

West Virginia Department of Environmental Protection

Harold D. Ward

Cabinet Secretary

# Permit to Operate



Pursuant to

**Title V**

of the Clean Air Act

*Issued to:*

**Columbia Gas Transmission, LLC**

**Ripley Compressor Station**

**R30-03500003-2022**

*Laura M. Crowder*

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*Laura M. Crowder*

*Director, Division of Air Quality*

*Issued: October 3, 2022 • Effective: October 17, 2022*  
*Expiration: October 3, 2027 • Renewal Application Due: April 3, 2027*

Permit Number: **R30-03500003-2022**  
Permittee: **Columbia Gas Transmission, LLC**  
Facility Name: **Ripley Compressor Station**  
Permittee Mailing Address: **1700 MacCorkle Avenue, SE**  
**Charleston, WV 25314**

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

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|                           |   |
|---------------------------|---|
| Facility Location:        | Ripley, Jackson County, West Virginia           |
| Facility Mailing Address: | 48 Columbia Gas Rd, Sandyville, WV 25275        |
| Telephone Number:         | (304)373-2402                                   |
| Type of Business Entity:  | LLC   |
| Facility Description:     | Natural Gas Transmission Facility               |
| SIC Codes:                | 4922  |
| UTM Coordinates:          | 440.1 km Easting • 4303.4 km Northing • Zone 17 |

Permit Writer: Beena J. Modi

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

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

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

### 1.1 Emission Units

| Emission Unit ID | Emission Point ID | Emission Unit Description  | Year Installed | Design Capacity | Control Device |
|------------------|-------------------|--|----------------|-----------------|----------------|
| 06201*           | E01               | Compressor RICE; Cooper Bessemer GMVH-10C; 2 Cycle Lean Burn     | 1980           | 2,250 hp        | None           |
| 06202*           | E02               | Compressor RICE; Cooper Bessemer GMVH-10C; 2 Cycle Lean Burn     | 1980           | 2,250 hp        | None           |
| 062A2*           | AC2               | Air Compressor RICE; Briggs & Stratton 543477; 4 Cycle Rich Burn | 2008           | 31 hp           | None           |
| BLR2*            | BL2               | Heating System Boiler; Burnham                                   | 2016           | 3.68 MMBTU/hr   | None           |
| HTR2*            | H2                | Indirect Heater; TERI T180101H                                   | 1979           | 0.66 MMBTU/hr   | None           |
| A23              | E-23              | Methanol Tank  | 1996           | 10,000 gal      | None           |
| A24              | E-24              | Methanol Tank  | 2020           | 550 gal         | None           |
| A25              | E-25              | Methanol Tank  | 2020           | 550 gal         | None           |
| A26              | E-26              | Pipeline Liquids Tank  | 2020           | 15,000 gal      | None           |
| A12              | E-12              | Pipeline Liquid Tank   | 1995           | 8,000 gal       | None           |
| A13              | E-13              | Pipeline Liquid Tank   | 1996           | 8,000 gal       | None           |
| A14              | E-14              | Pipeline Liquid Tank   | 1995           | 8,000 gal       | None           |
| LR-1             | E-LR1             | Pipeline Liquid Loading Rack                                     | 1990           | 450,000 gal/yr  | None           |
| 062G3*           | G3                | Generator RICE; Waukesha F18GL; 4 Cycle Lean Burn                | 2022           | 440 hp          | None           |
| HTR3*            | H3                | OGI TERI 16000 Line Heater                                       | 2022           | 15.25 MMBTU/hr  | None           |
| HTR4*            | H4                | OGI TERI 16000 Line Heater                                       | 2022           | 15.25 MMBTU/hr  | None           |
| RB1*             | E-RB1             | John Zink Reboiler   | 2022           | 4.0 MMBTU/hr    | None           |
| DEHY1            | C-1               | TEG Dehydration Unit   | 2022           | 225 MMSCFD      | FLLP-1         |
| FLLP-1           | C-1               | John Zink Combustor  | 2022           | 4.0 MMBTU/hr    | N/A            |
| A27              | E-27              | Pipeline Liquid Tank   | 2023           | 8,000 gal       | None           |
| A28              | E-28              | Pipeline Liquid Tank   | 2023           | 10,000 gal      | None           |
| A29              | E-29              | TEG Storage Tank   | 2022           | 4,500 gal       | None           |

\* All equipment is fueled exclusively with pipeline quality natural gas.

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**Control Devices**

| <b>Emission Unit</b>                         | <b>Pollutant</b>           | <b>Control Device</b>        | <b>Control Efficiency</b> |
|--|----------------------------|------------------------------|---------------------------|
| 225 MMSCFD TEG Dehydrator Still Vent (DEHY1) | Volatile Organic Compounds | John Zink Combustor (FLLP-1) | 98 %                      |
|  | Hazardous Air Pollutants   |                              | 98 %                      |

**1.2. Active R13, R14, and R19 Permits**

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

| <b>Permit Number</b> | <b>Date of Issuance</b> |
|----------------------|-------------------------|
| R13-3546             | June 21, 2022           |

