

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:*

**Eureka Midstream, LLC**

**Carbide Compressor Station**

**R30-10300049-2023**

*Laura M. Crowder*

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*Laura M. Crowder*

*Director, Division of Air Quality*

*Issued: November 07, 2023 • Effective: November 21, 2023*  
*Expiration: November 07, 2028 • Renewal Application Due: May 07, 2028*

Permit Number: **R30-10300049-2023**  
Permittee: **Eureka Midstream, LLC**  
Facility Name: **Carbide Compressor Station**  
Permittee Mailing Address: **2200 Energy Drive, Canonsburg, PA 15317**

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*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 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.*

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Facility Location:	Hastings, Wetzel County, West Virginia
Facility Mailing Address:	2200 Energy Drive, Canonsburg, PA 15317
Telephone Number:	(724) 271-7600
Type of Business Entity:	LLC
Facility Description:	The Carbide Compressor Station is a natural gas compressor facility that receives raw natural gas and produced liquids (primarily produced water) from nearby wells. The natural gas and liquids undergo compression and dehydration processes, after which the product is transported to a gas gathering line for additional processing.
SIC Codes:	1311
UTM Coordinates:	528.7365 km Easting • 4,376.709 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.*

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

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

### 1.1. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
S1	E1	Caterpillar G3516B Engine (4SLB)	2012	1,380 HP	C1/OxCat
S2	E2	Caterpillar G3516B Engine (4SLB)	2012	1,380 HP	C2/OxCat
S3	E3	Caterpillar G3516B Engine (4SLB)	2012	1,380 HP	C3/OxCat
S4	E4	Caterpillar G3516B Engine (4SLB)	2012	1,380 HP	C4/OxCat
S5A	E5A	Caterpillar 3406 NA Engine (4SRB)	2013 (Constructed 1993)	215 HP	C5A/NSCR
S7	E7	TEG Dehydration Unit	2012	80 mmscf/day	None
		Reboiler Vent		1.5 mmBTU/hr	
S9	E9	Caterpillar G3516B Engine (4SLB)	2012	1,380 HP	C9/OxCat
S10	E10	Caterpillar G3516B Engine (4SLB)	2019	1,380 HP	C10/OxCat
S11	E11	Caterpillar G3516B Engine (4SLB)	2012	1,380 HP	C11/OxCat
S14	E16	Truck Loading (uncaptured)	2014	4,600,000 gallons/year	VCU-1
S15-B	E16-A	Truck Loading VCU (VCU-1)	2016	10 mmBTU/hr	N/A
S15-C	E16-B	Truck Loading VCU Pilot	2016	8 mBTU/hr	N/A
S17	E17	Line Heater	2013	0.75 mmBTU/hr	None
S17-A	E17-A	Line Heater	2016	4 mmBTU/hr	None
S17-B	E17-B	Line Heater	2016	2 mmBTU/hr	None
S18	E18	Pigging and Blowdowns	2021	N/A	None
S20	E20	Caterpillar G3608 Compressor Engine (4SLB)	2015	2,370 HP	C20/OxCat
TK01	E21	Condensate Tank	2016	500 bbl	VCU-2
TK02	E21	Condensate Tank	2016	500 bbl	VCU-2
TK03	E21	Condensate Tank	2016	500 bbl	VCU-2
TK04	E21	Condensate Tank	2016	500 bbl	VCU-2
TK05	E21	Condensate Tank	2016	500 bbl	VCU-2
TK06	E21	Condensate Tank	2016	500 bbl	VCU-2
TK07	E21	Condensate Tank	2021	500 bbl	VCU-2
TK08	E21	Condensate Tank	2021	500 bbl	VCU-2

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
TK25	TK25	Tank Safe	2012	4,300 gallons	None
TK26	E26	Produced Water Tank	2021	50 bbl	None
S21-A	E21-A	Enclosed Combustor (VCU-2)	2016	10 mmBTU/hr	N/A
S21-B	E21-B	Enclosed Combustor (VCU-2)	2016	10 mmBTU/hr	N/A
S21-C	E21-C	Enclosed Combustor (VCU-2)	2016	10 mmBTU/hr	N/A
S21-D	E21-D	Enclosed Combustor (VCU-2)	2016	10 mmBTU/hr	N/A
S22-A	E21-A	Condensate Tank Combustor Pilot	2016	8 mBTU/hr	N/A
S22-B	E21-B	Condensate Tank Combustor Pilot	2016	8 mBTU/hr	N/A
S22-C	E21-C	Condensate Tank Combustor Pilot	2016	8 mBTU/hr	N/A
S22-D	E21-D	Condensate Tank Combustor Pilot	2016	8 mBTU/hr	N/A

**Control Devices**

Emission Unit	Pollutant	Control Device	Control Efficiency
S1 – S4 and S9 – S11 Caterpillar G3516B Compressor Engines	Carbon Monoxide	Oxidation Catalyst (C1-C4 and C9-C11)	93%
	Volatile Organic Compounds		50%
	Formaldehyde		86%
S5A Three-way Separator Vapor Compressor Engine	Nitrogen Oxides	Non-Selective Catalytic Reduction (C5A)	94%
	Carbon Monoxide		94%
	Formaldehyde		50%
S7 Regenerator Vapors	Volatile Organic Compounds	Reboiler	95%
S14 Truck Loading	Volatile Organic Compounds	Vapor Combustor (VCU-1)	98%
S20 Caterpillar G3608 Compressor Engine	Carbon Monoxide	Oxidation Catalyst (C20)	92.7%
	Volatile Organic Compounds		69.7%
	Formaldehyde		76.9%
TK01 – TK08 Condensate Tanks	Volatile Organic Compounds	Vapor Combustor (VCU-2)	98%
	Hazardous Air Pollutants		98%

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

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

<b>Permit Number</b>	<b>Date of Issuance</b>
R13-3007H	April 18, 2023

## 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

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

### **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)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

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

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

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

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

- 3.1.9. **Minor Source of Hazardous Air Pollutants.** HAP emissions from the facility shall be less than 10 tons per year of any single HAP and 25 tons per year of any combination of HAPs. Compliance with this Condition shall ensure that the facility is a minor HAP source.

**[45CSR13, R13-3007, 4.1.2.]**

- 3.1.10. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate the control devices listed in Section 1.1. and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.

**[45CSR13, R13-3007, 4.1.3. and 11.1.1.]**

- 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., State-Enforceable Only]**

## **3.2. Monitoring Requirements**

- 3.2.1. None.

## **3.3. Testing Requirements**

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

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.



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

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

### 3.4. Recordkeeping Requirements

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

[45CSR§30-5.1.c.2.A.; 45CSR13, R13-3007, 4.1.1.]

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

[45CSR§30-5.1.c.2.B.; 45CSR13, R13-3007, 3.4.1.]

- 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.]

- 3.4.4. **Record of Malfunctions of Air Pollution Control Equipment.** For the control devices listed in Section 1.1., the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

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

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

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

[45CSR13, R13-3007, 4.1.4.]

### 3.5. Reporting Requirements

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

[45CSR§§30-4.4. and 5.1.c.3.D.]

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

[45CSR§30-5.1.c.3.E.]

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

**DAQ:**

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

**US EPA:**

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 Enforcement<sup>1</sup>:**

DEPAirQualityReports@wv.gov

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

- 3.5.4. **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. Reciprocating Internal Combustion Engines (RICE) [Emission Point IDs: E1-E4, E5A, E9-E11, and E20]

##### 4.1. Limitations and Standards

4.1.1. The maximum controlled emissions from each of the 1,380 HP Caterpillar G3516B, natural gas-fired reciprocating engines (S1-S4 and S9-S11) shall not exceed the following limits:

<b>Pollutant</b>	<b>Maximum Hourly Emissions (lbs/hr)</b>	<b>Maximum Annual Emissions (tpy)</b>
Nitrogen Oxides	1.52	6.66
Carbon Monoxide	0.61	2.67
Volatile Organic Compounds	1.18	5.20
Formaldehyde	0.18	0.80

[45CSR13, R13-3007, 5.1.1.]

