

**OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

MEMORANDUM

January 9, 2016

TO: Phillip Fielder, P.E., Permits and Engineering Group Manager

THROUGH: Richard Groshong, Environmental Programs Manager,
Compliance and Enforcement

THROUGH: Phil Martin, P.E., Existing Source Permits Section Manager

THROUGH: Peer Review

FROM: Kyle Walker, E.I., Engineering Section

SUBJECT: Evaluation of Permit Application No. **2014-2324-TVR3**
DCP Midstream, LP
Ellis County No. 2 Compressor Station (Facility ID 1170)
Section 28, Township 22N, Range 23W; Ellis County
Located 3 Miles West of Fargo on SH-15, 0.5 Mile South
Latitude 36.35889°, Longitude 99.66028°
From Junction SR-15 and Main Street in Fargo, 2.3 Miles SW on SR-15 to
N1880 Road, South ¼ Mile to Site

SECTION I. INTRODUCTION

DCP Midstream, LP (DCP) has requested a Part 70 operating permit renewal for the Ellis County No. 2 Compressor Station. The facility (SIC 4922) is currently operated under Permit No. 2009-235-TVR2 (M-3) issued October 29, 2012. Modifications authorized by construction permit No. 2009-235-C (M-4), issued October 4, 2014, have been incorporated into this permit renewal. The application has been determined to be Tier II based on application for a Title V operating permit renewal and will require public and 45-day EPA review. The facility is an existing Prevention of Significant Deterioration (PSD) source because NO_x and CO emissions exceed 250 TPY.

Permit No. 2009-235-C (M-4) authorized DCP to replace one 1,194-hp Waukesha P9390 GU compressor engine (ENG3) with one 1,194-hp Waukesha P9390 GU compressor engine with non-selective catalytic reduction controls (ENG3a). ENG-3 was an exempt source installed at the facility in 1972. ENG-3a was manufactured on May 5, 1975, and was installed at the Ellis County No. 2 Compressor Station on July 3, 2013.

DCP has requested the following changes be incorporated in this renewal permit.

- DCP requests changing the represented emission factors for ENG2 and ENG4 to the manufacturer's worst case variable horsepower engine emission levels for NO_x, CO, and

VOC to reflect the maximum potential emissions under all operating scenarios (best power and best economy); 22.0 g/hp-hr

SECTION II. FACILITY DESCRIPTION

This facility (SIC 4922) has four stationary internal combustion engines: two 1,194-hp Waukesha P9390 GU engines (ENG2 and ENG3a), one 448-hp Waukesha F3521 GU engine (ENG4), and one 1,478-hp Waukesha L7042GSI engine (ENG5) in compressor service. The facility was originally constructed in 1972 with two 1,194-hp Waukesha P9390 GU engines. ENG2 was constructed in 1972 and remains a grandfathered source. ENG3 was replaced by ENG3a on July 3, 2013. The replacement engine ENG3a is not a grandfathered or exempted source. In 1977, the 448-hp Waukesha F3521 GU engine was added to the facility. The 448-hp Waukesha F3521 GU engine was exempted from permitting by a statutory exemption (14.1.17) which was in effect from 1972 to 1979. The facility stores condensate and water on-site in two 300-bbl and two 400-bbl storage tanks. Condensate and water are removed from the facility via tank truck. The facility has a slug catcher with all liquids sent to a pressurized flash tank. Vapors from the flash tank are recycled and the liquids are sent to the condensate storage tanks. There are various storage tanks on-site that are insignificant.

SECTION III. EQUIPMENT

Emission units (EUs) have been arranged into Emission Unit Groups (EUGs) in the following outline.

EUG 1 Grandfathered/Exempted Internal Combustion Engines					
EU	Point	Make/Model	Hp	Serial #	Const. Date
ENG2	1	Waukesha P9390 GU	1,194	206441	1972
ENG4	4	Waukesha F3521 GU	448	268011	1977

EUG 2A Condensate Tanks					
EU	Point	Contents	Barrels	Gallons	Const. Date
Tanks	T-1	Condensate	400	16,800	Unknown
	T-8	Condensate	400	16,800	2009
	T-10	Condensate	300	12,600	2012
	T-11	Condensate	300	12,600	2012

EUG 2B Insignificant Tanks				
EU	Point	Contents	Barrels	Gallons
Tanks	T-2	Methanol	143	6,000
	T-4	Antifreeze	60	2,506
	T-5	Lube Oil	71	3,000
	T-6	Lube Oil	12	500
	T-7	Antifreeze	12	500
	T-12	Slop Oil	15.5	650
	T-14	Slop Oil	210	8,820

EUG 3 Fugitives		
EU	Number Items	Type of Equipment
Fugitives	206	Gas/Vapor Valves
	1,100	Gas/Vapor Flanges
	28	Gas/Vapor Pressure-relief Valves
	16	Gas/Vapor Compressor Seals
	14	Light Liquid Pump Seals
	74	Light Liquid Valves
	140	Light Liquid Flanges

EUG 4 Internal Combustion Engine						
EU	Point	Make/Model	Hp	Serial #	Mfg. Date	Const. Date
ENG3a	3a	Waukesha P9390 GU	1,194	287377	1975	7/3/2013
ENG5	5	Waukesha L7042GSI	1,478	285745	1975	3/4/2009

EUG 5 Condensate Loading			
EU	Point	Type of Equipment	Annual Process Rate
Loading	L-1	Condensate Load-out	2,183,000 gallons condensate (4,266,000 gallons total liquid)

EUG 6 Blowdown Vent			
EU	Point	Type of Equipment	Annual Process Rate
Blowdown	V-1	Compressor Blowdowns	480,000 SCF with 28.1% VOC

SECTION IV. EMISSIONS

Emission estimates are based on continuous operations (8,760 hours per year).

- Emissions estimates for engines ENG2 and ENG4 are based on manufacturer data.

EU	Engine	Hp	Engine Type	Fuel Rate
ENG2	Waukesha P9390 GU	1,194	4SRB	7,731 Btu/hp-hr
ENG4	Waukesha F3521 GU	448	4SRB	7,264 Btu/hp-hr

Previous Emission Factors

EU	Engine	NOx (g/hp-hr)	CO (g/hp-hr)	VOC (g/hp-hr)
ENG2	Waukesha P9390 GU	12.0	12.0	2.0
ENG4	Waukesha F3521 GU	17.0	17.0	2.0

Revised Emission Factors

EU	Engine	NOx (g/hp-hr)	CO (g/hp-hr)	VOC (g/hp-hr)
ENG2	Waukesha P9390 GU	22.0	32.0	2.3
ENG4	Waukesha F3521 GU	22.0	32.0	2.3

Any modifications incorporating the removal of ENG2 or ENG4 to establish non applicability of PSD review will require engine testing to demonstrate actual emissions for these engines. There is no data to support the emissions estimates for ENG2 and ENG4. The estimated emissions do not represent actual emissions for ENG2 and ENG4.

- Emissions estimates for engine ENG3a are based on a fuel consumption of 7,731 Btu/hp-hr, continuous operation, NSCR efficiency, and manufacturer data. NSCR control efficiencies are as follows: NOx = 85%, CO = 78%, VOC = 50%, and formaldehyde = 76%.

EU	Engine	Hp	Engine Type	NOx (g/hp-hr)	CO (g/hp-hr)	VOC (g/hp-hr)
ENG3a	Waukesha P9390 GU w/NSCR	1,194	4SRB	2.0	3.0	1.0

- Emissions estimates for engine ENG5 are based on a fuel consumption of 7,847 Btu/hp-hr, continuous operation, catalyst control efficiencies, and manufacturer data with a 100% safety factor.

