel consumed in each fuel burning unit in a manner to be established by the Director. Though not exactly like the rule language, this requirement has been essentially incorporated via underlying permit R13-2818H, requirement 6.2.2., which has been set forth as operating permit condition 5.2.2. Note that since this requirement is only from the NSR permit, it applies to all the heaters. However, due to the exemption in 45CSR§2-11, the requirement of 45CSR§2-8.3.c. applies only to the heaters greater than 10 MMBtu/hr. Therefore, there are two citations of authority for condition 5.2.2.

45CSR§2-9.1. is the requirement that the opacity standard is applicable at all times except for start-ups, shutdowns and malfunctions, which has been incorporated into the operating permit as condition 5.1.4. In accordance with the exemption in 45CSR§2-11, this applies only to the heaters greater than 10 MMBtu/hr, which have been listed after the condition.

45CSR§2-9.2. is the requirement to operate fuel burning units in a manner consistent with good air pollution control practice for minimizing emissions and has been incorporated into the operating permit as condition 5.1.5. In accordance with the exemption in 45CSR§2-11, this applies only to the heaters greater than 10 MMBtu/hr, which have been listed after the condition.

2. **45CSR2A – TESTING, MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS UNDER 45CSR2.** This interpretive rule applies to any fuel burning unit having a design heat input over 10 MMBtu/hr, except as provided in 45CSR§§2A-3.1.a. and 3.1.b. 45CSR§2A-3.1.a. provides that units which combust only natural gas shall be exempt from sections 5 and 6, but that the Director reserves the right to require testing pursuant to subsections 8.1.b. and 8.1.c. of 45CSR2. Since the units combust only natural gas, the exemption in 45CSR§2A-3.1.a. is applicable; therefore, the periodic visible emissions testing, weight emission testing, and monitoring plan requirements in sections 5 and 6 are not applicable.

Section 7 sets forth recordkeeping and reporting requirements. For natural gas-fired units, 45CSR§2A-7.1.a.1. is applicable. This has been incorporated into the operating permit as condition 5.2.2. via underlying permit R13-2818H, requirement 6.2.2. This applicable section has a separate citation of authority from the NSR permit citation since it applies only to units greater than 10 MMBtu/hr while the NSR permit requirement applies to all the heaters listed in condition 5.1.1.

3. **45CSR6 – CONTROL OF AIR POLLUTION FROM COMBUSTION OF REFUSE.** This rule establishes emission standards for particulate matter and requirements for activities involving incineration of refuse which are not subject to or are exempted from regulation under a federal counterpart for specific combustion sources. The open burning provisions of the rule are incorporated into the operating permit facility-wide requirements in conditions 3.1.1. and 3.1.2. The remainder of this discussion will sequentially apply the rule to the flares FL-991 and FL-1991.

Flares are subject to the particulate matter emission limit prescribed by the equations in 45CSR§6-4.1. that is based on incinerator capacity. Note that incinerator capacity is defined in 45CSR§6-2.9 as the manufacturer's or designer's guaranteed maximum charging rate or such other rate as may be determined by the Secretary in accordance with good engineering practices. Therefore, the limit is based upon the maximum charge rate that the flare is designed to meet, rather than only the actual waste incinerated by the flare.

The permittee provided the weight rate capacities of the flares in 5/24/2019 technical correspondence, which are specified in the following PM limit calculations:

The PM limit calculation in 45CSR§6-4.1. is given by the following equation:

$$\text{Emissions (lb/hr)} = F \times \text{Incinerator Capacity (tons/hr)}$$

Where, the factor, F, is 5.43 for incinerator capacity less than 15,000 lb/hr, and is 2.72 for incinerator capacity 15,000 lb/hr or greater.

Using the incinerator capacities of 73,000 lb/hr and 684,400 lb/hr provided by the permittee, the PM limits for the flares FL-991 and FL-1991 are:

For FL-991:

$$\begin{aligned} \text{Emissions (lb/hr)} &= F \times \text{Incinerator Capacity (tons/hr)} \\ &= (2.72) \times (73,000 \text{ lb/hr}) / (2,000 \text{ lb/ton}) \\ &= 99.3 \text{ lb/hr} \end{aligned}$$

For FL-1991:

$$\begin{aligned} \text{Emissions (lb/hr)} &= F \times \text{Incinerator Capacity (tons/hr)} \\ &= (2.72) \times (684,400 \text{ lb/hr}) / (2,000 \text{ lb/ton}) \\ &= 931 \text{ lb/hr} \end{aligned}$$

These calculations and PM limits have been included in permit condition 6.1.8. which has been incorporated via underlying permit R13-2818H, requirement 7.1.8.

Though the facility is in Marshall county, the provisions of 45CSR§6-4.2. are not applicable to flares.

The visible emissions opacity limitations in 45CSR§6-4.3. and 4.4. in permit conditions 6.1.5. and 6.1.6. have been incorporated via underlying permit R13-2818H, requirements 7.1.5. and 7.1.6. However, flares FL-991 and FL-1991 are subject to a no visible emission standard (except for periods not to exceed a total of 5 minutes during any 2 consecutive hours) in condition 6.1.2.b. Therefore, compliance with the no VEs requirement in 6.1.2.b. ensures compliance with the 20% opacity limit in 6.1.5. except for the 5-minute period during any two consecutive hours. For such 5-minute periods, the requirements in 6.1.5. and 6.1.6. serve to limit the opacity. A reference note has been added to condition 6.1.2.b. and streamlining notes have been added to conditions 6.1.5. and 6.1.6.

45CSR§6-4.5. has been excluded from the permit since the emission of particles of unburned or partially burned refuse or ash is not anticipated from the combustion of natural gas and natural gas components.

45CSR§6-4.6. has been incorporated into the operating permit as condition 6.1.7. via underlying permit R13-2818H, requirement 7.1.7.

45CSR§§6-4.7. and 4.8. have been excluded from the permit since the flares do not combust pathological waste and are not temporary air curtain incinerators.

45CSR§6-4.9. has been excluded from the operating permit since flares are provided an exception to this requirement.

45CSR§6-4.10. has been excluded since it is not necessary as all applicable requirements from 45CSR13, 45CSR30, and 45CSR34 have been incorporated into the operating permit for the flares.

45CSR§6-7 has been excluded from the operating permit since such testing requirements are at the Director's discretion.

4. **45CSR10 – TO PREVENT AND CONTROL AIR POLLUTION FROM THE EMISSION OF SULFUR OXIDES.** The purpose of this rule is to prevent and control air pollution from the emission of sulfur oxides. The natural gas-fired heaters (H-741, H-781, H-2741, H-3741, H-4741, H-3781, H-1782, H-1741, H-5741, H-6741, H-7741, H-4781, H-7781, H-4782, H-D2782, H-D2741) meet the definitions of a Type 'b' "Fuel Burning Unit" in 45CSR§§10-2.8. and 2.8.b.

#### WEIGHT EMISSION STANDARD

Since the facility is in Marshall County, it is in Priority Classification I per Table 45-10A. Priority I regions are included in 45CSR§10-3.1.; therefore, the applicable weight rate standard is given under 45CSR§10-3.1.e. The limit is based on total design heat inputs for the affected units.

In accordance with the exemption in 45CSR§10-10.1, section 3 and sections 6 through 8 of the rule do not apply to units less than 10 MMBtu/hr. Therefore, only units that are 10 MMBtu/hr and greater will be examined for the weight emission standard. Among the sixteen heaters, only the following are affected by the weight rate standard: H-781, H-3781, H-1782, H-D2782, H-1741, H-D2741, H-4781, H-7781, H-4782.

The total design heat inputs for the affected heaters (listed above) is 341.16 MMBtu/hr (see discussion of 45CSR§2-4.1.b. above). Thus, the SO<sub>2</sub> weight rate limit is  $(3.1) \times (341.16 \text{ MMBtu/hr}) = 1,058 \text{ lb/hr}$  for the nine affected heaters.

By summing the potential SO<sub>2</sub> emissions of the affected heaters provided in the application, potential SO<sub>2</sub> emissions are 0.198 lb/hr. As such, there is approximately a 99.98% compliance margin while burning natural gas and operating at the MDHIs permitted in R13-2818H, 6.1.1. Since operating permits must include all applicable requirements, the 1,058 lb/hr limit has been added to Title V condition 5.1.1. in a streamlining note. Finally, 45CSR§10-3.1.e. has been added to the citation of authority.

#### NON-APPLICABILITY OF OTHER STANDARDS

Since the boilers will not exceed the allowable weight rate limit, the individual stack limit in 45CSR§10-3.4.a. has been excluded from the operating permit.

The boilers do not meet the definition of "Source Operation" in 45CSR§10-2.19.; therefore, the SO<sub>2</sub> concentration standard in 45CSR§10-4.1. is not applicable.

The boilers do not combust refinery or process gas streams; therefore, the hydrogen sulfide concentration standard in 45CSR§10-5 is not applicable.

MONITORING, TESTING, RECORDKEEPING, AND REPORTING

As mentioned above, 45CSR§10-10.1 exempts units less than 10 MMBtu/hr from section 3 and sections 6 through 8 of the rule. Therefore, only the units 10 MMBtu/hr or greater are potentially subject to section 8.

Additionally, 45CSR§10-10.3. provides that fuel burning units that combust natural gas shall be exempt from the requirements of section 8 in 45CSR10. Section 8 includes testing to determine compliance with the weight emission standard in 8.1; monitoring in 8.2.; and recordkeeping and reporting in 8.3. Therefore, all the heaters, regardless of design heat input, are exempt from 45CSR§10-8.

Note that while 45CSR10 exempts the natural gas-fired units from the requirement to record fuel use (45CSR§10-8.3.c.), such records are required under 45CSR2 as discussed above.

5. **45CSR10A – TESTING, MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS UNDER 45CSR10.** This interpretive rule applies to any fuel burning unit subject to 45CSR10, except for fuel burning units having a design heat input less than 10 MMBtu/hr, or those which combust natural gas, wood or distillate oil, alone or in combination (45CSR§§10A-3.1., 3.1.a., and 3.1.b.). Since all the heaters combust only natural gas, they are exempt from the requirements of 45CSR10A in accordance with 45CSR§10A-3.1.b.
6. **45CSR13, Permit No. R13-2818H.** The NSR permit R13-2818 was issued to the permittee to construct the Majorsville Gas Plant. The permit has undergone several updates and modifications as the facility has expanded, which are summarized in the following NSR Permit Historical Summary.

**NSR Permit Historical Summary**

Permit	Date of Issuance	Application Type	Permit Purpose & Description <sup>1</sup>
R13-2818	2/17/2010	Construction	Installation of four (4) [compressor] engines, two (2) process heaters, a molecular sieve dehydration unit, and a flare.
R13-2818A	8/10/2010	Class II Administrative Update	To upgrade the flare and replace three (3) Caterpillar G3608 engines with three (3) Caterpillar G3608 ultra lean burn engines.
R13-2818B	11/29/2010	Class II Administrative Update	To increase the throughput capacity of the facility from 120 mmscf/day to 140 mmscf/day. No new equipment was needed to achieve this increase. There were also no emission increases associated with this change.
R13-2818C	1/31/2011	Modification	To install a new tower and components for an additional 140 mmscf/day processing facility, one (1) new compressor engine, and one (1) new process heater.
R13-2818D	1/17/2013	Modification	To install two new depropanizer towers and a deethanizer. Additionally, two natural gas-fired compressor engines (C-101 and C-2102) were removed to be replaced with electric compression as commercial electrical power is now available.

<sup>1</sup> The purpose and description are from the respective Engineering Evaluation and permit application.

Permit	Date of Issuance	Application Type	Permit Purpose & Description <sup>1</sup>
R13-2818E	4/23/2014	Modification	To construct two (2) new depropanizer towers (cryogenic plants) to remove liquids from the gas stream. Additionally, one (1) deethanizer will be constructed to remove ethane from the residual natural gas.
R13-2818F	6/19/2014	Class I Administrative Update	To correct typographical errors that existed in Permit R13-2818E.
R13-2818G	3/21/2017	Modification	To construct one (1) new depropanizer tower (cryogenic plant) to remove liquids from the gas stream. An additional deethanizer will be constructed to remove ethane from the residual natural gas.
R13-2818H	11/28/2017	Modification	To correct items from an internal audit. This includes heater naming, flare throughputs and construction dates.

Since R13-2818H is the current underlying permit, it has been incorporated into the initial Title V operating permit as described in Table R13-2818H below.

**Table R13-2818H**

R13-2818H	Title V	Discussion
1.0	1.1.	<p>The permitted emission units have been incorporated into the operating permit. However, the following revisions have been made for the Title V permit emission units table:</p> <ul style="list-style-type: none"> <li>• The application cover letter states that the emergency generator M7-G-8 (EP ID: 28E) has not and will not be installed at the facility. However, since R13-2818H permits its installation and includes requirements applicable to it, the emergency generator has been included in section 1.1., the section headings 4.0 and 8.0, and Title V permit conditions in those sections as discussed below.</li> <li>• The engine M7-G-9 is permitted in R13-2818H as a 145-hp Cummins Model No. 60DSFAD. However, the engine is a 69-hp Cummins Model No. C35D6, which was noted in the application cover letter, Attachment E for the emission unit, and confirmed in 5/24/2019 technical correspondence. The permitted engine M7-G-9 has been retained for the R13 permit emission limitations in Section 4.0 of the operating permit. However, the as-built engine, designated as M7-G-9*, has been evaluated for Subpart III applicability and its requirements are in Section 8.0.</li> <li>• The engine MD2-G-10 is permitted in R13-2818H as a 53-hp Generac Model No. MMG45. However, the engine is a 24.3-hp Cummins Model No. C15D6, which was confirmed in 5/24/2019 technical correspondence. The permitted engine MD2-G-10 has been retained for the R13 permit emission limitations in Section 4.0 of the operating permit. However, the as-built engine, designated as MD2-G-10*, has been evaluated for Subpart III applicability and its requirements are in Section 8.0.</li> <li>• The manufacturer, model number, and fuel type for each emergency generator has been added for clarification to improve the permit as a working document. All information is from the application Attachments E and underlying R13-2818H permit requirements 5.1.4. through 5.1.7.</li> </ul>

