

**DRAFT**

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

**MEMORANDUM**

**January 25, 2017**

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

**THROUGH:** Rick Groshong, Senior Environmental Manager  
Compliance and Enforcement

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

**THROUGH:** Jian Yue, P.E., New Source Permits Section

**FROM:** Sharon Alder, E.I., New Source Permits Section

**SUBJECT:** Evaluation of Permit Application No. **2012-304-TV**  
Colorado Interstate Gas Company, L.L.C.  
Mocane Compressor Station  
DEQ Facility ID: 271  
Section 18, Township 5N, Range 25E of the Cimarron Meridian  
Beaver County, Oklahoma  
Latitude: 36.89990°N and Longitude: 100.39607°W  
Directions: 7 miles east of Forgan, Oklahoma on Hwy 64.

**SECTION I. INTRODUCTION**

The Colorado Interstate Gas Company, L.L.C. (CIG), a subsidiary of Kinder Morgan Inc. (Kinder Morgan), has submitted an application to renew the Title V permit for the Mocane Compressor Station. The facility is a natural gas compressor station (SIC 4922, NAICS 486210) which is currently operating under Permit No. 97-241-TV (M-1), issued on May 21, 2009. The Mocane Compressor Station is located adjacent to (and is considered to be collocated with) the Mocane Cryogenic Plant (SIC 1321) which is operated by Regency Gas Services, L.L.C. (Regency). The Mocane Cryogenic Plant is operating under Permit No. 2013-0357-TV, issued on September 23, 2015. Combined, the two facilities are considered to constitute a major source of HAP emissions.

Emission units (EUs) have been arranged into Emission Unit Groups (EUGs) in the Equipment Section. This facility is not subject to compliance assurance monitoring (CAM). The facility is considered an existing “PSD major” source of NO<sub>x</sub>. However, due to the age of the equipment installed and the dates of the various installations (predating PSD rules for equipment that would otherwise have been subject), the facility has not been required to undergo a PSD evaluation. For this renewal, CIG has requested the following changes to their current Title V permit.

- A 253-hp Waukesha F1197 GU engine powers an emergency generator. Previously, this engine was considered to be an insignificant activity. On October 19, 2013, this engine

became subject to work practice standards under NESHAP, Subpart ZZZZ. The permittee has requested that these requirements be added to the Title V permit.

- Heat input values for the engines and turbines have been updated. The horsepower ratings have not changed. There has been no change in equipment or method of operation; this change is just an update to provide more accurate data.

#### Changes to Heat Input Values

Equipment Type	Previous Heat Input (MMBTUH)	Updated Heat Input (MMBTUH)
1,420-hp Clark HRA8T Engines	10.22	12.33
3,830-hp Solar Centaur Turbines	37.17	39.27
1,160-hp Solar Saturn Turbines	14.32	16.03

- CIG has performed two like-kind turbine exchanges. In May 2012, the gas producer and power turbine were replaced for turbine CG-07. In October 2014, the gas producer, power turbine, and auxiliary drive were replaced for turbine CG-09. Both exchanges were like-kind replacements performed in accordance with the permit conditions. The current permit includes updated serial numbers for the gas producer components of each turbine. It should be noted that a “stationary gas turbine” (as defined in NSPS, Subpart GG) includes all of these components: gas producer, power turbine, and auxiliary drive. Each component, and the turbine “package” as a whole, has a unique serial number. For consistency with previous permits and with reports prepared by the Compliance and Enforcement group, the serial number used to reference a particular turbine is actually the serial number for the gas producer component of that turbine.
- The plant boiler, an existing 3.0-MMBTUH Beaver Boiler (BG3000-30HW, Series 636N), became subject to work practice standards under NESHAP, Subpart DDDDD on January 31, 2016. The unit will be required to undergo a tune-up every five years, but it is not subject to emission limits or operating limits under this subpart. Previously, the unit was considered to be an insignificant activity. In this permit, the unit has been added to a new emission unit group and applicable requirements have been incorporated into the permit.
- CIG requested permission to maintain records electronically. The option to maintain records electronically has been incorporated into the recordkeeping portion of the permit.

The changes requested in association with the issuance of this permit renewal will result in no increases in permitted emissions. However, the table of facility-wide emissions will show an increase in emissions: +2.96 TPY NO<sub>x</sub>, +3.90 TPY CO, and +0.14 TPY VOCs due to the inclusion of emission units previously considered to be insignificant activities. However, because there has been no modification of existing equipment or new equipment construction and no change in the method of operation, this increase will not require PSD review.

