

Fact Sheet



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

Permit Number: **R30-04100013-2023**
Application Received: **June 28, 2022**
Plant Identification Number: **03-54-04100013**
Permittee: **Eastern Gas Transmission and Storage, Inc.**
Facility Name: **Lightburn Station**
Mailing Address: **925 White Oaks Blvd., Bridgeport, WV 26330**

Physical Location: Jane Lew, Lewis County, West Virginia
UTM Coordinates: 547.54 km Easting • 4,331.11 km Northing • Zone 17
Directions: From Charleston, take I-79N to Jane Lew. Take Exit 105 (Jane Lew Exit) and make a left on County Road 7 (Berkin-Jane Lew Road). Stay on CR-7 until it intersects Route 19 (Main Avenue). Make a right on Route 19 and make the immediate left on Broad Run Road. Stay on Broad Run Road until it intersects County Road 1 (Old Mill Road/Fork River Road/Jackson Mill Road) and make a right. Stay on CR-1 for about 500 yards and Lightburn Station is on the right.

Facility Description

The Lightburn Station consists of a natural gas extraction plant, Lightburn Extraction Plant (LEP), and a compressor station, Lightburn Compressor Station (LCS). LEP is located adjacent to LCS. The LEP and LCS are located on contiguous property and are under common control. However, the plants do not belong to the same industrial grouping (SIC). The LCS operates under SIC Code 4922 (Pipeline Transmission of Natural Gas), and the LEP operates under SIC Code 1321 (Natural Gas Liquid Extraction).

Lightburn Compressor Station (LCS)

The emission units at LCS consist of two (2) 2,000 HP natural gas fired reciprocating engines (EN01, EN02), three (3) 4,000 HP natural gas fired reciprocating engines (EN03, EN04, EN05), two (2) 6,060 HP natural gas fired reciprocating engines (EN06 (6), EN07 (7)), one (1) 1,085 HP auxiliary generator (AUX02 (11)), two (2) dehydration

unit stills (DEHY01, DEHY02), two (2) boilers (BLR01, BLR02 (14)), one (1) heater (HTR02), two (2) reboilers (RBR01, RBR02 (13)), two (2) dehydration unit flares (F1, F2), and twenty six (26) tanks of various sizes.

Lightburn Extraction Plant (LEP)

The emission units at LEP consist of two (2) 3,550 HP natural gas fired reciprocating engines (EN08, EN09), two (2) 216 HP fire pump engines (EN10, EN11), four (4) 60,000-gallon aboveground natural gas liquid storage tanks (008-01, 008-02, 008-03, 008-04), two (2) natural gas liquid loading racks (009-01, 009-02), one (1) emergency and maintenance flare (FLARE3), two (2) 290-gallon aboveground diesel fuel storage tanks (014-01, 014-02), one (1) 500-gal methanol storage tank, one (1) 254 HP emergency generator (AUX-03), twelve (12) tanks of various sizes, one (1) 1,400-gal intermediate pressure vessel, and blowdown and pigging operations. The natural gas capacity of the LEP is 52 MMSCFD, and the plant is estimated to produce 2,244 barrels/day of natural gas liquids. The LEP receives natural gas from the existing Kennedy Compressor Station and Wymer Junction.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2021 Actual Emissions
Carbon Monoxide (CO)	1089.40	195.55
Nitrogen Oxides (NO _x)	2500.59	207.20
Particulate Matter (PM _{2.5})	35.57	11.40
Particulate Matter (PM ₁₀)	35.57	13.30
Total Particulate Matter (TSP)	46.27	13.30
Sulfur Dioxide (SO ₂)	0.75	0.30
Volatile Organic Compounds (VOC)	556.85	139.41

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2021 Actual Emissions
Formaldehyde	51.06	21.21
Acrolein	7.43	3.26
Acetaldehyde	8.21	3.47
Benzene	2.03	0.76
Ethylbenzene	1.10	0.04
Hexane	1.00	0.26
Toluene	1.58	0.39
Xylene	1.76	0.17

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 1,089.40 tons per year of Carbon Monoxide; 2,500.59 tons per year of Nitrogen Oxides; 556.85 tons per year of Volatile Organic Compounds; 51.06 tons per year of Formaldehyde; and 74.17 tons per year of aggregate Hazardous Air Pollutants. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Eastern Gas