## 2.0 General Conditions

### 2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

### 2.2. Acronyms

|                                       |   |                        |   |
|---------------------------------------|---|------------------------|---|
| <b>CAAA</b>                           | Clean Air Act Amendments                                  | <b>NSPS</b>            | New Source Performance Standards              |
| <b>CBI</b>                            | Confidential Business Information                         | <b>PM</b>              | Particulate Matter                            |
| <b>CEM</b>                            | Continuous Emission Monitor                               | <b>PM<sub>10</sub></b> | Particulate Matter less than 10µm in diameter |
| <b>CES</b>                            | Certified Emission Statement                              | <b>pph</b>             | Pounds per Hour                               |
| <b>C.F.R. or CFR</b>                  | Code of Federal Regulations                               | <b>ppm</b>             | Parts per Million                             |
| <b>CO</b>                             | Carbon Monoxide   | <b>PSD</b>             | Prevention of Significant Deterioration       |
| <b>C.S.R. or CSR</b>                  | Codes of State Rules                                      | <b>psi</b>             | Pounds per Square Inch                        |
| <b>DAQ</b>                            | Division of Air Quality                                   | <b>SIC</b>             | Standard Industrial Classification            |
| <b>DEP</b>                            | Department of Environmental Protection                    | <b>SIP</b>             | State Implementation Plan                     |
| <b>FOIA</b>                           | Freedom of Information Act                                | <b>SO<sub>2</sub></b>  | Sulfur Dioxide                                |
| <b>HAP</b>                            | Hazardous Air Pollutant                                   | <b>TAP</b>             | Toxic Air Pollutant                           |
| <b>HON</b>                            | Hazardous Organic NESHAP                                  | <b>TPY</b>             | Tons per Year                                 |
| <b>HP</b>                             | Horsepower  | <b>TRS</b>             | Total Reduced Sulfur                          |
| <b>lbs/hr or lb/hr</b>                | Pounds per Hour   | <b>TSP</b>             | Total Suspended Particulate                   |
| <b>LDAR</b>                           | Leak Detection and Repair                                 | <b>USEPA</b>           | United States Environmental Protection Agency |
| <b>m</b>                              | Thousand  | <b>UTM</b>             | Universal Transverse Mercator                 |
| <b>MACT</b>                           | Maximum Achievable Control Technology                     | <b>VEE</b>             | Visual Emissions Evaluation                   |
| <b>mm</b>                             | Million   | <b>VOC</b>             | Volatile Organic Compounds                    |
| <b>mmBtu/hr</b>                       | Million British Thermal Units per Hour                    |                        |   |
| <b>mmft<sup>3</sup>/hr or mmcf/hr</b> | Million Cubic Feet Burned per Hour                        |                        |   |
| <b>NA or N/A</b>                      | Not Applicable  |                        |   |
| <b>NAAQS</b>                          | National Ambient Air Quality Standards                    |                        |   |
| <b>NESHAPS</b>                        | National Emissions Standards for Hazardous Air Pollutants |                        |   |
| <b>NO<sub>x</sub></b>                 | Nitrogen Oxides   |                        |   |

### **2.3. Permit Expiration and Renewal**

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

### **2.4. Permit Actions**

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

### **2.5. Reopening for Cause**

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

**[45CSR§30-6.6.a.]**

## **2.6. Administrative Permit Amendments**

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

## **2.7. Minor Permit Modifications**

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

## **2.8. Significant Permit Modification**

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

## **2.9. Emissions Trading**

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

## **2.10. Off-Permit Changes**

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



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

**[45CSR§30-5.9.]**

## **2.11. Operational Flexibility**

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

**[45CSR§30-5.8]**

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

**[45CSR§30-5.8.a.]**

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

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

**[45CSR§30-5.8.c.]**

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

**[45CSR§30-2.39]**

## **2.12. Reasonably Anticipated Operating Scenarios**

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

[45CSR§30-5.1.i.]

## **2.13. Duty to Comply**

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

[45CSR§30-5.1.f.1.]

## **2.14. Inspection and Entry**

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

[45CSR§30-5.3.b.]

## **2.15. Schedule of Compliance**

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

**[45CSR§30-5.3.d.]**

## **2.16. Need to Halt or Reduce Activity not a Defense**

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

**[45CSR§30-5.1.f.2.]**

## **2.17. Emergency**

- 2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

**[45CSR§30-5.7.a.]**

- 2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.

**[45CSR§30-5.7.b.]**

- 2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

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

[45CSR§30-5.7.d.]

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

[45CSR§30-5.7.e.]

## **2.18. Federally-Enforceable Requirements**

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

[45CSR§30-5.2.a.]

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

## **2.19. Duty to Provide Information**

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

[45CSR§30-5.1.f.5.]

## **2.20. Duty to Supplement and Correct Information**

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

[45CSR§30-4.2.]

## **2.21. Permit Shield**

2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.  
**[45CSR§30-5.6.a.]**

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

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

**[45CSR§30-5.6.c.]**

## **2.22. Credible Evidence**

2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.  
**[45CSR§30-5.3.e.3.B. and 45CSR38]**

## **2.23. Severability**

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.  
**[45CSR§30-5.1.e.]**

## **2.24. Property Rights**

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

## **2.25. Acid Deposition Control**

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

- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.

- b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
- c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

**[45CSR§30-5.1.d.]**

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

**[45CSR§30-5.1.a.2.]**

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### 3.0 Facility-Wide Requirements

#### 3.1. Limitations and Standards

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

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

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

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

**[40 C.F.R. 68]**

- 3.1.9. Facilities using Mercaptan Tanks shall use proper odor control methods to comply with 45CSR4. **[45CSR§30-12.7 State-Enforceable only.]**

- 3.1.10. Emergency Operating Condition/Unit Replacement:

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

- a. The replacement engine(s) is only allowed to operate until repair of the failed engine(s) is complete, but under no circumstance may the replacement engine(s) operate in excess of sixty (60) days;
- b. Both the replacement engine(s) and the repaired failed engine(s) shall not operate at the same time with the exception of any necessary testing of the repaired engine(s) and this testing may not exceed five (5) hours;
- c. Potential hourly emissions from the replacement engine(s) are less than or equal to the potential hourly emissions from the engine(s) being replaced;
- d. Credible performance emission test data verifying the emission rates associated with the operation of the substitute engine shall be submitted to the Director within five (5) business days;
- e. The permittee must provide written notification to the Director within five (5) business days of the replacement. This notification must contain:
  - i. Information to support the claim of life threatening circumstances to justify applicability of this emergency provision;
  - ii. Identification of the engine(s) being temporarily replaced;
  - iii. The design parameters of the replacement engine(s) including, but not limited to, the design horsepower and emission factors;
  - iv. Projected duration of the replacement engine(s); and
  - v. The appropriate certification by a responsible official.

**[45CSR§30-12.7]**



- 3.1.11 a. No person shall cause, suffer, allow or permit fugitive particulate matter to be discharged beyond the boundary lines of the property on which the discharge originates or at any public or residential location, which causes or contributes to statutory air pollution.
- b. When a person is found in violation of this rule, the Director may require the person to utilize a system to minimize fugitive particulate matter. This system to minimize fugitive particulate matter may include, but is not limited to, the following:
- i. Use, where practicable, of water or chemicals for control of particulate matter in demolition of existing buildings or structures, construction operations, grading of roads or the clearing of land;
  - ii. Application of asphalt, water or suitable chemicals on unpaved roads, material stockpiles and other surfaces which can create airborne particulate matter;
  - iii. Covering of material transport vehicles, or treatment of cargo, to prevent contents from dripping, sifting, leaking or otherwise escaping and becoming airborne, and prompt removal of tracked material from roads or streets; or
  - iv. Installation and use of hoods, fans and fabric filters to enclose and vent the handling of materials, including adequate containment methods during sandblasting, abrasive cleaning or other similar operations.