<b>R13-2818H</b>	<b>Title V</b>	<b>Discussion</b>
<b>General Requirements</b>		
4.1.1.	3.4.1.	The record of monitoring requirement has been cited with the same facility-wide operating permit condition.
4.1.2.	3.1.9.	The minor source of HAPs requirement has been written in the operating permit.
4.1.3.	3.1.10.	The operation and maintenance of air pollution control equipment requirement has been written in the operating permit. The underlying permit's citation has been changed from 45CSR§13-5.11. to 45CSR§13-5.10. as a result of removing section 5.8 of 45CSR13, effective June 1, 2017.
4.1.4.	3.4.4.	The record of malfunctions of air pollution control equipment requirement has been written in the operating permit.
4.1.5.	3.1.11.	The maximum throughput limitation for wet natural gas through the gas processing plants has been written in the operating permit.
<b>Engines and Emergency Generators</b>		
5.1.1.	4.1.1.	The requirement has been written in the operating permit.
5.1.2.	4.1.2.	The requirement has been written in the operating permit.
5.1.3.	4.1.3.	The requirement has been written in the operating permit.
5.1.4.	4.1.4.	The requirement has been written in the operating permit. A note has been added regarding emergency generator M7-G-8 (EP ID: 28E). A note specifying the correct manufacturer, model, and horsepower rating has been added for M7-G-9. A compliance plan in condition 4.6.1. has been included to correct M7-G-9 and address any engines that will not be installed.
5.1.5.	4.1.5.	The requirement has been written in the operating permit.
5.1.6.	4.1.6.	The requirement has been written in the operating permit. A note specifying the correct manufacturer, model, and horsepower rating has been added for MD2-G-10. A compliance plan in condition 4.6.1. has been included to correct MD2-G-10.
5.1.7.	4.1.7.	The requirement has been written in the operating permit. A note specifying that MD2-G-11 has not been installed has been added.
5.1.8.	4.1.8.	The requirement has been written in the operating permit. A note has been added regarding emergency generators M7-G-8 (EP ID: 28E) and MD2-G-11 (EP ID: 33E) as discussed above. A compliance plan in condition 4.6.1. has been included to address any engines that will not be installed.
5.2.1.	4.2.1.	The requirement has been written in the operating permit.
5.3.1.	4.3.1.	The requirement has been written in the operating permit.
5.4.1.	4.4.1.	The requirement has been written in the operating permit.
5.5.1.	4.5.1.	The requirement has been written in the operating permit.
<b>Heaters</b>		
6.1.1.	5.1.1.	The requirement has been written in the operating permit. The footnotes regarding the various units being process heaters have been deleted because the units are not process heaters, and are subject to NSPS Subparts Db and Dc, as well as 45CSR2.
6.1.2.	5.1.2.	The requirement has been written in the operating permit.
6.1.3.	5.1.3.	The requirement has been written in the operating permit. This requirement incorporates the applicable opacity standard from 45CSR§2-3.1.
6.2.1.	5.2.1.	The requirement has been written in the operating permit.
6.2.2.	5.2.2.	The requirement has been written in the operating permit. While the underlying permit cited 45CSR§2A-7.1.a.1., thereby implying that it applies to all emission units in the condition, it should be noted that this interpretive rule requirement applies only to the heaters that are greater than 10 MMBtu/hr in accordance with 45CSR§2A-3.1. Therefore, 45CSR§2A-7.1.a.1. has been extracted from the NSR

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		permit citation and added to the separate citation of 45CSR§2-8.3.c. below the NSR citation of authority to clarify how each requirement applies to the emission units in the condition. The NSPS Subpart Dc citation of §60.48c(g)(2) is separate since it applies only to specific sources subject to Subpart Dc.
6.3.1.	5.3.1.	The requirement has been written in the operating permit. This requirement incorporates the applicable compliance methodology from 45CSR§2-3.2.
6.4.1.	5.4.1.	The requirement has been written in the operating permit.
6.5.1.	5.5.1.	The requirement has been written in the operating permit.
<b>Flares</b>		
7.1.1.	6.1.1.	<p>The requirement has been written in the operating permit. 45CSR16 has been added to each citation of authority from Part 60. The reference to condition 6.2.2. in requirement in 7.1.1.f. has been changed since 6.2.2. is unrelated to requirement 7.1.1.f.</p> <p>The language in requirement 7.1.1.f. corresponds to 40 C.F.R. §60.482-10a(k), which provides an exemption from the requirements of paragraphs (f)(1)(i) and (f)(2) of §60.482-10a.</p> <p>Requirement 6.2.2. is recordkeeping of hours of operation and fuel gas consumed by certain heaters and does not embody any requirement in §§60.482-10a(f)(1)(i) and (f)(2). Therefore, the reference to condition 6.2.2. has been replaced with 40 C.F.R. §§60.482-10a(f)(1)(i) and (f)(2).</p>
7.1.2.	6.1.2.	The requirement has been written in the operating permit. A note has been added to requirement in 6.1.2.b. to refer to the opacity requirements in conditions 6.1.5. and 6.1.6.
7.1.3.	6.1.3.	The requirement has been written in the operating permit.
7.1.4.	6.1.4.	The requirement has been written in the operating permit.
7.1.5.	6.1.5.	The requirement has been written in the operating permit.
7.1.6.	6.1.6.	The requirement has been written in the operating permit.
7.1.7.	6.1.7.	The requirement has been written in the operating permit.
7.1.8.	6.1.8.	The requirement has been written in the operating permit. The computed PM limits for flares FL-991 and FL-1991 have been added to the permit condition as discussed in the 45CSR6 section of the Determinations and Justifications portion of this Fact Sheet.
7.1.9.	6.1.9.	The requirement has been written in the operating permit.
7.1.10.	6.1.10.	The requirement has been written in the operating permit.
7.1.11.	6.1.11.	The requirement has been written in the operating permit.
7.2.1.	6.2.1.	The requirement has been written in the operating permit.
7.2.2.	6.2.2.	The requirement has been written in the operating permit.
7.3.1.	6.3.1.	The requirement has been written in the operating permit. The third statement in the requirement is to conduct the Method 22 testing within one (1) year of permit issuance or initial startup whichever is later. This deadline was in requirement 8.3.1. of the initial NSR permit R13-2818 (issued 2/17/2010) and applied to FL-991. The requirement became applicable to FL-1991 upon issuance of R13-2818D on 1/17/2013. According to 5/24/2019 technical correspondence, the permittee has completed the testing for flare FL-1991. To clarify that this requirement is based upon the underlying NSR permit issuance, and not the initial Title V permit, a parenthetical note has been including in the permit condition.
7.3.2.	6.3.2.	The requirement has been written in the operating permit.
7.4.1.	6.4.1.	The requirement has been written in the operating permit.
7.4.2.	6.4.2.	The requirement has been written in the operating permit.

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7.4.3.	6.4.3.	The requirement has been written in the operating permit.
7.4.4.	6.4.4.	The requirement has been written in the operating permit.
7.4.5.	6.4.5.	The requirement has been written in the operating permit.
7.4.6.	6.4.6.	The requirement has been written in the operating permit.
7.5.1.	6.5.1.	The requirement has been written in the operating permit.
7.5.2.	6.5.2.	The requirement has been written in the operating permit.
7.5.3.	6.5.3.	The requirement has been written in the operating permit.
7.5.4.	6.5.4.	The requirement has been written in the operating permit.
<b>40 C.F.R. 60 Subpart JJJJ Requirements</b>		
8.1.1.	7.1.1.	The requirement has been written in the operating permit.
8.2.1.	7.1.2.	The requirement has been written in the operating permit.
8.2.2.	None	This requirement has been excluded from the operating permit for the reasons discussed below regarding §60.4233(f) of NSPS Subpart JJJJ.
8.2.3.	7.1.3.	The requirement has been written in the operating permit.
8.2.4.	7.1.4.	The requirement has been written in the operating permit.
8.3.1.	7.1.5.	The requirement has been written in the operating permit. In order to retain requirement 8.3.1.a., an italicized note has been added at the end of the condition to clarify that the engines C-102, C-103, C-104, and M1-G-1 are all non-certified as confirmed by the permittee in 5/24/2019 technical correspondence.
8.3.2.	None	This requirement has been excluded from the operating permit for the reasons discussed below regarding §§60.4233(f) and 60.4243(c) of NSPS Subpart JJJJ.
8.3.3.	None	This requirement has been excluded from the operating permit for the reasons discussed below regarding §60.4243(h) of NSPS Subpart JJJJ.
8.3.4.	7.1.6.	The requirement has been written in the operating permit.
8.4.1.	7.3.1.	The requirement has been written in the operating permit.
8.5.1.a.	7.4.1.	The recordkeeping requirement has been written in the operating permit.
8.5.1.b.	7.4.2.	The recordkeeping requirement has been written in the operating permit.
8.5.1.c.	7.5.1.	The reporting requirement has been written in the operating permit.
8.5.1.d.	7.5.2.	The reporting requirement has been written in the operating permit.
<b>40 C.F.R. 60 Subpart IIII Requirements – Emergency Generators</b>		
9.1.1.	8.1.1.	The requirement has been written in the operating permit. The citation of authority with the NSR permit requirement has been changed from §60.4205(d) to §60.4205(b) for Title V permit condition 8.1.1. The specific emission standards applicable to each engine have been added to the condition. Refer to the discussion of NSPS Subpart IIII below. A note specifying that MD2-G-11 has not been installed has been added in 8.1.1.a. A note specifying that M7-G-8 has not been installed has been added in 8.1.1.d.
9.1.2.	8.1.2.	The requirement has been written in the operating permit. Though in the regulation language, the reference to §60.4204 has been deleted since it is not applicable. Refer to the discussion of NSPS Subpart IIII below.
9.1.3.	8.1.3.	The requirement has been written in the operating permit. The sulfur content for non-road (NR) diesel, cetane index, and aromatic content have been added to the condition as discussed below under NSPS Subpart IIII.
9.1.4.	8.1.4.	The requirement has been written in the operating permit.
9.1.5.	8.1.5.	The requirement has been written in the operating permit.

<b>R13-2818H</b>	<b>Title V</b>	<b>Discussion</b>
9.1.6.	None	According to 5/24/2019 technical correspondence, the engines are equipped with diesel particulate filters. However, the emission standards in §60.4204 are applicable to non-emergency engines. All the diesel engines at the facility are for emergency use; therefore, §60.4204 is not applicable. Consequently, the diesel particulate filters are not used to comply with emission standards in §60.4204 and thus §60.4209(b) is not applicable. Therefore, the NSR permit requirement based on §60.4209(b) has been excluded from the operating permit.
9.1.7.	8.1.6.	The requirement has been written in the operating permit.
9.1.8.	8.1.7.	The requirement has been written in the operating permit.
9.1.9.	8.1.8.	The requirement has been written in the operating permit.
9.1.10.	8.1.9.	The requirement has been written in the operating permit. §§60.4211(g), (g)(1), and (g)(2) have been added to the citation of authority.
9.2.1.	8.3.1.	The requirement has been written in the operating permit.
9.2.2.	8.3.2.	The requirement has been written in the operating permit.
9.2.3.	8.3.3.	The requirement has been written in the operating permit.
9.2.4.	8.3.4.	The requirement has been written in the operating permit.
9.3.1.	8.4.1.	The requirement has been written in the operating permit.
9.3.2.	8.4.2.	The requirement has been written in the operating permit.
9.3.3.	8.5.1.	The requirement has been written in the operating permit.
9.3.4.	8.4.3.	The requirement has been written in the operating permit. A note specifying that M7-G-8 has not been installed has been added.
9.3.5.	None	According to 5/24/2019 technical correspondence, the diesel generators are equipped with diesel particulate filters. However, the filters are not required to comply with the emission standards in §60.4204 as determined in the discussion of §60.4209(b) in NSPS Subpart III. Therefore, this underlying permit requirement is not applicable and has been excluded from the operating permit.
<b>40 C.F.R. 63 Subpart ZZZZ Requirements – Engines and Emergency Generators</b>		
10.1.1.	7.1.7.(1) 8.1.10.(1)	This requirement specifies the applicable compliance date (10/19/2013), which has been written in one condition to set forth Subpart ZZZZ requirements. The underlying permit language “this section” has been replaced with “40 C.F.R. 60 Subpart ZZZZ”.
10.1.2.	7.1.7.(2) 8.1.10.(2)	In condition 7.1.7.(2), the non-applicable language regarding Subpart III in section 8.0 has been deleted.  In condition 8.1.10.(2), the non-applicable language regarding Subpart JJJJ in section 7.0 has been deleted.
<b>40 C.F.R. 60 Subpart OOOO/OOOOa Requirements – Pneumatic Controllers</b>		
11.1.1.	9.1.1. 9.1.2.	The Subpart OOOO requirement applicable to Majorsville III through VI has been written as condition 9.1.1.  The Subpart OOOOa requirement applicable to Majorsville VII has been written as condition 9.1.2.
<b>40 C.F.R. 60 Subpart KKK Requirements – Majorsville I &amp; II</b>		
12.1.1.	10.1.1.	The requirement has been written in the operating permit.
12.1.2.	10.1.2.	The requirement has been written in the operating permit.
12.1.3.	10.1.3.	The requirement has been written in the operating permit.
12.1.4.	10.1.4.	The requirement has been written in the operating permit.
12.2.1.	10.4.1.	The requirement has been written in the operating permit.
12.2.2.	10.5.1.	The requirement has been written in the operating permit.
<b>40 C.F.R. 60 Subpart OOOO Requirements – Majorsville III – VI, De-ethanizer I</b>		
13.1.1.	11.1.1.	The requirement has been written in the operating permit.
13.1.2.	11.1.3.	The requirement has been written in the operating permit.
13.1.3.	11.1.4.	The requirement has been written in the operating permit.

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13.1.4.	11.1.5.	The requirement has been written in the operating permit.
13.1.5.	11.1.6.	The requirement has been written in the operating permit.
13.2.1.	11.1.7.	The requirement has been written in the operating permit.
13.3.1.	11.1.8.	The requirement has been written in the operating permit.
13.4.1.	11.4.1.	The requirement has been written in the operating permit.
13.4.3. <sup>2</sup>	11.5.1.	The requirement has been written in the operating permit.
<b>40 C.F.R. 60 Subpart OOOOa Requirements – Majorsville VII, De-ethanizer II</b>		
14.1.1.	12.1.1.	The requirement has been written in the operating permit.
14.1.2.	12.1.2.	The requirement has been written in the operating permit.
14.1.3.	12.1.3.	The requirement has been written in the operating permit.
14.1.4.	12.1.4.	The requirement has been written in the operating permit.
14.1.5.	12.1.5.	The requirement has been written in the operating permit.
14.1.6.	12.1.6.	The requirement has been written in the operating permit.
14.2.1.	12.1.7.	The requirement has been written in the operating permit.
14.3.1.	12.1.8.	The requirement has been written in the operating permit.
14.4.1.	12.4.1.	The requirement has been written in the operating permit.
14.4.2.	12.5.1.	The requirement has been written in the operating permit.
Cert. of Data Accuracy	None	The Certification of Data Accuracy form appended to the underlying permit has been excluded from the Title V operating permit since no requirement in the NSR permit directly refers to the form.