## SECTION II. BACKGROUND AND FACILITY DESCRIPTION

### Background

The Mocane Compressor Station is a natural gas compressor station (SIC 4922). The facility was originally constructed as authorized by Permit No. 73-148-C, issued September 26, 1973 and was later modified several times. After submittal of the Title V application in 1997, CIG sold the “Cryogenic Plant” portion of the facility on June 2, 2003, to Regency Gas Services, L.L.C. (Regency).

Although CIG and Regency are two separate and independent companies, Consent Order No. 06-181, executed June 16, 2006, determined that they are operating within the same *field facilities*, as defined in NESHAP (40 CFR § 63.761). Therefore, all units at this location are subject to Subpart HH and the site is a single major source of HAPs. It was also determined that because of separate ownership, individual Part 70 permits would be issued to each of the parties.

This facility is an existing PSD source. The permit to install turbines CG-07, CG-08, and CG-09 (Permit No. 79-O55-C) was issued on July 18, 1979. The turbines were not subject to PSD review at that time period. In the 4<sup>th</sup> Quarter of 2007, the permittee conducted quarterly tests of emission units CG-07, CG-08, and CG-09. The test results indicated that the NO<sub>x</sub> emission limitation for turbine CG-08 had not been met. CIG requested a modification to the Part 70 operating permit to increase the NO<sub>x</sub> emission limit for turbines CG-07, CG-08, and CG-09 from 3.3 lb/hour to 4.6 lb/hour so that the facility could achieve compliance. Permit No. 97-241-TV (M-1) included those modifications. Relaxing the limits on the turbines was not subject to PSD review. The relaxation of the NO<sub>x</sub> emission limit increased the annual emissions of NO<sub>x</sub> by 17.1 TPY. Even if the relaxation had been subject to PSD review, the increase was below the PSD significance level.

### Facility Description

The Mocane Compressor Station was originally constructed in 1973. This facility currently contains four 1,420-hp Clark HRA8T compressor engines (CG-01, CG-02, CG-03, and CG-04), two 3,830-hp Solar Centaur turbines (CG-05 and CG-06), and three 1,160-hp Solar Saturn turbines (CG-07, CG-08, and CG-09). A 253-hp Waukesha F1197 GU engine (A-Aux-1) is located at the facility and this unit runs an emergency generator. Engines CG-01, CG-02, CG-03, and CG-04 are “grandfathered.” Turbines CG-05 and CG-06 were installed in 1973 and both of those units are exempt from NSPS requirements and they have no emission limits associated with them. Turbines CG-07, CG-08, and CG-09 are subject to NSPS and these units have emissions limits. In addition to these units, the facility includes a number of equipment items that are considered to be insignificant activities as defined in OAC 252:100-8-2. Included in this category are natural gas-fired space heaters and water heaters with ratings less than 5 MMBTUH which are not subject to any state or federal applicable requirement. It should be noted that one of the units previously considered to be insignificant became subject to work practice standards under NESHAP, Subpart DDDDD. The 3.0-MMBTUH Beaver Boiler (BG3000-30HW, Series 636N) not only provides space heat, but also provides fuel gas heat and heat for three compressor skids. In this permit, the unit has been added to a new emission unit group and applicable requirements have been incorporated into the permit.

The main plant flare and the brine pit flares are also rated less than 5 MMBTUH and these units are also considered to be insignificant activities. The facility includes lube oil, antifreeze, and diesel tanks, each with a volume less than 39,894 gallons and these tanks store contents with a vapor pressure less than 1.5 psia at maximum storage temperature. The facility also is equipped with a parts washer that uses a low vapor-pressure solvent. The facility includes a hazardous waste and hazardous materials drum staging area and the facility performs some non-commercial crushing of a limited number of empty 55-gallon barrels.

As mentioned previously, the facility is collocated with the Mocane Cryogenic Plant operated by Regency Gas Services and most of the initial unit operations occur on the Regency portion of the plant. Natural gas from the surrounding area enters the portion of the facility operated by Regency and the gases are directed to inlet liquid separators. The free liquids (condensate) that are produced are processed in the condensate stabilizer. Vapors produced from the condensate stabilization are recovered as a product. The condensate is stabilized at 12 psia and is sent to the three 400-barrel condensate storage tanks. The liquids are, later on, trucked away and sold to a third party. All of these operations are performed in equipment owned and operated by Regency.