EU	Engine	Hp	Engine Type	NOx (g/hp-hr)	CO (g/hp-hr)	VOC (g/hp-hr)
ENG5	Waukesha L7042 GSI w/CC	1,478	4SRB	1.16	1.80	0.12

- Estimated working/breathing emissions from the condensate tanks (T-1 and T-8) are based on TANKS 4.0 with a liquid throughput of 1,200,000 gallons per year total volume (worst-case 650,000 gallons condensate with the balance water). VOC emissions for condensate flashing were estimated using the HYSYS process simulator based on the condensate volume (650,000 gallons per year).
- Estimated working/breathing emissions from the condensate tanks (T-10 and T-11) are based on TANKS 4.0 with a liquid throughput of 3,066,000 gallons per year total volume (worst-case 1,533,000 gallons condensate with the balance water). VOC emissions for condensate flashing were estimated using the HYSYS process simulator based on the condensate volume (1,533,000 gallons per year).
- The facility operates a VRU that collects working, breathing, and flashing emissions from the condensate tanks and recycle the vapors to the process. Tank emissions estimates are based on 100% VRU efficiency and 5% VRU downtime.
- Carbon dioxide equivalent (CO₂e) emissions were calculated by multiplying emissions by global warming potentials for each pollutant. Global warming potentials were obtained from 40 CFR 98 Subpart A, Table A-1. Methodology used was Calculation Based Method 2 (Generalized Approach).
- Load-out emissions are estimated using AP-42 (1/95), Section 5.2.
- Blowdown vent emissions were based on 30 blowdown events per year, 480,000 SCF total blowdown volume, and a VOC content of 28.1%.

- Fugitive VOC emissions are based on EPA’s 1995 Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017), an estimated percent C3+, and an estimated number of components.

Component	Number of Components	Emission Factor, lb/hr/component	Percent VOC	VOC Leakage	
				lb/hr	TPY
Gas/Vapor Valves	206	0.00992	28.1%	0.57	2.51
Gas/Vapor Flanges	1,100	0.00086	28.1%	0.27	1.16
Gas/Vapor Compressor Seals	16	0.0194	28.1%	0.09	0.38
Other (Gas/Vapor)	28	0.0194	28.1%	0.15	0.67
Light Liquid Valves	74	0.0055	100%	0.41	1.79
Light Liquid Flanges	140	0.000243	100%	0.03	0.15
Light Liquid Pumps	14	0.02866	100%	0.40	1.76
TOTALS				1.92	8.42

DCP Facility-Wide Emissions

EU	NOx		CO		VOC	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
ENG2	57.91	253.65	84.23	368.95	6.05	26.52
ENG3a	5.26	23.06	7.90	34.59	2.63	11.53
ENG4	21.73	95.17	31.61	138.43	2.27	9.95
ENG5	3.78	16.56	5.87	25.69	0.39	1.71
Insig. Tanks	---	---	---	---	---	1.03
T-1	---	---	---	---	---	4.69 ¹
T-8	---	---	---	---	---	4.69 ¹
T-10	---	---	---	---	---	16.40 ¹
T-11	---	---	---	---	---	16.40 ¹
Fugitives	---	---	---	---	1.92	8.42
Load-out	---	---	---	---	---	10.59
Blowdowns	---	---	---	---	---	3.75
2009-235-C (M-4)	57.42	251.52	62.15	272.18	12.18	110.98
Difference	31.44	136.92	67.46	295.48	1.08	4.70
Total	88.68	388.44	129.61	567.66	13.26	115.68

1 – Includes working, breathing, and flashing emissions. Estimate includes 5% VRU downtime.

HAP Emissions

The internal combustion engines have emissions of air toxics, the most significant being formaldehyde. Emission estimates of formaldehyde from ENG2, ENG3a, and ENG4 are based on emission factors from AP-42, (7/00), Section 3.2, Table 3.2-3. Formaldehyde emissions from ENG5 are based on manufacturer data. Formaldehyde emissions for the engines are presented in the following table.

Formaldehyde Emissions

Source	Emission Factor	lb/hr	TPY
1,194-hp Waukesha P9390 GU, ENG2	2.05E-02 lb/MMBTU	0.19	0.83
1,194-hp Waukesha P9390 GU w/NSCR, ENG3a	4.92E-03 lb/MMBTU	0.05	0.20
448-hp Waukesha F3521 GU, ENG4	2.05E-02 lb/MMBTU	0.07	0.29
1,478-hp Waukesha L7042 GSI, ENG5	0.004 g/hp-hr	0.03	0.11
Total		0.34	1.43

Formaldehyde emissions are less than the major source HAP threshold of 10 TPY for any one HAP.

Greenhouse Gas Emissions

The applicant has presented emission estimates for greenhouse gases, which demonstrate that the facility is not a PSD-major source for this pollutant.

SECTION V. INSIGNIFICANT ACTIVITIES

The insignificant activities identified and justified in the application are duplicated below. Appropriate record keeping of activities indicated below with "*" are specified in Specific Condition number 12.

1. *Stationary reciprocating engines burning natural gas, gasoline, aircraft fuels, or diesel fuel which are either used exclusively for emergency power generation or for peaking power service not exceeding 500 hours/year. None identified but may be used in the future.
2. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas). Two building/space heaters fired with natural gas and rated less than 5 MMBTUH are located onsite.
3. *Emissions from fuel storage/dispensing equipment operated solely for facility owned vehicles if fuel throughput is no more than 2,175 gallons/day, averaged over a 30-day period.
4. *Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature. Glycol and lube oil storage tanks all have capacities less than 10,000 gallons and store liquids with a vapor pressure below 1.0 psia.
5. Emissions from crude oil or condensate marine and truck loading equipment operations at crude oil and natural gas production sites where the loading rate does not exceed 10,000 gallons per day averaged over a 30-day period. Unloading into tank trucks is less than 10,000 gallons per day.
6. *Emissions from crude oil and condensate storage tanks with a capacity of less than or equal to 420,000 gallons that store crude oil and condensate prior to custody transfer. Tanks T-1 and T-8 store condensate prior to custody transfer and each has a capacity of 16,800 gallons.

However, due to PSD considerations (VOC emissions could exceed 40 TPY), limits on throughput and emissions will be taken for these tanks.

7. *Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature. Tanks T-4, T-5, T-6, T-7, and T-9 have capacities less than 39,894 gallons and store products having a vapor pressure less than 1.5 psia.
8. Additions or upgrades of instrumentation or control systems that result in emission increases less than the pollutant quantities specified in OAC 252:100-8-3(e)(1). None identified but may be used in the future.
9. Cold degreasing operations utilizing solvents that are denser than air. One parts washer is located at the facility and it uses a solvent that is denser than air.
10. Torch cutting and welding of under 200,000 tons of steel fabricated per year. Torch cutting is conducted as part of plant maintenance operations, which are listed "trivial activities," therefore, no recordkeeping will be required.
11. Hand wiping and spraying of solvents from containers with less than 1 liter capacity used for spot cleaning and/or degreasing in ozone attainment areas. None identified but may be used in the future.
12. *Activities that have the potential to emit no more than 5 TPY (actual) of any criteria pollutant. This category includes T-2, T-3, T-12, T-14, and the blowdown vent.

SECTION VI. OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions) [Applicable]
Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference) [Applicable]
This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations. These requirements are addressed in the "Federal Regulations" section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]
Subchapter 3 enumerates the primary and secondary ambient air quality standards and the significant deterioration increments. At this time, all of Oklahoma is in attainment of these standards.