Transmission and Storage, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

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

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

Federal and State:	45CSR2	Opacity Requirements for boilers
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur requirements for fuel burned
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources
	45CSR14	Prevention of significant deterioration
	45CSR16	Standard of Performance for new Stationary Sources
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR 34	Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	40 C.F.R. 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
	40 C.F.R. 60 Subpart KKK	Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants
	40 C.F.R. 60 Subpart VV	Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006
	40 C.F.R. 60 Subpart JJJJ	NSPS for Stationary Spark Ignition IC Engines
	40 CFR Part 63, Subpart ZZZZ	RICE MACT
40 C.F.R. 63 Subpart HHH	Natural Gas Transmission and Storage Facilities MACT	
40 C.F.R. 63 Subpart DDDDD	Boiler MACT	
State Only:	45CSR4	No objectionable odors.
	45CSR17	Control fugitive particulate matter

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

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

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2823F	June 2, 2021	
R14-0009E	January 7, 2009	

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

Determinations and Justifications

This is the fourth renewal of the Title V permit. The following changes to the Title V permit were made as part of this renewal:

- Title V Boilerplate changes:

Condition 2.11.4. – The reference notation was changed from 45CSR§30-2.39 to 45CSR§30-2.40 because this definition was renumbered in 45CSR30.

Condition 2.22.1. - The reference notation was changed to delete 45CSR38 because it has been repealed.

Condition 3.5.3. - The EPA contact information and address were updated.

- Conditions 3.7.2.1, 3.7.2.5, 3.7.2.7, 7.1.12, 7.1.18 and 9.3.1 were updated.
- HTR01 was replaced by HTR02 (see Response to Comments).
- Conditions 7.1.7, 7.1.9, 7.1.11 and 11.1.4 were updated due to changes in the regulations.
- Requirements of 40 C.F.R. §60.4211(g)(2) were added in condition 7.1.10.
- Requirements of 40 C.F.R. §60.4234 were added as condition 7.1.18
- Requirements of 40 C.F.R. §60.4243 (a)(2)(ii) were added in condition 7.1.19.
- Additional language in 40 C.F.R. §60.4245(d) was added in condition 7.4.5.
- Added requirements from 40 C.F.R. §60.4214(d) for EN10 and EN11 as condition 7.5.2.
- Added the requirements from 40 C.F.R. §60.4245(e) for AUX03 as condition 7.5.3.
- 40 C.F.R. 60 Subpart JJJJ was updated on August 10, 2022 to remove the vacated sections (40 C.F.R. §§60.4243(d)(2)(ii) and (iii)). Therefore, condition 7.1.20 was updated.
- Condition 7.4.7 was updated to the current language in 40 C.F.R. §60.4245(a)(3).
- Added requirements 40 C.F.R. §§60.18 (g), (h), and (i) as condition 9.2.1 (see Response to Comments).

Non-Applicability Determinations

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

40 C.F.R. Part 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.

40 C.F.R. §60.110b(d)(2) states that this subpart does not apply to pressure vessels designed to operate in excess of 204.9kPa (29.7 psi) and without emissions to the atmosphere. The Horizontal Natural Gas Liquid Storage Tanks at the Lightburn Extraction Plant (Em. Unit IDs: 008-01, 008-02, 008-03, 008-04) will be operated at 225 psi and do not vent to atmosphere since their emissions are controlled by FLARE3. The Horizontal Aboveground Drip/Condensate Tank (Emission Unit ID: TK09-LEP) is also operated above 204.9kPa. Since these tanks do not meet the applicability criteria they are not subject to this rule. The Lightburn compressor station tanks in the Emission Unit Table (Em. Unit IDs: TK01, TK02, TK03, TK04, TK05, TK06, TK07, TK08-LCS, TK09-LCS, TK10-LCS, TK11-LCS, TK12-LCS, TK13-LCS, TK14-LCS, TK15-LCS, TK16-LCS, TK17-LCS, TK18-LCS, TK19, TK20, TK21, TK22, TK23, TK26) and Lightburn Extraction Plant tanks in the Emission Unit Table (Em. Unit IDs: TK08-LEP, TK10-LEP through TK17-LEP, 014-01, 014-02 and 014-03) are of design capacity less than 75 cubic meters. Since these tanks do not meet the applicability criteria of §60.110b(a), they are not subject to this rule. Tanks TK24 and TK25 at the Lightburn Compressor Station are vessels with a design capacity of less than or equal to 1,589.874 cubic meters used for petroleum or condensate and exempt per 40 C.F.R. §60.110b(d)(4).