The Mocane Compressor Station then receives gas from the Regency facility. The gas passes through inlet separators where any entrained liquids are removed. The gas leaving the inlet separators is directed to compressors powered by turbines CG-05 through CG-09. After compression, the gas is sent to glycol dehydration units and then to molecular sieves. Both the glycol dehydration units and the molecular sieves are owned and operated by Regency. After dehydration, the gas is expanded to reduce pressure and temperature to allow separation of the gas from natural gas liquids (NGL). This also occurs in the equipment units owned and operated by Regency. The residue gas is then directed back to the compressors powered by engines CG-01, CG-02, CG-03, and CG-04. These compressors and engines are owned and operated by CIG. After the residue gas is compressed, it exits the facility via a transmission pipeline owned and operated by CIG. The engines and turbines are fueled by field-grade natural gas; the facility is operated continuously. Emission units have been arranged into Emission Unit Groups (EUGs) in the next section.

**SECTION III. EQUIPMENT**

Specific equipment items that are sources of emissions and other activities that yield emissions are divided into emission unit groups (EUGs) as follows.

**EUG 1 “Grandfathered” Internal Combustion Engines**

EU	Point	Make/Model	HP	Heat Input MMBTUH	Serial #	Installed Date
CG-01	EP1	Clark HRA8T	1,420	12.33	94032	1964
CG-02	EP2	Clark HRA8T	1,420	12.33	94033	1964
CG-03	EP3	Clark HRA8T	1,420	12.33	94045	1967
CG-04	EP4	Clark HRA8T	1,420	12.33	94050	1969

**EUG 2 Statutory Exempt Gas Turbines/NSPS Exempt**

EU	Point	Make/Model	HP	Heat Input MMBTUH	Serial #	Installed Date
CG-05	EP5	Solar Centaur	3,830	39.27	OHI11-C2373	1973
CG-06	EP6	Solar Centaur	3,830	39.27	OHC10-C0586	1973

**EUG 3 Gas Turbines/NSPS Affected**

EU	Point	Make/Model	HP	Heat Input MMBTUH	Serial #	Installed Date
CG-07	EP7	Solar Saturn	1,160	16.03	20724	1980
CG-08	EP8	Solar Saturn	1,160	16.03	30791	1980
CG-09	EP9	Solar Saturn	1,160	16.03	OHH14-S6090	1980

**EUG 4 Fugitive Equipment (Insignificant Activities)**

EU ID #	Equipment	Number of Items	Installed Date
Compressors and Turbines	Piping Components	1027 Valves	1982
		2411 Flanges	
		5 Pump Seals	
		26 Comp. Seals	
		4 Open End Lines	
		36 Relief Valves	

**EUG 5 Emergency Generator Engine <sup>1</sup>**

EU ID #	Point	Make/Model	HP	Heat Input MMBTUH	Serial #	Const. Date
A-Aux-1	EP10	Waukesha F1197 GU	253	1.98	267789	1974

<sup>1</sup> Emergency generator, operated less than 500 hours per year.

**EUG 6 Heaters and Boilers Subject to NESHAP, Subpart DDDDD**

EU ID #	Point	Make/Model	Heat Input MMBTUH	Const. Date
PB-1	EP11	Beaver Boiler BG3000-30HW, Series 636N	3.0	1964

**SECTION IV. AIR EMISSIONS**

The applicant estimated emissions from the reciprocating engines and turbines located at the site based on the procedures and assumptions described below. The criteria pollutant emission factors for the engines are presented in Table 1. Table 2 lists the engine stack parameters.

- For engines CG-01, CG-02, CG-03, and CG-04, the applicant used manufacturer’s data and/or AP-42 (7/00) factors for two-stroke, lean-burn engines as well as a safety factor. The engines were assumed to run continuously. These engines are uncontrolled. These are “grandfathered” engines and they have no emissions limits.

- For turbines CG-05 and CG-06, the applicant used manufacturer’s data with a safety factor. The turbines were assumed to run continuously. These turbines are uncontrolled. These turbines pre-date NSPS requirements and are not emission limited.
- For turbines CG-07, CG-08, and CG-09, the applicant used manufacturer’s data with a safety factor. The turbines were assumed to run continuously. These turbines are uncontrolled. These turbines are subject to NSPS, Subpart GG and they are subject to emission limits.
- For engine A-Aux-1, the applicant used AP-42 (7/00) factors for four-stroke, rich-burn engines as well as a safety factor. This is an emergency engine. This engine was assumed to be operated for 500 hours per year. This engine is uncontrolled.