7. **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. The Secretary hereby adopts these standards by reference. The Secretary also adopts associated reference methods, performance specifications and other test methods which are appended to these standards. Therefore, 45CSR16 has been included with each citation of authority based on 40 C.F.R. Part 60 throughout the Title V Operating Permit (e.g., Subparts Db, Dc, KKK, JJJ, IIII, OOOO, OOOOa, etc).
8. **45CSR17 – TO PREVENT AND CONTROL PARTICULATE MATTER AIR POLLUTION FROM MATERIALS HANDLING, PREPARATION, STORAGE AND OTHER SOURCES OF FUGITIVE PARTICULATE MATTER.** This rule prohibits fugitive particulate matter to be discharged beyond the property boundary which causes or contributes to statutory air pollution (45CSR§17-3.1.). In the event of a violation of this rule, the Director may require the utilization of a system to minimize fugitive particulate matter per 45CSR§17-3.2. The standard in 45CSR§17-3.1 has been included as permit condition 3.1.12.
9. **45CSR30 – REQUIREMENTS FOR OPERATING PERMITS.** The authority of this rule has been utilized to establish the compliance plan in condition 4.6.1. to address the permitting of the engines M7-G-9 and MD2-G-10, and any other corrections or revisions to the engines. According to 8/16/2019 technical correspondence, the permittee plans to submit a permit application to add a different engine in lieu of MD2-G-11.
10. **45CSR34 – EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS.** This rule establishes and adopts a program of national emission standards for hazardous air pollutants and other regulatory requirements promulgated by the United States Environmental Protection Agency pursuant to 40 CFR Parts 61, 63 and section 112 of the federal Clean Air Act, as amended. This rule codifies general procedures and criteria to implement emission standards for stationary sources that emit (or have the potential to emit) one or more of the eight substances listed as hazardous air pollutants in 40 CFR § 61.01(a), or one or more of the substances listed as hazardous air pollutants in section 112(b) of the

<sup>2</sup> Note that there is no requirement number 13.4.2. in NSR Permit No. R13-2818H.

CAA. The Secretary hereby adopts these standards by reference. The Secretary also adopts associated reference methods, performance specifications and other test methods which are appended to these standards. Therefore, 45CSR34 has been included with each citation of authority based on 40 C.F.R. Parts 61 (condition 3.1.3.) and 63 throughout the Title V Operating Permit (i.e., NESHAPs-MACT Subpart ZZZZ).

11. **40 C.F.R. Part 60 Subpart KKK – STANDARDS OF PERFORMANCE FOR EQUIPMENT LEAKS OF VOC FROM ONSHORE NATURAL GAS PROCESSING PLANTS FOR WHICH CONSTRUCTION, RECONSTRUCTION, OR MODIFICATION COMMENCED AFTER JANUARY 20, 1984, AND ON OR BEFORE AUGUST 23, 2011.** The provisions of this subpart are applicable to affected facilities in onshore natural gas processing plants (40 C.F.R. §60.630(a)(1)). A compressor in VOC service or in wet gas service is an affected facility (40 C.F.R. §60.630(a)(2)). The group of all equipment except compressors within a process unit is an affected facility (40 C.F.R. §60.630(a)(3)).

According to the Engineering Evaluation for R13-2818H, the equipment comprising Majorsville I and II are subject to this regulation since it is a natural gas processing facility constructed within the applicability dates of this regulation. The permittee must continue to meet the LDAR requirements of Subpart KKK for Majorsville I and II.

Refer to Section 10.0 of the operating permit for the requirements applicable to Majorsville I and II that have been incorporated via the underlying permit R13-2818H. Though the underlying permit reserved it, the language in §60.633(f) has been included in permit condition 10.1.3.(f).

12. **40 C.F.R. Part 60 Subpart IIII – STANDARDS OF PERFORMANCE FOR STATIONARY COMPRESSION IGNITION INTERNAL COMBUSTION ENGINES.** The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) and other persons as specified in paragraphs (a)(1) through (4) of §60.4200. The permittee has been permitted for the following CI ICE:

**Compression Ignition Engines**

<b>Emission Unit ID</b>	<b>Emission Unit Description</b>	<b>Engine Power (hp)</b>	<b>Electrical Output (kW)<sup>3</sup></b>	<b>Year Installed</b>
M3-G-2	Majorsville 3 Emergency Generator Cummins Model No. 60 DSF AD	145	60	2014
M3-G-3	Majorsville 3 MCC Emergency Generator Cummins Model No. 60 DSF AD	145	60	2014
M4-G-6	Majorsville 4 MCC Emergency Generator Cummins Model No. 60 DSF AD	145	60	2014
M4-G-7	Majorsville 4 Emergency Generator Cummins Model No. 60 DSF AD	145	60	2014
M7-G-8 <sup>5</sup>	Majorsville 4 Emergency Generator Cummins Model No. 60 DSF AD	145	60	Not installed
M7-G-9* <sup>1</sup>	Majorsville 7 MCC Emergency Generator Cummins Model No. C35D6	69	35	2017
MD1-G-4	DeEthanizer 1 Control Room Emergency Generator Generac Model No. MMG45	53	20	2013
MD1-G-5	DeEthanizer 1 Emergency Generator Generac Model No. MMG25	32	15	2013
MD2-G-11 <sup>4</sup>	DeEthanizer 2 Emergency Generator Generac Model No. MMG25	32	15	Not installed

Emission Unit ID	Emission Unit Description	Engine Power (hp)	Electrical Output (kW) <sup>3</sup>	Year Installed
MD2-G-10* <sup>2</sup>	DeEthanizer 2 Control Room Emergency Generator Cummins Model No. C15D6	24.3	15	2013

<sup>1</sup> According to 5/24/2019 technical correspondence, the engine M7-G-9 is a Cummins Model No. C35D6 rated 69-hp rather than a 145-hp Cummins Model No. 60DSFAD specified in R13-2818H, requirement 5.1.4. (Title V permit condition 4.1.4.). The as-built engine M7-G-9\* has been evaluated in this analysis of Subpart III. The difference in horsepower affects the applicability of the emission standards in Table 2 to Subpart III as discussed under §60.4205(b) in Table III below.

<sup>2</sup> According to 5/24/2019 technical correspondence, the engine MD2-G-10 is a Cummins Model No. C15D6 rated 24.3-bhp rather than a 53-hp Generac MMG45 specified in R13-2818H, requirement 5.1.6. (Title V permit condition 4.1.6.). The as-built engine MD2-G-10\* has been evaluated in this analysis of Subpart III. The difference in horsepower affects the applicability of the emission standards in Table 2 to Subpart III as discussed under §60.4205(b) in Table III below. The electrical output was confirmed in 8/16/2019 technical correspondence.

<sup>3</sup> Except for MD1-G-5, the rated electrical output of each generator is per 5/24/2019 technical correspondence from the permittee. The rating for MD1-G-5 was provided in 8/16/2019 technical correspondence.

<sup>4</sup> According to 8/16/2019 technical correspondence, MD2-G-11 has not been installed and will not be installed. Per the correspondence, the permittee plans to submit a permit modification to add a different engine in lieu of MD2-G-11.

<sup>5</sup> According to the application, M7-G-8 has not been installed and will not be installed.

Other relevant engine characteristics include:

- Each of the engines utilize a diesel particulate filter (per 5/24/2019 technical correspondence).
- Each engine’s displacement is less than 30 liters per cylinder.
- None of the engines are utilized for fire pumps.

Most of the applicable Subpart III requirements have been incorporated into operating permit Section 8.0 via underlying permit R13-2818H. However, several requirements have been added for the reasons discussed in Table III, below, which is an applicability analysis for the CI engines above.

**Table III**

Subpart III	Title V	Discussion
§60.4200	None	No permit condition is warranted for this applicability section.
<b>Emission Standards for Manufacturers</b>		
§60.4201	None	This section pertains to manufacturers of non-emergency engines. Since the permittee is not a manufacturer, and none of the engines are non-emergency, this section is not applicable.
§60.4202	None	This section applies directly to manufacturers of emergency engines. This section is not directly applicable to the permittee since it does not manufacture engines. However, the requirements of this paragraph are incorporated by reference into the applicable requirement of §60.4205(b).
§60.4203	None	This section pertains to manufacturers of stationary CI internal combustion engines. Since the permittee is not a manufacturer, this section is not applicable.
<b>Emission Standards for Owners and Operators</b>		
§60.4204	None	This section pertains to owners or operators of non-emergency engines. Since the engines are for emergency use, this section is not applicable.
§60.4205(a)	None	This paragraph is applicable to pre-2007 model year emergency stationary CI ICE. The engines were constructed after 2007; therefore, this paragraph is not applicable.

Subpart III	Title V	Discussion
§60.4205(b)	8.1.1.	<p>This paragraph is applicable to 2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder that are not fire pump engines. The paragraph requires such engines to comply with the emission standards for new nonroad CI engines in §60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE.</p> <p>All the engines meet the above criteria for §60.4205(b) to apply. Therefore, referenced §60.4202 has been reviewed to extract the applicable requirements.</p> <p>§60.4202(a) is applicable to all the engines since the engines are later than 2007 model year, emergency type, with a maximum power less than 3,000-hp and a displacement less than 10 liters per cylinder and are not fire pump engines. §60.4202(a) specifies that “manufacturers must certify” their engines. Therefore, this paragraph requires <b>manufacturer certification</b> to the emission standards specified in §§60.4202(a)(1) and (2), which are divided based upon engine horsepower rating.</p> <p style="text-align: center;"><b><u>ENGINES LESS THAN 50-HP</u></b></p> <p><b>§60.4202(a)(1) is applicable</b> only to MD1-G-5, MD2-G-10*, and MD2-G-11 since it applies to engines rated less than 50-hp. §60.4202(a)(1)(i) is not applicable since it applies only to model year 2007 engines. <b>§60.4202(a)(1)(ii) is applicable</b> since the engines are later than 2007 model year. This paragraph specifies new nonroad CI engines standards in the following sections:</p> <ul style="list-style-type: none"> <li>• 40 CFR §1039.104 – Interim provisions for limited time; applicable to manufacturers. No permit condition is warranted.</li> <li>• 40 CFR §1039.105 – Smoke standards; not applicable to constant speed engines per §1039.105(a)(2).</li> <li>• 40 CFR §1039.107 – Evaporative emission standards; not applicable to diesel-fueled engines, or engines using nonvolatile or nonliquid fuels (e.g., natural gas).</li> <li>• 40 CFR §1039.115 – Other requirements (crankcase emissions, adjustable parameters, prohibited controls, defeat devices) all pertain to manufacturers.</li> <li>• Table 2 to Subpart III, for 2008 model year and later engines, is applicable as follows:             <ul style="list-style-type: none"> <li>➤ MD1-G-5 and MD2-G-11 are each rated at 32-hp; therefore, the <b>applicable Table 2 emission standards</b> (g/kW-hr) are NO<sub>x</sub>+NMHC = 7.5; CO = 5.5; and PM = 0.30. These emission standards have been added to the permit condition as <b>8.1.1.a.</b> for engines MD1-G-5 and MD2-G-11.</li> </ul> </li> </ul>

Subpart IIII	Title V	Discussion
		<p>➤ The as-built engine MD2-G-10* is rated 24.3-hp; therefore, the <b>applicable Table 2 emission standards</b> (g/kW-hr) are NO<sub>x</sub>+NMHC = 7.5; CO = 6.6; and PM = 0.40. These emission standards have been added to the permit condition as <b>8.1.1.b</b>.</p> <p style="text-align: center;"><b><u>ENGINES GREATER THAN OR EQUAL TO 50-HP</u></b></p> <p><b>§60.4202(a)(2) is applicable</b> to the remaining engines (M3-G-2, M3-G-3, M4-G-6, M4-G-7, M7-G-8, M7-G-9*, and MD1-G-4) as they have a rated power greater than 50-hp. This paragraph requires the <b>certification emission standards</b> for new nonroad CI engines for the same model year and maximum engine power in 40 CFR §89.112 and 40 CFR §89.113 for all pollutants beginning in model year 2007.</p> <ul style="list-style-type: none"> <li>• Table 1 at §89.112(a) specifies the emission standards for various horsepower ranges and model years. The emergency generators M7-G-9* and MD1-G-4 are rated between 19-kW and 37-kW, and are later than model year 2008; therefore, the applicable standards are the Tier 2 emission limits 7.5, 5.5, and 0.60 (g/kW-hr) for NO<sub>x</sub>+NMHC, CO, and PM, respectively (condition 8.1.1.c.). The emergency generators M3-G-2, M3-G-3, M4-G-6, M4-G-7, and M7-G-8, are rated between 37-kW and 75-kW, and are later than model year 2008; therefore, the applicable standards are the Tier 3 emission limits 4.7, 5.0, and 0.40 (g/kW-hr) for NO<sub>x</sub>+NMHC, CO, and PM, respectively (condition 8.1.1.d.).</li> <li>• 40 CFR §89.113(c)(3) exempts constant-speed engines from the requirements of 40 CFR §89.113. Since a generator engine operates at constant speed, the requirements in §89.113 are not applicable.</li> </ul> <p>Engines with displacements greater than 30 liters per cylinder are affected by §60.4205(d). Since none of the engine meet this criterion, the citation of authority in R13-2818H, requirement 9.1.1., has been changed from §60.4205(d) to §60.4205(b) for Title V permit condition 8.1.1.</p> <p>The remaining paragraphs in §60.4202 are not applicable for the following reasons:</p> <ul style="list-style-type: none"> <li>• §60.4202(b) is not applicable since it pertains to engines greater than 3,000-hp.</li> <li>• §60.4202(c) is not applicable since it is reserved.</li> <li>• §60.4202(d) is not applicable since it pertains to fire pump engines.</li> <li>• §60.4202(e) is not applicable since the engines do not meet any of the horsepower and cylinder displacement criteria in this paragraph.</li> <li>• §60.4202(f) is not applicable since the engines do not meet the displacement criteria in §§60.4202(f)(1) and (2).</li> </ul>

Subpart III	Title V	Discussion
		<ul style="list-style-type: none"> <li>• §60.4202(g) is not applicable since it pertains to engines used solely in either remote areas of Alaska and marine offshore installations.</li> <li>• §60.4202(h) is not applicable since it pertains to reconstructed engines.</li> </ul>
§60.4205(c)	None	This paragraph is not applicable since it pertains to fire pump engines.
§60.4205(d)	None	This paragraph is not applicable since it pertains to emergency engines with a displacement of greater than or equal to 30 liters per cylinder.
§60.4205(e)	None	This paragraph is applicable to owners of emergency engines with a displacement of less than 30 liters per cylinder who conduct performance tests in-use. The engines are not subject to Subpart III performance testing but are rather required to be certified by the manufacturer; therefore, this section is not applicable.
§60.4205(f)	None	This paragraph is not applicable since it pertains to modified or reconstructed emergency engines.
§60.4206	8.1.2.	This paragraph is applicable since it requires compliance with emission standards in §60.4205 over the entire life of the engine. The reference in the regulation to §60.4204 has been deleted since §60.4204 is not applicable.
§60.4207(a)	None	This paragraph is no longer applicable since the date specified has passed and the requirement in §60.4207(b) is applicable.
§60.4207(b)	8.1.3.	This paragraph is applicable. The fuel specifications in §80.510(b) are for sulfur content, as well as minimum cetane index or aromatic content. The sulfur content for non-road (NR) diesel, cetane index, and aromatic content have been added to the condition and §80.510(b) has been added to the citation of authority.
§60.4207(c)	None	This paragraph is not applicable since it is reserved.
§60.4207(d)	None	This paragraph is not applicable since it pertains to engines with a displacement of greater than or equal to 30 liters per cylinder.
§60.4207(e)	None	This paragraph is not applicable since the engines do not have a national security exemption under §60.4200(d).
§60.4208	8.1.4.	This section regarding deadlines to import and install engines has been incorporated via NSR permit R13-2818H, requirement 9.1.4.
§60.4209(a)	8.1.5.	The permittee's engines are emergency stationary CI internal combustion engines that do not meet the standards applicable to non-emergency engines; therefore, the permittee must install a non-resettable hour meter prior to startup of the engine. This requirement has been incorporated into the operating permit via underlying NSR permit R13-2818H, requirement 9.1.5.
§60.4209(b)	None	The permittee's engines are equipped with diesel particulate filters but are not required to comply with the emission standards in §60.4204 since the engines are for emergency use; therefore, this paragraph is not applicable. Furthermore, requirement 9.1.6. of permit R13-2818H has been excluded from the Title V permit.
§60.4210	None	This section pertains to manufacturers of engines. Since the permittee is not a manufacturer, this section is not applicable.
§60.4211(a)	8.1.6.	This section is applicable and has been incorporated into the Title V permit via underlying NSR permit R13-2818H, requirement 9.1.7.

