

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:

Mountain Valley Pipeline, LLC

Bradshaw Compressor Station

R30-10300109-2025

Laura M. Crowder

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Director, Division of Air Quality

Issued: April 29, 2025 • Effective: May 13, 2025
Expiration: April 29, 2030 • Renewal Application Due: October 29, 2029

Permit Number: **R30-10300109-2025**
Permittee: **Mountain Valley Pipeline, LLC**
Facility Name: **Bradshaw Compressor Station**
Permittee Mailing Address: **2200 Energy Drive, Canonsburg, PA 15317**

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

Facility Location:	Smithfield, Wetzel County, West Virginia
Facility Mailing Address:	2165 Gilbert Ridge Road, Smithfield, WV 26437
Telephone Number:	844-378-5263
Type of Business Entity:	LLC
Facility Description:	The Bradshaw Compressor Station is a natural gas compressor station which receives natural gas and liquids (primarily produced water) from nearby wells. The natural gas undergoes compression before it is transported to a gas gathering line for additional processing.
SIC Codes:	4922
UTM Coordinates:	540.05 km Easting • 4,376.00 km Northing • Zone 17

Permit Writer: Sarah Barron

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

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

Table of Contents

1.0.	Emission Units and Active R13, R14, and R19 Permits.....	3
2.0.	General Conditions.....	5
3.0.	Facility-Wide Requirements and Permit Shield	13

Source-specific Requirements

4.0.	Turbines and Microturbine Generators.....	19
5.0.	40 C.F.R. Part 60 Subpart OOOOa Requirements for Fugitive Emissions Components	25
6.0.	Fuel Gas Heaters	35
7.0.	Produced Fluid Storage Tank and Liquid Loading	37
8.0.	Compressor Blowdown Events.....	38

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
S001	E001	Solar Turbine #1	2020	23,536 HP (site-specific conditions)	None
S002	E002	Solar Turbine #2	2020	23,536 HP (site-specific conditions)	None
S003	E003	Solar Turbine #3	2020	23,536 HP (site-specific conditions)	None
S004	E004	Solar Turbine #4	2020	23,536 HP (site-specific conditions)	None
S005	E005	Microturbine Generator #1	2020	200 kW	None
S006	E006	Microturbine Generator #2	2020	200 kW	None
S007	E007	Microturbine Generator #3	2020	200 kW	None
S008	E008	Microturbine Generator #4	2020	200 kW	None
S009	E009	Microturbine Generator #5	2020	200 kW	None
S010	E010	Microturbine Generator #6	2020	200 kW	None
S011	E011	Microturbine Generator #7	2020	200 kW	None
S012	E012	Microturbine Generator #8	2020	200 kW	None
S013	E013	Microturbine Generator #9	2020	200 kW	None
S014	E014	Microturbine Generator #10	2020	200 kW	None
S015	E015	Microturbine Generator #11	2020	200 kW	None
S016	E016	Microturbine Generator #12	2020	200 kW	None
S017	E017	Microturbine Generator #13	2020	200 kW	None
S018	E018	Microturbine Generator #14	2020	200 kW	None
S019	E019	Fuel Gas Heater	2020	2.31 mmBTU/hr	None
S020	E020	Fuel Gas Heater	2020	2.31 mmBTU/hr	None
S021	E021	Produced Fluids Tank	2020	10,080 gallons	None
S022	E022	Used Oil Tank	2020	4,200 gallons	None
S023	E023	Office Building Heater	2020	0.12 mmBTU/hr	None

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
S024	E024	Fugitive Components	2020	N/A	N/A
S025	E025	Liquid Loading	2020	126,000 gallons/yr	None
S026	E026	Blowdowns	2020	N/A	N/A

1.2. Active R13, R14, and R19 Permits

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

Permit Number	Date of Issuance
R13-3278B	January 3, 2025

2.0 General Conditions

2.1. Definitions

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

2.2. Acronyms

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

2.3. Permit Expiration and Renewal

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

2.4. Permit Actions

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

2.5. Reopening for Cause

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

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

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

2.7. Minor Permit Modifications

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

2.8. Significant Permit Modification

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

2.9. Emissions Trading

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

2.10. Off-Permit Changes

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

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

[45CSR§30-5.9.]

2.11. Operational Flexibility

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

[45CSR§30-5.8]

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

[45CSR§30-5.8.a.]

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

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

[45CSR§30-5.8.c.]

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

[45CSR§30-2.40]

2.12. Reasonably Anticipated Operating Scenarios

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

[45CSR§30-5.1.i.]

2.13. Duty to Comply

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

[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

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

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

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

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

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

[45CSR§30-5.1.f.2.]

2.17. Reserved.

2.18. Federally-Enforceable Requirements

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.
- [45CSR§30-5.2.a.]
- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

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

[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

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

[45CSR§30-4.2.]

2.21. Permit Shield

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

[45CSR§30-5.6.a.]

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

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

[45CSR§30-5.6.c.]

2.22. Credible Evidence

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

[45CSR§30-5.3.e.3.B.]

2.23. Severability

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

[45CSR§30-5.1.e.]

2.24. Property Rights

- 2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.

[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

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

[45CSR§30-5.1.d.]

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

[45CSR§30-5.1.a.2.]

3.0 Facility-Wide Requirements

3.1 Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person is prohibited except as noted in 45CSR§6-3.1. [45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause or allow any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. [45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them. [40 C.F.R. §61.145(b) and 45CSR34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public. [45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11. [45CSR§11-5.2]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality. [W.Va. Code § 22-5-4(a)(15)]
- 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. **Minor Source of Hazardous Air Pollutants (HAP).** HAP emissions from the facility shall be less than 10 tpy of any single HAP or 25 tpy of any combination of HAPs. Compliance with this condition shall ensure that the facility is a minor HAP source.

[45CSR13, R13-3278, 4.1.7.]

- 3.1.10. Only those emission units/sources as identified in the Emission Units Table of Section 1.1., with the exception of any *de minimis* sources as identified under Table 45-13B of 45CSR13, are authorized at the permitted facility.