**Table 1. Engine and Turbine Emissions Factors**

Equipment Type	Qty	NOx (g/hp-hr)	CO (g/hp-hr)	VOC (g/hp-hr)
1,420-hp Clark HRA8T 2-Stroke, Lean-Burn Engine	4	10.36	1.26	0.39
3,830-hp Solar Centaur Turbine	2	1.41	0.36	0.01
1,160-hp Solar Saturn Turbine	3	1.80	1.80	0.90
253-hp Waukesha F1197 GU 4-Stroke, Rich-Burn Emergency Engine	1	12.0	20.2	0.185

**Table 2. Engine and Turbine Stack Parameters**

EU	Point	Source	Height (feet)	Diameter (inches)	Fuel Usage (scf/hr)	Flow (acfm)	Temperature
							(deg F)
CG-01	EP1	Clark HRA8T	15	18	9,888	14,170	850
CG-02	EP2	Clark HRA8T	15	18	9,888	14,170	850
CG-03	EP3	Clark HRA8T	15	18	9,888	14,170	850
CG-04	EP4	Clark HRA8T	15	18	9,888	14,170	850
CG-05	EP5	Solar Centaur	15	40	35,944	83,170	840
CG-06	EP6	Solar Centaur	15	40	35,944	83,170	840
CG-07	EP7	Solar Saturn	15	24	13,853	35,940	970
CG-08	EP8	Solar Saturn	15	24	13,853	35,940	970
CG-09	EP9	Solar Saturn	15	24	13,853	35,940	970
A-Aux-1	EP10	Waukesha F1197 GU	6	4	2,162	1,420	1,050

Emissions from the lube oil, used oil, and antifreeze tanks were determined to be negligible.

Emissions from the plant boiler (PB-1) were estimated based on the emission factors in AP-42 (7/98), Tables 1.4-1 and 1.4-2, Section 1.4, “Natural Gas Combustion.”

Process piping fugitive emissions were based on Table 2-4 of “1995 Protocol for Equipment Leak Emission Estimates (EPA 453/R-95-017),” Oil and Gas Production Operations Average Emission Factors. Table 3 presents facility-wide criteria pollutant emissions.

**Table 3. Facility-Wide Criteria Pollutant Emissions**

EU ID	Source	NO <sub>x</sub>		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
<b>Emissions from the Mocane Compressor Station [This Permit]</b>							
CG-01	1,420-hp Clark HRA8T Engine	32.43	142.05	3.94	17.28	1.22	5.35
CG-02	1,420-hp Clark HRA8T Engine	32.43	142.05	3.94	17.28	1.22	5.35
CG-03	1,420-hp Clark HRA8T Engine	32.43	142.05	3.94	17.28	1.22	5.35
CG-04	1,420-hp Clark HRA8T Engine	32.43	142.05	3.94	17.28	1.22	5.35
CG-05	3,830-hp Solar Centaur Turbine	11.91	52.15	3.04	13.31	0.08	0.37
CG-06	3,830-hp Solar Centaur Turbine	11.91	52.15	3.04	13.31	0.08	0.37
CG-07	1,160-hp Solar Saturn Turbine	4.60	20.16	4.60	20.16	2.30	10.08
CG-08	1,160-hp Solar Saturn Turbine	4.60	20.16	4.60	20.16	2.30	10.08
CG-09	1,160-hp Solar Saturn Turbine	4.60	20.16	4.60	20.16	2.30	10.08
A-Aux-1	253-hp Waukesha F1197 GU Engine <sup>1</sup>	6.69	1.67	11.27	2.82	0.10	0.04
PB-1	3.0-MMBTUH Beaver Boiler BG3000-30HW, Series 636N <sup>2</sup>	0.29	1.29	0.25	1.08	0.02	0.10
<b>Total Emissions <sup>3</sup></b>		<b>174.32</b>	<b>735.94</b>	<b>47.16</b>	<b>160.12</b>	<b>12.06</b>	<b>52.52</b>
Facility-Wide Emissions from the Existing Permit [from Permit No. 97-241-TV (M-1)]		167.34	732.98	35.64	156.22	11.94	52.38
<b>Net Change <sup>4</sup></b>		<b>+6.98</b>	<b>+2.96</b>	<b>+11.52</b>	<b>+3.90</b>	<b>+0.12</b>	<b>+0.14</b>
<b>Emissions from the Mocane Cryogenic Plant [Permit No. 2006-153-TV (M-1)]</b>							
		<b>0.81</b>	<b>3.60</b>	<b>2.59</b>	<b>11.27</b>	<b>13.68</b>	<b>41.95</b>
<b>Aggregated Emissions from Both Facilities</b>		<b>175.13</b>	<b>739.54</b>	<b>49.75</b>	<b>171.39</b>	<b>25.74</b>	<b>94.47</b>