**[45CSR§17-3. State-Enforceable only.]**

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

**[45CSR13, R13-3546, 4.1.2]**

- 3.1.13 **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.

**[45CSR§13-5.10; 45CSR13, R13-3546, 4.1.3]**

- 3.1.14 **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

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

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

**[45CSR13, R13-3546, 4.1.4]**

- 3.1.15 Only those emission units/sources identified in Table 1.0 of R13-3546, with the exception of any de minimis sources as identified under Table 45-13B of 45CSR13, are authorized at the permitted facility.  
[45CSR13, R13-3546, 4.1.5]

### 3.2. Monitoring Requirements

- 3.2.1. None

### 3.3. Testing Requirements

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

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:

1. The permit or rule evaluated, with the citation number and language.

2. The result of the test for each permit or rule condition.
3. A statement of compliance or non-compliance with each permit or rule condition.

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

### 3.4. Recordkeeping Requirements

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

[45CSR§30-5.1.c.2.A., 45CSR13, R13-3546, 4.1.1]

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

[45CSR§30-5.1.c.2.B.]

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

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

### 3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

[45CSR§§30-4.4. and 5.1.c.3.D.]

- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

[45CSR§30-5.1.c.3.E.]

- 3.5.3. Except for the electronic submittal of the annual compliance certification and semi-annual monitoring reports to the DAQ and USEPA as required in 3.5.5 and 3.5.6 below, all notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class or by private carrier with postage prepaid to the address(es), or submitted in electronic format by e-mail as set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

**DAQ:**

Director  
WVDEP  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

**US EPA:**

United States Environmental Protection  
Agency  
Region III, Air and Radiation Division  
Permits Branch (3AD10)  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, Pennsylvania 19103-2852

**DAQ Compliance and Enforcement<sup>1</sup>:**

DEPAirQualityReports@wv.gov

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

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

**DAQ:**

DEPAirQualityReports@wv.gov

**US EPA:**

R3\_APD\_Permits@epa.gov

**[45CSR§30-5.3.e.]**

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

4.4. The semi-annual monitoring reports shall be submitted in electronic format by e-mail to the following address:

**DAQ:**  
DEPAirQualityReports@wv.gov

[45CSR§30-5.1.c.3.A.]

3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

3.5.8. **Deviations.**

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

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

[45CSR§30-5.1.c.3.C.]

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

[45CSR§30-5.1.c.3.B.]

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

[45CSR§30-4.3.h.1.B.]

### 3.6. Compliance Plan

3.6.1. None

### 3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

|  |  |
|--|--|
| <b>45CSR4</b>                          | <i>To Prevent and Control the Discharge of Air Pollutants into the Open Air Which Cause or Contributes to an Objectionable Odor or Odors:</i> This State Rule shall not apply to the following source of objectionable odor until such time as feasible control methods are developed: Internal combustion engines.  |
| <b>45CSR19</b>                         | <i>Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution which Cause or Contribute to Nonattainment:</i><br>The Ripley Compressor Station is located in Jackson County, which is an unclassified county for all criteria pollutants, therefore the facility is not subject to 45CSR19.  |
| <b>45CSR27</b>                         | <i>To Prevent and Control the Emissions of Toxic Air Pollutants:</i> Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”   |
| <b>40CFR63 Subpart DDDDD</b>           | <i>National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.</i> 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. The Ripley Compressor Station is not a major source of HAPs, therefore, this subpart does not apply.   |
| <b>40 C.F.R. Part 60 Subpart OOOO</b>  | <i>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.</i> As a transmission compression facility, this Rule only potentially applies to storage vessels. Although there have been storage vessels (Emission Point IDs: A24 to A29) constructed, modified, or reconstructed after August 23, 2011, the VOC Potential to Emit is less than 6 tons per year. They are not subject to this subpart per 40 C.F.R. §60.5365(e). |
| <b>40 C.F.R. Part 60 Subpart OOOOa</b> | <i>Standards of Performance for Crude Oil and Natural Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015:</i><br>The GHG and VOC requirements defined by this NSPS are not applicable to this site because all potentially affected sources commenced construction, modification or reconstruction prior to September 18, 2015 in accordance with 40CFR§60.5365a except tanks A24 through A29 which were constructed after September 18, 2015. The storage vessels (Emission Point IDs: A24 to A29) at  |

|   |   |
|---|---|
|   | the Ripley Compressor Station emit less than 6 tpy of VOC. Therefore, they are not required to further reduce VOC emissions by 95%. They are not subject to this subpart per 40 C.F.R. §60.5365a(e).  |
| <b>40 C.F.R. Part 60 Subpart Dc</b>       | <i>Standards of Performance for Steam Generating Units:</i> The indirect heater(HTR2), heating system boiler (BLR2) and Reboiler(RB1) are less than 10 MMBtu/hr design heat capacity, which makes them below the applicability criteria stated in 40CFR§60.40c(a).  |
| <b>40 C.F.R. Part 60 Subpart K and Ka</b> | <i>Standards of Performance for Petroleum Liquid Storage Vessels:</i> All tanks at the station are below the applicability criteria of 40,000 gallons in capacity as stated in 40CFR§§60.110(a) and 60.110a(a).   |
| <b>40 C.F.R. Part 60 Subpart Kb</b>       | <i>Standards of Performance for Volatile Organic Liquid Storage Vessels:</i> All tanks at the station are below the applicability criteria of 19,813 gallons in capacity as stated in 40CFR§60.110b(a).   |
| <b>40 C.F.R. Part 60 Subpart KKK</b>      | <i>Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant(s):</i> The station is not engaged in the extraction or fractionation of natural gas liquids from field gas, the fractionation of mixed natural gas liquids to natural gas products, or both. As a result, the station has no affected sources operating within this source category.  |
| <b>40 C.F.R. Part 63 Subpart HHH</b>      | <i>National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities:</i> The facility has a natural gas dehydration unit. However, since the Ripley Compressor Station is a minor source of HAPs, the unit (DEHY1) does not qualify as an affected unit.   |
| <b>40 C.F.R. Part 64</b>                  | <i>Compliance Assurance Monitoring (CAM):</i> Although dehydration unit (DEHY1) meets two applicability criteria for a PSEU in 40CFR§64.2(a): (1) it has emission limits for HAPs and VOC (condition 7.1.2) and (2) it uses a control device (FLLP-1) to achieve compliance with these limits, it does not meet the third criteria. With the emission limits of VOC (0.97 TPY), Benzene (0.06 TPY) and total HAPs (0.24 TPY) in condition 7.1.2 and DEHY1 control efficiency of 98%, pre-control device emissions of VOC (48.5 TPY), Benzene (3 TPY) and HAPs (12 TPY) would be below the major source applicability criteria of 100 TPY for criteria pollutants, 10 TPY for a single HAP, and 25 TPY of aggregated HAPs. Therefore, Compliance Assurance Monitoring (CAM) is not applicable. |