[45CSR13, R13-3278, 4.1.8.]

- 3.1.11. 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.

[45CSR§17-3.1.]

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. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit shall be revised in accordance with 45CSR§30-6.4. or 45CSR§30-6.5., as applicable.
- 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)(15-16) 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.

[45CSR13, R13-3278, 4.4.1.; 45CSR§30-5.1.c.2.A.]

- 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.

[45CSR13, R13-3278, 3.4.1.; 45CSR§30-5.1.c.2.B.]

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

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

3.5. Reporting Requirements

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

[45CSR§§30-4.4. and 5.1.c.3.D.]

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

[45CSR§30-5.1.c.3.E.]

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

DAQ:

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

US EPA:

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

DAQ Compliance and Enforcement¹:

DEPAirQualityReports@wv.gov

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

3.5.4. **Fees.** The permittee shall pay fees on an annual basis in accordance with 45CSR§30-8.
[45CSR§30-8.]

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

DAQ:

DEPAirQualityReports@wv.gov

US EPA:

R3_APD_Permits@epa.gov

[45CSR§30-5.3.e.]

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

DAQ:

DEPAirQualityReports@wv.gov

[45CSR§30-5.1.c.3.A.]

3.5.7. **Reserved.**

3.5.8. **Deviations.**

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

1. Reserved.

2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or email. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.

3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

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

[45CSR§30-5.1.c.3.B.]

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

[45CSR§30-4.3.h.1.B.]

3.6. Compliance Plan

- 3.6.1. None.

3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.
 - a. None.

4.0 Turbines and Microturbine Generators [Emission Point IDs: E001 through E018]

4.1. Limitations and Standards

4.1.1. The following conditions and requirements are specific to the Combustion Turbines (S001 to S004):

a. Emissions from each combustion turbine shall not exceed the following:

1. Emissions of nitrogen oxides (NO_x) shall be controlled with combustion controls. Each turbine shall not discharge NO_x emissions in excess of 25 ppm at 15 percent O₂ when operating at load conditions at or above 75 percent of peak load and/or when operating temperatures are at or above 0°F. For when the operating loads of the turbine are less than 75% of peak load and/or operating temperatures are less than 0°F, NO_x emissions rate from the turbine shall not exceed 150 ppm at 15 percent O₂. Annual NO_x emissions from each turbine shall not exceed 42.95 tpy on a 12-month rolling total. This limit applies at all times, including periods of startup, shutdown, or malfunction.
[45CSR16; 40 C.F.R. §60.4320(a); Table 1 to Subpart KKKK of Part 60]
2. Emissions of CO shall not exceed 45.67 tpy, on a rolling 12-month total basis.
3. Emissions of SO₂ shall not exceed 0.060 lbs of SO₂/mmBTU heat input. For the purpose of demonstrating compliance with this limit, the permittee shall maintain the Federal Energy Regulatory Commission (FERC) tariff limit on total sulfur content of 20 grains of sulfur per 100 standard cubic feet of natural gas combusted in the turbines.
[45CSR16; 40 C.F.R. §§60.4330(a)(2) and 60.4365(a)]
4. Emissions of VOC shall not exceed 5.02 tpy, on a rolling 12-month total basis.

b. Each turbine shall only be fired with pipeline-quality natural gas.

c. The permittee must operate and maintain each turbine, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.
[45CSR16; 40 C.F.R. §60.4333(a)]

[45CSR13, R13-3278, 4.1.1.]

4.1.2. The following conditions and requirements are specific to the Microturbine Generators (S005 to S018):

a. Emissions from each microturbine generator shall not exceed the following:

1. Emissions of NO_x shall not exceed 0.35 tpy, on a rolling 12-month total basis.
2. Emissions of CO shall not exceed 0.96 tpy, on a rolling 12-month total basis.
3. Emissions of VOC shall not exceed 0.09 tpy, on a rolling 12-month total basis.

b. Each turbine shall only be fired with pipeline-quality natural gas.

- c. The permittee must operate and maintain each turbine, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.

[45CSR13, R13-3278, 4.1.2.]

4.2. Monitoring Requirements

- 4.2.1. For the purpose of determining compliance with the annual limits for each combustion turbine (S001 to S004), the permittee shall monitor and record the following for each calendar month:
 - a. Hours the turbine operated at normal conditions, which is when the turbine is at or above 50% load, and the ambient temperature is above 0°F.
 - b. Hours the turbine operated at low-load conditions, which is when the turbine load is less than 50% load.
 - c. Hours the turbine operated at low temperature conditions, which is when the ambient temperature is less than 0°F but at or above -20°F.
 - d. Hours the turbine operated at very-low temperature conditions, which is when the ambient temperature is less than -20°F.
 - e. The number of startup and shutdown cycles that occurred during the month.

Such records shall be maintained in accordance with Condition 3.4.2. of this operating permit.

[45CSR13, R13-3278, 4.2.1.]

4.3. Testing Requirements

- 4.3.1. For the purposes of demonstrating compliance with the NO_x emission standards in Condition 4.1.1.a.1. and 40 C.F.R. §60.4320(a), the permittee shall conduct performance tests on an annual basis (no more than 14 calendar months following the previous test). If the NO_x emission result from the performance test is less than or equal to 75 percent of the NO_x emission limit for the turbine, the permittee may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NO_x emission limit for the turbine, the permittee must resume annual performance tests. Such testing shall be conducted in accordance with Condition 3.3.1. and 40 C.F.R. §60.4400 (paragraphs a. and b. of this condition). Records of such testing shall be maintained in accordance with Condition 3.4.2.
 - a. 1. There are two general methodologies that the permittee may use to conduct the performance tests. For each test run:
 - i. Measure the NO_x concentration (in parts per million (ppm)), using EPA Method 7E or EPA Method 20 in Appendix A of 40 C.F.R. Part 60. For units complying with the output based standard, concurrently measure the stack gas flow rate, using EPA Methods 1 and 2 in Appendix A of 40 C.F.R. Part 60, and measure and record the electrical and thermal output from the unit. Then, use the following equation to calculate the NO_x emission rate:

$$E = \frac{1.194 \times 10^{-7} \times (NO_X)_c \times Q_{std}}{P}$$

Where:

E = NO_X emission rate, in lbs/MWh

1.194 × 10⁻⁷ = conversion constant, in lbs/dscf-ppm

(NO_X)_c = average NO_X concentration for the run, in ppm

Q_{std} = stack gas volumetric flow rate, in dscf/hr

P = gross electrical and mechanical energy output of the combustion turbine, in MW (for simple-cycle operation), for combined-cycle operation, the sum of all electrical and mechanical output from the combustion and steam turbines, or, for combined heat and power operation, the sum of all electrical and mechanical output from the combustion and steam turbines plus all useful recovered thermal output not used for additional electric or mechanical generation, in MW, calculated according to §60.4350(f)(2); or

- ii. Measure the NO_X and diluent gas concentrations, using either EPA Methods 7E and 3A, or EPA Method 20 in Appendix A of 40 C.F.R. Part 60. Concurrently measure the heat input to the unit, using a fuel flowmeter (or flowmeters), and measure the electrical and thermal output of the unit. Use EPA Method 19 in Appendix A of 40 C.F.R. Part 60 to calculate the NO_X emission rate in lbs/mmBTU. Then, use Equations 1 and, if necessary, 2 and 3 in §60.4350(f) to calculate the NO_X emission rate in lbs/MWh.
2. Sampling traverse points for NO_X and (if applicable) diluent gas are to be selected following EPA Method 20 or EPA Method 1 (non-particulate procedures), and sampled for equal time intervals. The sampling must be performed with a traversing single-hole probe, or, if feasible, with a stationary multi-hole probe that samples each of the points sequentially. Alternatively, a multi-hole probe designed and documented to sample equal volumes from each hole may be used to sample simultaneously at the required points.
3. Notwithstanding paragraph a.2. of this condition, the permittee may test at fewer points than are specified in EPA Method 1 or EPA Method 20 in Appendix A of 40 C.F.R. Part 60 if the following conditions are met:
 - i. The permittee may perform a stratification test for NO_X and diluent pursuant to the procedures specified in section 6.5.6.1(a) through (e) of Appendix A of 40 C.F.R. Part 75.
 - ii. Once the stratification sampling is completed, the permittee may use the following alternative sample point selection criteria for the performance test:
 - a. If each of the individual traverse point NO_X concentrations is within ±10 percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than ±5 ppm or ±0.5 percent CO₂ (or O₂) from the mean for all traverse points, then the permittee may use three points (located either 16.7, 50.0 and 83.3 percent of the way across the stack or duct, or, for circular stacks or ducts greater than 2.4 meters (7.8 feet) in diameter, at 0.4, 1.2, and 2.0 meters from the wall). The three

points must be located along the measurement line that exhibited the highest average NO_x concentration during the stratification test; or

- b. For turbines with a NO_x standard greater than 15 ppm at 15% O₂, the permittee may sample at a single point, located at least 1 meter from the stack wall or at the stack centroid if each of the individual traverse point NO_x concentrations is within ± 5 percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than ± 3 ppm or ± 0.3 percent CO₂ (or O₂) from the mean for all traverse points; or
 - c. For turbines with a NO_x standard less than or equal to 15 ppm at 15% O₂, the permittee may sample at a single point, located at least 1 meter from the stack wall or at the stack centroid if each of the individual traverse point NO_x concentrations is within ± 2.5 percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than ± 1 ppm or ± 0.15 percent CO₂ (or O₂) from the mean for all traverse points.
- b. The performance test must be done at any load condition within plus or minus 25 percent of 100 percent of peak load. The permittee may perform testing at the highest achievable load point, if at least 75 percent of peak load cannot be achieved in practice. The permittee must conduct three separate test runs for each performance test. The minimum time per run is 20 minutes.
1. If the stationary combustion turbine combusts both oil and gas as primary or backup fuels, separate performance testing is required for each fuel.
 2. For a combined cycle and CHP turbine systems with supplemental heat (duct burner), the permittee must measure the total NO_x emissions after the duct burner rather than directly after the turbine. The duct burner must be in operation during the performance test.
 3. If water or steam injection is used to control NO_x with no additional post-combustion NO_x control and the permittee chooses to monitor the steam or water to fuel ratio in accordance with §60.4335, then that monitoring system must be operated concurrently with each EPA Method 20 or EPA Method 7E run and must be used to determine the fuel consumption and the steam or water to fuel ratio necessary to comply with the applicable §60.4320 NO_x emission limit.
 4. Compliance with the applicable emission limit in §60.4320 must be demonstrated at each tested load level. Compliance is achieved if the three-run arithmetic average NO_x emission rate at each tested level meets the applicable emission limit in §60.4320.
 5. If the permittee elects to install a CEMS, the performance evaluation of the CEMS may either be conducted separately or (as described in §60.4405) as part of the initial performance test of the affected unit.
 6. The ambient temperature must be greater than 0°F during the performance test.

[45CSR13, R13-3278, 4.3.1.; 45CSR16; 40 C.F.R. §§60.4340(a) and 60.4400]

4.4. Recordkeeping Requirements

- 4.4.1. Compliance with the annual emission limits in Condition 4.1.1. for NO_x, CO, and VOC for the turbines (S001 to S004) shall be based on a rolling 12-month total. The emissions from each turbine shall be determined monthly using the following equation:

$$ME_{P_x} = DLN_{P_x} \times DLN \text{ hrs} + LL_{P_x} \times LL \text{ hrs} + LT_{P_x} \times LT \text{ hrs} + VLT_{P_x} \times VLT \text{ hrs} + SS_{P_x} \times SS \text{ cycles}$$

Where:

ME_{P_x} = Monthly emissions of Pollutant X

DLN_{P_x} = Hourly emission rate of Pollutant X during normal operation

DLN = Number of hours of normal operation in said month

LL_{P_x} = Hourly emission rate of Pollutant X during low load (< 50%) operation

LL = Number of hours of low load operation in said month

LT_{P_x} = Hourly emission rate of Pollutant X during low temperatures (< 0°F)