OAC 252:100-5 (Registration, Emissions Inventory and Annual Operating Fees) [Applicable]
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Emission inventories have been submitted and fees paid for the past years.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]
Part 5 includes the general administrative requirements for Part 70 permits. Any planned changes in the operation of the facility that result in emissions not authorized in the permit and that exceed the “Insignificant Activities” or “Trivial Activities” thresholds require prior notification to AQD and may require a permit modification. Insignificant activities refer to those individual emission units either listed in Appendix I or whose actual calendar year emissions do not exceed the following limits.

- 5 TPY of any one criteria pollutant
- 2 TPY of any one hazardous air pollutant (HAP) or 5 TPY of multiple HAPs or 20% of any threshold less than 10 TPY for a HAP that the EPA may establish by rule

Emission limitations and operational requirements necessary to assure compliance with all applicable requirements for all sources are taken from the permit application, or developed from the applicable requirement.

OAC 252:100-9 (Excess Emissions Reporting Requirements) [Applicable]
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for affirmative defense, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

OAC 252:100-13 (Prohibition of Open Burning) [Applicable]
Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter) [Applicable]
This subchapter specifies a PM emissions limitation of 0.6 lbs/MMBTU from fuel-burning units with a rated heat input of 10 MMBTUH or less and a limit of 0.59 lb/MMBTU for fuel-burning units with a rated heat input of 11.6 MMBTUH (ENG5). For 4-stroke rich burn natural gas-fired engines, AP-42 (7/00), Sec. 3.2 lists the total PM emissions for natural gas to be 0.0194 lbs/MMBTU. The permit requires the use of natural gas for all fuel-burning units to ensure compliance with Subchapter 19.

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]
No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. This facility has negligible potential to violate this requirement when burning natural gas.

OAC 252:100-29 (Fugitive Dust) [Applicable]

This subchapter states that no person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. Under normal operating conditions, this facility has negligible potential to violate this requirement, therefore it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds) [Applicable]

Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBTU heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,000 BTU/SCF, this limit corresponds to fuel sulfur content of 1,203 ppmv. The permit requires the use of gaseous fuel with sulfur content less than 343 ppmv to ensure compliance with Subchapter 31.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]

This subchapter limits new gas-fired fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.2 lb of NO_x per MMBTU. There are no equipment items that exceed the 50 MMBTUH threshold.

OAC 252:100-35 (Carbon Monoxide) [Not Applicable]

This facility has none of the affected sources: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic reforming unit or petroleum catalytic cracking unit.

OAC 252:100-37 (Volatile Organic Compounds) [Applicable]

Part 3 requires VOC storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The condensate tanks are subject to this requirement.

Part 3 requires VOC loading facilities with a throughput equal to or less than 40,000 gallons per day to be equipped with a system for submerged filling of tank trucks or trailers if the capacity of the vehicle is greater than 200 gallons. This facility does not have the physical equipment (loading arm and pump) to conduct this type of loading and is not subject to this requirement.

Part 5 limits the VOC content of coatings used in coating lines or operations. This facility will not normally conduct coating or painting operations except for routine maintenance of the facility and equipment, which is exempt.

Part 7 requires fuel-burning and refuse-burning equipment to be operated to minimize emissions of VOC. The fuel-burning equipment at this location is subject to this requirement.

Part 7 requires all effluent water separator openings, which receive water containing more than 200 gallons per day of any VOC, to be sealed or the separator to be equipped with an external floating roof or a fixed roof with an internal floating roof or a vapor recovery system. No effluent water separators are located at this facility.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]

This subchapter regulates toxic air contaminants (TAC) that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required

by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]
 This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice of intent-to-test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

The following Oklahoma Air Pollution Control Rules are not applicable to this facility:

OAC 252:100-11	Alternative Reduction	not requested
OAC 252:100-17	Incinerators	not type of emission unit
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Feed & Grain Facility	not in source category
OAC 252:100-39	Nonattainment Areas	not in a subject area
OAC 252:100-47	Landfills	not type of source category

SECTION VII. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Not applicable at this time]
 Final total facility emissions are greater than the PSD major source threshold of 250 TPY for regulated pollutants NOx and CO. The facility is considered an existing major source for PSD and any future emission increases must be evaluated for PSD if they exceed a significance level (40 TPY for NOx, 100 TPY for CO, 40 TPY for VOC, 40 TPY for SO₂, 25 TPY for TSP, 15 TPY for PM, 0.6 TPY for Pb, and 10 TPY for TRS). Removal of ENG2 and/or ENG4 will require emissions testing of ENG2 and/or ENG4 to demonstrate actual emissions for PSD applicability.

NSPS, 40 CFR Part 60 [Not Applicable]
Subpart Kb, VOL Storage Vessels. This subpart regulates hydrocarbon storage tanks larger than 19,812 gallons capacity and built after July 23, 1984. All storage tanks at this facility are below this threshold; therefore, this subpart is not applicable.
Subpart GG, Stationary Gas Turbines. There are none at this facility.

Subpart KKK, Equipment Leaks of VOC from Onshore Natural Gas Processing Plants. This subpart sets standards for natural gas processing plants which are defined as any site engaged in the extraction of natural gas liquids from field gas, fractionation of natural gas liquids, or both. This facility will not engage in this type of activity.

Subpart LLL, Onshore Natural Gas Processing: SO₂ Emissions. This subpart affects sweetening units and sweetening units followed by a sulfur recovery unit. This facility does not have a sweetening unit.

Subpart JJJ, Stationary Spark Ignition Internal Combustion Engines (SI-ICE), promulgates emission standards for all new SI engines ordered after June 12, 2006, and all SI engines modified or reconstructed after June 12, 2006, regardless of size. All engines at this facility were manufactured prior to the applicability date of Subpart JJJ.

Subpart OOOO, Crude Oil and Natural Gas Production, Transmission, and Distribution. This subpart was promulgated April 23, 2012, and affects the following sources that commence construction, reconstruction, or modification after August 23, 2011:

1. Each single gas well;
2. Single centrifugal compressors using wet seals that are located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment;
3. Reciprocating compressors which are single reciprocating compressors located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment;
4. Single continuous bleed natural gas driven pneumatic controllers with a natural gas bleed rate greater than 6 SCFH, which commenced construction after August 23, 2011, located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not located at a natural gas processing plant;
5. Single continuous bleed natural gas driven pneumatic controllers which commenced construction after August 23, 2011, and is located at a natural gas processing plant;
6. Single storage vessels located in the oil and natural gas production segment, natural gas processing segment, or natural gas transmission and storage segment;
7. All equipment, except compressors, within a process unit at an onshore natural gas processing plant;
8. Sweetening units located at onshore natural gas processing plants.

For each reciprocating compressor the owner/operator must replace the rod packing before 26,000 hours of operation or prior to 36 months. If utilizing the number of hours, the hours of operation must be continuously monitored. The compressors at the facility were installed prior to the applicability date for this subpart. Any new or modified compressors will have to comply with this subpart.

Pneumatic controllers at a natural gas processing plant must have a bleed rate of zero. No pneumatic controllers will be installed as a part of this modification. This facility is not a natural gas processing plant.

Storage vessels constructed, modified or reconstructed after August 23, 2011, with VOC emissions equal to or greater than 6 TPY must reduce VOC emissions by 95.0 % or greater. No storage vessels will be installed as a part of this modification. All new or modified storage vessels will have to comply with this subpart.

The group of all equipment, except compressors, within a process unit at a natural gas processing plant must comply with the requirements of NSPS, Subpart VVa, except as provided in §60.5401. This facility is not a natural gas processing plant.

A sweetening unit means a process device that removes hydrogen sulfide and/or carbon dioxide from the sour natural gas stream. A sour natural gas stream is defined as containing greater than or equal to 0.25 grains sulfur per 100 standard cubic feet or 4 ppmv. There are no sweetening units at this facility.

The facility is not subject to the requirements of NSPS, Subpart OOOO.