<b>Subpart III</b>	<b>Title V</b>	<b>Discussion</b>
§60.4211(b)	None	This section is not applicable since the engines are not pre-2007 model year stationary CI ICE.
§60.4211(c)	8.1.7.	This section is applicable and has been incorporated into the Title V permit via underlying NSR permit R13-2818H, requirement 9.1.8.
§60.4211(d)	None	This section is not applicable since the engines are not subject to emission standards specified in §60.4204(c) or §60.4205(d).
§60.4211(e)	None	This paragraph is not applicable since it pertains to modified or reconstructed emergency engines.
§60.4211(f)	8.1.8.	<p>This section is applicable and has been incorporated into the Title V permit with underlying NSR permit R13-2818H, requirement 9.1.9. However, according to 5/24/2019 technical correspondence, none of the requirements in §§60.4211(f)(2)(ii), (2)(iii), and (3)(i) are applicable since the permittee only uses the generators for its own emergency power usage at the Majorsville site.</p> <p>In paragraph (2), the language “any combination of” has been removed since paragraphs (ii) and (iii) are not included in the condition.</p> <p>In paragraph (3), the language “emergency demand response in paragraph (f)(2) of this section” has been excluded. Since §60.4211(f)(3)(i) is not applicable, the last statement in §60.4211(f)(3) (concerning peak shaving, emergency demand response, or generating income) has been excluded.</p>
§60.4211(g)	8.1.9.	<p>§60.4211(g) is applicable and has been incorporated into the Title V permit via underlying NSR permit R13-2818H, requirement 9.1.10.</p> <p>§60.4211(g)(1) is applicable to the engines M7-G-9*, MD1-G-4, MD1-G-5, MD2-G-10*, and MD2-G-11 since they are rated less than 100-hp. The engines have been listed in parentheses following condition 8.1.10.(1).</p> <p>§60.4211(g)(2) is applicable to the engines M3-G-2, M3-G-3, M4-G-6, M4-G-7, and M7-G-8 since these are rated greater than or equal to 100-hp and less than or equal to 500-hp. The engines have been listed in parentheses following condition 8.1.10.(2).</p> <p>§60.4211(g)(3) is not applicable since none of the CI engines are rated greater than 500-hp.</p>
§60.4211(h)	None	This paragraph is not applicable since the engines are not equipped with an air emissions control device (AECD).
<b>Testing Requirements for Owners and Operators</b>		
§60.4212(a)	8.3.4.	This section has been incorporated into the Title V permit via underlying NSR permit R13-2818H, requirement 9.2.4. The engines are manufacturer certified; however, if the engines are not operated in a certified manner, then this testing requirement must be followed by the permittee.
§60.4212(b)	None	This section is not applicable since the engines are not subject to emission standards for new CI engines in 40 C.F.R. part 1039.

Subpart III	Title V	Discussion
§60.4212(c)	8.3.5.	This section is applicable since the engines M3-G-2, M3-G-3, M4-G-6, M4-G-7, M7-G-8, M7-G-9*, MD1-G-4, and MD2-G-10* are subject to emission standards for new CI engines in 40 C.F.R. §89.112 (MD1-G-5 and MD2-G-11 are not subject to §89.112 as discussed above concerning §60.4205(b) and §60.4202(a)(2)).
§60.4212(d)	None	This section is not applicable since the engines are not subject pre-2007 model year engine emission standards.
§60.4212(e)	None	This section is not applicable since the engines are not subject to emission standards for new CI engines in 40 C.F.R. part 1042.
§60.4213	None	This section is not applicable since the engines do not have a displacement greater than 30 liters per cylinder.
<b>Notification, Reports, and Records for Owners and Operators</b>		
§60.4214(a)	None	This section is not applicable since the engine is an emergency type and is less than 3,000-hp; does not have a displacement greater than or equal to 10 liters per cylinder; and is not a pre-2007 model year engine.
§60.4214(b)	8.4.3.	<p>This section is applicable to the engines in as far as the first statement provides that an initial notification is not required for emergency engines. In other words, the first statement applies an exemption that is applicable to the engines.</p> <p>The second statement is applicable to engines starting with the applicable model year in Table 5 to Subpart III. The engines M3-G-2, M3-G-3, M4-G-6, and M4-G-7 are each rated at 145 hp and were constructed in 2014. Per Table 5 to Subpart III, the recordkeeping in §60.4214(b) is applicable to these engines since they are post-2012 model year. The engine M7-G-8 is included in this list but has not been installed.</p> <p>The engine M7-G-9* (MY<sup>3</sup> 2017), MD1-G-4 (MY 2012), MD1-G-5 (MY 2012), and MD2-G-11 (will not be installed) are rated between 25-hp and 75-hp. This requirement is applicable for such engines beginning in MY 2013. Since M7-G-9* is the only engine meeting the model year criteria, only it has been listed in addition to the engines specified above.</p> <p>The engines MD2-G-10* is rated 24.3 hp and does not fall within the engine power ranges listed in Table 5; therefore, this requirement is not applicable to MD2-G-10*.</p>
§60.4214(c)	None	Though each of the diesel engines are equipped with a diesel particulate filter, they are not required to comply with the emission standards in §60.4204 as determined above concerning §60.4209(b). Therefore, this paragraph is not applicable. Furthermore, requirement 9.3.5. of permit R13-2818H has been excluded from the Title V permit.
§60.4214(d)	None	According to 5/24/2019 technical correspondence, none of the diesel engines that are greater than 100-hp operate or are contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §§60.4211(f)(2)(ii) and (iii) or operates for

<sup>3</sup> MY = Model Year

Subpart IIII	Title V	Discussion
		the purposes specified in §60.4211(f)(3)(i). For these reasons, this paragraph regarding an annual report is not applicable.
§60.4214(e)	None	In 8/16/2019 technical correspondence, the permittee confirmed there are no auxiliary control devices on the diesel engines. Therefore, this paragraph is not applicable since none of the engines are equipped with an auxiliary emission control device (AECD) pursuant to the requirements of 40 C.F.R. §1039.665.
<b>Special Requirements</b>		
§60.4215	None	This section is not applicable since the engines are not located in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands.
§60.4216	None	This section is not applicable since the engines are not located in Alaska.
§60.4217	None	This section is not applicable since the engines combust only diesel fuel.

13. **40 C.F.R. Part 60 Subpart JJJJ – STANDARDS OF PERFORMANCE FOR STATIONARY SPARK IGNITION INTERNAL COMBUSTION ENGINES.** The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (6) of §60.4230. The permittee owns and operates the following SI ICE:

**Spark Ignition Engines**

Emission Unit ID	Rated Power	Emission Unit Description	Control Device	Year Installed
C-102	2,370 hp	Caterpillar G3608 Compressor Engine	Oxidation Catalyst	2010
C-103	2,370 hp	Caterpillar G3608 Compressor Engine	Oxidation Catalyst	2010
C-104	2,370 hp	Caterpillar G3608 Compressor Engine	Oxidation Catalyst	2010
M1-G-1	254 hp	Majorsville 1 & 2 150 kW Emergency Generator Generac Model No. QT13068KNAC (non-certified by manufacturer)	None	2013

Other relevant engine characteristics include:

- The engines combust only natural gas.
- The engines are 4-stroke, lean burn (4SLB), according to the application.
- The engines are not manufacturer certified, according to 5/24/2019 technical correspondence.

Table JJJJ, below, is an applicability analysis for the SI engines above.

**Table JJJJ**

Subpart JJJJ	Title V	Discussion
§60.4230(a)	7.1.1.	This section has been incorporated into the operating permit via underlying NSR permit R13-2818, requirement 8.1.1. The specific paragraphs §§60.4230(a)(4) and (a)(5) have been added to the citation of authority since they are the specific paragraphs included in the underlying permit requirement.

<b>Subpart JJJJ</b>	<b>Title V</b>	<b>Discussion</b>
§60.4230(b)	None	This section is not applicable since the engines are not being tested at an engine test cell/stand.
§60.4230(c)	None	This section is not applicable since the facility is subject to the Title V permitting program.
§60.4230(d)	None	This section is not applicable since the engines do not combust alcohol-based fuels or gasoline.
§60.4230(e)	None	This section is not applicable since the engines are not subject to an exemption described in 40 C.F.R. part 1068, subpart C.
§60.4230(f)	None	This section is not applicable since the engines are not acting as temporary replacement units located at a stationary source less than 1 year.
<b>Emission Standards for Manufacturers</b>		
§§60.4231(a) through (g)	None	This section pertains to manufacturers of non-emergency engines. Since the permittee is not a manufacturer this section is not applicable.
§60.4232	None	This section pertains to manufacturers of engines. Since the permittee is not a manufacturer, this section is not applicable.
<b>Emission Standards for Owners and Operators</b>		
§60.4233(a)	None	This section pertains to engines less than or equal to 25-hp. Since none of the engines meet this criterion, this section is not applicable.
§60.4233(b)	None	This section pertains to engines greater than 25-hp that combust gasoline. Since none of the engines combust gasoline, this section is not applicable.
§60.4233(c)	None	This section pertains to engines that combust LPG. Since none of the engines combust LPG, this section is not applicable.
§60.4233(d)	None	This section pertains to engines rated between 25-hp and 100-hp. Since none of the engines meet these criteria, this section is not applicable.
§60.4233(e)	7.1.2.	This section has been incorporated into the operating permit via underlying NSR permit R13-2818, requirement 8.2.1. However, the specific pollutant emission limitations from Table 1 in Subpart JJJJ have been added to the condition. The fifth row in Table 1 is applicable to the compressor engines since they are non-emergency SI natural gas greater than 500-hp manufactured after 7/1/2007. The last (14 <sup>th</sup> ) row is applicable to the emergency generator since it is an emergency type greater than 130-hp. The emission limits for each pollutant happen to be the same for both types of engines; therefore, only one table of emission limits has been included in the permit condition. Because the engines are non-certified, both the mass rate and concentration limits have been included in the permit as provided in footnote “a” of Table 1. Because the compressor engines are not certified to the standards in 40 C.F.R. part 1048, the last statement in the permit condition is not applicable. However, since the NSR permit includes it since it’s part of §60.4233(e), it has been retained in the Title V permit.
§60.4233(f)	None	The requirements of this section are in underlying NSR permit R13-2818, requirement 8.2.2. However, none of the SI engines at the facility meet any of the criteria in §§60.4233(f)(1) through (5): <ul style="list-style-type: none"> <li>▪ §60.4233(f)(1) is for engines rated less than 25 hp.</li> <li>▪ §60.4233(f)(2) is for engines that use gasoline.</li> </ul>

Subpart JJJJ	Title V	Discussion
		<ul style="list-style-type: none"> <li>▪ §60.4233(f)(3) is for engines that are rich burn and use LPG.</li> <li>▪ §60.4233(f)(4) is for engines that combust natural gas, but that are modified or reconstructed after June 12, 2006.</li> <li>▪ §60.4233(f)(5) is for engines that combust landfill/digester gas.</li> </ul> <p>Therefore, this section of Subpart JJJJ is not applicable and has been excluded from the Title V permit.</p>
§60.4233(g)	None	This section pertains to engines that combust wellhead gas. Since none of the engines combust wellhead gas, this section is not applicable.
§60.4233(h)	None	The engines are not required to meet 40 C.F.R. 1048.101; therefore, this section is not applicable.
§60.4234	7.1.3.	This applicable section has been incorporated into the operating permit via underlying NSR permit R13-2818, requirement 8.2.3.
<b>Other Requirements for Owners and Operators</b>		
§60.4235	None	This section pertains to engines that combust gasoline. Since none of the engines combust gasoline, this section is not applicable.
§60.4236	None	This section pertains to deadlines for importing and installing stationary SI ICE produced in previous model years. The application does not indicate that the permittee intends to do this; therefore, a permit condition from this section is not warranted.
§60.4237(a)	None	This section pertains to emergency engines rated greater than or equal to 500-hp. Since the only SI emergency engine (M1-G-1) is less than 500-hp, this section is not applicable.
§60.4237(b)	7.1.5.	This section is applicable since M1-G-1 is an emergency stationary SI engine greater than or equal to 130-hp and less than 500-hp. The section has been incorporated into the operating permit via underlying NSR permit R13-2818, requirement 8.2.4.
§60.4237(c)	None	This section pertains to emergency engines rated less than 130-hp. Since the only SI emergency engine (M1-G-1) is greater than 500-hp, this section is not applicable.
<b>Compliance Requirements for Manufacturers</b>		
§60.4238	None	This section pertains to manufacturers of SI ICEs rated less than 25-hp. Since none of the permittee's SI ICEs meet these criteria, this section is not applicable.
§60.4239	None	This section pertains to manufacturers of SI ICEs that combust gasoline. Since none of the permittee's SI ICEs meet these criteria, this section is not applicable.
§60.4240	None	This section pertains to manufacturers of SI ICEs that are rich burn engines that combust LPG. Since none of the permittee's SI ICEs meet these criteria, this section is not applicable.
§60.4241	None	This section pertains to manufacturers of SI ICEs that are participating in the voluntary certification program or a manufacturer of equipment containing such engines. Since none of the permittee's SI ICEs meet these criteria, this section is not applicable.
§60.4242	None	This section pertains to manufacturers of SI ICEs. Since the permittee is not a manufacturer, this section is not applicable. Furthermore, no applicable substantive requirement in Subpart JJJJ refers to requirements in §60.4242; therefore, it is not applicable.