4.1.2. The maximum controlled emissions from the 215 HP Caterpillar 3406 NA, natural gas-fired reciprocating engine (S5A) shall not exceed the following limits:

<b>Pollutant</b>	<b>Maximum Hourly Emissions (lbs/hr)</b>	<b>Maximum Annual Emissions (tpy)</b>
Nitrogen Oxides	0.46	2.02
Carbon Monoxide	0.46	2.02
Volatile Organic Compounds	0.06	0.28

[45CSR13, R13-3007, 5.1.2.]

- 4.1.3. The maximum controlled emissions from the 2,370 HP Caterpillar G3608, natural gas-fired reciprocating engine (S20) shall not exceed the following limits:

<b>Pollutant</b>	<b>Maximum Hourly Emissions (lbs/hr)</b>	<b>Maximum Annual Emissions (tpy)</b>
Nitrogen Oxides	2.61	11.44
Carbon Monoxide	1.04	4.58
Volatile Organic Compounds	2.03	8.92
Formaldehyde	0.31	1.37

**[45CSR13, R13-3007, 5.1.3.]**

- 4.1.4. Requirements for the Use of Catalytic Reduction Devices

- a. The rich burn natural gas compressor engine (S5A) equipped with non-selective catalytic reduction (NSCR) air pollution control devices shall be fitted with a closed-loop, automatic air-to-fuel ratio controller to ensure emissions of the regulated pollutants do not exceed the potential to emit for any engine/NSCR combination under varying load. The closed-loop, automatic air-to-fuel ratio controller shall control a fuel metering valve to ensure a fuel-rich mixture and a resultant exhaust oxygen content of less than or equal to 0.5%;
- b. For the lean burn natural gas compressor engines (S1-S4, S9-S11, and S20), the permittee shall monitor the temperature to the inlet of the catalyst and in accordance with the manufacturer's specifications, a high temperature alarm shall shut off the engine before thermal deactivation of the catalyst occurs. If the engine shuts off due to high temperature, the permittee shall also check for thermal deactivation of the catalyst before normal operations are resumed;
- c. The permittee shall follow the written operation and maintenance plan that provides the periodic and annual maintenance requirements;
- d. The automatic air-to-fuel ratio controller or closed-loop automatic feedback controller shall provide a warning or indication to the operator and/or be interlocked with the engine ignition system to cease engine operation in case of a masking, poisoning, or over-rich air-to-fuel ratio situation which results in performance degradation or failure of the catalyst element; and
- e. No person shall knowingly:
  1. Remove or render inoperative any air pollution or auxiliary air pollution control device installed subject to the requirements of this permit;
  2. Install any part or component when the principal effect of the part or component is to bypass, defeat, or render inoperative any air pollution control device or auxiliary air pollution control device installed subject to the requirements of this permit; or

3. Cause or allow engine exhaust gases to bypass any catalytic reduction device.

**[45CSR13, R13-3007, 5.1.4.]**

- 4.1.5. The following emission standards from Table 1 to Subpart JJJJ of Part 60 are applicable to compressor engines S1-S4, S9-S11, and S20:

Engine Type and Fuel	Maximum Engine Power	Manufacture Date	Emission Standards <sup>1</sup>					
			g/HP-hr			ppmvd at 15% O <sub>2</sub>		
			NO <sub>x</sub>	CO	VOC <sup>2</sup>	NO <sub>x</sub>	CO	VOC <sup>2</sup>
Non-Emergency SI Natural Gas	HP ≥ 500	07/01/2010	1.0	2.0	0.7	82	270	60
<sup>1</sup> Owners and operators of stationary non-certified SI engines may choose to comply with the emission standards in units of either g/HP-hr or ppmvd at 15% O <sub>2</sub> . <sup>2</sup> For purposes of Subpart JJJJ, when calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.								

**[45CSR13, R13-3007, 6.1.1. and 6.1.3.; 45CSR16; 40 C.F.R. §60.4233(e); Table 1 to Subpart JJJJ of Part 60]**

- 4.1.6. For emission units S1-S4, S9-S11, and S20, the permittee must operate and maintain stationary SI ICEs that achieve the emission standards as required in Condition 4.1.5. over the entire life of the engine.

**[45CSR13, R13-3007, 6.1.2. and 6.1.4.; 45CSR16; 40 C.F.R. §60.4234]**

- 4.1.7. For each stationary SI ICE listed in Condition 4.1.5., the permittee must demonstrate compliance according to the following:

- a. Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in Condition 4.1.5. and according to the requirements specified in Condition 4.3.1., and according to the requirements specified below:

1. For a stationary SI ICE with an engine power greater than 500 HP, the permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee must conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.

**[45CSR13, R13-3007, 6.2.1.; 45CSR16; 40 C.F.R. §§60.4243(b), (b)(2), and (b)(2)(ii)]**



- 4.1.8. The stationary SI natural gas-fired engines S1-S4, S9-S11, and S20 may be operated using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but records must be kept of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the permittee is required to conduct a performance test to demonstrate compliance with the emission standards of 40 C.F.R. §60.4233.  
**[45CSR16; 40 C.F.R. §60.4243(e)]**
- 4.1.9. It is expected that air-to-fuel ratio controllers will be used with the operation of three-way catalysts/non-selective catalytic reduction. The air-to-fuel ratio controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.  
**[45CSR13, R13-3007, 6.2.2.; 45CSR16; 40 C.F.R. §60.4243(g)]**
- 4.1.10. *Stationary RICE subject to Regulations under 40 C.F.R. Part 60.* The engines S1-S4, S9-S11, and S20 are new stationary RICE located at an area source. Therefore, for S1-S4, S9-S11, and S20, the permittee must meet the requirements of 40 C.F.R. Part 63 Subpart ZZZZ by meeting the requirements of 40 C.F.R. Part 60 Subpart JJJJ.  
**[45CSR13, R13-3007, 8.1.2.; 45CSR34; 40 C.F.R. §§63.6590(c) and (c)(1)]**
- 4.1.11. The following requirements from Table 2d to Subpart ZZZZ of Part 63 are applicable to compressor engine S5A:

For each. . .	The permittee must meet the following requirement, except during periods of startup. . .
Non-emergency, non-black start 4SRB stationary RICE ≤ 500 HP	a. Change oil and filter every 1,440 hours of operation or annually, whichever comes first; <sup>1</sup>
	b. Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; and
	c. Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.
<sup>1</sup> Sources have the option to utilize an oil analysis program as described in Condition 4.1.14. in order to extend the specified oil change requirement in Table 2d to Subpart ZZZZ of Part 63.	

**[45CSR13, R13-3007, 8.1.3. through 8.1.5.; 45CSR34; 40 C.F.R. §63.6603(a); Item 10 of Table 2d to Subpart ZZZZ of Part 63]**

- 4.1.12. For the compressor engine S5A, the permittee must comply with the following general requirements:
- a. The permittee must be in compliance with the emission limitations, operating limitations, and other requirements of 40 C.F.R. Part 63 Subpart ZZZZ that apply at all times.
  - b. At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by 40 C.F.R. Part 63 Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may

include, but is not limited to, monitor results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

**[45CSR34; 40 C.F.R. §63.6605]**

- 4.1.13. The permittee must minimize the engine S5A's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d to Subpart ZZZZ of Part 63 apply.