NESHAP, 40 CFR Part 61

[Not Applicable]

There are no emissions of any of the regulated pollutants: arsenic, asbestos, beryllium, benzene, coke oven emissions, mercury, radionuclides or vinyl chloride except for trace amounts of benzene. Subpart J, Equipment Leaks of Benzene, only affects process streams which contain more than 10% benzene by weight. Analysis of Oklahoma natural gas indicates a maximum benzene content of less than 1%. All process streams at this facility are below this threshold.

NESHAP, 40 CFR Part 63

[Subparts ZZZZ and CCCCCC Applicable]

Subpart HH, Oil and Natural Gas Production Facilities. This subpart applies to affected emission points that are located at facilities which are major or area sources of HAPs and either process, upgrade, or store hydrocarbons prior to the point of custody transfer or prior to which the natural gas enters the natural gas transmission and storage source category. This facility is not a major source of HAPs and has no dehydration unit.

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart previously affected only RICE with a site-rating greater than 500 brake horsepower that are located at a major source of HAP emissions. On January 18, 2008, the EPA published a final rule that promulgates standards for new and reconstructed engines (after June 12, 2006) with a site-rating less than or equal to 500 HP located at major sources, and new and reconstructed engines (after June 12, 2006) located at area sources. Owners and operators of new or reconstructed engines at area sources, and new or reconstructed engines with a site-rating equal to or less than 500 HP located at a major source (except new or reconstructed 4-stroke lean-burn engines with a site-rating greater than or equal to 250 HP and less than or equal to 500 HP located at a major source) must meet the requirements of Subpart ZZZZ by complying with either 40 CFR Part 60 Subpart IIII (for CI engines), or 40 CFR Subpart JJJJ (for SI engines). Based on emission calculations, this facility is a minor source of HAP. The engines at the facility are subject to Subpart ZZZZ area source requirements.

On August 20, 2010, EPA finalized the requirements for stationary SI RICE located at area sources. On January 14, 2013, EPA signed final revisions to the August 20, 2010 SI RICE NESHAP which reflect new technical information submitted by stakeholders after the 2010 standards were issued. A summary of requirements for the SI RICE located at this facility are in the following table.

Engine Category	Requirements
Existing non-emergency, non-black start 4SRB stationary RICE ≤500 HP	Change oil and filter every 1,440 hours of operation or annually, whichever comes first;
	Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; and
	Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.
Existing non-emergency, non-Black Start 4SRB remote stationary RICE >500-hp	Change oil and filter every 2,160 hours of operation or annually, whichever comes first;
	Inspect spark plugs every 2,160 hours of operation or annually, whichever comes first, and replace as necessary; and
	Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.

Onshore remote stationary RICE means stationary RICE meeting any of the following criteria:

1. Stationary RICE located on a pipeline segment that meets both of the following criteria:
 - i. A pipeline segment with 10 or fewer buildings intended for human occupancy and no buildings with four or more stories within 220 yards (200 meters) on either side of the centerline of any continuous 1-mile (1.6 kilometers) length of pipeline. Each separate dwelling unit in a multiple dwelling unit building is counted as a separate building intended for human occupancy.
 - ii. The pipeline segment does not lie within 100 yards (91 meters) of either a building or a small, well-defined outside area (such as a playground, recreation area, outdoor theater, or other place of public assembly) that is occupied by 20 or more persons on at least 5 days a week for 10 weeks in any 12-month period. The days and weeks need not be consecutive. The building or area is considered occupied for a full day if it is occupied for any portion of the day.
2. Stationary RICE that are not located on gas pipelines and that have 5 or fewer buildings intended for human occupancy and no buildings with four or more stories within a 0.25 mile radius around the engine. A building is intended for human occupancy if its primary use is for a purpose involving the presence of humans.

This facility and engines within the facility are considered remote. All applicable requirements have been incorporated into the permit.

Subpart CCCCCC, Gasoline Dispensing Facilities. This subpart establishes emission limitations and management practices for HAP emitted from the loading of gasoline storage tanks at gasoline dispensing facilities (GDF) located at an area source. GDF means any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank. If a GDF has a monthly throughput of less than 10,000 gallons of gasoline, the operator must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

- 1) Minimize gasoline spills;
- 2) Clean up spills as expeditiously as practicable;
- 3) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
- 4) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

The facility is subject to Subpart CCCCCC.

CAM, 40 CFR Part 64

[Applicable]

This part applies to any pollutant-specific emission unit at a major source that is required to obtain an operating permit, for any application for an initial operating permit submitted after April 18, 1998, that addresses “large emissions units,” or any application that addresses “large emissions units” as a significant modification to an operating permit, or for any application for renewal of an operating permit, if it meets all of the following criteria.

- It is subject to an emission limit or standard for an applicable regulated air pollutant
- It uses a control device to achieve compliance with the applicable emission limit or standard
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant of 100 TPY or 10/25 TPY of a HAP.

The grandfathered/exempted units (ENG2 and ENG4) are not subject to any emission limits or standard for any applicable regulated air pollutant. ENG3a and ENG5 use control devices and have potential emissions greater than 100 TPY. A CAM plan has been incorporated into the permit.

Chemical Accident Prevention Provisions, 40 CFR Part 68

[Not Applicable]

This facility will not process or store more than the threshold quantity of any regulated substance (Section 112r of the Clean Air Act 1990 Amendments). More information on this federal program is available on the web page: www.epa.gov/ceppo.

Stratospheric Ozone Protection, 40 CFR Part 82

[Subpart A and F Applicable]

These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).

Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030.

This facility does not utilize any Class I & II substances.

SECTION VIII. COMPLIANCE

Inspection

The facility was inspected on February 29, 2016, by Mr. Andrew Thomas of the AQD Compliance Section. Garrett Scribner and Steven Kuhn, Environmental Specialists, represented DCP. Based on information provided or obtained during this evaluation the following violation was identified during record review preparing this report:

1. Failure to change oil within two business days after a condemning limit was exceeded in an oil analysis, in violation of 40 C.F.R. Part 63, Subpart ZZZZ § 63.6625(j).

The following areas of concern were identified during the evaluation:

1. An updated tank inventory, without T-3 and T-9, should be included in the next Title V permit application for the Facility.
2. Failure to submit O₂% for the third quarter of 2014, in violation of SC 1, EUG 4(B) of Permit No. 2009-235-C (M-4). However, this information was later submitted upon request.

T-3 and T-9 have been removed from the tank inventory list. The additional items identified during the February 29, 2016 inspection have no bearing on the issuance of this permit.

Testing

Listed below are the results from recent testing which show compliance with the applicable permit conditions.

Test Results					
Unit	Test Date	NO_x (lb/hr)		CO (lb/hr)	
		Limit	Test	Limit	Test
ENG3a	1/25/2016	5.26	1.61	7.90	0.98
ENG5	1/25/2016	3.78	1.44	5.87	0.91

Tier Classification and Public Review

This application has been determined to be a **Tier II** based on the request for an operating permit renewal for a major source for which a Title V operating permit is required. The applicant is required to publish a notice of filing the permit application and a notice of draft permit. Public and EPA review are required for a Title V renewal permit.

The permittee has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns or leases the land.

The applicant will submit a signed affidavit from the *The Northwest Oklahoman and Ellis County News*, a weekly newspaper printed in the Town of Shattuck, Ellis County, that a “Notice of Filing a Tier II Application” and a “Notice of Draft Tier II Permit” have been published. The notice(s) will state the permit application and draft permit are available for review in the

Shattuck Public Library and at the Oklahoma City DEQ Air Quality Division main office. The draft permit will also be available via the Air Quality section of the DEQ web page at <http://www.deq.state.ok.us>.