40 C.F.R. Part 60 Subpart LLL – Standards of Performance for Onshore Natural Gas Processing: SO₂ Emissions. According to 40 C.F.R. §60.640(a), this rule applies to the following affected facilities: each sweetening unit, and each sweetening unit followed by a sulfur recovery unit. There are no sweetening units at the Lightburn Extraction Plant (LEP). The remaining applicability criteria §§60.640(b) through (e) all apply to affected facilities (i.e., sweetening units). Since there are no sweetening units, none of these criteria make the rule applicable. Since the facility does not meet the applicability criteria, this rule does not apply to the Lightburn Extraction Plant (LEP).

40 C.F.R. Part 63 Subpart HH – National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. Under the definition of “Facility” in 40 C.F.R. §63.761 and in accordance with U.S. EPA Applicability Determination Index (ADI) # M050022, HAP emissions from the Lightburn Extraction Plant (LEP) are not to be aggregated with the Lightburn Compressor Station (LCS) to determine HAP status (major/minor) under Subpart HH. Based upon the potential HAP emissions for the LEP, the LEP is an area source of HAPs. According to 40 C.F.R. §63.760(b)(2), the affected source for area sources includes each triethylene glycol (TEG) dehydration unit, of which there are none at LEP. In accordance with 40 C.F.R. §63.760(d), if there are no affected sources at the facility, then the facility is not subject to Subpart HH. The Lightburn Compressor Station is also not subject to this Subpart as it is characterized as a natural gas transmission and storage facility, which does not meet the definition of “Facility”.

40 C.F.R. Part 63 Subpart EEEE - National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline). The Lightburn Extraction Plant (LEP) is a natural gas production facility, as the term “facility” is defined in §63.761 of 40 C.F.R. 63 Subpart HH; and the Lightburn Compressor Station (LCS) is a natural gas

transmission and storage facility, as the term “facility” is defined in §63.1271 of 40 C.F.R 63 Subpart HHH. Therefore, Lightburn Station is not subject to Subpart EEEE since it meets the criteria of 40 C.F.R. §§63.2334(c)(1) and (2).

40 C.F.R. Part 64 – Compliance Assurance Monitoring (CAM). The table below sets forth the non-applicability determinations for multiple emission units integral to the Lightburn Station.

Em. Unit ID	Pollutant	Rationale
001-01 through 001-07, 002-02, 005-01, 005-02, 005-06, 005-04, 005-05	Various	These Emission Units do not have any control; Therefore, in accordance with 40 C.F.R § 64.2(a)(2), CAM is not applicable to these emission units.
004-01, 004-02	VOC, HAPs	These Emission Units have flares to control VOC and HAPs, but the only limitations for these come from 40 C.F.R 63 Subpart HHH which is exempt from CAM per §64.2(b)(1)(i).
006-01, 006-02	CO, VOC	For each of the Caterpillar G3612 engines (Em. Unit IDs: 006-01, 006-02) uncontrolled potential emissions of CO and VOC are 94.18 tpy and 22.26 tpy, respectively. These pre-control device PTEs are less than the major source threshold of 100 tpy. Since the applicability criterion at 40 C.F.R. §64.2(a)(3) is not met, CAM does not apply to the engines on a pollutant-specific basis for pollutants CO and VOC.
	NOx	A control device is not employed to control NOx emissions from the Caterpillar G3612 engines (Em. Unit IDs: 006-01, 006-02). According to the manufacturer’s data supplied in Attachment M of the application, NOx emissions are unaffected by the oxidation catalyst employed to reduce CO and VOC emissions. The applicability criterion at 40 C.F.R. §64.2(a)(2) is not met, and thus CAM does not apply on a pollutant-specific basis for NOx emitted from the engines. Furthermore, potential NOx emissions from each engine are 17.124 tpy, which is less than the major source threshold. Thus, even if a NOx control device were used, the engines would still not meet applicability criterion at 40 C.F.R. §64.2(a)(3) for NOx.
	HCHO	The Caterpillar G3612 engines (Em. Unit IDs: 006-01, 006-02) are subject to an emission limitation for formaldehyde, which meets applicability criterion §64.2(a)(1). An oxidation catalyst controls formaldehyde emissions to meet the limitation, which meets applicability criterion §64.2(a)(2). According to the application, the uncontrolled potential emissions of formaldehyde from each of the Caterpillar G3612 engines are 13.70 tpy, which exceeds the major source threshold of 10 tpy of a single HAP. Thus all applicability criteria §§64.2(a)(1) through (3) are met. However, emissions of formaldehyde from the engines are subject to 40 C.F.R. 63 Subpart ZZZZ. Therefore, the criterion at §64.2(b)(1)(i) for an exemption is met and CAM does not apply to the Caterpillar G3612 engines (Em. Unit IDs: 006-01, 006-02) for formaldehyde.