**[45CSR34; 40 C.F.R. §63.6625(h)]**

- 4.1.14. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d to Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d to Subpart ZZZZ. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

**[45CSR34; 40 C.F.R. §63.6625(j)]**

- 4.1.15. The permittee must comply with the general provisions in Table 8 to Subpart ZZZZ of Part 63 that are applicable to engine S5A.

**[45CSR34; 40 C.F.R. §63.6665; Table 8 to Subpart ZZZZ of Part 63]**

## **4.2. Monitoring Requirements**

- 4.2.1. **Catalytic Oxidizer Control Devices.** The permittee shall regularly inspect, properly maintain, and/or replace catalytic reduction devices and auxiliary air pollution control devices to ensure functional and effective operation of the engine's physical and operational design. The permittee shall ensure proper operation, maintenance and performance of catalytic reduction devices and auxiliary air pollution control devices by:

- a. Maintaining proper operation of the automatic air-to-fuel ratio controller or automatic feedback controller; and
- b. Following a written operating and maintenance plan.

**[45CSR13, R13-3007, 5.2.1.]**

- 4.2.2. The permittee must operate and maintain engine S5A and the after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must

provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

**[45CSR34; 40 C.F.R. §§63.6625(e) and (e)(8) and 63.6640(a); Item 9 of Table 6 to Subpart ZZZZ of Part 63]**

### 4.3. Testing Requirements

- 4.3.1. To demonstrate compliance with Condition 4.1.5., the permittee shall conduct performance tests of the stationary SI ICEs S1-S4, S9-S11, and S20 following the procedures in paragraphs a. through g. of this condition:
- Each performance test must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and according to the requirements in 40 C.F.R. §60.8 and under the specific conditions that are specified by Table 2 to Subpart JJJJ of Part 60.
  - The permittee may not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in 40 C.F.R. §60.8(c). If the stationary SI ICE is non-operational, it is not necessary to start up the engine solely to conduct a performance test; however, the performance test must be conducted immediately upon startup of the engine.
  - The permittee must conduct three separate test runs for each performance test required in this condition, as specified in 40 C.F.R. §60.8(f). Each test run must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and last at least 1 hour.
  - To determine compliance with the NO<sub>x</sub> mass per unit output emission limitation, convert the concentration of NO<sub>x</sub> in the engine exhaust using Equation 1 of 40 C.F.R. §60.4244:

$$ER = \frac{C_d \times 1.912 \times 10^{-3} \times Q \times T}{HP-hr} \quad \text{Eq. 1}$$

Where:

ER = Emission rate of NO<sub>x</sub> in g/HP-hr

C<sub>d</sub> = Measured NO<sub>x</sub> concentration in parts per million by volume (ppmv)

1.912 × 10<sup>-3</sup> = Conversion constant for ppm NO<sub>x</sub> to grams per standard cubic meter at 20°C

Q = Stack gas volumetric flow rate, in standard cubic meter per hour, dry basis

T = Time of test run, in hours

HP-hr = Brake work of the engine, horsepower-hour (HP-hr)

- To determine compliance with the CO mass per unit output emission limitation, convert the concentration of CO in the engine exhaust using Equation 2 of 40 C.F.R. §60.4244:

$$ER = \frac{C_d \times 1.164 \times 10^{-3} \times Q \times T}{HP-hr} \quad \text{Eq. 2}$$

Where:

ER = Emission rate of CO in g/HP-hr

C<sub>d</sub> = Measured CO concentration in ppmv

1.164 × 10<sup>-3</sup> = Conversion constant for ppm CO to grams per standard cubic meter at 20°C

Q = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis

T = Time of test run, in hours

HP-hr = Brake work of the engine, in HP-hr

- f. For the purposes of 40 C.F.R. Part 60 Subpart JJJJ, when calculating emissions of VOC, emissions of formaldehyde should not be included. To determine compliance with the VOC mass per unit output emission limitation, convert the concentration of VOC in the engine exhaust using Equation 3 of 40 C.F.R. §60.4244.

$$ER = \frac{C_d \times 1.833 \times 10^{-3} \times Q \times T}{HP-hr} \quad \text{Eq. 3}$$

Where:

ER = Emission rate of VOC in g/HP-hr

$C_d$  = VOC concentration measured as propane in ppmv

$1.833 \times 10^{-3}$  = Conversion constant for ppm VOC measured as propane, to grams per standard cubic meter at 20°C

Q = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis

T = Time of test run, in hours

HP-hr = Brake work of the engine, in HP-hr

- g. If the permittee chooses to measure VOC emissions using either Method 18 of 40 C.F.R. Part 60, Appendix A or Method 320 of 40 C.F.R. Part 63, Appendix A, then it has the option of correcting the measured VOC emissions to account for the potential differences in measured values between these methods and Method 25A. The results from Method 18 and Method 320 can be corrected for response factor differences using Equations 4 and 5 of 40 C.F.R. §60.4244. The corrected VOC concentration can then be placed on a propane basis using Equation 6 of 40 C.F.R. §60.4244.

$$RF_i = \frac{C_{Mi}}{C_{Ai}} \quad \text{Eq. 4}$$

Where:

$RF_i$  = Response factor of compound i when measured with EPA Method 25A

$C_{Mi}$  = Measured concentration of compound i in ppmv as carbon

$C_{Ai}$  = True concentration of compound i in ppmv as carbon

$$C_{icorr} = RF_i \times C_{imeas} \quad \text{Eq. 5}$$

Where:

$C_{icorr}$  = Concentration of compound i corrected to the value that would have been measured by EPA Method 25A, ppmv as carbon

$C_{imeas}$  = Concentration of compound i measured by EPA Method 320, ppmv as carbon

$$C_{Peq} = 0.6098 \times C_{icorr} \quad \text{Eq. 6}$$

Where:

$C_{Peq}$  = Concentration of compound i in mg of propane equivalent per DSCM

[45CSR13, R13-3007, 6.3.1.; 45CSR16, 40 C.F.R. §60.4244]

#### 4.4. Recordkeeping Requirements

- 4.4.1. To demonstrate compliance with Conditions 4.1.1. through 4.1.3., the permittee shall maintain records of the hours of operation of each engine. Said records shall be maintained on-site or in a readily accessible off-site

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

**[45CSR13, R13-3007, 5.4.1.]**

- 4.4.2. To demonstrate compliance with Condition 4.1.4, the permittee shall maintain records of all catalytic reduction device maintenance. Said records shall be maintained on-site or in a readily accessible off-site location maintained by the permittee for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

**[45CSR13, R13-3007, 5.4.2.]**

- 4.4.3. The permittee shall keep the following records pursuant to Condition 3.4.2.:

- a. All notifications submitted to comply with 40 C.F.R. Part 60 Subpart JJJJ and all documentation supporting any notification.
- b. Maintenance conducted on the SI ICEs S1-S4, S9-S11, and S20.
- c. Documentation that each of the non-certified SI ICEs listed in 4.4.3.b. meets the emission standards set forth in Condition 4.1.5.

**[45CSR13, R13-3007, 6.4.1. through 6.4.3.; 45CSR16; 40 C.F.R. §§60.4245(a), (a)(1), (a)(2), and (a)(4)]**

- 4.4.4. The permittee must keep records of the maintenance conducted on engine S5A in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the maintenance plan.

**[45CSR34; 40 C.F.R. §§63.6655(e) and (e)(3)]**

- 4.4.5. The records of Condition 4.4.4. must be kept as follows:

- a. Records must be in a form suitable and readily available for expeditious review according to 40 C.F.R. §63.10(b)(1).
- b. As specified in 40 C.F.R. §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- c. The permittee must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 C.F.R. §63.10(b)(1).