This facility is located within 50 miles of the border of Oklahoma and the states of Kansas and Texas. Therefore, Texas and Kansas will be forwarded the draft/proposed permit for review.

The public review and 45-day EPA review of Permit No. 2014-2324-TVR3 will run concurrently. Information on all permit actions is available for review by the public in the Air Quality section of the DEQ Web Page: www.deq.state.ok.us.

Fees Paid

Part 70 operating permit renewal fee of \$7,500 has been paid.

SECTION IX. SUMMARY

This facility was constructed as described in the application. Ambient air quality standards are not threatened at this site. AQD Compliance and Enforcement concur with issuance of this permit. Issuance of the Part 70 operating permit renewal is recommended upon public and EPA review.

**PERMIT TO OPERATE
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS**

**DCP Midstream, LP
Ellis County No. 2 Compressor Station**

Permit Number 2014-2324-TV3

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on December 1, 2014. The Evaluation Memorandum, dated January 9, 2016, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein:

1. Points of emissions and limitations for each point: [OAC 252:100-8-6(a)(1)]

EUG 1: Emission unit ENG2 is grandfathered and ENG4 is exempted. There are no emission limits applied to these units under Title V but they are limited to the existing equipment as it is.

EU	Make/Model	Hp	Serial #
ENG2	Waukesha P9390 GU	1,194	206441
ENG4	Waukesha F3521 GU	448	268011

EUG 2A: Condensate storage tank VOC emissions and operations are limited as follows.

EU	Point	Contents	Tank Size, Barrels	Annual Condensate Throughput Limits, Gallons	VOC Emissions, TPY
Tanks	T-1	Condensate	400	2,183,000	58.40*
	T-8	Condensate	400		
	T-10	Condensate	300		
	T-11	Condensate	300		

* Based on 100% VRU efficiency and 5% VRU downtime.

Note: throughput limits apply only to organic condensate; throughput of water is not limited.

The condensate tanks T-1, T-8, T-10, and T-11 shall vent all working, breathing, and flashing emissions to the vapor recovery unit (VRU) at least 8,322 hours per year with 100% efficiency. The facility shall record VRU downtime. The flash vapors from the condensate tanks shall be routed to the VRU except during downtime or bypass of the vapor recovery system. VRU downtime is defined as periods when the condensate tank pressure exceeds 0.875 psig. To demonstrate compliance with the emission limit, the potential to emit emissions shall be apportioned based on the recorded downtime or apportioned based on direct condensate measurement. VRU downtime shall not exceed 438 hours in any 12 month period. Compliance shall be based on a 12 month rolling total.

EUG 2B: Storage tank VOC emissions are estimated based on existing equipment items but do not have a specific limitation.

EU	Point	Contents	Barrels	Gallons
Tanks	T-2	Methanol	143	6,000
	T-3	Methanol	12	500
	T-4	Antifreeze	60	2,506
	T-5	Lube Oil	71	3,000
	T-6	Lube Oil	12	500
	T-7	Used Antifreeze	12	500
	T-9	Methanol	18	750
	T-12	Slop Oil	15.5	650
	T-14	Slop Oil	210	8,820

EUG 3: Fugitive VOC emissions do not have a specific limitation.

EU	Number Items	Type of Equipment
Fugitives	206	Gas/Vapor Valves
	1,100	Gas/Vapor Flanges
	28	Gas/Vapor Pressure-relief Valves
	16	Gas/Vapor Compressor Seals
	14	Light Liquid Pump Seals
	74	Light Liquid Valves
	140	Light Liquid Flanges

EUG 4 Permitted Internal Combustion Engines

EU	Point	Make/Model	Hp	Mfg. Date	Const. Date
ENG3a	3a	Waukesha P9390 GU	1,194	1975	7/3/2013
ENG5	5	Waukesha L7042GSI	1,478	1975	3/4/2009

EU	NOx		CO		VOC	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
ENG3a	5.26	23.06	7.90	34.59	2.63	11.53
ENG5	3.78	16.56	5.87	25.69	0.39	1.71

A. ENG3a and ENG5 shall each be operated with exhaust gases processed by a functioning catalytic converter.

B. Compliance Assurance Monitoring Requirements and Specifications for ENG3a and ENG5.

	Indicator No. 1	Indicator No. 2	Indicator No. 3
I. Indicator	Temperature of exhaust gas into catalyst.	pressure differential across catalyst (pressure in – pressure out).	Oxygen in exhaust.
Measurement Approach	Temperature is measured continuously using an inline thermocouple and translated by a temp. scanner or other end device.	pressure differential is measured monthly using a manometer or an equivalent device indicating water column pressure differential across the catalyst bed	Oxygen concentrations into the catalyst are measured continuously using an in-line O ₂ sensor.
II. Indicator Range	The indicator range is above 650°F but below 1,250°F. Excursions trigger corrective action, logging and reporting in semiannual report.	The indicator range is a pressure drop deviation of more than 2 inches WC established for a specific load. Excursions trigger corrective action, logging and reporting in semiannual report.	The indicator range is O ₂ % less than 0.5% for 30 minutes or more, or above 0.1 V or below 1.2 V. Excursions trigger corrective action, logging and reporting in semiannual report.
III. Performance Criteria	Temperature is measured by a thermocouple with a minimum accuracy of ± 5°F.	Pressure is measured at the inlet and outlet of the catalyst by pressure gauge or manometer. Minimum accuracy is ± 0.25 inch WC.	Measurements are performed to the nearest one-tenth of a volt at the engine exhaust while the engine is operating.
A. Data Representativeness			
B. Verification of Operational Status	Guarantee from thermocouple manufacturer.	Quarterly I/M inspections verify operating characteristics of the system.	Quarterly I/M inspections verify operating characteristics of the system.
C. QA/QC Practices and Criteria	Thermocouple scanner or other end device is calibrated annually.	Pressure gauge calibrated at least quarterly. Pressure taps checked monthly for plugging.	O ₂ sensor replaced quarterly.
D. Monitoring Frequency	Temperature measured continuously and recorded on log sheets once daily, Compliance assumed daily if no corrective action events occur.	Initial benchmark monitoring will be performed within 180 days of issuance of the Title V renewal permit. Initial monitoring will establish benchmark pressure drops at various loads (e.g., 100%, 90%, etc.). These data will be recorded for comparison to periodic measurements.	continuous
Data Collection Procedure	Temperature data recorded on log sheet once daily. Otherwise, excursions trigger corrective action, logging, and reporting in semiannual report.	Pressure data recorded at least monthly. Otherwise, excursions trigger corrective action, logging, and reporting in semiannual report.	O ₂ is measured whenever oxygen sensor is replaced. Records of alarm events and required maintenance are maintained.
Averaging Period	None, not to exceed minimums and maximums	None, not to exceed minimums and maximums	NA

EUG 5 Condensate Loading

EU	Point	Type of Equipment	Throughput	Emissions
Loading	L-1	Condensate Load-out	2,183,000 gallons	10.59

Note: throughput limits apply only to organic condensate; throughput of water is not limited.

EUG 6 Blowdown Vent Emissions from the blowdown vent(s) are insignificant and do not have a specific limitation.

EU	Point	Type of Equipment	Estimated Annual Process Rate
Blowdown	V-1	Compressor Blowdowns	480,000 SCF with 28.1% VOC

2. The fuel-burning equipment shall be fired with pipeline grade natural gas or other gaseous fuel with a sulfur content less than 343 ppmv. Compliance can be shown by the following methods: for pipeline grade natural gas, a current gas company bill; for other gaseous fuel, a current lab analysis, stain-tube analysis, gas contract, tariff sheet, or other approved methods. Compliance shall be demonstrated at least once every calendar year.