#### **4.0 Heating System Boiler [Emission Unit IDs: (BLR2 & HTR2)]**

##### **4.1 Limitations and Standards**

- 4.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. [45CSR§2-3.1.]
- 4.1.2. Compliance with the visible emission requirements of 45CSR§2-3.1 (Section 4.1.1 of this permit) shall be determined in accordance with 40 C.F.R. Part 60, Appendix A, Method 9 or by using measurements from continuous opacity monitoring systems approved by the Director. The Director may require the installation, calibration, maintenance and operation of continuous opacity monitoring systems and may establish policies for the evaluation of continuous opacity monitoring results and the determination of compliance with the visible emission requirements of 45CSR§2-3.1 (Section 4.1.1 of this permit). Continuous opacity monitors shall not be required on fuel burning units which employ wet scrubbing systems for emission control. [45CSR§2-3.2.]

##### **4.2 Monitoring Requirements**

- 4.2.1. At such reasonable times as the Secretary may designate, the permittee shall conduct visible emissions observations using Method 22 for the purpose of demonstrating compliance with Section 4.1.1. If visible emissions are observed, the permittee shall conduct a Method 9 reading unless the cause for visible emissions is corrected within 24 hours. Records of observation will be kept for at least 5 years from the date of observation. [45CSR§30-5.1.c.]

##### **4.3 Testing Requirements**

- 4.3.1. N/A

##### **4.4 Recordkeeping Requirements**

- 4.4.1. N/A

##### **4.5 Reporting Requirements**

- 4.5.1. N/A

##### **4.6 Compliance Plan**

- 4.6.1. N/A



**5.0 40 C.F.R. 63, Subpart ZZZZ GACT Requirements for 2SLB Reciprocating Internal Combustion Engine(s) RICE [Emission Unit IDs: (06201, 06202)]**

**5.1 Limitations and Standards**

5.1.1. As stated in 40 C.F.R. §63.6603, the permittee must comply with the following requirements from Table 2d for existing stationary RICE located at area sources of HAP emissions:

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

<sup>1</sup> Sources have the option to utilize an oil analysis program as described in 40 C.F.R. §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.

**[45CSR34, 40 C.F.R. §63.6603(a) and Table 2d, Item 6]**

5.1.2. The permittee shall comply with the following general requirements:

- a. The permittee must be in compliance with the operating limitations in this subpart that apply to the permittee at all times.
- b. At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if required levels have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

**[45CSR34, 40 C.F.R. § 63.6605]**

5.1.3. The permittee shall demonstrate continuous compliance by doing the following:

- a. The permittee must demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Table 2d to 40 C.F.R. 63, Subpart ZZZZ that apply to the permittee according to methods specified in Table 6 to 40 C.F.R. 63, Subpart ZZZZ.

Table 6 states that for work or management practices the permittee shall operate and maintain the stationary RICE according to the manufacturer's emission related operation and maintenance instructions; or develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

**[45CSR34, 40 C.F.R. § 63.6640(a), and Table 6, Item 9]**

- 5.1.4. The permittee shall comply with all applicable General Provisions according to Table 8 to 40 C.F.R., Part 63, Subpart ZZZZ.  
**[45CSR34, 40 C.F.R. § 63.6665]**

## **5.2. Monitoring Requirements**

- 5.2.1. This facility is subject to the following requirements:

- a. The permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.  
**[40 C.F.R. §63.6625(e)(5)]**
- b. If you operate a new, reconstructed, or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.  
**[40 C.F.R. §63.6625(h)]**
- c. If you own or operate a stationary SI engine that is subject to the work, operation or management practices in items 6, 7, or 8 of Table 2c to this subpart or in items 5, 6, 7, 9, or 11 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.  
**[40 C.F.R. §63.6625(j)]**  
**[45CSR34, 40 C.F.R. § 63.6625]**

### **5.3. Testing Requirements**

5.3.1. NA

### **5.4. Recordkeeping Requirements**

- 5.4.1. The permittee shall keep the records required in Table 6 (Item 9) of this subpart to show continuous compliance with each emission or operating limitation that applied.  
**[45CSR34, 40 CFR §63.6655(d)]**
- 5.4.2. The permittee must keep records of the maintenance conducted on each stationary RICE in order to demonstrate that the permittee operated and maintained each stationary RICE and after-treatment control device (if any) according to the permittee's own maintenance plan.  
**[45CSR34, 40 CFR §63.6655(e)(3)]**

### **5.5. Reporting Requirements**

5.5.1. (b) You must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.

(e) You must also report each instance in which you did not meet the requirements in Table 8 to this subpart that apply to you. If you own or operate a new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions (except new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP), a new or reconstructed stationary RICE located at an area source of HAP emissions, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart: An existing 2SLB stationary RICE, an existing 4SLB stationary RICE, an existing emergency stationary RICE, an existing limited use stationary RICE, or an existing stationary RICE which fires landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis. If you own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart, except for the initial notification requirements: a new or reconstructed stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new or reconstructed emergency stationary RICE, or a new or reconstructed limited use stationary RICE.  
**[45CSR34, 40 CFR §§63.6640(b)&(e)]**

### **5.6. Compliance Plan**

5.6.1 N/A

## 6.0 Source-Specific Requirements and 40 C.F.R. 60 Subpart JJJJ Requirements for Emergency Reciprocating Internal Combustion Engine [Emission Unit ID: (062G3)]

### 6.1 Limitations and Standards

- 6.1.1. Owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 75 KW (100 HP) (except gasoline and rich burn engines that use LPG) must comply with the emission standards in Table 1 to 40 C.F.R. 60 Subpart JJJJ for their stationary SI ICE. For owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 100 HP (except gasoline and rich burn engines that use LPG) manufactured prior to January 1, 2011 that were certified to the certification emission standards in 40 CFR part 1048 applicable to engines that are not severe duty engines, if such stationary SI ICE was certified to a carbon monoxide (CO) standard above the standard in Table 1 to this subpart, then the owners and operators may meet the CO certification (not field testing) standard for which the engine was certified.