Subpart JJJJ	Title V	Discussion
<b>Compliance Requirements for Owners and Operators</b>		
§60.4243(a)	None	This section pertains to owners and operators of SI ICEs manufactured after July 1, 2008, and that must comply with emission standards in §§60.4233(a) through (c). Since none of the engines are subject to §§60.4233(a) through (c), but are subject to §60.4233(e), this section is not applicable.
§60.4243(b)	7.1.5.	This section is applicable to owners and operators of SI ICEs that must comply with emission standards in §§60.4233(d) or (e). All the SI ICEs (C-102, C-103, C-104, M1-G-1) are subject to §60.4233(e); therefore, this section is applicable and has been incorporated into the operating permit via underlying NSR permit R13-2818, requirement 8.3.1.
§60.4243(c)	None	The requirements of this section are in underlying NSR permit R13-2818, requirement 8.3.2. However, none of the SI engines at the facility must comply with the emission standards specified in §60.4233(f) as discussed above. Therefore, this section of Subpart JJJJ is not applicable and has been excluded from the Title V permit.
§60.4243(d)	7.1.6.	This section has been incorporated into the operating permit via underlying NSR permit R13-2818, requirement 8.3.4. The specific requirements in §60.4243(d)(1) through (3) have been added to the permit condition.
§60.4243(e)	None	This section pertains to stationary SI natural gas fired engines and the option to operate the engines using propane. The application does not indicate that any SI engine will combust propane; therefore, this section is not applicable.
§60.4243(f)	7.3.2.	<p>This section pertains to stationary SI ICE that are less than or equal to 500-hp and are non-certified or are not operated and maintained according to the manufacturer’s emission-related instructions.</p> <p>Due to their horsepower ratings, the compressor engines (C-102, C-103, C-104) are not subject to this section.</p> <p>The emergency generator (M1-G-1) is less than 500-hp and is not a certified engine; therefore, this section is applicable to engine M1-G-1 and has been written in the operating permit.</p>
§60.4243(g)	None	This section pertains to use of air-to-fuel controllers with the operation of three-way catalysts/none-selective catalytic reduction. None of the SI ICEs are equipped with such control devices; therefore, this requirement is not applicable.
§60.4243(h)	None	<p>According to 5/24/2019 technical correspondence, the three engines C-102, C-103 and C-104 were manufactured on 1/28/2010, 2/18/2010 and 2/16/2010, respectively. Therefore, the dates do not meet the applicability criteria in this section. Further, the engines are not required to comply with the emission standards specified in §§60.4233(b) or (c) as discussed above. For these reasons, the requirements in §60.4243(h) are not applicable.</p> <p>The requirements of this section are in underlying NSR permit R13-2818, requirement 8.3.3. However, the requirement is not applicable since its underlying Subpart JJJJ requirement is not applicable.</p>

Subpart JJJJ	Title V	Discussion
<b>Testing Requirements for Owners and Operators</b>		
§§60.4244(a) through (g)	7.3.1.	These sections have been incorporated into the operating permit via underlying NSR permit R13-2818, requirement 8.4.1. These testing requirements are applicable when a non-certified engine is utilized as specified in §60.4243(b) (condition 7.1.5.b.).
<b>Notification, Reports, and Records for Owners and Operators</b>		
§60.4245(a)	7.4.1.	This section has been incorporated into the operating permit via underlying NSR permit R13-2818, requirement 8.5.1.a.
§60.4245(b)	7.4.2.	This section has been incorporated into the operating permit via underlying NSR permit R13-2818, requirement 8.5.1.b.
§60.4245(c)	7.5.1.	This section applies to engines greater than 500-hp that have not been certified by an engine manufacturer to meet requirements in §60.4231. Since the compressor engines are not certified, this section is applicable and has been incorporated into the operating permit via underlying NSR permit R13-2818, requirement 8.5.1.c.
§60.4245(d)	7.5.2.	This section has been incorporated into the operating permit via underlying NSR permit R13-2818, requirement 8.5.1.d.
§60.4245(e)	None	According to 5/24/2019 technical correspondence, the emergency generator M1-G-1 does not meet the criteria in §60.4245(e) for this annual report requirement in this section to be applicable.
<b>General Provisions</b>		
§60.4246	None	No permit condition is warranted from this section.
<b>Mobile Source Provisions</b>		
§§60.4247(a) through (c)	None	These sections specify mobile source provisions applicable to manufacturers of SI ICEs. Since the permittee is not a manufacturer, this section is not applicable.

14. **40 C.F.R. Part 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.** This subpart establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO<sub>2</sub>) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011, and on or before September 18, 2015 (40 C.F.R. §60.5360). The provisions of this subpart are applicable to onshore affected facilities listed in paragraphs (a) through (g) of §60.5365 (40 C.F.R. §60.5365).

According to the Engineering Evaluation for R13-2818H, the equipment comprising Majorsville III through VI and De-ethanizer I are subject to this regulation since it is a natural gas processing facility for which construction commenced within the applicability dates of this regulation. Table OOOO-1 below lists the types of equipment that are affected facilities in paragraphs (a) through (g) of §60.5365 and specifies which equipment utilized by the permittee are subject to Subpart OOOO requirements.

**Table OOOO-1**

Subpart OOOO	Affected Facility	Permittee's Facility
§60.5365(a)	Gas well	The facility does not have a gas well. Therefore, all requirements regarding gas well affected facilities under this subpart do not apply.

Subpart OOOO	Affected Facility	Permittee's Facility
§60.5365(b)	Centrifugal compressor	<p>The facility utilizes centrifugal compressors listed in Attachment A of this Fact Sheet, but none of them meet the criteria and definitions in Subpart OOOO for the units to be subject as affected facilities under this subpart. Specifically, the permittee's units are dry seal type, but the standards in §60.5380 pertain to wet seal units. Therefore, all requirements regarding centrifugal compressor affected facilities under this subpart are not applicable to this equipment.</p> <p>The facility utilizes screw type compressors; however, the definition of <i>Centrifugal compressor</i> in §60.5430 excludes screw compressors.</p>
§60.5365(c)	Reciprocating compressor	<p>The facility utilizes reciprocating compressors listed in Attachment A of this Fact Sheet that are affected facilities under this subpart. The affected compressor IDs are: C-3102, C-3103, C-3104, C-3105, C-4110, C-4111, C-4102, C-4103, C-4104, C-4105, C-5102, C-5103, C-5104, C-6102, C-6103, C-6104, C-1101, C-1102, C-1103, C-7117, and C-2110. Therefore, all requirements regarding reciprocating compressors in this subpart are <b>applicable</b> to this equipment.</p>
§60.5365(d)	Pneumatic controllers	<p>Majorsville III through VI and De-ethanizer I were constructed after August 23, 2011, and on or before September 18, 2015. Therefore, all requirements regarding pneumatic controllers located at a natural gas processing plant this subpart are <b>applicable</b> to this equipment.</p>
§60.5365(e)	Storage Vessel	<p>The facility does not have a storage vessel that has the potential for VOC emissions equal to or greater than 6 tpy; therefore, the storage vessel requirements are not applicable.</p>
§60.5365(f)	Group of all equipment, except compressors, within a process unit subject to leak standards	<p>Majorsville III through VI and De-ethanizer I were constructed within the applicability dates of Subpart OOOO. Therefore, Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants are <b>applicable</b> to this equipment.</p>
§60.5365(g)	Sweetening units	<p>The facility does not have a sweetening unit. Therefore, all requirements regarding sweetening unit affected facilities under this subpart do not apply.</p>

Refer to Section 11.0 of the operating permit for the specific requirements applicable to Majorsville III through VI and De-ethanizer I that have been incorporated as detailed in Table OOOO-2 below. Note that only the sections in the regulation that pertain to the affected facilities that have applicable requirements (as determined above) and sections that set forth general requirements (e.g., reporting) will be analyzed. Finally, several requirements have been included via the underlying permit R13-2818H, which are noted in the table.

**Table OOOO-2**

<b>Subpart OOOO</b>	<b>Title V</b>	<b>Discussion</b>
<b>General Requirements</b>		
§60.5370(a)	11.1.1.	The compliance date has been incorporated into the permit via underlying NSR permit R13-2818H, requirement 13.1.1.
§60.5370(b)	11.1.2.	The general duty requirement has been incorporated into the permit.
§60.5370(c)	11.1.3.	The exemption regarding Title V has been incorporated into the permit only because 13.1.2. in underlying NSR permit R13-2818H is an applicable requirement. The permittee is required by law to obtain a Title V permit.
<b>Standards for Reciprocating Compressors</b>		
§60.5385	13.1.1.	The standards for reciprocating compressors have been included in the operating permit.
<b>Standards for Pneumatic Controllers</b>		
§60.5390	9.1.1.	The standards for pneumatic controllers have been incorporated into the operating permit with underlying NSR permit R13-2818H, requirement 11.1.1.
<b>Leak standards for the group of all equipment, except compressors, within a process unit, exceptions and alternatives to the limitations</b>		
§60.5400	11.1.4.	The equipment leak standards have been incorporated into the permit via underlying NSR permit R13-2818H, requirement 13.1.3.
§60.5401	11.1.5.	The exceptions to the equipment leak standards have been incorporated into the permit via underlying NSR permit R13-2818H, requirement 13.1.4.
§60.5402	11.1.6.	The alternative emission limitations for equipment leaks have been incorporated into the permit via underlying NSR permit R13-2818H, requirement 13.1.5.
<b>Initial Compliance Requirements</b>		
§§60.5410 and 60.5410(c)	13.2.1.	The initial compliance demonstration requirements for reciprocating compressors in §60.5410(c) have been incorporated into the operating permit.
§§60.5410, 60.5410(d)	9.1.5.	The initial compliance demonstration requirements for pneumatic controllers in §60.5410(d) have been incorporated into the operating permit.
§§60.5410 and 60.5410(f)	11.1.7.	The initial compliance demonstration requirements for equipment leaks have been incorporated into the permit via underlying NSR permit R13-2818H, requirement 13.2.1. The specific citation §60.5410(f) has been added to the citation of authority.
<b>Additional Requirements for Reciprocating Compressors</b>		
§60.5411(a)	13.1.2.	The closed vent system requirements for reciprocating compressors have been incorporated into the operating permit.
<b>Continuous Compliance Requirements</b>		
§60.5415(c)	13.2.2.	The continuous compliance demonstration requirements for reciprocating compressors in §60.5415(c) have been incorporated into the operating permit.
§60.5415(d)	9.1.6.	The continuous compliance demonstration requirements for pneumatic controllers have been incorporated into the operating permit.
§60.5415(f)	11.1.8.	The continuous compliance demonstration requirements for equipment leaks have been incorporated into the permit via underlying NSR permit R13-2818H, requirement 13.3.1. The specific citation §60.5415(f) has been added to the citation of authority.
§60.5416(a)	13.3.1.	The inspection requirements for reciprocating compressors in §60.5416(a) have been incorporated into the operating permit.

Subpart OOOO	Title V	Discussion
§60.5416(b)	13.3.2.	This section requires compliance with applicable test methods and procedures; therefore, it has been written in the operating permit. Since this section provides testing specifications and methods, the first paragraph of §60.5416(b) only is included in the permit without including all the test specifications contained in §§60.5416(b)(1) through (13). This decision agrees with U.S. EPA guidance <sup>4</sup> regarding IBR in operating permits.
<b>Notification, Reporting, and Recordkeeping Requirements</b>		
§60.5420(a)	None	<p><i>Notifications.</i></p> <p>The notification requirement in §60.5420(a)(1) is applicable to the permittee’s pneumatic controllers and reciprocating compressors in as far as it provides that the notifications in §§60.7(a)(1), (3), and (4) are not required for these affected facilities. In other words, this paragraph applies an exemption that is applicable to the pneumatic controllers and reciprocating compressors.</p> <p>The requirements in §60.5420(a)(2) are not applicable since the facility does not have a well affected facility.</p>
§60.5420(b)	9.5.2. 13.5.1.	<p><i>Reporting Requirements.</i></p> <p>The requirements in (b)(1) through (8) are reviewed below for applicability to generate reporting condition content.</p> <ul style="list-style-type: none"> <li>▪ (b)(1) general information is <b>applicable</b>.</li> <li>▪ (b)(2) is not applicable since it pertains to wells.</li> <li>▪ (b)(3) is not applicable since it pertains to centrifugal compressors.</li> <li>▪ (b)(4) is <b>applicable</b> since it pertains to reciprocating compressors.</li> <li>▪ (b)(5) is <b>applicable</b> since it pertains to each pneumatic controller.</li> <li>▪ (b)(6) is not applicable since it pertains to each storage vessel.</li> <li>▪ (b)(7) is not applicable since there are no applicable performance tests under this subpart.</li> <li>▪ (b)(8) is not applicable since it pertains to enclosed combustors.</li> </ul> <p>The permit conditions have been written to include the respective applicable requirements determined above.</p>
§60.5420(c)	9.4.2. 13.4.1.	<p><i>Recordkeeping Requirements.</i></p> <p>The requirements in (c)(1) through (14) are reviewed below for applicability to generate the recordkeeping condition content.</p> <ul style="list-style-type: none"> <li>▪ (c)(1) is not applicable since it pertains to wells.</li> <li>▪ (c)(2) is not applicable since it pertains to centrifugal compressors.</li> <li>▪ (c)(3) is <b>applicable</b> since it pertains to reciprocating compressors.</li> </ul>

<sup>4</sup> Refer to section II.E.2.c. of U.S. EPA’s White Paper Number 2 for Improved Implementation of the Part 70 Operating Permit Program (March 5, 1996), located at <https://www.epa.gov/title-v-operating-permits/white-paper-number-2-improved-implementation-part-70-operating-permits> and accessed by the writer on August 22, 2019.