**[45CSR34; 40 C.F.R. §63.6660]**

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

- 4.5.1. The permittee shall submit an initial notification to the Director of the Division of Air Quality as required by 40 C.F.R. §60.7(a)(1) and include the following.
- a. Name and address of the owner or operator;
  - b. The address of the affected source;
  - c. Make, model, engine family, serial number, model year, maximum engine power, and engine displacement;
  - d. Emission control equipment; and
  - e. Fuel used.

**[45CSR13, R13-3007, 6.5.1.; 45CSR16; 40 C.F.R. §60.4245(c)]**

- 4.5.2. The permittee must submit a copy of each performance test as conducted in accordance with Condition 4.3.1. within 60 days after the test has been completed. Performance test reports using EPA Method 18, EPA Method 320, or ASTM D6348-03 (incorporated by reference – see 40 C.F.R. §60.17) to measure VOC require reporting of all QA/QC data. For Method 18, report results from sections 8.4 and 11.1.1.4; for Method 320, report results from sections 8.6.2, 9.0, and 13.0; and for ASTM D6348-03 report results of all QA/QC procedures in Annexes 1-7.

**[45CSR13, R13-3007, 6.5.2.; 45CSR16; 40 C.F.R. §60.4245(d)]**

- 4.5.3. The permittee must report each instance in which the requirements referenced in Condition 4.1.14. are not met.

**[45CSR34; 40 C.F.R. §63.6640(e)]**

- 4.5.4. The permittee must submit all of the notifications in 40 C.F.R. §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to engine S5A by the dates specified.

**[45CSR34; 40 C.F.R. §§63.6645(a) and (a)(2)]**

- 4.5.5. For engine S5A, the permittee must report all deviations as defined in 40 C.F.R. §63.6675 in the semiannual monitoring report required by 40 C.F.R. §70.6(a)(3)(iii)(A).

**[45CSR34; 40 C.F.R. §63.6650(f)]**

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

- 4.6.1. None.

## 5.0. 40 C.F.R. Part 60 Subparts OOOO and OOOOa Requirements for Reciprocating Compressors

### 5.1. Limitations and Standards

5.1.1. At all times, including periods of startup, shutdown, and malfunction, the permittee shall maintain and operate any affected facility under 40 C.F.R. Part 60 Subpart OOOO or Subpart OOOOa, 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 Subpart OOOOa.  
**[45CSR16; 40 C.F.R. §60.5370(b); 40 C.F.R. §60.5370a(b)]**

5.1.2. The permittee must comply with the VOC standards in 40 C.F.R. §60.5385 for the reciprocating compressors associated with engines S1 to S4, S5A, S9, S11, and S20 as well as the VOC and methane standards in 40 C.F.R. §60.5385a for the reciprocating compressor associated with engine S10. The applicable requirements are included in paragraphs a. through c. of this condition.

a. The permittee must replace the reciprocating compressor rod packing according to either paragraph 1. or paragraph 2. below:

1. Before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of the reciprocating compressor affected facility or the date of the most recent reciprocating compressor rod packing replacement, whichever is later.
2. Prior to 36 months from the date of the most recent rod packing replacement, or 36 months from the date of startup for a new reciprocating compressor for which the rod packing has not yet been replaced.

**[45CSR13, R13-3007, 7.1.1.]**

- b. The permittee must demonstrate initial compliance with the standards that apply to reciprocating compressor affected facilities as required by Condition 5.2.1.
- c. The permittee must demonstrate continuous compliance with the standards that apply to reciprocating compressor affected facilities as required by Condition 5.2.2.
- d. The permittee must perform the reporting as required by Condition 5.5.1. and the recordkeeping as required by Condition 5.4.1.

**[45CSR16; 40 C.F.R. §60.5385; 40 C.F.R. §60.5385a]**

### 5.2. Monitoring Requirements

5.2.1. The permittee must determine initial compliance with the standards for each affected facility using the requirements in this condition. The initial compliance period begins upon initial startup and ends no later than one year after the initial startup date for the affected facility. The initial compliance period may be less

than one full year. To achieve initial compliance with the standards for each reciprocating compressor affected facility, the permittee must comply with paragraphs a. through c. of this condition.

- a. During the initial compliance period, the permittee must continuously monitor the number of hours of operation or track the number of months since initial startup or since the last rod packing replacement, whichever is latest.
- b. The permittee must submit the initial annual report for the reciprocating compressor as required in Condition 5.5.1.
- c. The permittee must maintain the records as specified in Condition 5.4.1.

**[45CSR16; 40 C.F.R. §§60.5410(c), (c)(1), (c)(3), and (c)(4); 40 C.F.R. §§60.5410a(c), (c)(1), (c)(3), and (c)(4)]**

5.2.2. For each reciprocating compressor complying with Condition 5.1.2., the permittee must demonstrate continuous compliance according to paragraphs a through c. of this condition.

- a. The permittee must continuously monitor the number of hours of operation for each reciprocating compressor affected facility or track the number of months since initial startup or the date of the most recent reciprocating compressor rod packing replacement, whichever is latest.
- b. The permittee must maintain records as required in Condition 5.4.1. and submit annual reports as required in Condition 5.5.1.
- c. The permittee must replace the reciprocating compressor rod packing before the total number of hours of operation reaches 26,000 hours or the number of months since the most recent rod packing replacement reaches 36 months.

**[45CSR16; 40 C.F.R. §§60.5415(c) and (c)(1) through (c)(3); 40 C.F.R. §§60.5415a(c) and (c)(1) through (c)(3)]**

### **5.3. Testing Requirements**

5.3.1. None.

### **5.4. Recordkeeping Requirements**

5.4.1. For each reciprocating compressor affected facility, the permittee must maintain the records as specified in 40 C.F.R. §60.7(f) and in this condition. All records required by 40 C.F.R. Part 60 Subpart OOOO or Subpart OOOOa must be maintained either on-site or at the nearest local field office for at least 5 years.

- a. Records of the cumulative number of hours of operation or number of months since initial startup or since the previous replacement of the reciprocating compressor rod packing, whichever is later;
- b. Records of the date and time of each reciprocating compressor rod packing replacement; and



- c. Records of deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in Condition 5.1.2., including the date and time the deviation began, duration of the deviation, and a description of the deviation.

**[45CSR13, R13-3007, 7.2.1. and 7.2.2.; 45CSR16; 40 C.F.R. §§60.5420(c) and (c)(3); 40 C.F.R. §§60.5420a(c) and (c)(3)]**

## **5.5. Reporting Requirements**

- 5.5.1. The permittee must submit annual reports containing the information specified in 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 Condition 5.2.1. 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 required as specified in 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. The information specified below is required for each reciprocating compressor affected facility:

1. The cumulative number of hours of operation or the number of months since initial startup or since the previous reciprocating compressor rod packing replacement, whichever is later.
2. Records of deviations specified in Condition 5.4.1.c. that occurred during the reporting period, the date and time the deviation began, duration of the deviation and a deviation and a description of the deviation.

- c. The permittee must submit Subpart OOOOa reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>)). The permittee must use the appropriate electronic report in CEDRI for Subpart OOOOa or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI web site (<https://www3.epa.gov/ttn/chief/cedri>).

**[45CSR13, R13-3007, 7.3.1.; 45CSR16; 40 C.F.R. §§60.5420(b), (b)(1) and (b)(4); 40 C.F.R. §§60.5420a(b), (b)(1), (b)(4), and (b)(11)]**

## **5.6. Compliance Plan**

5.6.1. None.

## 6.0. 40 C.F.R. Part 60 Subpart OOOOa Requirements for Fugitive Emissions Components

### 6.1. Limitations and Standards

6.1.1. At all times, including periods of startup, shutdown, and malfunction, the permittee 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)]**

6.1.2. **Methane Standards.** For each affected facility under 40 C.F.R. §60.5365a(j), the permittee must reduce GHG emissions (in the form of a limitation on emissions of methane) by complying with the requirements of paragraphs a. through j. of this condition. These requirements are independent of the closed vent system and cover requirements in 40 C.F.R. §60.5411a.