Em. Unit ID	Pollutant	Rationale
007-01, 007-02	Various	The John Deere Co. Fire Pump engines (Em. Unit IDs: 007-01, 007-02) are subject to emission limitations for various pollutants; however no air pollution control device is employed to achieve compliance with such limitations. Therefore, CAM does not apply to these engines since they do not meet the applicability criterion at 40 C.F.R. §64.2(a)(2).
008-01, 008-02, 008-03, 008-04	VOC	The Horizontal Natural Gas Liquids Storage Tanks (Em. Unit IDs: 008-01, 008-02, 008-03, 008-04) are subject to an emission limitation or standard. The standard is the maximum throughput limitation of permit R13-2823, 6.1.1. This is determined since part of the definition of <i>Emission limitation or standard</i> at §64.1 is that “An emission limitation or standard may also be expressed either as a work practice, process or control device parameter, or other form of specific design, equipment, operational, or operation and maintenance requirement.” The throughput limitation is considered an operational standard; therefore, the applicability criterion at §64.2(a)(1) is met. The tanks are pressurized vessels under normal operations, and the tanks are only vented to control device FLARE3 during emergency situations or non-routine maintenance activities. Thus, the control device is not employed during normal operations. More importantly, the FLARE3 is not employed to achieve compliance with the throughput limitation. Therefore, applicability criterion §64.2(a)(2) is not met and CAM does not apply to the tanks.
FLARE3	Various	The Emergency and Maintenance Flare (Control Device ID: FLARE3) controls VOC emissions from (i) absorber draining; and (ii) emergency episodes of venting the Horizontal Natural Gas Liquids Storage Tanks. The flare pilot runs continuously through all times. None of the PTEs of any pollutant emitted from the flare exceed the major source threshold. Therefore, applicability criterion §64.2(a)(3) is not met and CAM does not apply to the FLARE3.
AUX-03	Various	The Emergency Generator (012-01) is subject to the emission standards of 40 C.F.R. 63 Subpart JJJJ which are exempt from CAM per 40 C.F.R § 64.2 (b) (1)(i)

45CSR10 – To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.

Internal Combustion Engines (Em. Unit IDs: 001-01 through 001-07, 002-02, 006-01, 006-02, 007-01, 007-02)

All limits and standards of 45CSR§10-3 apply to fuel burning units. None of the compressor engines (001-01 through 001-07, 006-01, 006-02), Auxiliary Generator (002-02) and fire pump engines (007-01, 007-02) are a “Fuel burning unit” as defined in 45CSR§10-2.8. Therefore, none of the engines are subject to 45CSR§10-3 limits or standards. Similarly, all limits and standards of 45CSR§10-4 apply to manufacturing process source operations. None of the engines are a “manufacturing process” “source operation” according to the definitions in 45CSR§§10-2.11. and 2.19. Therefore, none of the engines are subject to 45CSR§10-4 limits or standards. As a final point, internal combustion engines, including gas turbines and emergency generators, are not subject to 45CSR10 according to the Director’s verbal guidance.

Emission Unit IDs- BLR02, HTR02, RBR01, RBR02 are less than 10 MMBtu/hr, and are exempt from the requirements of 45CSR§10-3 and 45CSR§§10-6 through 8 in accordance with the exemption granted under 45CSR§10-10.1.