LT = Number of hours of low temperature operation in said month

VLT_{P_x} = Hourly emission rate of Pollutant X during very low temperatures (< -20°F)

VLT = Number of hours of very low temperature operation in said month

SS_{P_x} = Unit emission rate (lbs/cycle) for Pollutant X during startup/shutdown cycles

SS = Number of startup/shutdown cycles for said month

Hourly emission rates used in the above calculation shall be based on best available data which is the data collected during source specific testing or the data for the specific model turbine provided or published by the manufacturer. When source test data is used, it can be adjusted for the average operating conditions for each specific month using a generally accepted model or methodology. This determination shall be performed within 30 days after the end of the calendar month and the monthly emissions shall be summed with the preceding 11 months to determine compliance with the annual limits in Condition 4.1.1.a. Records of the monthly total and 12-month totals shall be maintained in accordance with Condition 3.4.2.

[45CSR13, R13-3278, 4.4.2.]

- 4.4.2. The permittee shall maintain current and valid documentation that the natural gas consumed by the combustion turbines specifying that the maximum total sulfur content is 20 grains of sulfur or less per 100 cubic feet of natural gas. Said documentation can be purchase contracts, tariff sheets, or transportation contracts. Such records shall be maintained in accordance with Condition 3.4.2., except that these records can be maintained off-site but must be made available for inspection within 15 days of the request. By satisfying this requirement, the permittee is exempted from the total sulfur monitoring requirement of 40 C.F.R. §60.4370. *These records satisfy Conditions 4.1.1.b., 4.1.2.b., and 6.1.1.d.*

[45CSR13, R13-3278, 4.4.3.; 45CSR16; 40 C.F.R. §§60.4360 and 60.4365(a)]

4.5. Reporting Requirements

- 4.5.1. For each affected unit that performs annual performance tests in accordance with Condition 4.3.1. (40 C.F.R. §60.4340(a)), the permittee must submit a written report of the results of each performance test before the close of business on the 60th day following the completion of the performance test.
[45CSR13, R13-3278, 4.3.1.; 45CSR16; 40 C.F.R. §60.4375(b)]

4.6. Compliance Plan

- 4.6.1. None.

5.0 40 C.F.R. Part 60 Subpart OOOOa Requirements for Fugitive Emissions Components

5.1. Limitations and Standards

- 5.1.1. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating 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, opacity observations, review of operating and maintenance procedures, and inspection of the source. The provisions for exemption from compliance during periods of startup, shutdown, and malfunctions provided for in 40 C.F.R. §60.8(c) do not apply to 40 C.F.R. Part 60 Subpart OOOOa.

[45CSR16; 40 C.F.R. §60.5370a(b)]

- 5.1.2. For each affected facility under 40 C.F.R. §60.5365a(j), the permittee must reduce GHG (in the form of a limitation on emissions of methane) and VOC emissions by complying with the requirements of paragraphs a. through j. of this condition. The requirements in this condition are independent of the closed vent system and cover requirements in 40 C.F.R. §60.5411a. Alternatively, the permittee may comply with the requirements of 40 C.F.R. §60.5398b, including the notification, recordkeeping, and reporting requirements outlined in 40 C.F.R. §60.5424b. For the purpose of 40 C.F.R. Part 60 Subpart OOOOa, compliance with the requirements in 40 C.F.R. §60.5398b will be deemed compliance with this condition. When complying with 40 C.F.R. §60.5398b, the definitions in 40 C.F.R. §60.5430b shall apply for those activities conducted under 40 C.F.R. §60.5398b.

- a. The permittee must monitor all fugitive emission components, as defined in 40 C.F.R. §60.5430a, in accordance with paragraphs b. through g. of this condition. The permittee must repair all sources of fugitive emissions in accordance with paragraph h. The permittee must keep records in accordance with paragraph i. of this condition and report in accordance with paragraph j. of this condition. For the purposes of this condition, fugitive emissions are defined as any visible emission from a fugitive emissions component observed using optical gas imaging or an instrument reading of 500 parts per million (ppm) or greater using Method 21 of appendix A-7 to 40 C.F.R. Part 60.
- b. The permittee must develop an emissions monitoring plan that covers the collection of fugitive emissions components at compressor stations within each company-defined area in accordance with paragraphs c. and d. of this condition.
- c. Fugitive emissions monitoring plans must include the elements specified in paragraphs c.1. through 8. of this condition, at a minimum.
 1. Frequency for conducting surveys. Surveys must be conducted at least as frequently as required by paragraph g. of this condition.
 2. Technique for determining fugitive emissions (i.e., Method 21 of appendix A-7 to 40 C.F.R. Part 60 or optical gas imaging meeting the requirements in paragraphs c.7.i. through vii. of this condition).
 3. Manufacturer and model number of fugitive emissions detection equipment to be used.
 4. Procedures and timeframes for identifying and repairing fugitive emissions components from which fugitive emissions are detected, including timeframes for fugitive emission components that are

- unsafe to repair. The repair schedule must meet the requirements of paragraph h. of this condition at a minimum.
5. Procedures and timeframes for verifying fugitive emission component repairs.
 6. Records that will be kept and the length of time records will be kept.
 7. If using optical gas imaging, the plan must also include the elements specified in paragraphs c.7.i. through vii. of this condition.
 - i. Verification that the optical gas imaging equipment meets the specifications of paragraphs c.7.i.a. and b. of this condition. This verification is an initial verification and may either be performed by the facility, by the manufacturer, or by a third party. For the purposes of complying with the fugitive emissions monitoring program with optical gas imaging, a fugitive emission is defined as any visible emissions observed using optical gas imaging.
 - a. The optical gas imaging equipment must be capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions.
 - b. The optical gas imaging equipment must be capable of imaging a gas that is half methane, half propane at a concentration of 10,000 ppm at a flow rate of ≤ 60 g/hr from a quarter inch diameter orifice.
 - ii. Procedure for a daily verification check.
 - iii. Procedure for determining the operator's maximum viewing distance from the equipment and how the operator will ensure that this distance is maintained.
 - iv. Procedure for determining maximum wind speed during which monitoring can be performed and how the operator will ensure monitoring occurs only at wind speeds below this threshold.
 - v. Procedures for conducting surveys, including the items specified in paragraphs c.7.v.a. through c. of this condition.
 - a. How the operator will ensure an adequate thermal background is present in order to view potential fugitive emissions.
 - b. How the operator will deal with adverse monitoring conditions, such as wind.
 - c. How the operator will deal with interferences (e.g., steam).
 - vi. Training and experience needed prior to performing surveys.
 - vii. Procedures for calibration and maintenance. At a minimum, procedures must comply with those recommended by the manufacturer.
 8. If using Method 21 of Appendix A-7 of 40 C.F.R. Part 60, the plan must also include the elements specified in paragraphs c.8.i. through iii. of this condition. For the purposes of complying with the