Subpart OOOO	Title V	Discussion
		<ul style="list-style-type: none"> <li>▪ (c)(4) is <b>applicable</b> since it pertains to each pneumatic controller.</li> <li>▪ (c)(5) is not applicable since it pertains to each storage vessel.</li> <li>▪ (c)(6) is <b>applicable</b> since it pertains to each closed vent system inspection for reciprocating compressors. Since there are no storage vessels or centrifugal compressors affected facilities, these have been excluded from the condition.</li> <li>▪ (c)(7) is <b>applicable</b> since it pertains to each cover inspection for reciprocating compressors. Since there are no storage vessels or centrifugal compressors affected facilities, these have been excluded from the condition.</li> <li>▪ (c)(8) is <b>applicable</b> since it pertains to each inspection of reciprocating compressors. Since there are no pneumatic pumps, storage vessels or centrifugal compressors affected facilities, these are excluded from the condition.</li> <li>▪ (c)(9) is <b>applicable</b> since it pertains to each closed vent system for reciprocating compressors. Since there are no centrifugal compressors affected facilities, this has been excluded from the condition.</li> <li>▪ (c)(10) is not applicable since it pertains to each centrifugal compressor.</li> <li>▪ (c)(11) is not applicable since it pertains to each centrifugal compressor.</li> <li>▪ (c)(12) is not applicable since it pertains to carbon adsorbers installed on a storage vessel.</li> <li>▪ (c)(13) is not applicable since it pertains to each storage vessel.</li> <li>▪ (c)(14) is not applicable since it pertains to each control device failing the visible emissions test.</li> </ul> <p>The permit conditions have been written to include the respective applicable requirements determined above.</p>
§60.5421	11.4.1.	<p><i>Additional Recordkeeping Requirements.</i></p> <p>The additional records requirements for equipment leaks have been incorporated into the permit via underlying NSR permit R13-2818H, requirement 13.4.1.</p>
§60.5422	11.5.1.	<p><i>Additional Reporting Requirements.</i></p> <p>The additional reporting requirements for equipment leaks have been incorporated into the permit via underlying NSR permit R13-2818H, requirement 13.4.3.</p>

15. **40 C.F.R. Part 60 Subpart OOOOa – STANDARDS OF PERFORMANCE FOR CRUDE OIL AND NATURAL GAS FACILITIES FOR WHICH CONSTRUCTION, MODIFICATION OR RECONSTRUCTION COMMENCED AFTER SEPTEMBER 18, 2015.** This subpart establishes emission standards and compliance schedules for the control of the pollutant greenhouse gases (GHG). The greenhouse gas standard in this subpart is in the form of a limitation on emissions of methane from affected facilities in the crude oil and natural gas source category that commence construction, modification, or reconstruction after September 18, 2015. This subpart also establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO<sub>2</sub>) emissions from affected facilities in the crude oil and natural gas source category that commence construction, modification or reconstruction after September 18, 2015. The effective date of the rule is August 2, 2016 (40 C.F.R. §60.5360a(a)).

According to the Engineering Evaluation for R13-2818H, the equipment comprising Majorsville VII and De-ethanizer II are subject to this regulation since it is a natural gas processing facility constructed after the applicability date, September 18, 2015. Table OOOOa-1 below lists the types of equipment that are affected facilities under this subpart and specifies which equipment utilized by the permittee are affected facilities.

**Table OOOOa-1**

Subpart OOOOa	Affected Facility	Permittee's Facility
§60.5365a(a)	Gas well	The facility does not have a gas well. Therefore, all requirements regarding gas well affected facilities under 40 C.F.R. 60 Subpart OOOOa do not apply.
§60.5365a(b)	Centrifugal compressor	<p>The facility utilizes centrifugal compressors listed in Attachment A of this Fact Sheet, but none of them meet the criteria and definitions in Subpart OOOOa for the units to be subject as affected facilities under this subpart. Specifically, the permittee's units are dry seal type, but the standards in §60.5380a pertain to wet seal units. Therefore, all requirements regarding centrifugal compressor affected facilities under this subpart are not applicable to this equipment.</p> <p>The facility utilizes screw type compressors; however, the definition of <i>Centrifugal compressor</i> in §60.5430a excludes screw compressors.</p>
§60.5365a(c)	Reciprocating compressor	The facility utilizes reciprocating compressors listed in Attachment A of this Fact Sheet that are affected facilities under this subpart. The affected compressor IDs are: C-7102, C-7103, C-7104, C-7105, C-D2101, C-D2102, C-D2103, and C-D2117. Therefore, all requirements regarding reciprocating compressors in this subpart are <b>applicable</b> to this equipment.
§60.5365a(d)	Pneumatic controllers	Majorsville VII and De-ethanizer II were constructed after September 18, 2015. Therefore, all requirements regarding pneumatic controllers located at a natural gas processing plant this subpart are <b>applicable</b> to this equipment.
§60.5365a(e)	Storage Vessel	The facility does not have storage vessels for which construction commenced after September 18, 2015. Therefore, the requirements regarding storage vessels under this subpart do not apply.

Subpart OOOOa	Affected Facility	Permittee's Facility
§60.5365a(f)	Group of all equipment within a process unit subject to leak standards	Majorsville VII and De-ethanizer II were constructed after September 18, 2015. Therefore, Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants are <b>applicable</b> to this equipment.
§60.5365a(g)	Sweetening units	The facility does not have a sweetening unit. Therefore, the requirements regarding sweetening units under this subpart do not apply.
§60.5365a(h)	Pneumatic Pumps	The facility does not have pneumatic pump affected facilities constructed after September 18, 2015. Therefore, the requirements regarding pneumatic pumps under this subpart do not apply.
§60.5365a(i)	Collection of fugitive emission components at a well site	The facility does not have a well site. Therefore, the requirements regarding the collection of fugitive emission components at a well site under this subpart do not apply.
§60.5365a(j)	Collection of fugitive emission components at a compressor station	<p>Majorsville VII and De-ethanizer II were constructed after September 18, 2015. Based on this, the Engineering Evaluation for R13-2818G (i.e., the revision that permitted the construction of Majorsville VII and De-ethanizer II) stated that the Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants are applicable to this equipment.</p> <p>However, the term <i>Compressor station</i> is defined in §60.5430a as any permanent combination of one or more compressors that move natural gas at increased pressure through gathering or transmission pipelines, or into or out of storage. This includes, but is not limited to, gathering and boosting stations and transmission compressor stations. The combination of one or more compressors located at a well site, or located at an onshore natural gas processing plant, is not a compressor station for purposes of §60.5397a.</p> <p>§60.5397a sets forth standards for the collection of fugitive emission components at a compressor station. Since the compressors at the facility are located at an onshore natural gas processing plant, the facility is not a compressor station for purposes of §60.5397a and such standards in §60.5397a therefore are not applicable.</p>

Refer to Sections 9.0 and 12.0 of the operating permit for the pneumatic controller and equipment leak requirements, respectively, that are applicable to Majorsville VII and De-ethanizer II that have been incorporated as detailed in Table OOOOa-2 below. Note that only the sections in the regulation that pertain to the affected facilities that have applicable requirements (as determined above) and sections that set forth general requirements (e.g., reporting) will be analyzed. Finally, several requirements have been included via the underlying permit R13-2818H.

**Table OOOOa-2**

<b>Subpart OOOOa</b>	<b>Title V</b>	<b>Discussion</b>
<b>General Requirements</b>		
§60.5370a(a)	12.1.1.	The compliance date has been incorporated into the permit via underlying NSR permit R13-2818H, requirement 14.1.1.
§60.5370a(b)	12.1.2.	The general duty requirement has been incorporated into the permit via underlying NSR permit R13-2818H, requirement 14.1.2.
§60.5370a(c)	12.1.3.	The exemption regarding Title V has been incorporated into the permit only because 14.1.3. in underlying NSR permit R13-2818H is an applicable requirement. The permittee is required by law to obtain a Title V permit.
<b>Standards for Reciprocating Compressors</b>		
§60.5385a	13.1.3.	The standards for reciprocating compressors have been included in the operating permit.
<b>Standards for Pneumatic Controllers</b>		
§60.5390a	9.1.2.	The standards for pneumatic controllers have been incorporated into the operating permit with underlying NSR permit R13-2818H, requirement 11.1.1.
<b>Standards for the Collection of Fugitive Emissions Components at a Compressor Station</b>		
§60.5397a	None	Per the definition of <i>Compressor station</i> in 40 C.F.R. §60.5430a, the requirements of this section are not applicable. Refer to the discussion in Table OOOOa-1 above regarding non-applicability of §60.5365a(j).
<b>Leak standards for the group of all equipment within a process unit, exceptions and alternatives to the limitations</b>		
§60.5400a	12.1.4.	The equipment leak standards have been incorporated into the permit via underlying NSR permit R13-2818H, requirement 14.1.4.
§60.5401a	12.1.5.	The exceptions to the equipment leak standards have been incorporated into the permit via underlying NSR permit R13-2818H, requirement 14.1.5.
§60.5402a	12.1.6.	The alternative emission limitations for equipment leaks have been incorporated into the permit via underlying NSR permit R13-2818H, requirement 14.1.6.
<b>Initial Compliance Requirements</b>		
§§60.5410a and 60.5410a(c)	13.2.3.	The initial compliance demonstration requirements for reciprocating compressors in §60.5410a(c) have been incorporated into the operating permit.
§§60.5410a and 60.5410a(d)	9.1.3.	The initial compliance demonstration requirements for pneumatic controllers have been incorporated into the operating permit.
§§60.5410a and 60.5410a(f)	12.1.7.	The initial compliance demonstration requirements for equipment leaks have been incorporated into the permit via underlying NSR permit R13-2818H, requirement 14.2.1. The specific citation §60.5410a(f) has been added to the citation of authority.
<b>Additional Requirements for Reciprocating Compressors</b>		
§§60.5411a(a) and 60.5411a(d)	13.1.4.	The closed vent system requirements for reciprocating compressors have been incorporated into the operating permit.
<b>Continuous Compliance Requirements</b>		
§60.5415a(c)	13.2.4.	The continuous compliance demonstration requirements for reciprocating compressors in §60.5415a(c) have been incorporated into the operating permit.
§60.5415a(d)	9.1.4.	The continuous compliance demonstration requirements for pneumatic controllers have been incorporated into the operating permit.

Subpart OOOOa	Title V	Discussion
§60.5415a(f)	12.1.8.	The continuous compliance demonstration requirements for equipment leaks have been incorporated into the permit via underlying NSR permit R13-2818H, requirement 14.3.1. The specific citation §60.5415a(f) has been added to the citation of authority.
§60.5416a(a)	13.3.3.	The inspection requirements for reciprocating compressors in §60.5416(a) have been incorporated into the operating permit.
§60.5416a(b)	13.3.4.	This section requires compliance with applicable test methods and procedures; therefore, it has been written in the operating permit. The specific requirements in this paragraph have been IBR as previously discussed under 40 C.F.R. §60.5416(b).
<b>Notification, Reporting, and Recordkeeping Requirements</b>		
§60.5420a(a)	12.5.2.	<p><i>Notifications.</i></p> <p>The notification requirement in §60.5420a(a)(1) is applicable to the permittee’s group of all equipment within a process unit at an onshore natural gas processing plant affected facility. Therefore, it has been included as permit condition 12.5.2.</p> <p>However, §60.5420a(a)(1) states that the notifications in §§60.7(a)(1), (3), and (4) are not required for pneumatic controllers and reciprocating compressor affected facilities. In other words, this paragraph applies an exemption to these affected facilities.</p> <p>The requirements in §60.5420a(a)(2) are not applicable since the facility does not have a well affected facility.</p>
§60.5420a(b)	9.5.1. 13.5.2.	<p><i>Reporting Requirements.</i></p> <p>The requirements in (b)(1) through (13) are reviewed below for applicability to generate reporting condition content.</p> <ul style="list-style-type: none"> <li>▪ (b)(1) general information is <b>applicable</b>.</li> <li>▪ (b)(2) is not applicable since it pertains to wells.</li> <li>▪ (b)(3) is not applicable since it pertains to centrifugal compressors.</li> <li>▪ (b)(4) is <b>applicable</b> since it pertains to reciprocating compressors.</li> <li>▪ (b)(5) is <b>applicable</b> since it pertains to each pneumatic controller.</li> <li>▪ (b)(6) is not applicable since it pertains to each storage vessel.</li> <li>▪ (b)(7) is not applicable since it pertains to the collection of fugitive emissions components at each well site and the collection of fugitive emissions components at each compressor station.</li> <li>▪ (b)(8) is not applicable since it pertains to pneumatic pumps.</li> <li>▪ (b)(9) is not applicable since there are no applicable performance tests under this subpart.</li> <li>▪ (b)(10) is not applicable since there are no combustion control devices subject to this subpart.</li> <li>▪ (b)(11) is <b>applicable</b> since it pertains to electronic reporting.</li> <li>▪ (b)(12) is not applicable since there are no closed vent systems routing to a control device or process subject to this subpart.</li> </ul>

Subpart OOOOa	Title V	Discussion
		<ul style="list-style-type: none"> <li>▪ (b)(13) is not applicable since there is no collection of fugitive emissions components at a well site (as defined in §60.5430a); the collection of fugitive emissions components at a compressor station (as defined in §60.5430a); and pneumatic pump affected facilities at a well site (as defined in §60.5365a(h)(2)).</li> </ul> <p>The permit conditions have been written to include the respective applicable requirements determined above.</p>
§60.5420a(c)	9.4.1. 13.4.2.	<p><i>Recordkeeping Requirements.</i></p> <p>The requirements in (c)(1) through (17) are reviewed below for applicability to generate the recordkeeping condition content.</p> <ul style="list-style-type: none"> <li>▪ (c)(1) is not applicable since it pertains to wells.</li> <li>▪ (c)(2) is not applicable since it pertains to centrifugal compressors.</li> <li>▪ (c)(3) is <b>applicable</b> since it pertains to reciprocating compressors.</li> <li>▪ (c)(4) is <b>applicable</b> since it pertains to each pneumatic controller.</li> <li>▪ (c)(5) is not applicable since it pertains to each storage vessel.</li> <li>▪ (c)(6) is <b>applicable</b> since it pertains to each closed vent system inspection for reciprocating compressors.</li> <li>▪ (c)(7) is <b>applicable</b> since it pertains to each cover inspection for reciprocating compressors.</li> <li>▪ (c)(8) is <b>applicable</b> since it pertains to each inspection for reciprocating compressors.</li> <li>▪ (c)(9) is <b>applicable</b> since it pertains to each closed vent system for reciprocating compressors.</li> <li>▪ (c)(10) is not applicable since it pertains to each centrifugal compressor and pneumatic pumps.</li> <li>▪ (c)(11) is not applicable since it pertains to each centrifugal compressor.</li> <li>▪ (c)(12) is not applicable since it pertains to carbon adsorbers installed on a storage vessel.</li> <li>▪ (c)(13) is not applicable since it pertains to each storage vessel.</li> <li>▪ (c)(14) is not applicable since §60.5412a(d)(1)(iii) is not applicable.</li> <li>▪ (c)(15) is not applicable since there is no collection of fugitive emissions components at a well site, or the collection of fugitive emissions components at a compressor station (as defined in §60.5430a).</li> <li>▪ (c)(16) is not applicable since it pertains to pneumatic pumps.</li> <li>▪ (c)(17) is <b>applicable</b> since it pertains to each closed vent system routing to a control device or process.</li> </ul> <p>The permit condition has been written to include the applicable requirement determined above.</p>

Subpart OOOa	Title V	Discussion
§60.5421a	12.4.1.	<i>Additional Recordkeeping Requirements.</i> The additional records requirements for equipment leaks have been incorporated into the permit via underlying NSR permit R13-2818H, requirement 14.4.1. This section does not apply to reciprocating compressors.
§60.5422a	12.5.1.	<i>Additional Reporting Requirements.</i> The additional reporting requirements for equipment leaks have been incorporated into the permit via underlying NSR permit R13-2818H, requirement 14.4.2. This section does not apply to reciprocating compressors.