<sup>1</sup> This emissions unit was previously considered to be an insignificant activity and is an existing stationary emergency RICE. On October 19, 2013, this unit became subject to work practice standards under NESHAP, Subpart ZZZZ. At that time, the unit was no longer considered an insignificant activity.

<sup>2</sup> This emission unit was previously considered to be an insignificant activity and is an existing boiler. On January 31, 2016, this this unit became subject to work practice standards under NESHAP, Subpart DDDDD. At that time, the unit was no longer considered an insignificant activity.

<sup>3</sup> Totals do not necessarily add up exactly due to rounding.

<sup>4</sup> The increase in emissions is due to the inclusion of emergency backup engine and the plant boiler in this permit. There has been no change in equipment or method of operation.

Based on the estimates shown in Table 3, the facility is classified as a PSD major source of criteria pollutants.

**Hazardous Air Pollutant Emissions (HAPs)**

The primary hazardous air pollutant (HAP) emitted from the engines is formaldehyde (HCHO). Table 4 presents estimates of the formaldehyde emissions from the engines and turbines as well as the emission factors used. No engine or turbine is equipped with post-combustion controls. The formaldehyde emissions estimates were prepared based on the same hours operation used to estimate criteria pollutant emissions.

**Table 4. Engine Formaldehyde Emissions**

Emission Unit ID	Source	Emission Factor (lb/MMBtu)	Emissions	
			lb/hr	TPY
CG-01	1,420-hp Clark HRA8T Engine	0.0552	0.681	2.981
CG-02	1,420-hp Clark HRA8T Engine	0.0552	0.681	2.981
CG-03	1,420-hp Clark HRA8T Engine	0.0552	0.681	2.981
CG-04	1,420-hp Clark HRA8T Engine	0.0552	0.681	2.981
CG-05	3,830-hp Solar Centaur Turbine	0.00071	0.028	0.122
CG-06	3,830-hp Solar Centaur Turbine	0.00071	0.028	0.122
CG-07	1,160-hp Solar Saturn Turbine	0.00071	0.011	0.050
CG-08	1,160-hp Solar Saturn Turbine	0.00071	0.011	0.050
CG-09	1,160-hp Solar Saturn Turbine	0.00071	0.011	0.050
A-Aux-1	253-hp Waukesha F1197 GU Engine <sup>1</sup>	0.0205	0.045	0.011
<b>Totals <sup>2</sup></b>			<b>2.86</b>	<b>12.33</b>

<sup>1</sup> The emissions estimate from the Waukesha engine was based on 500 hours of operation per year.

<sup>2</sup> Totals do not necessarily add up exactly due to rounding.

In addition to formaldehyde, the applicant reported emissions of additional HAPs for which there are emission factors in AP-42 for the engines or the turbines. In addition, the Mocane Cryogenic Plant reports HAP emissions, primarily associated with their glycol dehydration units. Table 5 presents HAP emissions for all HAPs (for both facilities combined) where individual unit emissions were reported in amounts equal to or in excess of 0.01 TPY.



**Table 5. Facility-Wide HAP Emissions (Controlled) <sup>1</sup>**

Pollutant	CAS Number	Estimated Emissions	
		lb/hr <sup>2</sup>	TPY
Acetaldehyde	75070	0.38	1.68
Acrolein	107028	0.38	1.68
Benzene	71432	0.16	0.64
1,3-Butadiene	106990	0.04	0.18
Formaldehyde	50000	2.86	12.33
n-Hexane	110543	0.05	0.23
Methanol	67561	0.12	0.52
Toluene	108883	0.17	0.74
2,2,4-Trimethylpentane	540841	0.04	0.18
Total Xylenes	1330207	0.04	0.17
<b>Total HAPs <sup>3</sup></b>		<b>4.25</b>	<b>18.34</b>

<sup>1</sup> The glycol dehydration unit located at the Mocane Cryogenic Plant has still vent emissions controlled by a flare. No engine or turbine located at the Mocane Compressor Station is equipped with post-combustion controls.