[OAC 252:100-31]
3. The permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year).

[OAC 252:100-8-6(a)]
4. Each engine/turbine at the facility shall have a permanent identification plate attached which shows the make, model number, and serial number.

[OAC 252:100-43]
5. The permittee shall keep operation and maintenance (O&M) records for those “exempted/grandfathered” emission units identified in EUG 1 which have not been modified and for those replacement or additional engines/turbines which do not conduct quarterly testing. Such records shall at a minimum include the dates of operation, and maintenance, type of work performed, and the increase, if any, in emissions as a result.

[OAC 252:100-8-6 (a)(3)(B)]
6. At least once per calendar quarter, the permittee shall conduct tests of NO_x and CO emissions in exhaust gases from ENG3a, ENG5, and each replacement engine/turbine when operating under representative conditions for that period. Testing is required for any engine/turbine that runs for more than 220 hours during that calendar quarter. A quarterly test may be conducted no sooner than 20 calendar days after the most recent test. Testing shall be conducted using a portable analyzer in accordance with a protocol meeting the requirements of the latest AQD Portable Analyzer Guidance document, or an equivalent method approved by Air Quality. When four consecutive quarterly tests show the engine/turbine to be in compliance with the emissions limitations shown in the permit, then the testing frequency may be reduced to semi-annual testing. A semi-annual test may be conducted no sooner than 60 calendar days nor later than 180 calendar days after the most recent test. Likewise, when the following two consecutive semi-annual tests show compliance, the testing frequency may be reduced to annual testing. An annual test may be

conducted no sooner than 120 calendar days nor later than 365 calendar days after the most recent test. Upon any showing of non-compliance with emissions limitations or testing that indicates that emissions are within 10% of the emission limitations, the testing frequency shall revert to quarterly. Testing performed under a previous permit may be used to justify a reduced monitoring frequency, i.e., quarterly to semiannual or annual, and may be used in lieu of testing required by this permit for an applicable reporting period, i.e., quarter, six-month, or annual period coinciding with issuance of this permit. Reduced testing frequency does not apply to engines with catalytic converters. Any reduction in the testing frequency shall be noted in the next required semiannual monitoring and deviation report.

[OAC 252:100-8-6(a)(3)(A)]

7. When periodic compliance testing shows engine exhaust emissions in excess of the lb/hr limits in Specific Condition Number 1, the permittee shall comply with the provisions of OAC 252:100-9 for excess emissions during start-up, shut-down, and malfunction of air pollution control equipment. Requirements of OAC 252:100-9 include immediate notification and written notification of Air Quality and demonstrations that the excess emissions meet the criteria specified in OAC 252:100-9. [OAC 252:100-9]
8. Replacement (including temporary periods of 6 months or less for maintenance purposes), of internal combustion engines/turbines with emissions limitations specified in this permit with engines of lesser or equal emissions of each pollutant (in lbs/hr and TPY) are authorized under the following conditions. [OAC 252:100-8]
 - a. The permittee shall notify AQD in writing no later than 7 days in advance of the start-up of the replacement engine(s)/turbine(s). Said notice shall identify the equipment removed and shall include the new engine/turbine make, model, serial number, and horsepower; date of the change, and any change in emissions.
 - b. Quarterly emissions tests for the replacement engine(s)/turbine(s) shall be conducted to confirm continued compliance with NO_x and CO emissions limitations. A copy of the first quarter testing shall be provided to AQD within 60 days of start-up of each replacement or additional engine/turbine. The test report shall include the engine/turbine fuel usage, stack flow (ACFM), stack temperature (°F), stack height (feet), stack diameter (inches), and pollutant emissions rates (lbs/hr and TPY) at maximum rated horsepower for the altitude/location.
 - c. Replacement equipment and emissions are limited to equipment and emissions which are not a modification under NSPS or NESHAP, or a significant modification under PSD. For existing PSD facilities, the permittee shall calculate the PTE or the net emissions increase resulting from the replacement to document that it does not exceed significance levels and submit the results with the notice required by a. of this Specific Condition.
 - d. Engines installed as allowed under the replacement allowances in this Specific Condition that are subject to 40 CFR Part 63, Subpart ZZZZ and/or 40 CFR Part 60, Subpart JJJJ shall comply with all applicable requirements.

9. The owner/operator shall comply with all applicable requirements of the NESHAP: Reciprocating Internal Combustion Engines, Subpart ZZZZ, for each affected facility by the applicable compliance date including but not limited to: [40 CFR 63.6580 through 63.6675]

What This Subpart Covers

- a. § 63.6580 What is the purpose of subpart ZZZZ?
- b. § 63.6585 Am I subject to this subpart?
- c. § 63.6590 What parts of my plant does this subpart cover?
- d. § 63.6595 When do I have to comply with this subpart?

Emission and Operating Limitations

- e. § 63.6603 What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

General Compliance Requirements

- f. § 63.6605 What are my general requirements for complying with this subpart?

Testing and Initial Compliance Requirements

- g. § 63.6625 What are my monitoring, installation, operation, and maintenance requirements?
- h. § 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?

Continuous Compliance Requirements

- i. § 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?

Notifications, Reports, and Records

- j. § 63.6650 What reports must I submit and when?
- k. § 63.6655 What records must I keep?
- l. § 63.6660 In what form and how long must I keep my records?

Other Requirements and Information

- m. § 63.6665 What parts of the General Provisions apply to me?
- n. § 63.6670 Who implements and enforces this subpart?
- o. § 63.6675 What definitions apply to this subpart?

10. The permittee shall comply with NESHAP, Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities, for all affected equipment located at this facility including but not limited to:

[40 CFR 63.11110 to 63.11132]

- a. §63.11110 What is the purpose of this subpart?
- b. §63.11111 Am I subject to the requirements in this subpart?
- c. §63.11112 What parts of my affected source does this subpart cover?
- d. §63.11113 When do I have to comply with this subpart?
- e. §63.11115 What are my general duties to minimize emissions?
- f. §63.11116 Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline.
- g. §63.11117 Requirements for facilities with monthly throughput of 10,000 gallons of gasoline or more.

- h. §63.11118 Requirements for facilities with monthly throughput of 100,000 gallons of gasoline or more.
 - i. §63.11120 What testing and monitoring requirements must I meet?
 - j. §63.11124 What notifications must I submit and when?
 - k. §63.11125 What are my recordkeeping requirements?
 - l. §63.11126 What are my reporting requirements?
 - m. §63.11130 What parts of the General Provisions apply to me?
 - n. §63.11131 Who implements and enforces this subpart?
 - o. §63.11132 What definitions apply to this subpart?
11. The permittee shall maintain records of operations as listed below. These records shall be maintained on site or at a local field office for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-8-6 (a)(3)(B)]
- a. Operation, maintenance, and inspection log for the grandfathered/exempted engines and for any replacement or additional engine/turbine not tested in each 6 month period.
 - b. Periodic emission testing for ENG3a, ENG5, and each replacement or additional engine/turbine.
 - c. For the fuel(s) burned, the appropriate document(s) as described in Specific Condition No. 2.
 - d. Records as required for CAM.
 - e. Condensate throughput (monthly and 12-month rolling totals).
 - f. VRU downtime (monthly and 12-month rolling totals).
 - g. Records as required by 40 CFR Part 63, Subpart ZZZZ.
 - h. Records as required by 40 CFR Part 63, Subpart CCCCCC.
12. The following records shall be maintained on site to verify Insignificant Activities. No recordkeeping is required for those operations which qualify as Trivial Activities. [OAC 252:100-8-6 (a)(3)(B)]
- a. For stationary reciprocating engines used exclusively for emergency power generation or for peaking power service: records of the size of engines, type of fuel used, and number of hours operated (annual).
 - b. For fuel storage/dispensing equipment operated solely for facility owned vehicles: records of the type and amount of fuel dispensed (annual).
 - c. For storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature: records of capacity of the tanks and the amount of throughput (annual).
 - d. For crude oil and condensate storage tanks with a capacity of less than or equal to 420,000 gallons that store crude oil and condensate prior to custody transfer: records of capacity of the tanks and the amount of throughput (annual).
 - e. For fluid storage tanks with a capacity of less than 39,894 gallons and a true vapor pressure less than 1.5 psia: records of capacity of the tanks and contents.