- 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. of this condition. 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 section, 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 paragraphs f. and 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).
  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  $\leq 60$  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. and ii. 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.
- d. Each fugitive emissions monitoring plan must include the elements specified in paragraphs d.1. through 4. of this condition, at a minimum, as applicable.
    1. Sitemap.
    2. A defined observation path that ensures that all fugitive emissions components are within sight of the path. The observation path must account for interferences.
    3. If using Method 21, the plan must include a list of the fugitive emissions components to be monitored and the 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.).
    4. 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. The permittee must conduct an initial monitoring survey within 60 days of the startup of a new compressor station for each collection of fugitive emissions components at the new compressor station. For a modified collection of fugitive emissions components at a compressor station, the initial monitoring survey must be conducted within 60 days of the modification.
  - 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 g.3. of this condition.
    1. A monitoring survey of the collection of fugitive emissions components at a compressor station within a company-defined area 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 or replaced in accordance with paragraphs h.1. and 2. of this condition. For fugitive emissions components also subject to the repair provisions of 40 C.F.R. §§60.5416a(b)(9) through (12) and (c)(4) through (7), those provisions apply instead to those closed vent system and covers, and the repair provisions of paragraphs h.1. and 2. of this condition do not apply to those closed vent systems and covers.
    1. Each identified source of fugitive emissions shall be repaired or replaced as soon as practicable, but no later than 30 calendar days after detection of the fugitive emissions.
    2. If the repair or replacement 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 or replacement must be completed during the next scheduled compressor station shutdown, after a planned vent blowdown, or within 2 years, whichever is earliest.
    3. Each repaired or replaced fugitive emissions component must be resurveyed as soon as practicable, but no later than 30 days after being repaired, to ensure that there are no fugitive emissions.
      - i. For repairs that cannot be made during the monitoring survey when the fugitive emissions are initially found, the operator may resurvey the repaired fugitive emissions components using either Method 21 or optical gas imaging within 30 days of finding such fugitive emissions.
      - 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 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).

- iii. Operators that use Method 21 to resurvey the repaired fugitive emissions components are subject to the resurvey provisions specified in paragraphs h.3.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 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.
- iv. Operators that use optical gas imaging to resurvey the repaired fugitive emissions components, are subject to the resurvey provisions specified in paragraphs h.3.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 6.4.1.
- j. Annual reports shall be submitted for each collection of fugitive emissions components at a compressor station that include the information specified in Condition 6.5.1.b. Multiple collection of fugitive emissions components at a compressor station may be included in a single annual report.

**[45CSR13, R13-3007, 4.1.5.; 45CSR16; 40 C.F.R. §§60.5397a(a) through (e), (f)(2), (g), (g)(2) through (4), and (h) through (j)]**

- 6.1.3. **VOC Standards.** For each affected facility under 40 C.F.R. §60.5365a(j), the permittee must reduce VOC emissions by complying with the requirements of paragraphs a. through j. of this condition. These requirements are independent of the closed vent system and cover requirements in 40 C.F.R. §60.5411a.
- 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. of this condition. 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 section, 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 paragraphs f. and 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  $\leq 60$  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. and 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, 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, 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 d.1. through 3. of this condition, at a minimum, as applicable.
    1. If the permittee is using optical gas imaging, the monitoring 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 the permittee is using Method 21, the monitoring 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 paragraph 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. The permittee must conduct an initial monitoring survey within 90 days of the startup of a new compressor station for each collection of fugitive emissions components at the new compressor station. For a modified collection of fugitive emissions components at a compressor station, the initial monitoring survey must be conducted within 90 days of the modification.
  - 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 g.3. of this condition.
    1. A monitoring survey of the collection of fugitive emissions components at a compressor station must be conducted at least semiannually after the initial survey. Consecutive semiannual monitoring surveys must be conducted at least 4 months apart and no more than 7 months 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 or replaced 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. 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 compressor station shutdown for maintenance, after a scheduled vent blowdown, or within 2 years, whichever is earliest. For purposes of this paragraph, a vent blowdown is the opening of one or more blowdown valves to depressurize major production and processing equipment, other than a storage vessel.
  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 repair using either Method 21 of Appendix A-7 of 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 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 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.
- 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 6.4.2.
- j. Annual reports shall be submitted for each collection of fugitive emissions components at a compressor station that include the information specified in Condition 6.5.2.b. Multiple collection of fugitive emissions components at a compressor station may be included in a single annual report.

**[45CSR13, R13-3007, 4.1.5.; 45CSR16; 40 C.F.R. §§60.5397a(a), (a)(1), (b) through (e), (f)(2), (g), (g)(2) through (4), and (h) through (j)]**

## **6.2. Monitoring Requirements**

- 6.2.1. To achieve initial compliance with the fugitive emission standards for each collection of fugitive emissions components at a compressor station, the permittee must comply with paragraphs a. through e. of this condition.
  - a. The permittee must develop a fugitive emissions monitoring plan as required in 40 C.F.R. §§60.5397a(b), (c), and (d).

- b. The permittee must conduct an initial monitoring survey as required in 40 C.F.R. §60.5397a(f).
- c. The permittee must maintain the records specified in 40 C.F.R. §60.5420a(c)(15).
- d. The permittee must repair each identified source of fugitive emissions for each affected facility as required in 40 C.F.R. §60.5397a(h).
- e. The permittee must submit the initial annual report for each collection of fugitive emissions components at a compressor station as required in 40 C.F.R. §§60.5420a(b)(1) and (7).

**[45CSR16; 40 C.F.R. §60.5410a(j)]**

6.2.2. For each collection of fugitive emissions components at a compressor station, the permittee must demonstrate continuous compliance with the fugitive emission standards specified in 40 C.F.R. §60.5397a according to paragraphs a. through d. of this section.

- a. The permittee must conduct periodic monitoring surveys as required in 40 C.F.R. §60.5397a(g).
- b. The permittee must repair or replace each identified source of fugitive emissions as required in 40 C.F.R. §60.5397a(h).
- c. The permittee must maintain records as specified in 40 C.F.R. §60.5420a(c)(15).
- d. The permittee must submit annual reports for collection of fugitive emissions components at a compressor station as required in 40 C.F.R. §§60.5420a(b)(1) and (7).

**[45CSR16; 40 C.F.R. §60.5415a(h)]**

### **6.3. Testing Requirements**

6.3.1. None.

### **6.4. Recordkeeping Requirements**

6.4.1. **Recordkeeping for Methane Standards.** The permittee must maintain the records identified as specified in 40 C.F.R. §60.7(f) and specified 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 fugitive emissions monitoring plan as required in 40 C.F.R. §§60.5397a(b), (c), and (d).
- b. 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) performing the survey. The permittee must note the training and experience of the operator.
4. Monitoring instrument used.
5. When optical gas imaging is used to perform the survey, one or more digital photographs or videos, captured from the optical gas imaging instrument used for conduct of monitoring, of each required monitoring survey being performed. The digital photograph must include the date the photograph was taken and the latitude and longitude of the collection of fugitive emissions components at a compressor station imbedded within or stored with the digital file. As an alternative to imbedded latitude and longitude within the digital file, the digital photograph or video may consist of an image of the monitoring survey being performed with a separately operating GPS device within the same digital picture or video, provided the latitude and longitude output of the GPS unit can be clearly read in the digital image.
6. Fugitive emissions component identification when Method 21 of 40 C.F.R. Part 60, Appendix A-7 is used to perform the monitoring survey.
7. Ambient temperature, sky conditions, and maximum wind speed at the time of the survey.
8. Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.
9. Documentation of each fugitive emission, including the information specified in paragraphs b.9.i. through xii. of this condition.
  - i. Location.
  - ii. Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.
  - iii. Number and type of components for which fugitive emissions were detected.
  - iv. Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored.
  - v. Instrument reading of each fugitive emissions component that requires repair when Method 21 is used for monitoring.
  - vi. Number and type of fugitive emissions components that were not repaired as required in 40 C.F.R. §60.5397a(h).
  - vii. Number and type of components that were tagged as a result of not being repaired during the monitoring survey when the fugitive emissions were initially found as required in Condition 6.1.2.h.3.ii.
  - viii. If a fugitive emissions component is not tagged, a digital photograph or video of each fugitive emissions component that could not be repaired during the monitoring survey when the fugitive emissions were initially found as required in paragraph h.3.ii. of Condition 6.1.2. The digital photograph or video must clearly identify the location of the component that must be repaired. Any digital photograph or video required under this paragraph can also be used to meet the requirements under paragraph b.5. of this condition, as long as the photograph or video is taken

with the optical gas imaging instrument, includes the date and the latitude and longitude are either imbedded or visible in the picture.