<sup>2</sup> The lb/hr emission estimates do not necessarily convert to the TPY quantities due to the non-continuous nature of some of the emission sources.

<sup>3</sup> The totals do not necessarily sum exactly due to rounding.

Total HAP emissions equal 18.34 TPY. That quantity is below the 25 TPY major source threshold. However, the facility is classified as a major source of HAPs due to the magnitude of the formaldehyde emissions (12.33 TPY).

### **Greenhouse Gas (GHG) Emissions**

The applicant estimated potential annual greenhouse gas (GHG) emissions from combustion sources in accordance with 40 CFR 98, Subpart C. The operating assumptions (hours of operation per year, etc.) were the same as those used to estimate emissions of criteria pollutants and HAPs. Total annual maximum potential GHG emissions were estimated to be 91,902 US tons per year.

### **SECTION V. INSIGNIFICANT ACTIVITIES**

The insignificant activities identified and justified in the application are duplicated below. Appropriate recordkeeping on activities indicated below with "\*" is specified in the permit.

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. The 253-hp Waukesha F1197 GU gas-fired engine was formerly considered to be an insignificant activity, but this engine became subject to work practice standards under NESHAP, Subpart ZZZZ on October 19, 2013.
2. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas). The facility has natural gas-fired space heaters and water heaters, which are located on-site and are rated less than 5 MMBTUH.

The main plant flare and the brine pit flares are rated less than 5 MMBTUH. Other space heaters, boilers, and emergency flares may be used in the future. The plant boiler (a 3.0-MMBTUH Beaver Boiler BG3000-30HW, Series 636N) was formerly considered to be an insignificant activity, but it became subject to work practice standards under NESHAP, Subpart DDDDD on January 31, 2016. The comfort heaters and water heater are exempt from NESHAP, Subpart DDDDD and those units will continue to be classified as insignificant activities.

3. Emissions from stationary internal combustion engines rated less than 50-hp output which are not subject to NSPS or NESHAP. None identified but may be used in the future.
4. \* Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store a VOC with a vapor pressure less than 1.5 psia at maximum storage temperature. The lube oil, antifreeze, and diesel tanks have capacities less than 39,894 gallons and store products having a vapor pressure less than 1.5 psia and others may be used in the future.
5. Gasoline and fuel handling facilities, equipment, and storage tanks except those subject to NSPS and standards in OAC 252:100-37-15, 100-39-30, 100-39-41, and 100-39-48. None identified but may be used in the future.
6. Emissions from condensate tanks with a design capacity of 400 gallons or less in ozone attainment areas. None identified but may be used in the future.
7. Additions or upgrades of instrumentation or control systems that result in emission increases less than the pollutant quantities specified in the definition of Insignificant Activities in OAC 252:100-8-2. This may occur in the future.
8. Cold degreasing operations utilizing solvents that are denser than air. One parts washer is located on-site and it uses solvents that are denser than air and others may be used in the future.
9. Welding and soldering operations utilizing less than 100 pounds of solder and 53 tons per year of electrodes. The facility does welding and soldering as part of routine maintenance, which is considered a trivial activity and records will not be required to be kept.
10. Torch cutting and welding of under 200,000 tons of steel fabricated. Routine maintenance operations may include torch cutting and welding. The facility does torch cutting and welding as part of routine maintenance, which is considered a trivial activity and records will not be required to be kept.
11. Non-commercial water washing operations (less than 2,250 barrels/year) and drum crushing operations of empty barrels less than or equal to 55 gallons with less than three percent by volume of residual material.
12. Hazardous waste and hazardous materials drum staging areas. The facility has a hazardous waste and hazardous materials drum staging area and others may be used in the future.

13. Sanitary sewage collection and treatment facilities other than incinerators and Publicly Owned Treatment Works (POTW). Stacks or vents for sanitary sewer plumbing traps are also included (i.e., lift station).
14. \* Surface coating operations, which do not exceed a combined total usage of more than 60 gallons/month of coatings, thinners, and clean-up solvents at any one emissions unit.
15. Exhaust systems for chemical, paint, and/or solvent storage rooms or cabinets, including hazardous waste satellite (accumulation) areas. The facility has exhaust systems for chemical, paint, and/or solvent storage rooms or cabinets, including hazardous waste satellite (accumulation) areas and others may be used in the future.
16. 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.
17. \* Activities that have the potential to emit no more than 5 TPY (actual) of any criteria pollutant. This covers the equipment fugitives; records of throughput and calculated emissions will be required.