fugitive emissions monitoring program using Method 21, a fugitive emission is defined as an instrument reading of 500 ppm or greater.

- i. *Verification that monitoring equipment meets the requirements specified in Section 6.0 of Method 21 at 40 C.F.R. Part 60, Appendix A-7.* For purposes of instrument capability, the fugitive emissions definition shall be 500 ppm or greater methane using a FID-based instrument. If the permittee wishes to use an analyzer other than a FID-based instrument, the permittee must develop a site-specific fugitive emission definition that would be equivalent to 500 ppm methane using a FID-based instrument (e.g., 10.6 eV PID with a specified isobutylene concentration as the fugitive emission definition would provide equivalent response to the compound of interest).
- ii. *Procedures for conducting surveys.* At a minimum, the procedures shall ensure that the surveys comply with the relevant sections of Method 21 at 40 C.F.R. Part 60, Appendix A-7, including Section 8.3.1.
- iii. *Procedures for calibration.* The instrument must be calibrated before use each day of its use by the procedures specified in Method 21 of Appendix A-7 of 40 C.F.R. Part 60. At a minimum, the permittee must also conduct precision tests at the interval specified in Method 21 of Appendix A-7 of 40 C.F.R. Part 60, Section 8.1.2, and a calibration drift assessment at the end of each monitoring day. The calibration drift assessment must be conducted as specified in paragraph c.8.iii.a. of this condition. Corrective action for drift assessments is specified in paragraphs c.8.iii.b. and c. of this condition.
 - a. Check the instrument using the same calibration gas that was used to calibrate the instrument before use. Follow the procedures specified in Method 21 of Appendix A-7 of 40 C.F.R. Part 60, Section 10.1, except do not adjust the meter readout to correspond to the calibration gas value. If multiple scales are used, record the instrument reading for each scale used. Divide the arithmetic difference of the initial and post-test calibration response by the corresponding calibration gas value for each scale and multiply by 100 to express the calibration drift as a percentage.
 - b. If a calibration drift assessment shows a negative drift of more than 10 percent, then all equipment with instrument readings between the fugitive emission definition multiplied by (100 minus the percent of negative drift/divided by 100) and the fugitive emission definition that was monitored since the last calibration must be re-monitored.
 - c. If any calibration drift assessment shows a positive drift of more than 10 percent from the initial calibration value, then, at the owner/operator's discretion, all equipment with instrument readings above the fugitive emission definition and below the fugitive emission definition multiplied by (100 plus the percent of positive drift/divided by 100) monitored since the last calibration may be re-monitored.
- d. Each fugitive emissions monitoring plan must include the elements specified in paragraphs d.1. through 3. of this condition, at a minimum, as applicable.
 1. If using optical gas imaging, the plan must include procedures to ensure that all fugitive emissions components are monitored during each survey. Example procedures include, but are not limited to,

- a sitemap with an observation path, a written narrative of where the fugitive emissions components are located and how they will be monitored, or an inventory of fugitive emissions components.
2. If using Method 21 of Appendix A-7 of 40 C.F.R. Part 60, the plan must include a list of fugitive emissions components to be monitored and method for determining the location of fugitive emissions components to be monitored in the field (e.g., tagging, identification on a process and instrumentation diagram, etc.).
 3. The fugitive emissions monitoring plan must include the written plan developed for all of the fugitive emissions components designated as difficult-to-monitor in accordance with paragraph g.2. of this condition, and the written plan for fugitive emissions components designated as unsafe-to-monitor in accordance with g.3. of this condition.
- e. Each monitoring survey shall observe each fugitive emissions component, as defined in 40 C.F.R. §60.5430a, for fugitive emissions.
- f. Reserved.
- g. A monitoring survey of each collection of fugitive emissions components at a compressor station must be performed at the frequencies specified in paragraph g.1. of this condition, with the exceptions noted in paragraphs g.2. and 3. of this condition.
1. A monitoring survey of the collection of fugitive emissions components at a compressor station must be conducted at least quarterly after the initial survey. Consecutive quarterly monitoring surveys must be conducted at least 60 days apart.
 2. Fugitive emissions components that cannot be monitored without elevating the monitoring personnel more than 2 meters above the surface may be designated as difficult-to-monitor. Fugitive emissions components that are designated difficult-to-monitor must meet the specifications of paragraphs g.2.i. through iv. of this condition.
 - i. A written plan must be developed for all of the fugitive emissions components designated difficult-to-monitor. This written plan must be incorporated into the fugitive emissions monitoring plan required by paragraphs b., c., and d. of this condition.
 - ii. The plan must include the identification and location of each fugitive emissions component designated as difficult-to-monitor.
 - iii. The plan must include an explanation of why each fugitive emissions component designated as difficult-to-monitor is difficult-to-monitor.
 - iv. The plan must include a schedule for monitoring the difficult-to-monitor fugitive emissions components at least once per calendar year.
 3. Fugitive emissions components that cannot be monitored because monitoring personnel would be exposed to immediate danger while conducting a monitoring survey may be designated as unsafe-to-monitor. Fugitive emissions components that are designated unsafe-to-monitor must meet the specifications of paragraphs g.3.i. through iv. of this condition.