- ix. Repair methods applied in each attempt to repair the fugitive emissions components.
- x. Number and type of fugitive emissions components placed on delay of repair and explanation for each delay of repair.
- xi. The date of successful repair of the fugitive emissions component.
- xii. Instrumentation used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding.

**[45CSR16; 40 C.F.R. §§60.5420a(c), (c)(15), and (c)(15)(i) to (ii)]**

6.4.2. **Recordkeeping for VOC Standards.** The permittee must maintain the records identified as specified in 40 C.F.R. §60.7(f) and specified 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 the 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 40 C.F.R. §§60.5397a(b), (c), and (d).
- 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 viii. 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 the 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. Date of planned shutdowns that occur while there are any components that have been placed on delay of repair.

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

## 6.5. Reporting Requirements

- 6.5.1. **Reporting for Methane Standards.** The permittee must submit annual reports containing the information specified in 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 Condition 6.2.1. 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 required as specified in 40 C.F.R. §60.5420a(b). 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 within the company-defined area, the records of each monitoring survey including the records of each monitoring survey including the information specified in paragraphs b.1. through 12. of this condition.
  1. Date of the survey.
  2. Beginning and end time of the survey.
  3. Name of operator(s) performing the survey. If the survey is performed by optical gas imaging, the permittee must note the training and experience of the operator.
  4. Ambient temperature, sky conditions, and maximum wind speed at the time of the survey.
  5. Monitoring instrument used.
  6. Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.
  7. Number and type of components for which fugitive emissions were detected.
  8. Number and type of fugitive emissions components that were not repaired as required in 40 C.F.R. §60.5397a(h).
  9. Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored.
  10. The date of successful repair of the fugitive emissions component.
  11. Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair.
  12. Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding.
- c. The permittee must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>.) The permittee must use the appropriate electronic report in CEDRI for 40 C.F.R. Part 60 Subpart OOOOa or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>).

**[45CSR16; 40 C.F.R. §§60.5420a(b), (b)(1), (b)(7), and (b)(11)]**

6.5.2. **Reporting for VOC Standards.** The permittee must submit annual reports containing the information specified in 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 Condition 6.2.1. 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 required as specified in 40 C.F.R. §60.5420a(b). 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 below:

1. Designation of the type of site (i.e., well site or compressor station) at which the collection of fugitive emissions components is located.
2. 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.
3. For each fugitive emissions monitoring survey performed during the annual reporting period, the information specified below:
  - i. Date of the survey.
  - ii. Monitoring instrument used.
  - iii. Any deviations from the monitoring plan elements under 40 C.F.R. §§60.5397a(c)(1), (2), and (7) and (c)(8)(i) 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 40 C.F.R. §60.5397a(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.
- c. The permittee must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>)). The permittee must use the appropriate electronic report in CEDRI for 40 C.F.R. Part 60 Subpart OOOOa or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI web site (<https://www3.epa.gov/ttn/chief/cedri/>).

**[45CSR16; 40 C.F.R. §§60.5420a(b), (b)(1), (b)(7), and (b)(11)]**

## **6.6. Compliance Plan**

- 6.6.1. None.

## 7.0. Triethylene Glycol (TEG) Dehydration Unit [Emission Point ID: E7]

### 7.1. Limitations and Standards

7.1.1. **Maximum Throughput Limitation.** The maximum wet natural gas throughput to the glycol dehydration unit/still column shall not exceed 80.0 million standard cubic feet per day (mmscf/day). Compliance with the Maximum Throughput Limitation shall be determined using a twelve-month rolling total. A twelve-month rolling total shall mean the sum of the monthly throughput at any given time during the previous twelve consecutive calendar months.

**[45CSR13, R13-3007, 9.1.1.]**

7.1.2. Maximum emissions from the glycol dehydration unit/still column (S7) shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lbs/hr)	Maximum Annual Emissions (tpy)
Nitrogen Oxides	0.16	0.67
Carbon Monoxide	0.13	0.56
Volatile Organic Compounds	0.24	1.11
n-Hexane	0.02	0.06
Benzene	0.01	0.03
Ethyl Benzene	0.01	0.02
Toluene	0.01	0.03
Xylenes	0.01	0.03

**[45CSR13, R13-3007, 9.1.2.]**

7.1.3. For the purposes of determining potential HAP emissions at production-related facilities, the methods specified in 40 C.F.R. Part 63 Subpart HH (i.e. excluding compressor engines from HAP PTE) shall be used.

**[45CSR13, R13-3007, 9.1.3.]**

7.1.4. Any source that determines it is not a major source but has actual emissions of 5 tpy or more of a single HAP, or 12.5 tpy or more of a combination of HAPs (i.e., 50 percent of the major source thresholds), shall update its major source determination within 1 year of the prior determination and each year thereafter, using gas composition data measured during the preceding 12 months.

**[45CSR13, R13-3007, 9.1.4.; 45CSR34; 40 C.F.R. §63.760(c)]**

- 7.1.5. The permittee is exempt from the requirements of 40 C.F.R. §63.764(d) if the criteria below is met, except that the records of the determination of these criteria must be maintained as required in Condition 7.4.2. of this permit.
- a. The actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram per year (1 tpy), as determined by the procedures specified in 40 C.F.R. §63.772(b)(2) of 40 C.F.R. Part 63 Subpart HH.

**[45CSR13, R13-3007, 9.1.5.; 45CSR34; 40 C.F.R. §§63.764(e)(1) and (e)(1)(ii)]**

- 7.1.6. All vapors from the regenerator will be sent to a condenser and then to reboiler S7 to be used as fuel and operated to achieve minimum 95% control efficiency.  
**[45CSR13, R13-3007, 9.1.6.]**
- 7.1.7. At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practice for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.  
**[45CSR34; 40 C.F.R. §63.764(j)]**

## **7.2. Monitoring Requirements**

- 7.2.1. The permittee shall monitor the throughput of wet natural gas process stream which flows through the contactor of the TEG dehydration unit on a monthly basis.  
**[45CSR13, R13-3007, 9.2.1.]**
- 7.2.2. In order to demonstrate compliance with the area source status claimed within Conditions 7.1.2. and 7.1.4., as well as the benzene exemption provided under Condition 7.1.5., the following parameters shall be measured at least once quarterly, with the exception of the natural gas flow rate annual daily average, natural gas flow rate maximum design capacity, and wet gas composition, in order to define annual average values, or if monitoring is not practical, some parameters may be assigned default values as listed below.
- a. Natural gas flow rate
1. Number of hours operated per quarter,
  2. Quarterly throughput (mmscf/quarter),
  3. Annual daily average (mmscf/day), and
  4. Maximum design capacity (mmscf/day);
- b. Absorber temperature and pressure;
- c. Lean glycol circulation rate;
- d. Glycol pump type and maximum design capacity (gpm);

- e. Flash tank temperature and pressure, if applicable;
- f. Stripping gas flow rate, if applicable;
- g. Wet gas composition (upstream of the absorber-dehydration column) sampled in accordance with GPA Method 2166 and analyzed consistent with GPA Extended Method 2286 as well as the procedures presented in the GRI-GLYCalc™ Technical Reference User Manual and Handbook V4;
- h. Wet gas water content (lbs H<sub>2</sub>O/mmscf); and
- i. Dry gas water content (lbs H<sub>2</sub>O/mmscf) at a point directly after exiting the dehydration column and before any additional separation points.