16. **40 C.F.R. 63 Subpart ZZZZ – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES.** Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations. The facility is an area source of HAP emissions and utilizes the engines listed in the emission units table of the operating permit.

None of the engines at the facility meet the definitions in §63.6675 of residential, commercial, or institutional emergency stationary RICE; therefore, they do not meet the exemption from the regulation in §63.6585(f).

For an area source of HAP emissions, the date June 12, 2006, determines if a RICE is new or existing regardless of horsepower rating. Since all the engines at the site were constructed after this date, they are considered *New stationary RICE* in accordance with §63.6590(a)(2)(iii).

None of the engines meet the criteria in §63.6590(b) for *Stationary RICE subject to limited requirements*. However, all the engines meet the criteria in §63.6590(c)(1) for *Stationary RICE subject to Regulations under 40 CFR Part 60*. Therefore, the engines will meet the requirements of 40 C.F.R. 63 Subpart ZZZZ by meeting the requirements of 40 C.F.R. Part 60 Subpart III, for compression ignition engines or 40 C.F.R. Part 60 Subpart JJJJ, for spark ignition engines, and no further requirements apply for such engines under Subpart ZZZZ. The applicable requirements of Subpart JJJJ and Subpart III have been incorporated into permit sections 7.0 and 8.0, respectively.

The underlying NSR permit R13-2818H incorporated both the compliance date and the requirement to comply with the applicable NSPS in its requirements 10.1.1. and 10.1.2., which are Title V conditions 7.1.7. and 8.1.10. While this writer normally would cite §§63.6590(c) and (c)(1) with all NSPS conditions, it is unnecessary in this case since the NSR permit requirement is applicable to all NSPS requirements in the respective permit section.

17. **Source Aggregation.** “Building, structure, facility, or installation” is defined as all the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous and adjacent properties, and are under the control of the same person. The Source Determination Rule for the oil and gas industry was published in the Federal Register on June 3, 2016 and became effective on August 2, 2016. EPA defined the term “adjacent” and stated that equipment and activities in the oil and gas sector that are under common control will be considered part of the same source if they are located on the same site or on sites that share equipment and are within ¼ mile of each other. The Majorsville Gas Plant will operate under the SIC code of 1321 (Natural Gas Liquid Extraction). There are other facilities operated by MarkWest that share the same two-digit major SIC code of 13. However, these facilities are not located on “contiguous or adjacent” property. Therefore, the emissions from this facility shall not be aggregated with other facilities for the purposes of making Title V and PSD determinations.

18. **40 C.F.R. 60 Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.** The affected facility to which this subpart applies is each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 100 MMBtu/hr (40 C.F.R. §60.40b(a)). The heaters H-1782 and H-D2782 are each rated greater than 100 MMBtu/hr and were constructed after the applicability date.

Both units are subject to the NO<sub>x</sub> emission limit of 0.10 lb/MMBtu in §60.44b(a) as specified in the Consent Decree for Civil Action No. 3:18-cv-2526. Refer to permit condition 5.1.6., to which a note has been added regarding 365 days after the effective date of the consent decree as per paragraph 90 in the consent decree.

As specified in the Consent Decree, compliance shall be demonstrated using a PEMS as required by 40 C.F.R. §60.48b(g)(2). Refer to permit condition 5.2.3. A note has been added regarding 365 days after the effective date of the consent decree as per paragraph 91.a. in the consent decree.

As specified in the Consent Decree, recordkeeping shall be performed per §60.49b(c). Refer to permit condition 5.4.2.

A detailed analysis of Subpart Db has been set forth in Table Db below to determine if any other requirements other than those specified in the Consent Decree are applicable. Any additional applicable requirements are designated in bold font.

**Table Db**

<b>Subpart Db</b>	<b>Title V</b>	<b>Description</b>
<b>Standard for Sulfur Dioxide (SO<sub>2</sub>)</b>		
§60.42b(a)	None	This section is not applicable since the units do not combust coal or oil.
§60.42b(b)	None	This section is not applicable since the units do not combust coal refuse.
§60.42b(c)	None	This section is not applicable since the units do not combust coal or oil.
§60.42b(d)	None	This section is not applicable since the units do not combust coal or oil.
§60.42b(e)	None	This section is not applicable since the units are not subject to emission limits, fuel oil sulfur limits, or percent reduction requirements in §60.42b.
§60.42b(f)	None	This section is not applicable since the units are not subject to emission limits or fuel oil sulfur limits in §60.42b.
§60.42b(g)	None	This section is not applicable since the units are not subject to SO <sub>2</sub> emission limits or percent reduction requirements in §60.42b.
§60.42b(h)	None	This section is not applicable since the units are not subject to SO <sub>2</sub> percent reduction requirements in §60.42b.
§60.42b(i)	None	This section is not applicable since the units are not subject to requirements in §60.42b(a), (b), or (c).

<b>Subpart Db</b>	<b>Title V</b>	<b>Description</b>
§60.42b(j)	None	This section is not applicable since the units are not subject to SO <sub>2</sub> percent reduction requirements in §60.42b.
§60.42b(k)	None	<p>§60.42b(k)(1) sets a heat rate limit on SO<sub>2</sub> or a percent reduction requirement for units that combust natural gas. However, §60.42b(k)(2) states “Units firing only very low sulfur oil, gaseous fuel, a mixture of these fuels, or a mixture of these fuels with any other fuels with a potential SO<sub>2</sub> emission rate of 140 ng/J (0.32 lb/MMBtu) heat input or less are exempt from the SO<sub>2</sub> emissions limit in §60.42b(k)(1).”</p> <p>According to the emission calculations in the application, the potential SO<sub>2</sub> emissions from H-1782 and H-D2782 are 0.07 lb/hr for each heater. The design heat input of each unit is 119.2 MMBtu/hr. Therefore, the potential emission rate is approximately (0.07 lb/hr) / (119.2 MMBtu/hr) = 0.0006 lb/MMBtu. The potential emissions being less than 32 lb/MMBtu, both units are exempt from the SO<sub>2</sub> emissions limit in §60.42b(k)(1).</p>
<b>Standard for Particulate Matter (PM)</b>		
§60.43b(a)	None	This section is not applicable since the units do not combust coal or oil.
§60.43b(b)	None	This section is not applicable since the units do not combust oil or mixtures of oil with other fuels.
§60.43b(c)	None	This section is not applicable since the units do not combust wood or mixtures of wood with other fuels.
§60.43b(d)	None	This section is not applicable since the units do not combust municipal-type solid waste or mixtures of municipal-type solid waste with other fuels.
§60.43b(e)	None	This section is not applicable since no applicable requirement requires utilization of the annual capacity factor for the heaters.
§60.43b(f)	None	This section that sets a 20% opacity standard is not applicable since the units do not combust coal, oil, wood, or mixtures of these fuels with any other fuels.
§60.43b(g)	None	This section is not applicable since the opacity standard in §60.43b(f) is not applicable.
§60.43b(h)	None	This section is not applicable since the units do not combust coal, oil, wood, a mixture of these fuels, or a mixture of these fuels with any other fuels.
<b>Standard for Nitrogen Oxides (NO<sub>x</sub>)</b>		
§60.44b(a)	5.1.6.	According to the consent decree, both units are subject to the NO <sub>x</sub> emission limit of 0.10 lb/MMBtu.
§60.44b(b)	None	This section is not applicable since the units do not combust mixtures of only coal, oil, or natural gas.
§60.44b(c)	None	This section is not applicable since the units do not simultaneously combust coal or oil, natural gas (or any combination of the three), and wood, or any other fuel.
§60.44b(d)	None	This section is not applicable since the units do not simultaneously combust natural gas and/or distillate oil.
§60.44b(e)	None	This section is not applicable since the units do not simultaneously combust only coal, oil, or natural gas with byproduct/waste.
§60.44b(f)	None	This section is not applicable since the units do not combust byproduct/waste with either natural gas or oil.
§60.44b(g)	None	This section is not applicable since the units do not combust hazardous waste with natural gas or oil.
<b>§60.44b(h)</b>	<b>5.1.7.</b>	This paragraph states that the NO <sub>x</sub> standards in §60.44b apply at all times, including periods of SSM. This applicable requirement has been included in the operating permit.
<b>§60.44b(i)</b>	<b>5.1.8.</b>	This paragraph states that compliance with the NO <sub>x</sub> standard in §60.44b is determined on a 30-day rolling average basis. This applicable requirement has been included in the operating permit.

Subpart Db	Title V	Description
§60.44b(j)	None	This section is not applicable since the units are not subject to an annual capacity factor.
§60.44b(k)	None	This section is not applicable since the units are not subject to §60.44b(j).
§60.44b(l)	None	Since §60.44b(a) states that §60.44b(l) is an exception to §60.44b(a), and the units are subject to §60.44b(a), then this paragraph in §60.44b(l) is not applicable.
<b>Compliance and performance test methods and procedures for SO<sub>2</sub></b>		
§§60.45b(a) through (k)	None	None of the requirements in this section are applicable since none of the SO <sub>2</sub> standards in §§60.42b(a) through (k) are applicable.
<b>Compliance and performance test methods and procedures for PM and NO<sub>x</sub></b>		
§60.46b(a)	5.1.7.	This paragraph states that the NO <sub>x</sub> standards in §60.44b apply at all times. This applicable requirement has been included in the operating permit with §60.44b(h).
§60.46b(b)	None	This section is not applicable since the units are not subject to Subpart Db PM emission standards.
§60.46b(c)	5.3.2.	<p>This section states that compliance with the NO<sub>x</sub> emission standards under §60.44b shall be determined through performance testing under paragraph (e) or (f), or under paragraphs (g) and (h) of this section, as applicable.</p> <p>Paragraph (e) requires performance testing using the continuous monitoring method under §60.48b, which is §60.48b(g) and §60.48b(g)(2) specified in the Consent Decree.</p> <p>Paragraph (f) is not applicable since the units are not duct burners.</p> <p>Paragraphs (g) and (h) are not applicable since §60.44b(j) or §60.44b(k) are not applicable.</p>
§60.46b(d)	None	This section is not applicable since the units are not subject to Subpart Db PM emission standards.
§60.46b(e)	5.3.3.	<p>This paragraph is applicable since it establishes required performance testing to determine compliance with the NO<sub>x</sub> emission limits under §60.44b using the continuous system of monitoring NO<sub>x</sub> under §60.48b. However, only certain paragraphs in §60.46b(e)(1) through (5) are applicable, as determined below.</p> <p><b>§60.46b(e)(1) is applicable</b> for the initial performance test.</p> <p>§60.46b(e)(2) is not applicable since it pertains to an affected facility that combusts coal.</p> <p>§60.46b(e)(3) is not applicable since it pertains to an affected facility that has a heat input capacity greater than 250 MMBtu/hr.</p> <p><b>§60.46b(e)(4) is applicable</b> following the initial performance test. However this requirement is upon request.</p> <p>§60.46b(e)(5) is not applicable since it pertains to an affected facility that combusts residual oil.</p>
§60.46b(f)	None	This paragraph is not applicable since it pertains to the limits in §§60.44b(a)(4) and 60.44b(l) for duct burners used in combined cycle systems.
§60.46b(g)	None	This paragraph is not applicable since §§60.44b(j) and 60.44b(k) are not applicable.
§60.46b(h)	None	This paragraph is not applicable since §60.44b(j) is not applicable.

<b>Subpart Db</b>	<b>Title V</b>	<b>Description</b>
§60.46b(i)	None	This paragraph is not applicable since §§60.43b(a)(4) and 60.43b(h)(5) are not applicable.
§60.46b(j)	None	This paragraph is not applicable since heaters H-1782 and H-D2782 are not subject to Subpart Db PM emission limits.
<b>Emission monitoring for SO<sub>2</sub></b>		
§§60.47b(a) through (f)	None	None of the requirements in this section are applicable since none of the SO <sub>2</sub> standards in §§60.42b(a) through (k) are applicable.
<b>Emission monitoring for PM and NO<sub>x</sub></b>		
§60.48b(a)	None	This paragraph is not applicable since heaters H-1782 and H-D2782 are not subject to a Subpart Db opacity standard.
§60.48b(b)	None	This paragraph requiring a NO <sub>x</sub> CEMS is not applicable since there is an exception for affected facilities subject to §60.48b(g), which is the compliance method prescribed in the Consent Decree.
§60.48b(c)	None	This paragraph is not applicable since it pertains to the NO <sub>x</sub> CEMS in §60.48b(b).
§60.48b(d)	None	This paragraph is not applicable since it pertains to the NO <sub>x</sub> CEMS in §60.48b(b).
§60.48b(e)	None	This paragraph is not applicable since it pertains to COMS in §60.48b(a) and the NO <sub>x</sub> CEMS in §60.48b(b).
§60.48b(f)	None	This paragraph is not applicable since it pertains to the NO <sub>x</sub> CEMS in §60.48b(b).
§60.48b(g)	5.2.3.	As specified in the Consent Decree, compliance shall be demonstrated using a PEMS as required by 40 C.F.R. §60.48b(g)(2).
§60.48b(h)	None	This paragraph is not applicable since it pertains to duct burners.
§60.48b(i)	None	This paragraph is not applicable since §§60.44b(j) and 60.44b(k) are not applicable.
§60.48b(j)	None	This paragraph is not applicable since heaters H-1782 and H-D2782 are not subject to a Subpart Db opacity standard.
§60.48b(k)	None	This paragraph is not applicable since heaters H-1782 and H-D2782 are not subject to Subpart Db PM emission limits.
§60.48b(l)	None	This paragraph is not applicable since heaters H-1782 and H-D2782 are not subject to a Subpart Db opacity standard.
<b>Reporting and Recordkeeping Requirements</b>		
§60.49b(a)	None	No permit condition is warranted for this initial permit since this paragraph is the initial notification requirement. Paragraph 88 of the Consent Decree required the submittal by no later than 180 days after the effective date. Since this date has passed, no permit condition is necessary.
§60.49b(b)	None	No permit condition is warranted for this requirement to submit initial performance test data since paragraph 89 of the Consent Decree allows the permittee to rely on an existing performance test and use a developed PEMS plan from another heater (i.e., Houston 3).
§60.49b(c)	5.4.2.	As specified in the Consent Decree, recordkeeping shall be performed per §60.49b(c). Refer to permit condition 5.4.2.
<b>§60.49b(d)</b>	<b>5.4.3.</b>	This requirement in §60.49b(d)(1) to maintain records of daily fuel use and calculate the annual capacity is applicable to an affected facility that combusts natural gas. The less stringent monthly frequency in §60.49b(d)(2) are not applicable since the permittee is required to continuously monitor parameters indicative of emissions.
§60.49b(e)	None	This paragraph is not applicable since heaters H-1782 and H-D2782 do not combust residual oil.
§60.49b(f)	None	This paragraph is not applicable since heaters H-1782 and H-D2782 are not subject to a Subpart Db opacity standard.