Condition 10.2.1.b. of Permit R13-2823. This underlying condition applies to the fire pump engines 007-01 and 007-02. The condition states, “For the purpose of determining compliance with the Regulated Pollutant Limitation for SO₂, a person designated by a Responsible Official or Authorized Representative shall maintain records of the maximum sulfur content on a per-shipment basis for fuel oil, recycled or used oil or annual certification of the sulfur content from the supplier for pipeline quality natural gas.” These engines are not subject to an SO₂ emission limitation. Therefore, this underlying recordkeeping is unnecessary for Title V permitting purposes.

40 CFR 63 Subpart ZZZZ - Emission Unit IDs 001-01 through 001-07 are spark ignited non-emergency, 2 stroke lean burn engines. They are existing stationary engines with a site rating of greater than 500HP located at a major source of HAPs (Lightburn Compressor Station). These Engines are not subject to any requirements for 40 CFR 63 Subpart ZZZZ, per 40 C.F.R § 63.6590(b)(3)(i).

40 CFR 60 Subpart JJJJ – The compressor engines (EN01 – EN07) and auxiliary generator (AUX02) are not subject to this subpart since they were manufactured before the applicability date.

40 CFR 60 Subpart OOOO – This subpart does not apply to the facility since the facility does not have gas wells, centrifugal compressors, reciprocating compressors, and/or pneumatic controllers constructed, modified, or reconstructed after August 23, 2011. None of the newly installed tanks onsite meet the applicability requirements in 40 CFR§60.5365(e).

40 CFR 60 Subpart OOOOa – This subpart does not apply to the facility since the facility does not have gas wells, centrifugal compressors, reciprocating compressors, and/or pneumatic controllers constructed, modified, or reconstructed after September 18, 2015.

40 CFR 63 Subpart DDDDD – The reboilers (RBR01 and RBR02) at the Lightburn Compressor Station are not subject to this subpart since they are exempt by §63.7491(h).

40 CFR 63 Subpart JJJJJJ – The Lightburn Compressor Station is a major source of HAP; therefore, this subpart does not apply. The Lightburn Extraction Plant does not have any boilers as defined in §63.11237.

Request for Variances or Alternatives

None.

Insignificant Activities

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

Comment Period

Beginning Date: February 1, 2023

Ending Date: March 3, 2023

Point of Contact

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

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41283
Beena.j.modi@wv.gov

Procedure for Requesting Public Hearing

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

Response to Comments (Statement of Basis)

During the public comment period, DAQ received comments from Eastern Gas Transmission and Storage, Inc. (EGTS) on March 3, 2023 through email. Their comments and the DAQ responses are as follows:

- Comment 1. The 4.0 mmBtu/hour Natco heater (HTR01) has been removed and its function replaced with a 1.25 mmBtu/hour ETI Water Bath Heater (HTR02). The applicable requirements for HTR01 also apply to HTR02, and are correct in the draft/proposed permit, except for the one-time energy assessment. Please delete HTR01 from the equipment list and replace all references to it in the draft/proposed permit with HTR02, except at the one-time energy assessment reference. Please add HTR02 to the equipment list in place of HTR01.
- Response 1. DAQ has deleted HTR01 from the equipment list and replaced all references to it in the permit with HTR02, except at the one-time energy assessment reference (in item 4 of Table 3 to Part 63 Subpart DDDDD which does not apply to HTR02). PD23-007 confirmed that an NSR permit was not needed for this change in equipment.
- Comment 2. We suggest that clarifying language added regarding the allowable use of the Alternative Work Practice for detecting equipment leaks could be added Section 9.0 of the permit. The following language could be inserted before condition 9.1.1 (i.e., between the Section 9.1 header and condition 9.1.1): The facility may, at its option, utilize an alternative work practice (AWP) for monitoring equipment for leaks, which is codified at 40 CFR Part 60, Subpart A, §60.18(g)-(i). In accordance with 40 CFR §60.18(g), the AWP may be used in lieu of the Method 21 monitoring requirements of the applicable regulation, except for those that apply to:
- Closed vent systems;
 - Equipment designated as leakless;
 - Equipment identified as having no detectable emissions, as indicated by an instrument reading of 500 parts per million (ppm) above background.

When using the AWP, the requirements of the applicable regulation that are specific to Method 21 do not apply, except as noted above. Equipment specification and other non-Method 21 requirements in the applicable subpart continue to apply. This facility has the option to utilize the AWP to monitor equipment.

Response 2. The Alternative Work Practice option (40 CFR §§60.18(g), (h), (i)) was included as monitoring condition 9.2.1.