**Table 1 to 40 C.F.R. 60 Subpart JJJJ**

| Engine Type and Fuel | Maximum Engine Power | Emission Standards |     |                  |                             |     |                  |
|----------------------|----------------------|--------------------|-----|------------------|-----------------------------|-----|------------------|
|                      |                      | g/HP-hr            |     |                  | ppmvd at 15% O <sub>2</sub> |     |                  |
|                      |                      | NO <sub>x</sub>    | CO  | VOC <sup>d</sup> | NO <sub>x</sub>             | CO  | VOC <sup>d</sup> |
| Emergency            | HP ≥ 130             | 2.0                | 4.0 | 1.0              | 160                         | 540 | 86               |

<sup>d</sup> For purposes of this subpart, when calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.

**[40CFR§60.4233(e), and Table 1 of 40 C.F.R. 60 Subpart JJJJ; 45CSR16]**

- 6.1.2 Owners and operators of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in 40 C.F.R. §60.4233 over the entire life of the engine.  
**[40CFR§60.4234; 45CSR16]**
- 6.1.3 For emergency stationary SI ICE with a maximum engine power of greater than 19 KW (25 HP), owners and operators may not install engines that do not meet the applicable requirements in §60.4233 after January 1, 2011.  
**[40CFR§60.4236(c); 45CSR16]**
- 6.1.4 Starting on January 1, 2011, if the emergency stationary SI internal combustion engine that is greater than or equal to 130 HP and less than 500 HP that was built on or after January 1, 2011, does not meet the standards applicable to non-emergency engines, the owner or operator must install a non-resettable hour meter.  
**[40CFR§60.4237(b); 45CSR16]**
- 6.1.5 If you are an owner or operator of a stationary SI internal combustion engine and must comply with the emission standards specified in § 60.4233(d) or (e), you must demonstrate compliance according to one of the methods specified in paragraphs (b)(1) and (2) of this section.
- (2) Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in § 60.4233(d) or (e) and according to the requirements specified in § 60.4244, as applicable, and according to paragraphs (b)(2)(i) and (ii) of 40CFR§60.4243.
- (i) If you are an owner or operator of a stationary SI internal combustion engine greater than 25 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance.

Compliance with the limits in condition 6.1.1. shall be determined using the testing methods and procedures specified in 40 CFR §60.4244.

**[40CFR§§60.4243(b)(2) and 60.4244, 45CSR16]**

6.1.6 If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements 40 C.F.R. §§60.4243(d)(1) through (3). In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in 40 C.F.R. §§60.4243(d)(1) through (3), is prohibited. If you do not operate the engine according to the requirements of 40 C.F.R. §§60.4243(d)(1) through (3) listed below, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

- a. There is no time limit on the use of emergency stationary ICE in emergency situations.
- b. You may operate your emergency stationary ICE for any combination of the purposes specified in 40 C.F.R. §60.4243(d)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by 40 C.F.R. §60.4243(d)(3) counts as part of the 100 hours per calendar year allowed by this paragraph.
  - i. Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.
- c. Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in 40 C.F.R. §60.4243(d)(2). Except as provided in 40 C.F.R. §60.4243(d)(3)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
  - i. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
    - (A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;
    - (B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
    - (C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
    - (D) The power is provided only to the facility itself or to support the local transmission and distribution system.
    - (E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

**[40CFR§60.4243(d); 45CSR16]**

6.1.7 Owners and operators of stationary SI natural gas fired engines may operate their engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of §60.4233.

[40CFR§60.4243(e); 45CSR16]

6.1.8. Maximum emissions from the 440 hp natural gas fired Waukesha F18GL generator (062G3), shall not exceed the following limits:

| Pollutant                  | Maximum Hourly Emissions (lb/hr) | Maximum Annual Emissions (ton/year) |
|----------------------------|----------------------------------|-------------------------------------|
| Nitrogen Oxides            | 1.94                             | 0.49                                |
| Carbon Monoxide            | 1.26                             | 0.32                                |
| Volatile Organic Compounds | 0.22                             | 0.06                                |

[45CSR13, R13-3546, 5.1.1.]

6.1.9. **Maximum Annual Operation.** The maximum hours of operation of the generator (062G3) shall not exceed 500 hours each. Compliance with the Maximum Annual Operation Limitation shall be determined using a twelve month rolling total. A twelve month rolling total shall mean the sum of the hours of operation at any given time during the previous twelve consecutive calendar months.

[45CSR13, R13-3546, 5.1.2.]

6.1.10. The emission limitations specified in permit condition 6.1.8 shall apply at all times except during periods of start-up and shut-down provided that the duration of these periods does not exceed 30 minutes per occurrence. The permittee shall operate the engine in a manner consistent with good air pollution control practices for minimizing emissions at all times, including periods of start-up and shut-down. The emissions from start-up and shut-down shall be included in the twelve (12) month rolling total of emissions. The permittee shall comply with all applicable start-up and shut-down requirements in accordance with 40 CFR Part 60, Subpart JJJJ and 40 CFR Part 63, Subpart ZZZZ.

[45CSR13, R13-3546, 5.1.3.]

6.1.11. The permittee shall comply with all applicable testing, recordkeeping and reporting requirements in accordance with 40 CFR Part 60, Subpart JJJJ and 40 CFR Part 63, Subpart ZZZZ.

[45CSR13, R13-3546, 5.1.4.]

## 6.2. Monitoring Requirements

6.2.1. None

## 6.3. Testing Requirements

6.3.1. See permit condition 6.1.5.

6.3.2. See Facility-Wide Testing Requirements Section 3.3 and Testing Requirements of permit condition 6.1.11.

[45CSR13, R13-3546, 5.2.1.]