- f. For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant: the type of activity and the amount of emissions from that activity (annual).

- 13. No later than 30 days after each anniversary date of the issuance of the original Title V operating permit (June 23, 1998), the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit. [OAC 252:100-8-6 (c)(5)(A) & (D)]

- 14. This permit supersedes all previous Air Quality operating permits which are now cancelled.



PART 70 PERMIT

AIR QUALITY DIVISION
STATE OF OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY
707 N. ROBINSON, SUITE 4100
P.O. BOX 1677
OKLAHOMA CITY, OKLAHOMA 73101-1677

Permit No. 2014-2324-TVR3

DRAFT/PROPOSED

DCP Midstream, LP

having complied with the requirements of the law, is hereby granted permission to operate all the sources within the boundaries of the Ellis County No. 2 Compressor Station at Section 28, Township 22N, Range 23W near Fargo in Ellis County, Oklahoma, subject to standard conditions dated June 21, 2016, and specific conditions, both attached.

This permit shall expire on five years from the date of issuance, except as authorized under Section VIII of the Standard Conditions.

DRAFT/PROPOSED

Director – Air Quality Division

Date

DCP Midstream, LP
Attn: Mr. Joseph Rumler
370 17th Street, Suite 2500
Denver, CO 80202

Re: Permit Application **No. 2014-2324-TV3**
Ellis County No. 2 Compressor Station (Facility ID 1170)
Section 28, Township 22N, Range 23W
Ellis County, Oklahoma

DRAFT

Dear Mr. Rumler:

Enclosed is the permit authorizing operation of the referenced facility. Please note that this permit is issued subject to standard and specific conditions, which are attached. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections.

Also note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed on approved AQD forms and submitted (hardcopy or electronically) by April 1st of every year. Any questions concerning the form or submittal process should be referred to the Emissions Inventory Staff at 405-702-4100.

Thank you for your cooperation in this effort. If you have any questions or comments, please feel free to contact me at (405) 702-4193.

Sincerely,

DRAFT

Kyle Walker, E.I.
Engineering Section
AIR QUALITY DIVISION

Enclosures

**MAJOR SOURCE AIR QUALITY PERMIT
STANDARD CONDITIONS
(June 21, 2016)**

SECTION I. DUTY TO COMPLY

A. This is a permit to operate / construct this specific facility in accordance with the federal Clean Air Act (42 U.S.C. 7401, et al.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.

[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

D. 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 the 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 assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations. [OAC 252:100-8-6(a)(7)(B)]

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

A. Any exceedance resulting from an emergency and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV (Emergencies). [OAC 252:100-8-6(a)(3)(C)(iii)(I) & (II)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements. [OAC 252:100-8-6(a)(3)(C)(iv)]

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F. [OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[OAC 252:100-8-6 (a)(3)(B)(ii), OAC 252:100-8-6(c)(1), and OAC 252:100-8-6(c)(2)(B)]

B. Records of required monitoring shall include:

- (1) the date, place and time of sampling or measurement;
- (2) the date or dates analyses were performed;
- (3) the company or entity which performed the analyses;
- (4) the analytical techniques or methods used;
- (5) the results of such analyses; and
- (6) the operating conditions existing at the time of sampling or measurement.

[OAC 252:100-8-6(a)(3)(B)(i)]

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report.

[OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions.

[OAC 252:100-8-6(a)(3)(C)(iii)]

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act.

[OAC 252:100-43]

F. Any Annual Certification of Compliance, Semi Annual Monitoring and Deviation Report, Excess Emission Report, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f), OAC 252:100-8-6(a)(3)(C)(iv), OAC 252:100-8-6(c)(1), OAC 252:100-9-7(e), and OAC 252:100-5-2.1(f)]

G. Any owner or operator subject to the provisions of New Source Performance Standards (“NSPS”) under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants (“NESHAPs”) under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 C.F.R. §§60.7 and 63.10, 40 CFR Parts 61, Subpart A, and OAC 252:100, Appendix Q]

H. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted. [OAC 252:100-8-6(c)(4)]

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer’s instructions and in accordance with a protocol meeting the requirements of the “AQD Portable Analyzer Guidance” document or an equivalent method approved by Air Quality.

[OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter (PM₁₀). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 C.F.R. Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards. [OAC 252:100-8-6(c)(1) and OAC 252:100, Appendix Q]

SECTION IV. COMPLIANCE CERTIFICATIONS

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.

[OAC 252:100-8-6(c)(5)(A), and (D)]

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source.

[OAC 252:100-8-6(c)(5)(C)(i)-(v)]

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.

[OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification.

[OAC 252:100-8-6(c)(6)]

SECTION VI. PERMIT SHIELD

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit.

[OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit.

[OAC 252:100-8-6(d)(2)]

SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.

[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

SECTION VIII. TERM OF PERMIT

A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance. [OAC 252:100-8-6(a)(2)(A)]

B. A source's right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration. [OAC 252:100-8-7.1(d)(1)]

C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]

D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

SECTION IX. SEVERABILITY

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[OAC 252:100-8-6 (a)(6)]

SECTION X. PROPERTY RIGHTS

A. This permit does not convey any property rights of any sort, or any exclusive privilege. [OAC 252:100-8-6(a)(7)(D)]

B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued. [OAC 252:100-8-6(c)(6)]

SECTION XI. DUTY TO PROVIDE INFORMATION

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking,

reissuing, terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit.

[OAC 252:100-8-6(a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment.

[OAC 252:100-8-6(a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer.

[Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

SECTION XII. REOPENING, MODIFICATION & REVOCATION

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation and reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.

[OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances:

[OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

- (1) Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
- (2) The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (3) The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.
- (4) DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

C. The permit may be reopened for cause by EPA, pursuant to the provisions of OAC 100-8-7.3(d).

[OAC 100-8-7.3(d)]

D. The permittee shall notify AQD before making changes other than those described in Section XVIII (Operational Flexibility), those qualifying for administrative permit amendments, or those defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII). The notification should include any changes which may alter the status of a “grandfathered source,” as defined under AQD rules. Such changes may require a permit modification.

[OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited. [OAC 252:100-8-6(c)(6)]

SECTION XIII. INSPECTION & ENTRY

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(17) for confidential information submitted to or obtained by the DEQ under this section):

- (1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

[OAC 252:100-8-6(c)(2)]

SECTION XIV. EMERGENCIES

A. Any exceedance resulting from an emergency shall be reported to AQD promptly but no later than 4:30 p.m. on the next working day after the permittee first becomes aware of the exceedance. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken.

[OAC 252:100-8-6 (a)(3)(C)(iii)(I) and (IV)]

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance. [OAC 252:100-8-6(a)(3)(C)(iii)(II)]

C. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. [OAC 252:100-8-2]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that: [OAC 252:100-8-6 (e)(2)]

- (1) an emergency occurred and the permittee can identify the cause or causes of the emergency;
- (2) the permitted facility was at the time being properly operated;
- (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [OAC 252:100-8-6(e)(3)]

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F. [OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION XV. RISK MANAGEMENT PLAN

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date. [OAC 252:100-8-6(a)(4)]

SECTION XVI. INSIGNIFICANT ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or Federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

- (1) 5 tons per year of any one criteria pollutant.
- (2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.