The following parameter(s) may be assigned default values when using GRI-GLYCalc:

- a. Dry gas water content can be assumed to be equivalent to pipeline quality at 7 lbs H<sub>2</sub>O/mmscf;
- b. Wet gas water content can be assumed to be saturated;
- c. Lean glycol water content, if not directly measured, may use the default value of 1.5% water as established by GRI; and
- d. Lean glycol circulation rate may be estimated using the TEG recirculation ratio of 3 gal TEG/lbs H<sub>2</sub>O removed.

Note: If measuring and using the actual wet or dry gas water content, then the permittee should also measure the glycol recirculation rate rather than using the default TEG recirculation ratio.

[45CSR13, R13-3007, 9.2.2.; 45CSR34; 40 C.F.R. §63.772(b)(2) and (b)(2)(i)]

### 7.3. Testing Requirements

- 7.3.1. In order to demonstrate compliance with the minor source status of hazardous air pollutants required by Condition 3.1.9., upon request of the Director, the permittee shall demonstrate compliance with the HAP emissions thresholds using GLYCalc Version 3.0 or higher. The permittee shall sample in accordance with GPA Method 2166 and analyze the samples utilizing the extended GPA Method 2286 as specified in the GRI-GLYCalc V4 Technical Reference User Manual and Handbook.

[45CSR13, R13-3007, 9.3.3.]

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

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

[45CSR13, R13-3007, 9.3.4.; 45CSR34; 40 C.F.R. §§63.772(b)(2) and (b)(2)(i)]

#### **7.4. Recordkeeping Requirements**

7.4.1. The permittee shall maintain a record of the wet natural gas throughput through the TEG dehydration contactor to demonstrate compliance with Condition 7.1.1. of this permit. Said records shall be maintained for a period of five (5) years on-site or in a readily accessible off-site location maintained by the permittee. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

**[45CSR13, R13-3007, 9.4.1.]**

7.4.2. To demonstrate that the permittee is exempt from the requirements of 40 C.F.R. §63.764(d) if the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere is less than 0.90 megagram per year (1 tpy), as determined by the procedures specified in 40 C.F.R. §63.772(b)(2) and Condition 7.3.2. of this permit, records of the actual average benzene emissions (in terms of benzene emissions per year) shall be maintained.

**[45CSR13, R13-3007, 9.4.2.; 45CSR34; 40 C.F.R. §§63.764(e), 63.774(d)(1) and (d)(1)(ii)]**

#### **7.5. Reporting Requirements**

7.5.1. The TEG dehydration unit is located at an area source and meets the criteria in 40 C.F.R. §63.764(e)(1)(ii). Therefore, the permittee is exempt from the reporting requirements for area sources specified in 40 C.F.R. §§63.775(c)(1) through (7).

**[45CSR34; 40 C.F.R. §§63.775(c) and (c)(8)]**

#### **7.6. Compliance Plan**

7.6.1. None.

## 8.0. Reboiler and Line Heaters [Emission Point IDs: E7, E17, E17-A, and E17-B]

### 8.1. Limitations and Standards

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

Emission Point ID	Emission Unit Description	MDHI (mmBTU/hr)
E7	Dehydration Reboiler	1.5
E17	Line Heater	0.75
E17-A	Line Heater	4.0
E17-B	Line Heater	2.0

[45CSR13, R13-3007, 10.1.1.]

8.1.2. No person shall cause, suffer, allow, or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six-minute block average.  
[45CSR13, R13-3007, 10.1.2.; 45CSR§2-3.1.]

### 8.2. Monitoring Requirements

8.2.1. At such reasonable times as the Secretary may designate, the permittee shall conduct Method 9 emission observations for the purpose of demonstrating compliance with Condition 8.1.2. Method 9 shall be conducted in accordance with 40 C.F.R. Part 60 Appendix A.  
[45CSR13, R13-3007, 10.2.1.]

### 8.3. Testing Requirements

8.3.1. Compliance with the visible emission requirements of Condition 8.1.2. shall be determined in accordance with 40 C.F.R. Part 60 Appendix A, Method 9 or by using measurements from continuous opacity monitoring systems approved by the Director. The Director may require the installation, calibration, maintenance, and operation of continuous opacity monitoring systems and may establish policies for the evaluation of continuous opacity monitoring results and the determination of compliance with the visible emission requirements of Condition 8.1.2. Continuous opacity monitors shall not be required on fuel burning units which employ wet scrubbing systems for emission control.  
[45CSR13, R13-3007, 10.3.1.; 45CSR§2-3.2.]

### 8.4. Recordkeeping Requirements

8.4.1. The permittee shall maintain records of all monitoring data required by Condition 8.2.1. documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6 - 10 mph NE wind) during the visual emission check(s). Should a visible emission observation be required to be performed per the requirements specified in Method 9, the data records of each observation shall be maintained per the requirements of Method 9.  
[45CSR13, R13-3007, 10.4.1.]



## **8.5. Reporting Requirements**

- 8.5.1. Any deviation(s) from the allowable visible emission requirement for any emission source discovered during observations using 40 C.F.R. Part 60 Appendix A, Method 9 or 22 shall be reported in writing to the Director of the Division of Air Quality as soon as practicable, but in any case within ten (10) calendar days of the occurrence and shall include at least the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.

[45CSR13, R13-3007, 10.5.1.]

## **8.6. Compliance Plan**

- 8.6.1. None.

## 9.0. Condensate Tanks, Condensate Truck Loading, and Vapor Combustion Units [Emission Point IDs: E16 and E21]

### 9.1. Limitations and Standards

- 9.1.1. **Truck Loading Limitations.** Condensate Loading shall be limited to twelve (12) hours of any day. [45CSR13, R13-3007, 11.1.2.]
- 9.1.2. The permittee shall use the vapor combustor VCU-1 at all times truck loading occurs, have a constant pilot flame during all times of truck loading, and follow the manufacturer's recommendations in operation of the vapor combustor. [45CSR13, R13-3007, 11.1.3.]
- 9.1.3. The vapor combustors shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five (5) minutes during any two (2) consecutive hours. [45CSR13, R13-3007, 11.1.4.]
- 9.1.4. The permittee shall route all VOC and HAP emissions from the Condensate Truck Loading to a vapor combustion unit (VCU-1) and the Condensate Storage Tanks (TK01-TK08) to a vapor combustion unit (VCU-2). These vapor combustion units shall be designed to achieve a minimum guaranteed control efficiency of 98% for volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions. [45CSR13, R13-3007, 11.1.3.]
- 9.1.5. **Annual Condensate Truck Loading Limitation.** The maximum quantity of condensate that shall be loaded shall not exceed 4,600,000 gallons per year. Compliance with this limit shall be demonstrated using a twelve-month rolling total. A twelve-month rolling total shall mean the sum of the monthly throughput at any given time during the previous twelve consecutive calendar months. [45CSR13, R13-3007, 11.1.5.]
- 9.1.6. To demonstrate compliance with Condition 9.1.7., the quantity of waste gas that shall be consumed in the vapor combustor VCU-1 shall not exceed 456,300 cubic feet per year. Compliance with the gas throughput limit shall be demonstrated using a rolling twelve-month total. [45CSR13, R13-3007, 11.1.6.]
- 9.1.7. **VCU-1 Emission Limitations.** Maximum emissions from VCU-1 or emission point E16-A shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lbs/hr)	Maximum Annual Emissions (tpy)
Volatile Organic Compounds	3.00	0.82
Nitrogen Oxides	0.21	0.06
Carbon Monoxide	1.13	0.31

[45CSR13, R13-3007, 11.1.7.]