## 6.4. Recordkeeping Requirements

- 6.4.1 Owners or operators of stationary SI ICE must meet the following notification, reporting and recordkeeping requirements.
- a. Owners and operators of all stationary SI ICE must keep records of the information in 40 C.F.R. §§60.4245(a)(1) through (4).
    1. All notifications submitted to comply with this subpart and all documentation supporting any notification.
    2. Maintenance conducted on the engine.
    3. If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to 40 C.F.R. §60.4243(a)(2), documentation that the engine meets the emission standards.  
**[40CFR§60.4245(a)]**
  - b. For all stationary SI emergency ICE greater than or equal to 500 HP manufactured on or after July 1, 2010, that do not meet the standards applicable to non-emergency engines, the owner or operator of must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. For all stationary SI emergency ICE greater than or equal to 130 HP and less than 500 HP manufactured on or after July 1, 2011 that do not meet the standards applicable to non-emergency engines, the owner or operator of must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. For all stationary SI emergency ICE greater than 25 HP and less than 130 HP manufactured on or after July 1, 2008, that do not meet the standards applicable to non-emergency engines, the owner or operator of must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.  
**[40CFR§60.4245(b)]**  
**[40CFR§60.4245, 45CSR16]**
- 6.4.2. To demonstrate compliance with permit condition 6.1.9, the permittee shall maintain records of the hours of operation. Said records shall be maintained in accordance with permit condition 3.4.2.  
**[45CSR13, R13-3546, 5.3.1.]**

## 6.5. Reporting Requirements

- 6.5.1. If the permittee owns or operates an emergency stationary SI ICE with a maximum engine power more than 100 HP that operates for the purposes specified in 40 C.F.R. §60.4243(d)(3)(i), the permittee must submit an annual report according to 40 C.F.R. §63.4245(e).  
**[40CFR§60.4245(e), 45CSR16]**
- 6.5.2. See Facility-Wide Reporting Requirements Section 3.5 and Reporting Requirements of permit condition 6.1.11.  
**[45CSR13, R13-3546, 5.5.1.]**
- 6.5.3 Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed. Performance test reports using EPA Method 18, EPA Method 320, or ASTM D6348-03 (incorporated by reference - see

40 CFR 60.17) to measure VOC require reporting of all QA/QC data. For Method 18, report results from sections 8.4 and 11.1.1.4; for Method 320, report results from sections 8.6.2, 9.0, and 13.0; and for ASTM D6348-03 report results of all QA/QC procedures in Annexes 1-7.  
**[40CFR§60.4245(d), 45CSR16]**

## **6.6. Compliance Plan**

6.6.1 N/A



## 7.0. Source-Specific Hazardous Air Pollutant Requirements for Natural Gas Dehydration Unit [Emission Unit ID: (DEHY1)]

### 7.1. Limitations and Standards

7.1.1. **Maximum Throughput Limitation.** The maximum dry natural gas throughput to the TEG dehydration unit/still column (DEHY1) shall not exceed 225 million standard cubic feet per day (mmscf) for each unit. Compliance with the Maximum Throughput Limitation shall be determined using a twelve month rolling total. A twelve month rolling total shall mean the sum of the monthly throughput at any given time during the previous twelve consecutive calendar months.

[45CSR13, R13-3546, 6.1.1.]

7.1.2. Maximum emissions from the 4.0 MMBTU/hr vapor combustor (FLLP-1) shall not exceed the following limits:

| Pollutant                  | Maximum Hourly Emissions (lb/hr) | Maximum Annual Emissions (ton/year) |
|----------------------------|----------------------------------|-------------------------------------|
| Nitrogen Oxides            | 0.27                             | 1.19                                |
| Carbon Monoxide            | 1.24                             | 5.43                                |
| Volatile Organic Compounds | 0.22                             | 0.97                                |
| Benzene                    | 0.01                             | 0.06                                |
| Total HAP                  | 0.05                             | 0.24                                |

[45CSR13, R13-3546, 6.1.2.]

7.1.3. The limitations set forth in this condition are established to ensure that the permittee operates and maintains the glycol dehydration unit (DEHY1) with associated control device (FLLP-1) that limit hazardous air pollutant emissions to below the major source threshold value of HAPs as defined in 40 CFR §63 Subpart HHH as follows:

- a. The maximum amount of dry natural gas processed through the dehydration unit shall not exceed 225 MMscf per day. Compliance with this limit shall be determined using a 12-month rolling average.
- b. The glycol circulation rate for the dehydration unit shall not exceed 20.0 gallons per minute.
- c. The permittee shall only operate one glycol pump for the dehydration unit at any given time.
- d. The flowrate of stripping gas in the reboiler vessel shall not exceed 42 standard cubic feet per minute.
- e. The effluent generated by the flash tank separator from the dehydration unit shall be routed through a closed vent system to the burner of the reboiler for destruction at all times while the dehydration unit is in operation.

- f. The effluent generated by the still vent of the dehydration unit shall be routed through a closed vent system to the 4.0 MMBTU/hr enclosed combustor (FLLP-1) at all times while the dehydration unit is in operation.

[45CSR13, R13-3546, 6.1.3.]

7.1.4. The facility shall comply with the closed vent system requirements for the glycol dehydration unit (DEHY1) as noted below.

- a. You must design and operate a closed vent system with no detectable emissions, as determined using olfactory, visual and auditory inspections.
- b. You must meet the requirements specified in paragraphs (i) and (ii) of this section if the closed vent system contains one or more bypass devices that could be used to divert all or a portion of the gases, vapors, or fumes from entering the control device or to a process.

- (i) Except as provided in paragraph (ii) of this section, you must comply with either paragraph (A) or (B) of this section for each bypass device.

- A. You must properly install, calibrate, maintain, and operate a flow indicator at the inlet to the bypass device that could divert the stream away from the control device or process to the atmosphere that sounds an alarm, or initiates notification via remote alarm to the nearest field office, when the bypass device is open such that the stream is being, or could be diverted away from the control device or process to the atmosphere.

- B. You must secure the bypass device valve installed at the inlet to the bypass device in the non-diverting position using a car-seal or a lock-and-key type configuration.

- (ii) Low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and safety devices are not subject to the requirements of paragraph (i) of this section.

[45CSR§13-5.10, 45CSR13, R13-3546, 6.1.4.]

7.1.5 No person shall cause or allow particulate matter to be discharged from any incinerator into the open air in excess of the quantity determined by use of the following formula:

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

Where, the factor, F, is as indicated in Table I below:

**Table I:** Factor, F, for Determining Maximum Allowable Particulate Emissions.

| Incinerator Capacity        | Factor F |
|-----------------------------|----------|
| A. Less than 15,000 lbs/hr  | 5.43     |
| B. 15,000 lbs/hr or greater | 2.72     |

**45CSR6 PM Limitation Determination**

| Unit ID | Capacity (tons/hr) | 45CSR6 Emission Limit (lb-PM/hr) |
|---------|--------------------|----------------------------------|
| FLLP-1  | 0.08               | 0.45                             |

[45CSR§6-4.1]

- 7.1.6 **Emission of Visible Particulate Matter.** No person shall cause or allow emission of smoke into the atmosphere from any incinerator which is twenty percent (20%) opacity or greater.