[OAC 252:100-8-2 and OAC 252:100, Appendix I]

SECTION XVII. TRIVIAL ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list.

[OAC 252:100-8-2 and OAC 252:100, Appendix J]

SECTION XVIII. OPERATIONAL FLEXIBILITY

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the

permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

B. The permittee may make changes within the facility that:

- (1) result in no net emissions increases,
- (2) are not modifications under any provision of Title I of the federal Clean Air Act, and
- (3) do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this paragraph. [OAC 252:100-8-6(f)(2)]

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

- (1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]
- (2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]
- (3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for: [OAC 252:100-25]
 - (a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
 - (b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
 - (c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
 - (d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.

- (4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]
- (5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
- (6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]
- (7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances: [40 CFR 82, Subpart A]

- (1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
- (2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and
- (3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

B. If the permittee performs a service on motor (fleet) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]

C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B: [40 CFR 82, Subpart F]

- (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;

- (2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
- (3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161;
- (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
- (5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
- (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

SECTION XXI. TITLE V APPROVAL LANGUAGE

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Source's Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in OAC 252:100-8-7.2(a) only if the following procedures are followed:

- (1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
- (2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).
- (3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).
- (4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R. § 70.8(a) and (c).
- (5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.
- (6) The DEQ complies with 40 C.F.R. § 70.8(d).
- (7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).
- (8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
- (9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ

as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).

- (10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

B. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

SECTION XXII. CREDIBLE EVIDENCE

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[OAC 252:100-43-6]

DCP Midstream, LP
Attn: Mr. Joseph Rumler
370 17th Street, Suite 2500
Denver, CO 80202

Subject: Operating Permit No. **2014-2324-TV3**
Ellis County No. 2 Compressor Station (Facility ID 1170)
Location: Section 28, Township 22N, Range 23W; Ellis County, Oklahoma
Date Received: December 1, 2014

Dear Mr. Rumler:

Air Quality Division has completed the initial review of your permit application referenced above. This application has been determined to be a Tier II. In accordance with 27A O.S. § 2-14-302 and OAC 252:002-4-7-13(c) the enclosed draft permit is now ready for public review. The requirements for public review include the following steps, which you must accomplish:

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located. The notice shall include information that satisfies requirements to publish "Notice of Filing a Tier II Application" and a "Notice of Draft Tier II Permit" (Instructions enclosed).
2. Provide for public review (for a period of 30 days following the date of the newspaper announcement) a copy of this draft permit and a copy of the application at a convenient public location within the county of the facility such as the public library in the county seat.
3. Send to AQD a copy of the proof of publication notice from Item #1 above together with any additional comments or requested changes that you may have on the draft permit.

If no public comments are received on the draft permit, the draft permit will be deemed the "proposed" permit. A copy of the proposed permit will be sent to EPA Region VI for a 45-day review period

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me at (405) 702-4100.

Sincerely,

Kyle Walker, E.I.
Engineering Section

AIR QUALITY DIVISION

NOTICE OF DRAFT PERMIT TIER II or TIER III AIR QUALITY PERMIT APPLICATION

APPLICANT RESPONSIBILITIES

Permit applicants are required to give public notice that a Tier II or Tier III draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD. Note that if either the applicant or the public requests a public meeting, this must be arranged through the Customer Services Division of the DEQ.

REQUIRED CONTENT (27A O.S. § 2-14-302 and OAC 252:4-7-13(c))

1. A statement that a Tier II or Tier III draft permit has been prepared by DEQ;
2. Name and address of the applicant;
3. Name, address, driving directions, legal description and county of the site or facility;
4. The type of permit or permit action being sought;
5. A description of activities to be regulated, including an estimate of emissions from the facility;
6. Location(s) where the application and draft permit may be reviewed (a location in the county where the site/facility is located must be included);
7. Name, address, and telephone number of the applicant and DEQ contacts;
8. Any additional information required by DEQ rules or deemed relevant by applicant;
9. A 30-day opportunity to request a formal public meeting on the draft permit.

SAMPLE NOTICE on page 2.

SAMPLE NOTICE (*Italicized print is to be filled in by the applicant.*):

DEQ NOTICE OF TIER ...II or III... DRAFT PERMIT

A Tier ...II or III... application for an air quality ...type of permit or permit action being sought (e.g., Construction Permit for a Major Facility)... has been filed with the Oklahoma Department of Environmental Quality (DEQ) by applicant, ...name and address.

The applicant requests approval to ...brief description of purpose of application... at the ...site/facility name ... [proposed to be] located at ...physical address (if any), driving directions, and legal description including county....

In response to the application, DEQ has prepared a draft permit [modification] (Permit Number: ...xx-xxx-x...), which may be reviewed at ...locations (one must be in the county where the site/facility is located)... or at the Air Quality Division's main office (see address below). The draft permit is also available for review in the Air Quality Section of DEQ's Web Page: <http://www.deq.state.ok.us/>

This draft permit would authorize the facility to emit the following regulated pollutants: (list each pollutant and amounts in tons per year (TPY))

The public comment period ends 30 days after the date of publication of this notice. Any person may submit written comments concerning the draft permit to the Air Quality Division contact listed below. [Modifications only, add: Only those issues relevant to the proposed modification(s) are open for comment.] A public meeting on the draft permit [modification] may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ/CSD staff.

In addition to the public comment opportunity offered under this notice, this draft permit is subject to U.S. Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8. **[For Construction Permits, add:** The requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process. Therefore, no additional opportunity to provide comments or EPA review, EPA objection, and petitions to EPA will be available to the public when requirements from the con

Texas Commission on Environmental Quality
Operating Permits Divisions (MC 163)
P. O. Box 13087
Austin, Texas 78711-3087

Subject: Title V Operating Permit Renewal, Application No. **2014-2324-TVR**
Facility: DCP Midstream, LP
Ellis County No. 2 Compressor Station
Location: Section 28, Township 22N, Range 23W
Ellis County, Oklahoma
Permit Writer: Kyle Walker

Dear Sir / Madame:

The subject facility has requested a renewal of the Title V operating permit under 40 CFR Part 70. Air Quality Division has completed the initial review of the application and prepared a draft permit for public review. Since this facility is within 50 miles of the **Oklahoma-Texas** border, a copy of the proposed permit will be provided to you upon request. Information on all permit actions and a copy of this draft permit are available for review by the public in the Air Quality Section of DEQ Web Page: <http://www.deq.state.ok.us>.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or contact the permit writer at (405) 702-4100.

Sincerely,

Phillip Fielder, P.E.
Permits and Engineering Group Manager
AIR QUALITY DIVISION

KDHE, BAR
Forbes Field, Building 283
Topeka, KS 66620

Subject: Title V Operating Permit Renewal, Application No. **2014-2324-TV**R
Facility: DCP Midstream, LP
Ellis County No. 2 Compressor Station
Location: Section 28, Township 22N, Range 23W
Ellis County, Oklahoma
Permit Writer: Kyle Walker

Dear Sir / Madame:

The subject facility has requested a renewal of the Title V operating permit under 40 CFR Part 70. Air Quality Division has completed the initial review of the application and prepared a draft permit for public review. Since this facility is within 50 miles of the Oklahoma - Kansas border, a copy of the proposed permit will be provided to you upon request. Information on all permit actions and a copy of this draft permit are available for review by the public in the Air Quality Section of DEQ Web Page: <http://www.deq.state.ok.us>.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (405) 702-4100.

Sincerely,

Phillip Fielder, P.E.
Permits and Engineering Group Manager
AIR QUALITY DIVISION