- i. A written plan must be developed for all of the fugitive emissions components designated unsafe-to-monitor. This written plan must be incorporated into the fugitive emissions monitoring plan required by paragraphs b., c., and d. of this condition.
 - ii. The plan must include the identification and location of each fugitive emissions component designated as unsafe-to-monitor.
 - iii. The plan must include an explanation of why each fugitive emissions component designated as unsafe-to-monitor is unsafe-to-monitor.
 - iv. The plan must include a schedule for monitoring the fugitive emissions components designated as unsafe-to-monitor.
- h. Each identified source of fugitive emissions shall be repaired, as defined in 40 C.F.R. §60.5430a, in accordance with paragraphs h.1. and 2. of this condition.
 - 1. A first attempt at repair shall be made no later than 30 calendar days after detection of the fugitive emissions.
 - 2. Repair shall be completed as soon as practicable, but no later than 30 calendar days after the first attempt at repair as required in paragraph h.1. of this condition.
 - 3. Delay of repair will be allowed if the conditions in paragraphs h.3.i. or ii. of this section are met.
 - i. If the repair is technically infeasible, would require a vent blowdown, a compressor station shutdown, or would be unsafe to repair during operation of the unit, the repair must be completed during the next scheduled compressor station shutdown for maintenance, after a scheduled vent blowdown, or within 2 years of detecting the fugitive emissions, whichever is earliest. For the purposes of this paragraph h.3., a vent blowdown is the opening of one or more blowdown valves to depressurize major production and processing equipment, other than a storage vessel.
 - ii. If the repair requires replacement of a fugitive emissions component or a part thereof, but the replacement cannot be acquired and installed within the repair timelines specified in paragraphs h.1. and 2. of this section due to either of the conditions specified in paragraphs h.3.ii.a. or b. of this section, the repair must be completed in accordance with paragraph h.3.ii.c. of this section and documented in accordance with Condition 5.4.1.c.9.
 - a. Valve assembly supplies had been sufficiently stocked but are depleted at the time of the required repair.
 - b. A replacement fugitive emissions component or a part thereof requires custom fabrication.
 - c. The required replacement must be ordered no later than 10 calendar days after the first attempt at repair. The repair must be completed as soon as practicable, but no later than 30 calendar days after receipt of the replacement component, unless the repair requires a compressor station shutdown. If the repair requires a compressor station shutdown, the repair must be completed in accordance with the timeframe specified in paragraph h.3.i. of this condition.

4. Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs h.4.i. through iv. of this condition to ensure that there are no fugitive emissions.
 - i. The operator may resurvey the fugitive emissions components to verify the repair using either Method 21 of Appendix A-7 to 40 C.F.R. Part 60 or optical gas imaging.
 - ii. For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph must be taken of that component or the component must be tagged during the monitoring survey when the fugitives were initially found for identification purposes and subsequent repair. The digital photograph must include the date that the photograph was taken and must clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture).
 - iii. Operators that use Method 21 of Appendix A-7 of 40 C.F.R. Part 60 to resurvey the repaired fugitive emissions components are subject to the resurvey provisions specified in paragraphs h.4.iii.a. and b. of this condition.
 - a. A fugitive emissions component is repaired when the Method 21 instrument indicates a concentration of less than 500 ppm above background or when no soap bubbles are observed when the alternative screening procedures specified in Section 8.3.3 of Method 21 of Appendix A-7 of 40 C.F.R. Part 60 are used.
 - b. Operators must use the Method 21 monitoring requirements specified in paragraph c.8.ii. of this condition or the alternative screening procedures specified in Section 8.3.3 of Method 21 of Appendix A-7 of 40 C.F.R. Part 60.
 - iv. Operators that use optical gas imaging to resurvey the repaired fugitive emissions components, are subject to the resurvey provisions specified in paragraphs h.4.iv.a. and b. of this condition.
 - a. A fugitive emissions component is repaired when the optical gas imaging instrument shows no indication of visible emissions.
 - b. Operators must use the optical gas imaging monitoring requirements specified in paragraph c.7. of this condition.
- i. Records for each monitoring survey shall be maintained as specified in Condition 5.4.1.
- j. Annual reports shall be submitted for each collection of fugitive emissions components at a compressor station that include the information specified in Condition 5.5.1.b. Multiple collection of fugitive emissions components at a compressor station may be included in a single annual report.

[45CSR16; 40 C.F.R. §§60.5397a(a) through (e), (g), (g)(2) through (4), and (h) through (j)]

5.2. Monitoring Requirements

- 5.2.1. For each collection of fugitive emissions components at a compressor station, the permittee must demonstrate continuous compliance with the fugitive emission standards specified in Condition 5.1.2. according to paragraphs a. through d. of this condition.
- a. The permittee must conduct periodic monitoring surveys as required in Condition 5.1.2.g.
 - b. The permittee must repair each identified source of fugitive emissions as required in Condition 5.1.2.h.
 - c. The permittee must maintain records as specified in Condition 5.4.1.
 - d. The permittee must submit annual reports for the collection of fugitive emissions components at a compressor station as required in Condition 5.5.1.a. and b.

[45CSR16; 40 C.F.R. §60.5415a(h)]

5.3. Testing Requirements

- 5.3.1. None.

5.4. Recordkeeping Requirements

- 5.4.1. The permittee must maintain the records identified as specified in 40 C.F.R. §60.7(f) and in this condition for each collection of fugitive emissions components at a compressor station. All records required by 40 C.F.R. Part 60 Subpart OOOOa must be maintained either on-site or at the nearest local field office for at least 5 years. Any records required to be maintained by Subpart OOOOa that are submitted electronically via the EPA's CDX may be maintained in electronic format.
- a. The date of startup or the date of modification for each collection of fugitive emissions components at a compressor station.
 - b. The fugitive emissions monitoring plan as required in paragraphs b. through d. of Condition 5.1.2.
 - c. The records of each monitoring survey as follows:
 1. Date of the survey.
 2. Beginning and end time of the survey.
 3. Name of the operator(s), training, and experience of the operator(s) performing the survey.
 4. Monitoring instrument used.
 5. Fugitive emissions component identification when Method 21 of 40 C.F.R. Part 60, Appendix A-7 is used to perform the monitoring survey.
 6. Ambient temperature, sky conditions, and maximum wind speed at the time of the survey. For compressor stations, operating mode of each compressor (i.e., operating, standby pressurized, and not operating-depressurized modes) at the station at the time of the survey.

7. Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.
8. Records of calibrations for the instrument used during the monitoring survey.
9. Documentation of each fugitive emission detected during the monitoring survey, including the information specified in paragraphs c.9.i. through ix. of this condition.
 - i. Location of each fugitive emission identified.
 - ii. Type of fugitive emissions component, including designation as difficult-to-monitor or unsafe-to-monitor, if applicable.
 - iii. If Method 21 of Appendix A-7 of 40 C.F.R. Part 60 is used for detection, record the component ID and instrument reading.
 - iv. For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph or video must be taken of that component or the component must be tagged for identification purposes. The digital photograph must include the date that the photograph was taken and must clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture). The digital photograph or identification (e.g., tag) may be removed after the repair is completed, including verification of repair with the resurvey.
 - v. The date of first attempt at repair of the fugitive emissions component(s).
 - vi. The date of successful repair of the fugitive emissions component, including the resurvey to verify repair and instrument used for the resurvey.
 - vii. Identification of each fugitive emission component placed on delay of repair and explanation for each delay of repair.
 - viii. For each fugitive emission component placed on delay of repair for reason of replacement component unavailability, the operator must document: the date the component was added to the delay of repair list, the date the replacement fugitive component or part thereof was ordered, the anticipated component delivery date (including any estimated shipment or delivery date provided by the vendor), and the actual arrival date of the component.
 - ix. Date of planned shutdowns that occur while there are any components that have been placed on delay of repair.
- d. For each collection of fugitive emissions components at a compressor station complying with an alternative means of emissions limitation under 40 C.F.R. §60.5399a, the permittee must maintain the records specified by the specific alternative fugitive emissions standard for a period of at least 5 years.
- e. If complying with the alternative GHG and VOC standard under 40 C.F.R. §60.5398b, in lieu of the information specified in paragraphs b. through c. of this condition, the permittee must maintain the records specified in 40 C.F.R. §60.5424b.

[45CSR16; 40 C.F.R. §§60.5420a(c), (c)(15), and (c)(15)(i), (vi) through (ix)]

5.5. Reporting Requirements

5.5.1. The permittee must submit annual reports containing the information specified in paragraphs a. and b. of this condition. The permittee must submit annual reports following the procedure specified in paragraph c. of this condition. The initial annual report is due no later than 90 days after the end of the initial compliance period as determined according to 40 C.F.R. §60.5410a. Subsequent annual reports are due no later than the same date each year as the initial annual report. The permittee may submit one report for multiple affected facilities provided the report contains all of the information specified in paragraphs a. and b. of this condition. Annual reports may coincide with Title V reports as long as all the required elements of the annual report are included. The permittee may arrange with the Administrator a common schedule on which reports required by 40 C.F.R. Part 60 may be submitted as long as the schedule does not extend the reporting period.

a. The general information specified below is required for all reports:

1. The company name, facility site name associated with the affected facility, and address of the affected facility;
2. An identification of each affected facility being included in the annual report;
3. Beginning and ending dates of the reporting period; and
4. A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

b. For the collection of fugitive emissions components at each compressor station, report the information specified in paragraphs b.1. through 3. of this condition, as applicable.

1.
 - i. Designation of the type of site (i.e., well site or compressor station) at which the collection of fugitive emissions components is located.
 - ii. For each collection of fugitive emissions components at a compressor station that became an affected facility during the reporting period, the permittee must include the date of startup or the date of modification.
2. For each fugitive emissions monitoring survey performed during the annual reporting period, the information specified in paragraphs b.2.i. through vii. of this condition.
 - i. Date of the survey.
 - ii. Monitoring instrument used.
 - iii. Any deviations from the monitoring plan elements under paragraphs c.1., c.2., c.7., and c.8.i. of Condition 5.1.2. or a statement that there were no deviations from these elements of the monitoring plan.
 - iv. Number and type of components for which fugitive emissions were detected.
 - v. Number and type of fugitive emissions components that were not repaired as required in Condition 5.1.2.h.

- vi. Number and type of fugitive emission components (including designation as difficult-to-monitor or unsafe-to-monitor, if applicable) on delay of repair and explanation for each delay of repair.
- vii. Date of planned shutdown(s) that occurred during the reporting period if there are any components that have been placed on delay of repair.
- 3. For each collection of fugitive emissions components at a compressor station complying with an alternative fugitive emissions standard under 40 C.F.R. §60.5399a, in lieu of the information specified in paragraphs b.1. and 2. of this condition, the permittee must provide the information specified in paragraphs b.3.i. through iii. of this condition.
 - i. The alternative standard with which you are complying.
 - ii. The site-specific reports specified by the specific alternative fugitive emissions standard, submitted in the format in which they were submitted to the state, local, or tribal authority. If the report is in hard copy, the permittee must scan the document and submit it as an electronic attachment to the annual report required in this condition.
 - iii. If the report specified by the specific alternative fugitive emissions standard is not site-specific, the permittee must submit the information specified in paragraphs b.1. and 2. of this condition for each individual site complying with the alternative standard.
- 4. If complying with the alternative GHG and VOC standard under 40 C.F.R. §60.5398b, in lieu of the information specified in paragraph b.2. of this condition, the permittee must provide the information specified in 40 C.F.R. §60.5424b.
- c. The permittee must submit reports to the EPA via CEDRI, except as outlined in 40 C.F.R. §60.5420a(b)(11). CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must use the appropriate electronic report template on the CEDRI website for 40 C.F.R. Part 60 Subpart OOOOa (<https://www.epa.gov/electronic-reporting-air-emissions/cedri/>). If the reporting form specific to Subpart OOOOa is not available on the CEDRI website at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for at least 90 calendar days, the permittee must begin submitting all subsequent reports via CEDRI. The date reporting forms become available will be listed on the CEDRI website. Unless the Administrator or delegated state agency or other authority has approved a different schedule for submission of reports, the reports must be submitted by the deadlines specified in Subpart OOOOa, regardless of the method in which the reports are submitted. The EPA will make all the information submitted through CEDRI available to the public without further notice. Do not use CEDRI to submit information claimed as CBI.