The provisions of subsection 4.3 shall not apply to smoke which is less than forty percent (40%) opacity, for a period or periods aggregating no more than eight (8) minutes per start-up, or six(6) minutes in any sixty (60)-minute period for stoking operations.

[45CSR§§6-4.3&4.4]

- 7.1.7 No person shall cause, suffer, allow or permit the emission of particles of unburned or partially burned refuse or ash from any incinerator which are large enough to be individually distinguished in the open air.

Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

[45CSR§§6-4.5 &4.6]

## 7.2. Monitoring Requirements

- 7.2.1. The permittee shall monitor the throughput of dry natural gas fed to the dehydration system on a monthly basis for each glycol dehydration unit.

[45CSR13, R13-3546, 6.2.1.]

## 7.3. Testing Requirements

- 7.3.1. In order to demonstrate compliance with the minor source status of hazardous air pollutants required by 3.1.12, upon request of the Director, the permittee shall demonstrate compliance with the HAP emissions thresholds using GLYCalc Version 3.0 or higher. The permittee shall sample in accordance with GPA Method 2166 and analyze the samples utilizing the extended GPA Method 2286 as specified in the GRI-GLYCalc V4 Technical Reference User Manual and Handbook.

[45CSR13, R13-3546, 6.3.1.]

- 7.3.2. Determination of glycol dehydration benzene emissions. In order to demonstrate that the benzene emissions are less than 1 tpy, the permittee shall determine the actual average benzene emissions using the procedure in the paragraph below. Emissions shall be determined either uncontrolled, or with federally enforceable controls in place.

The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled “Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions” (GRI-95/0368.1).

[45CSR13, R13-3546, 6.3.2.]

## 7.4. Recordkeeping Requirements

- 7.4.1. The permittee shall document and maintain the corresponding records specified by the on-going monitoring requirements of 7.2 and testing requirements of 7.3.

[45CSR13, R13-3546, 6.4.1.]

- 7.4.2. For the purpose of demonstrating compliance with the minor source status of hazardous air pollutants required by permit condition 3.1.12, the permittee shall maintain a record of all potential to emit (PTE) HAP

calculations for the entire affected facility. These records shall include the natural gas compressor engines and ancillary equipment.

**[45CSR13, R13-3546, 6.4.2]**

7.4.3. The permittee shall maintain a record of the dry natural gas throughput through the dehydration system to demonstrate compliance with permit conditions 7.1.1 and 7.1.2.

**[45CSR13, R13-3546, 6.4.3.]**

7.4.4. All records required under Section 7.4 shall be maintained on site or in a readily accessible off-site location maintained by the permittee for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

**[45CSR13, R13-3546, 6.4.4.]**

## **7.5. Reporting Requirements**

7.5.1 If permittee is required by the Director to demonstrate compliance with section 7.3.2, then the permittee shall submit a testing protocol at least thirty (30) days prior to testing and shall submit a notification of the testing date at least fifteen (15) days prior to testing. The permittee shall submit the testing results within sixty (60) days of testing and provide all supporting calculations and testing data.

**[45CSR13, R13-3546, 6.5.1.]**

## **7.6. Compliance Plan**

7.6.1. N/A

**8.0. Source-Specific Requirements for Reboiler [Emission Unit ID: (RB1)], Heaters [Emission Unit IDs:(HTR3, HTR4)]**

**8.1. Limitations and Standards**

8.1.1. Maximum Design Heat Input. The maximum design heat input (MDHI) shall not exceed the following:

| <b>Emission Unit ID#</b> | <b>Emission Unit Description</b> | <b>MDHI (MMBTU/hr)</b> |
|--------------------------|----------------------------------|------------------------|
| HTR3                     | OGI TERI 16000 Line Heater       | 15.25                  |
| HTR4                     | OGI TERI 16000 Line Heater       | 15.25                  |
| RB1                      | John Zink Reboiler               | 2.86                   |

[45CSR13, R13-3546, 7.1.1.]

8.1.2. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. [45CSR§2-3.1., 45CSR13, R13-3546, 7.1.2.]

8.1.3. Maximum emissions from each of the 15.25 MMBTU/hr OGI TERI 16000 Line Heaters (HTR3, HTR4) shall not exceed the following limits:

| <b>Pollutant</b>           | <b>Maximum Hourly Emissions (lb/hr)</b> | <b>Maximum Annual Emissions (ton/year)</b> |
|----------------------------|---|--|
| Nitrogen Oxides            | 1.49                                    | 6.55                                       |
| Carbon Monoxide            | 1.26                                    | 5.50                                       |
| Volatile Organic Compounds | 0.08                                    | 0.36                                       |
| Particulate Matter-10      | 0.03                                    | 0.12                                       |
| Sulfur Dioxide             | 0.01                                    | 0.05                                       |

Compliance with the above hourly emission limits for particulate matter and sulfur dioxide shall demonstrate compliance with the less stringent hourly particulate matter and sulfur dioxide emission limits of 45CSR§2-4.1 and 45CSR§10-3.1.e.

[45CSR2-4.1 and 45CSR10-3.1.e., 45CSR13, R13-3546, 7.1.3.](HTR3, HTR4)

8.1.4. To demonstrate compliance with permit condition, 8.1.3 the quantity of natural gas that shall be consumed in each of the line heaters (HTR3, HTR4) shall not exceed 14,947 scf/hr cubic feet per hour and  $130.94 \times 10^6$  cubic feet per year.

[45CSR13, R13-3546, 7.1.4.]

8.1.5. Heaters (HTR3, HTR4) are subject to all applicable provisions of 40 CFR 60, Subpart Dc, provided that compliance with any more stringent limitation set forth under this permit shall also be demonstrated.

[45CSR§13-5.10, 45CSR13, R13-3546, 7.1.5.]

## **8.2. Monitoring Requirements**

- 8.2.1. At such reasonable times as the Secretary may designate, the permittee shall conduct Method 9 emission observations for the purpose of demonstrating compliance with permit condition 8.1.2. Method 9 shall be conducted in accordance with 40 CFR 60 Appendix A.  
[45CSR13, R13-3546, 7.2.1.]
- 8.2.2. The permittee shall monitor and record the amount of natural gas consumed by the heaters (HTR3, HTR4) during each operating day.  
[45CSR§2-8.3.c., and 40 CFR §60.48c(g)(1), 45CSR16, 45CSR13, R13-3546, 7.2.2.]