<b>Subpart Db</b>	<b>Title V</b>	<b>Description</b>
<b>§60.49b(g)</b>	<b>5.4.4.</b>	This recordkeeping is applicable to the heaters H-1782 and H-D2782. The requirements in §§60.49b(g)(8) through (10) are not applicable since they pertain to CEMS; therefore, they are excluded from the permit condition.
<b>§60.49b(h)</b>	<b>5.5.2.</b>	This excess emissions reporting is applicable since the heaters H-1782 and H-D2782 are subject to a NO <sub>x</sub> standard in §60.44b and combusts natural gas (§60.49b(h)(2)(i)). In addition, the heaters are less than 250 MMBtu/hr and are required to monitor NO <sub>x</sub> emissions on a continuous basis under §60.48b(g)(2) (§60.49b(h)(2)(ii)).  §60.49b(h)(3) is not applicable since heaters H-1782 and H-D2782 are not subject to a Subpart Db opacity standard.  §60.49b(h)(4) is not applicable since §60.48b(g)(1) is not applicable.
<b>§60.49b(i)</b>	<b>5.5.3.</b>	This applicable paragraph requires reporting of information recorded under §60.49b(g); therefore, it has been included in permit condition 5.4.4.
§60.49b(j)	None	This paragraph is not applicable since heaters H-1782 and H-D2782 are not subject to a Subpart Db SO <sub>2</sub> standard.
§60.49b(k)	None	This paragraph is not applicable since heaters H-1782 and H-D2782 are not subject to §60.45b and the reporting in §60.49b(j).
§60.49b(l)	None	This paragraph is not applicable since heaters H-1782 and H-D2782 are not subject to §60.45b and the reporting in §60.49b(j).
§60.49b(m)	None	This paragraph is not applicable since heaters H-1782 and H-D2782 are not subject to a Subpart Db SO <sub>2</sub> standard.
§60.49b(n)	None	This paragraph is not applicable since heaters H-1782 and H-D2782 are not subject to §60.45b.
<b>§60.49b(o)</b>	<b>5.4.5.</b>	This applicable paragraph requires records under 60.49b be maintained for two years.
§60.49b(p)	None	This paragraph is not applicable since §§60.44b(j) and 60.44b(k) are not applicable.
§60.49b(q)	None	This paragraph is not applicable since §§60.44b(j) and 60.44b(k) are not applicable.
§60.49b(r)	None	This paragraph is not applicable since the permittee has not elected to use the fuel based compliance alternatives in §60.42b or §60.43b.
§60.49b(s)	None	This paragraph is not applicable since it pertains to Cytec Industries.
§60.49b(t)	None	This paragraph is not applicable since it pertains to Rohm and Haas Kentucky Incorporated's Boiler No. 100.
§60.49b(u)	None	This paragraph is not applicable since it pertains to Merch & Co., Inc.
<b>§60.49b(v)</b>	<b>5.5.4.</b>	This applicable paragraph allows electronic reports of NO <sub>x</sub> in lieu of submitting written reports under paragraphs (h), (i), (j), (k), or (l) of §60.49b. This is applicable to §§60.49b(h) and (i).
<b>§60.49b(w)</b>	<b>5.5.5.</b>	This applicable paragraph prescribes 6-month frequency for submitted reports required under Subpart Db.
§60.49b(x)	None	This paragraph is not applicable since it pertains to Weyerhaeuser Company.
§60.49b(y)	None	This paragraph is not applicable since it pertains to INEOS USA.

19. **40 C.F.R. 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.** The affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr (40 C.F.R. §60.40c(a)). The heaters H-781, H-3781, H-1741, H-4781, H-7781, H-4782, and H-D2741 are each rated between 10 MMBtu/hr and 100 MMBtu/hr and were constructed after the applicability date. However, according to 9/11/2019 technical correspondence, the Regen heaters H-1741 and H-D2741 do not meet the definition of a *Steam generating unit* in §60.41c because they do not heat water or any other heat transfer medium. Instead, H-1741 and H-D2741 heat the gas directly and are considered process heaters, which also are excluded from the definition of *Steam generating unit*. Since this subpart applies to a steam generating unit (§60.40c(a)), it is not applicable to the heaters H-1741 and H-D2741. Consequently, only the HMO heaters H-781, H-3781, H-4781, H-7781, and H-4782 are listed in the Subpart Dc initial notification received on January 31, 2019. Since the units combust only natural gas, the applicable requirement is in §60.48c(g)(2), which is also specified in paragraph 95 of the Consent Decree. Refer to permit condition 5.2.2.

### Non-Applicability Determinations

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

1. **45CSR40 – Control of Ozone Season Nitrogen Oxides Emissions.** This rule establishes ozone season NO<sub>x</sub> emission limitations, MRR, NO<sub>x</sub> reduction, and NO<sub>x</sub> control standards. There are no NO<sub>x</sub> Ozone Season units, as defined in 40CSR§40-2.26., present at the facility; therefore, this rule does not apply.
2. **40 C.F.R. 60 Subpart LLL – Standards of Performance for SO<sub>2</sub> Emissions from Onshore Natural Gas Processing for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011.** The provisions of this subpart are applicable to the following affected facilities that process natural gas: each sweetening unit, and each sweetening unit followed by a sulfur recovery unit (40 C.F.R. §60.640(a)). There are no sweetening units, as defined in this subpart, present at the facility; therefore, this subpart does not apply.
3. **40 C.F.R. 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.** This subpart establishes national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP (40 C.F.R. §63.7480). The facility is not a major source of HAPs; therefore, this regulation is not applicable to any heater at the facility.
4. **40 C.F.R. 63 Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.** This subpart is applicable to each industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP). The facility is an area source of HAPs that operates heaters. All the heaters combust natural gas, and as such, are not subject to this regulation as provided in §63.11195(e). Based upon these facts, Subpart JJJJJ is not applicable to the heaters H-741, H-781, H-2741, H-3741, H-4741, H-3781, H-1782, H-1741, H-5741, H-6741, H-7741, H-4781, H-7781, H-4782, H-D2782, and H-D2741.

5. **40 C.F.R. Part 64 Compliance Assurance Monitoring (CAM).** Section 19 in the application general forms gives a non-applicability determination for 40 C.F.R. Part 64 CAM. According to 5/24/2019 technical correspondence from the permittee, each emission unit that emits to the flare FL-991 and FL-1991 have potential pre-control VOC emissions less than 100 tpy. Flare FL-991 controls four (4) sources (Maj-I, Maj-II, Maj-III, Maj-V) and pipeline blowdowns that vent to the flare in addition to the pilot sweep gas. This is an average of less than 40 tpy uncontrolled VOC per PSEU. Flare FL-1991 controls five (5) sources (Maj-IV, Maj-VI, Maj-VII, DeEth-I, DeEth-II) in addition to the pilot and sweep gas, which yields an average of approximately 60 tpy of uncontrolled VOC per PSEU. It is noted that Maj-I and Maj-II are designed to be 120 mmscf/d plants while III, IV, V, VI, VII are designed to be 200 mmscf/d, which helps explain why FL-1991 has a higher average uncontrolled VOC emission rate than FL-991 per PSEU and why each PSEU venting to FL-1991 is still below 100 tpy uncontrolled VOC. Since none of the PSEUs controlled by the flares FL-991 and FL-1991 meet the applicability criterion in 40 C.F.R. §64.2(a)(3), CAM is not applicable. The engines C-102, C-103, and C-104 are equipped with oxidation catalysts that (according to the application) control CO, VOC, and HCHO, for which there are non-exempt emission limitations in permit R13-2818H. However, pre-control potential emissions of these pollutants do not exceed the respective major source thresholds (cf. 40 C.F.R. §64.2(a)(3)). Therefore, CAM is not applicable to the engines C-102, C-103, and C-104. Diesel particulate filters are used on the compression ignition engines M3-G-2, M3-G-3, M4-G-6, M4-G-7, M7-G-8 (not installed), M7-G-9\*, MD1-G-4, MD1-G-5, MD2-G-11 (not installed), and MD2-G-10\*. However, the engines are not subject to a non-exempt particulate matter emission limitation or standard (cf. 40 C.F.R. §64.2(a)(1)). Therefore, CAM is not applicable to the compression ignition engines.

### **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: September 18, 2019  
Ending Date: October 18, 2019

### **Point of Contact**

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

Denton B. McDerment, P.E.  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478  
[denton.b.mcderment@wv.gov](mailto:denton.b.mcderment@wv.gov)

### **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 regarding the draft/proposed permit.

## **ATTACHMENT A**

### **40 C.F.R. Part 60 Subparts OOOO and OOOOa Applicability Table For Compressors**

Compressor ID	Gas Service	Type	Subject to OOOO/OOOOa	Date of Startup	Reason
C-161	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-162	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-2103	Residue	Reciprocating	No	6/22/2011	Prior to August 23, 2011
C-2104	Residue	Reciprocating	No	6/22/2011	Prior to August 23, 2011
C-2161	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-2162	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-3102	Residue	Reciprocating	OOOO	4/28/2013	After 8/23/2011, before 9/18/2015
C-3103	Residue	Reciprocating	OOOO	4/28/2013	After 8/23/2011, before 9/18/2015
C-3104	Residue	Reciprocating	OOOO	4/28/2013	After 8/23/2011, before 9/18/2015
C-3105	Residue	Reciprocating	OOOO	4/28/2013	After 8/23/2011, before 9/18/2015
C-3161	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-3162	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-3163	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-4110	Inlet/Condensate	Reciprocating	OOOO	5/19/2014	After 8/23/2011, before 9/18/2015
C-4111	Inlet/Condensate	Reciprocating	OOOO	5/19/2014	After 8/23/2011, before 9/18/2015
C-4102	Residue	Reciprocating	OOOO	5/19/2014	After 8/23/2011, before 9/18/2015
C-4103	Residue	Reciprocating	OOOO	5/19/2014	After 8/23/2011, before 9/18/2015
C-4104	Residue	Reciprocating	OOOO	5/19/2014	After 8/23/2011, before 9/18/2015
C-4105	Residue	Reciprocating	OOOO	5/19/2014	After 8/23/2011, before 9/18/2015
C-4161	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-4162	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-4163	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-5102	Residue	Reciprocating	OOOO	11/7/2013	After 8/23/2011, before 9/18/2015
C-5103	Residue	Reciprocating	OOOO	11/7/2013	After 8/23/2011, before 9/18/2015
C-5104	Residue	Reciprocating	OOOO	11/7/2013	After 8/23/2011, before 9/18/2015
C-5161	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-5162	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-5163	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-6102	Residue	Reciprocating	OOOO	6/9/2015	After 8/23/2011, before 9/18/2015
C-6103	Residue	Reciprocating	OOOO	6/9/2015	After 8/23/2011, before 9/18/2015
C-6104	Residue	Reciprocating	OOOO	6/9/2015	After 8/23/2011, before 9/18/2015
C-6161	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-6162	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-6163	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-7102	Residue	Reciprocating	OOOOa	7/5/2018	After 9/18/2015
C-7103	Residue	Reciprocating	OOOOa	7/5/2018	After 9/18/2015
C-7104	Residue	Reciprocating	OOOOa	7/5/2018	After 9/18/2015
C-7105	Residue	Reciprocating	OOOOa	7/5/2018	After 9/18/2015
C-7161	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-7162	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-7163	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-1101	Ethane	Reciprocating	OOOO	12/14/2013	After 8/23/2011, before 9/18/2015
C-1102	Ethane	Reciprocating	OOOO	12/14/2013	After 8/23/2011, before 9/18/2015
C-1103	Ethane	Reciprocating	OOOO	12/14/2013	After 8/23/2011, before 9/18/2015
C-1161	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-1162	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-7117	CO <sub>2</sub>	Reciprocating	OOOO	12/14/2013	After 8/23/2011, before 9/18/2015

Compressor ID	Gas Service	Type	Subject to OOOO/ OOOOa	Date of Startup	Reason
C-D2101	Ethane	Reciprocating	OOOOa	11/6/2017	After 9/18/2015
C-D2102	Ethane	Reciprocating	OOOOa	11/6/2017	After 9/18/2015
C-D2103	Ethane	Reciprocating	OOOOa	11/6/2017	After 9/18/2015
C-D2161	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-D2162	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-D2163	Refrig	Screw	No		Screw Drive not subject to OOOO/a
C-D2117	CO <sub>2</sub>	Reciprocating	OOOOa	11/6/2017	After 9/18/2015
C-110	Inlet/Condensate	Reciprocating	No	9/9/2010	Prior to August 23, 2011
C-141	Inlet	Centrifugal	No		Dry Seal not subject to OOOO/a
C-121	Inlet	Centrifugal	No		Dry Seal not subject to OOOO/a
C-2141	Inlet	Centrifugal	No		Dry Seal not subject to OOOO/a
C-2110	Inlet/Condensate	Reciprocating	OOOO	4/28/2013	After 8/23/2011, before 9/18/2015
C-3141	Inlet	Centrifugal	No		Dry Seal not subject to OOOO/a
C-4141	Inlet	Centrifugal	No		Dry Seal not subject to OOOO/a
C-5141	Inlet	Centrifugal	No		Dry Seal not subject to OOOO/a
C-6141	Inlet	Centrifugal	No		Dry Seal not subject to OOOO/a
C-7141	Inlet	Centrifugal	No		Dry Seal not subject to OOOO/a
C-1141	Ethane	Centrifugal	No		Dry Seal not subject to OOOO/a
C-D2141	Ethane	Centrifugal	No		Dry Seal not subject to OOOO/a