[45CSR16; 40 C.F.R. §§60.5420a(b), (b)(1), (b)(7), (b)(7)(i)(A), (b)(7)(i)(B), (b)(7)(ii) through (iv), and (b)(11)]

5.6. Compliance Plan

- 5.6.1. None.

6.0 Fuel Gas Heaters [Emission Point IDs: E019 and E020]

6.1 Limitations and Standards

6.1.1. The following conditions and requirements are specific to Fuel Gas Heaters (S019 and S020):

- a. NO_x emissions emitted to the atmosphere from each heater shall not exceed 0.93 tpy on a rolling yearly total basis.
- b. CO emissions emitted to the atmosphere from each heater shall not exceed 0.78 tpy on a rolling yearly total basis.
- c. The heaters shall not be designed or constructed with a maximum design heat input in excess of 2.31 mmBTU/hr.
- d. The heaters shall only be fired with pipeline quality natural gas.

[45CSR13, R13-3278, 4.1.3.]

6.1.2. 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 10 percent opacity based on a six-minute block average.

[45CSR§2-3.1.]

6.2 Monitoring Requirements

6.2.1. None.

6.3 Testing Requirements

6.3.1. Compliance with the visible emission requirements of Condition 6.1.2. shall be determined in accordance with 40 C.F.R. Part 60, Appendix A, Method 9 and 45CSR16 or by using measurements from continuous opacity monitoring systems approved by the Secretary. The Secretary 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 Condition 6.1.2. Continuous opacity monitors shall not be required on fuel burning units which employ wet scrubbing systems for emission control.

[45CSR§2-3.2.]

6.4 Recordkeeping Requirements

6.4.1. The permittee shall keep records of the amount of fuel consumed by each fuel gas heater (S019 and S020) on a monthly basis. Such records shall be maintained in accordance with Condition 3.4.2. and must be in a manner to demonstrate compliance with the emission limits of Condition 6.1.1.

[45CSR13, R13-3278, 4.2.2.]

6.4.2. Compliance with Condition 6.1.1.d. will be demonstrated by the recordkeeping requirement of Condition 4.4.2. of this operating permit.

[45CSR13, R13-3278, 4.4.3.]

6.5. Reporting Requirements

6.5.1. None.

6.6. Compliance Plan

6.6.1. None.

7.0 Produced Fluid Storage Tank and Liquid Loading [Emission Point IDs: E021 and E025]

7.1. Limitations and Standards

- 7.1.1. The maximum annual throughput of produced fluid to the 10,080-gallon storage tank (S021) shall not exceed 126,000 gallons per year.
[45CSR13, R13-3278, 4.1.4.]
- 7.1.2. The permittee shall install, maintain, and operate all above-ground piping, valves, connectors, flanges, open ended lines, etc. that service lines in the transport of potential sources of regulated air pollutants to prevent any substantive fugitive escape of regulated air pollutants. Any above-ground piping, valves, connectors, flanges, open ended lines, etc. that shows signs of excess wear and that have a reasonable potential for substantive fugitive emissions of regulated air pollutants shall be replaced.
[45CSR13, R13-3278, 4.1.5.]

7.2. Monitoring Requirements

- 7.2.1. None.

7.3. Testing Requirements

- 7.3.1. None.

7.4. Recordkeeping Requirements

- 7.4.1. To demonstrate compliance with Condition 7.1.1., the permittee shall maintain a record of the volume of produced fluid removed from the storage tank S021 during the calendar year. Such records must be maintained in accordance with Condition 3.4.2. of this operating permit.
[45CSR§30-5.1.c.]
- 7.4.2. To demonstrate compliance with Condition 7.1.2., the permittee shall maintain a record of the fugitive component counts (valves, connectors, flanges, open ended lines, etc.). Additionally, the permittee shall maintain a record of any fugitive component leaks or replacements.
[45CSR13, R13-3278, 4.4.4.]

7.5. Reporting Requirements

- 7.5.1. None.

7.6. Compliance Plan

- 7.6.1. None.

8.0 Compressor Blowdown Events [Emission Point IDs: E026]

8.1 Limitations and Standards

8.1.1. The maximum quantity of vented gas per year (scf/year) shall not exceed the following:

Blowdown Event	Events per Year	Vented Gas Volume per Year (scf/year)
Station ESD Event	4	6,400,000
Unit Shutdown	32	10,880,000
Main Gas Filter Changes	36	4,368,000
Pig Receiver 42"	4	80,057
Pig Receiver 48"	4	112,215
Pig Launcher 42"	4	37,100
Pig Launcher 48"	4	110,175

Compliance can be demonstrated using either the volume of gas vented on a 12-month rolling total or through the sum of blowdown events on a 12-month rolling total (not to exceed the number of events in the above table).

[45CSR13, R13-3278, 4.1.6.]

8.2 Monitoring Requirements

8.2.1. None.

8.3 Testing Requirements

8.3.1. None.

8.4 Recordkeeping Requirements

8.4.1. To demonstrate compliance with Condition 8.1.1., the permittee shall maintain a record of the blowdown and pigging events and estimated volume per event (scf) on a monthly and rolling twelve-month total.
[45CSR13, R13-3278, 4.4.5.]

8.5 Reporting Requirements

8.5.1. Any exceedance of Condition 8.1.1. must be reported in writing to the Director of the DAQ as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: the date of the exceedance, the estimate of VOC emissions released to the atmosphere as a result of the exceedance and any corrective measures taken or planned.
[45CSR13, R13-3278, 4.5.2.]

8.6. Compliance Plan

8.6.1. None.