## **8.3. Testing Requirements**

- 8.3.1. Compliance with the visible emission requirements of permit condition 8.1.2 shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 or by using measurements from continuous opacity monitoring systems approved by the Director. The Director may require the installation, calibration, maintenance and operation of continuous opacity monitoring systems and may establish policies for the evaluation of continuous opacity monitoring results and the determination of compliance with the visible emission requirements of permit condition 8.1.2. Continuous opacity monitors shall not be required on fuel burning units which employ wet scrubbing systems for emission control.  
[45CSR§2-3.2., 45CSR13, R13-3546, 7.3.1.]

## **8.4 Recordkeeping Requirements**

- 8.4.1. The permittee shall maintain records of all monitoring data required by permit condition 8.2.1 documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6 - 10 mph NE wind) during the visual emission check(s). Should a visible emission observation be required to be performed per the requirements specified in Method 9, the data records of each observation shall be maintained per the requirements of Method 9.  
[45CSR13, R13-3546, 7.4.1.]
- 8.4.2. The natural gas consumption records of permit condition 8.4.1. shall be maintained in accordance with permit condition 3.4.2.  
[45CSR§13-5.10, 45CSR13, R13-3546, 7.4.2.]

## **8.5. Reporting Requirements**

- 8.5.1. Any deviation(s) from the allowable visible emission requirement for any emission source discovered during observations using 40CFR Part 60, Appendix A, Method 9 or 22 shall be reported in writing to the Director of the Division of Air Quality as soon as practicable, but in any case within ten (10) calendar days of the occurrence and shall include at least the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.  
[45CSR13, R13-3546, 7.5.1.]
- 8.5.2. Recordkeeping and reporting requirements shall be conducted in accordance with 40 CFR §60.48c. These reports shall be submitted in accordance with the timelines and in the order set forth in §60.48c and submitted to the addresses listed in permit condition 3.5.3.  
[45CSR§13-5.10, 45CSR13, R13-3546, 7.5.2.]

## **8.6. Compliance Plan**

8.6.1. N/A

## 9.0 Source-Specific Requirements for Storage Tanks [Emission Unit IDs: (A12, A13, A14, A26, A27, A28)]

### 9.1. Limitations and Standards

- 9.1.1. Maximum combined emissions from the three (3) 8,000 gallon pipeline liquid tanks (A12, A13, A14) shall not exceed the following limits:

| Pollutant                  | Maximum Hourly Emissions (lb/hr) | Maximum Annual Emissions (ton/year) |
|----------------------------|----------------------------------|-------------------------------------|
| Volatile Organic Compounds | 0.01                             | 0.01                                |
| Total HAPs                 | 0.01                             | 0.01                                |

[45CSR13, R13-3546, 8.1.1.]

- 9.1.2. To demonstrate compliance with the limits in permit condition 9.1.1, the pipeline liquid throughput through each of the three (3) 8,000 gallon pipeline liquid tanks (A12, A13, A14) shall not exceed 96,000 gallons per year.

[45CSR13, R13-3546, 8.1.2.]

- 9.1.3. Maximum emissions from the 15,000 gallon pipeline liquids tank (A26) shall not exceed the following limits:

| Pollutant                  | Maximum Hourly Emissions (lb/hr) | Maximum Annual Emissions (ton/year) |
|----------------------------|----------------------------------|-------------------------------------|
| Volatile Organic Compounds | 0.01                             | 0.01                                |
| Total HAPs                 | 0.01                             | 0.01                                |

[45CSR13, R13-3546, 8.1.3.]

- 9.1.4. To demonstrate compliance with the limits in permit condition 9.1.3, the pipeline liquid throughput through A26 shall not exceed 180,000 gallons per year.

[45CSR13, R13-3546, 8.1.4.]

- 9.1.5. Maximum emissions from the 8,000 gallon pipeline liquid tank (A27) shall not exceed the following limits:

| Pollutant                  | Maximum Hourly Emissions (lb/hr) | Maximum Annual Emissions (ton/year) |
|----------------------------|----------------------------------|-------------------------------------|
| Volatile Organic Compounds | 0.01                             | 0.01                                |
| Total HAPs                 | 0.01                             | 0.01                                |

[45CSR13, R13-3546, 8.1.5.]

- 9.1.6. To demonstrate compliance with the limits in permit condition 9.1.5, the pipeline liquid throughput through A27 shall not exceed 50,174.3 gallons per year.

[45CSR13, R13-3546, 8.1.6.]



9.1.7. Maximum emissions from the 10,000 gallon pipeline liquid tank (A28) shall not exceed the following limits:

| <b>Pollutant</b>           | <b>Maximum Hourly Emissions (lb/hr)</b> | <b>Maximum Annual Emissions (ton/year)</b> |
|----------------------------|---|--|
| Volatile Organic Compounds | 0.01                                    | 0.01                                       |
| Total HAPs                 | 0.01                                    | 0.01                                       |

[45CSR13, R13-3546, 8.1.7.]

9.1.8. To demonstrate compliance with the limits in permit condition 9.1.7, the pipeline liquid throughput through A28 shall not exceed 50,000 gallons per year.

[45CSR13, R13-3546, 8.1.8.]

## **9.2. Monitoring Requirements**

9.2.1. The permittee shall monitor the throughput to the storage tanks (A12, A13, A14, A26, A27, A28) on a monthly basis.

[45CSR13, R13-3546, 8.2.1.]

## **9.3. Testing Requirements**

9.3.1. See Facility-Wide Testing Requirements Section 3.3.

[45CSR§13-5.10., 45CSR13, R13-3546, 8.3.1.]

## **9.4. Recordkeeping Requirements**

9.4.1. To demonstrate compliance with permit conditions 9.1.2 - 9.1.8, the permittee shall maintain a record of the aggregate throughput for each storage tank on a monthly and rolling twelve month total. Said records shall be maintained on site or in a readily accessible off-site location maintained by the registrant for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

[45CSR13, R13-3546, 8.4.1.]

## **9.5. Reporting Requirements**

9.5.1. See Facility-Wide Reporting Requirements Section 3.5.

[45CSR13, R13-3546, 8.5.1.]

## **9.6. Compliance Plan**

9.6.1. N/A