- 9.1.8. **Annual Condensate Storage Tanks Throughput Limitation.** The maximum throughput of condensate shall not exceed 4,600,000 gallons per year for the storage tanks TK01 to TK08. Compliance with this annual throughput limitation shall be determined using a twelve-month rolling total. A twelve-month rolling total shall mean the sum of the tank throughputs at any given time during the previous twelve consecutive months. **[45CSR13, R13-3007, 11.1.8.]**
- 9.1.9. To demonstrate compliance with Condition 9.1.10., the quantity of waste gas that shall be consumed in the vapor combustor VCU-2 shall not exceed 27.17 mmscf/yr. Compliance with the gas throughput limit shall be demonstrated using a twelve-month rolling total. **[45CSR13, R13-3007, 11.1.9.]**
- 9.1.10. **VCU-2 Emission Limitations.** The maximum emissions from VCU-2 or emission point E21 shall not exceed the following limits:

<b>Pollutant</b>	<b>Maximum Hourly Emissions (lbs/hr)</b>	<b>Maximum Annual Emissions (tpy)</b>
Volatile Organic Compounds	9.40	41.16
Nitrogen Oxides	1.96	2.86
Carbon Monoxide	10.66	15.57
Toluene	0.49	2.20
Hexane	0.95	4.14

**[45CSR13, R13-3007, 11.1.10.]**

- 9.1.11. No person shall cause or allow particulate matter to be discharged from VCU-1 into the open air in excess of 0.41 lbs/hr. **[45CSR§6-4.1.]**
- 9.1.12. No person shall cause or allow particulate matter to be discharged from VCU-2 into the open air in excess of 1.28 lbs/hr. **[45CSR§6-4.1.]**
- 9.1.13. No person shall cause or allow emission of smoke into the atmosphere from any incinerator which is twenty percent (20%) opacity or greater. **[45CSR§6-4.3.]**
- 9.1.14. The provisions of Condition 9.1.13. shall not apply to smoke which is less than forty percent (40%) opacity, for a period or periods aggregating no more than eight (8) minutes per start-up, or six (6) minutes in any sixty (60)-minute period for stoking operations. **[45CSR§6-4.4.]**
- 9.1.15. No person shall cause or allow the emission of particles of unburned or partially burned refuse or ash from any incinerator which are large enough to be individually distinguished in the open air. **[45CSR§6-4.5.]**

- 9.1.16. Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.  
[45CSR§6-4.6.]

## **9.2. Monitoring Requirements**

- 9.2.1. The pilot flames shall be continuously monitored by a thermocouple or an infrared monitor. Each monitoring device shall be operated according to the manufacturer's specifications.  
[45CSR13, R13-3007, 11.2.1.]
- 9.2.2. The permittee shall monitor the throughput to the vapor combustor units (VCU-1 and VCU-2) on a monthly basis.  
[45CSR13, R13-3007, 11.2.2.]

## **9.3. Testing Requirements**

- 9.3.1. The permittee shall conduct a Method 22 opacity test on the vapor combustor for at least two hours. This test shall demonstrate no visible emissions are observed for more than a total of 5 minutes during any 2 consecutive hour period using 40 C.F.R. Part 60 Appendix A, Method 22. The permittee shall conduct this test within one (1) year of permit issuance or initial startup whichever is later. The visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in References 1 and 2 from 40 C.F.R. Part 60 Appendix A, Method 22 or from the lecture portion of 40 C.F.R. Part 60 Appendix A, Method 9 certification course.  
[45CSR13, R13-3007, 11.3.1.]
- 9.3.2. At such reasonable times as the Secretary may designate, the operator of any incinerator shall be required to conduct or have conducted stack tests to determine the particulate matter loading, by using 40 C.F.R. Part 60 Appendix A, Method 5 or other equivalent U.S. EPA approved method approved by the Secretary, in exhaust gases. Such tests shall be conducted in such manner as the Secretary may specify and be filed on forms and in a manner acceptable to the Secretary. The Secretary may, at the Secretary's option, witness or conduct such stack tests. Should the Secretary exercise his or her option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for the test equipment and the required safety equipment such as scaffolding, railings, and ladders to comply with generally accepted good safety practices.

The Secretary may conduct such other tests as the Secretary may deem necessary to evaluate air pollution emissions other than those noted above.

[45CSR§§6-7.1. and -7.2.]

## **9.4. Recordkeeping Requirements**

- 9.4.1. For the purpose of demonstrating compliance with Condition 9.2.1., the permittee shall maintain records of the times and duration of all periods in which the pilot flame was absent.  
[45CSR13, R13-3007, 11.4.1.]

- 9.4.2. For the purpose of demonstrating compliance with Condition 9.3.1., the permittee shall maintain records of the visible emission opacity tests.  
**[45CSR13, R13-3007, 11.4.2.]**
- 9.4.3. For the purpose of demonstrating compliance with Conditions 9.1.5. and 9.1.8., the permittee shall maintain records of the condensate loaded into the trucks and the condensate tank throughput. The permittee shall calculate the monthly throughput to each vapor combustor by the ratio of the recorded condensate tank and truck loading volumes against the process modeling and throughput information within the plans and specifications filed in Permit Application R13-3007E.  
**[45CSR13, R13-3007, 11.4.3.]**
- 9.4.4. All records required under Section 9.4. shall be maintained on-site or in a readily accessible off-site location maintained by the permittee for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.  
**[45CSR13, R13-3007, 11.4.4.]**

## **9.5. Reporting Requirements**

- 9.5.1. Any deviation(s) of the allowable visible emission requirement for any emission source discovered during observations using 40 C.F.R. Part 60 Appendix A, Method 9 must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: the results of the visible determination of the opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.  
**[45CSR13, R13-3007, 11.5.1.]**

## **9.6. Compliance Plan**

- 9.6.1. None.

## **10.0. Pigging and Blowdowns [Emission Point ID: E18]**

### **10.1. Limitations and Standards**

- 10.1.1. The maximum number of compressor blowdown events per year shall not exceed 863 events. Compliance shall be determined using a twelve-month rolling total. A twelve-month rolling total shall mean the sum of the compressor blowdown events at any given time during the previous twelve consecutive calendar months. [45CSR13, R13-3007, 12.1.1.]
- 10.1.2. VOC emissions from the pigging and blowdowns shall not exceed 8.68 lbs/hr or 38.08 tpy. [45CSR13, R13-3007, 12.1.2.]

### **10.2. Monitoring Requirements**

- 10.2.1. None.

### **10.3. Testing Requirements**

- 10.3.1. None.

### **10.4. Recordkeeping Requirements**

- 10.4.1. To demonstrate compliance with Condition 10.1.1. of this permit, the permittee shall maintain a record of the compressor blowdown events and estimated volume per event (scf) on a monthly and rolling twelve-month total. Records shall be kept in accordance with Condition 3.4.2. of this permit. [45CSR13, R13-3007, 12.2.1. and 12.2.2.]

### **10.5. Reporting Requirements**

- 10.5.1. None.

### **10.6. Compliance Plan**

- 10.6.1. None.