## 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]  
Primary Standards are in Appendix E and Secondary Standards are in Appendix F of the Air Pollution Control Rules. 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 for this facility as required.

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 which result in emissions not authorized in the permit and which exceed the "Insignificant Activities" or "Trivial Activities" thresholds require prior notification to AQD and may require a permit modification. Insignificant activities mean individual emission units that either are on the list in Appendix I (OAC 252:100) or whose actual calendar year emissions do not exceed the following limits:

- 5 TPY of any one criteria pollutant; and

- 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.

Emissions limitations have not been established for engines CG-01 through CG-04 or turbines CG-05 and CG-06 since they are "grandfathered" (the engines) or "statutory exempt" (the turbines). In addition, there are no emission limits for the 253-hp emergency generator engine or the 3.0-MMBTUH plant boiler, because those two units were previously insignificant and are only subject to work practice standards under NESHAP, Subparts ZZZZ and DDDDD. The only units with emissions limitations are units CG-07, CG-08, and CG-09.

OAC 252:100-9 (Excess Emission 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 (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 (PM)) [Applicable]

This subchapter specifies particulate matter (PM) emissions limitations for new and existing fuel-burning equipment based on the maximum design heat input rating. Appendix C presents the specific PM limits: 0.6 lb/MMBTU for fuel-burning equipment with a rated heat input of 10 MMBTUH or less and a limit of 0.10 lb/MMBTU for fuel-burning equipment with a rated heat input of 10,000 MMBTUH or more. For equipment with a rated heat input that is between those values, there are two equations used to compute the allowable PM emissions. For units with a maximum heat input that is greater than 10 MMBTUH, but less than 1,000 MMBTUH, the following equation is used.

$$E = 1.0428080 \cdot X^{-0.238561}$$

Where E = the allowable total particulate matter emissions in pounds per MMBTU

X = the maximum heat input in MMBTU per hour

For natural gas-fired engines, AP-42 (7/00), Table 3.2-1 lists the total PM emissions (filterable plus condensable) to be 0.0483 lb/MMBTU for two-stroke, lean-burn engines; Table 3.2-2 lists the total PM emissions to be 0.0100 lb/MMBTU for four-stroke, lean-burn engines; and Table 3.2-3 lists the total PM emissions to be 0.0194 lb/MMBTU for four-stroke rich-burn engines. For natural gas-fired turbines, AP-42 (4/00), Table 3.1-2a lists the total PM emissions (filterable plus

condensable) to be 0.0066 lb/MMBtu. For diesel engines, AP-42 (10/96), Table 3.3-1 lists the total PM emissions to be 0.31 lb/MMBTU for diesel industrial engines. Table 1.4-2 lists total PM emissions for natural gas combustion from heaters, boilers, etc., to be 7.6 lb/10<sup>6</sup> scf (0.0075 lb/MMBtu). The table presented below summarizes the data, showing that the engines and turbines comply with the limits computed from the applicable equation in Appendix C. In addition, the permit requires the use of natural gas for the engines and turbines to ensure compliance with Subchapter 19.

Quant.	Equipment	Heat Input (MMBTUH)	Appendix C Emission Limit (lb/MMBTU)	AP-42 Emission Rate <sup>1</sup> (lb/MMBTU)
4	1,420-hp Clark HRA8T 2-Stroke, Lean-Burn Engines	12.33	0.573	0.0483
2	3,830-hp Solar Centaur Turbines	39.27	0.434	0.0066
3	1,160-hp Solar Saturn Turbines	16.03	0.538	0.0066
1	253-hp Waukesha F1197 4-Stroke, Rich-Burn Engine	2.20	0.600	0.0194
1	Beaver Boiler BG3000-30HW, Series 636N (Natural Gas-Fired)	3.00	0.600	0.0075

<sup>1</sup> Filterable plus condensable PM-10 emissions.

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]  
 No discharge of greater than 20% opacity is allowed except for short-term occurrences that 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. When burning natural gas, there is little possibility of exceeding the opacity standards.

OAC 252:100-29 (Fugitive Dust) [Applicable]  
 No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originated 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 to 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 petroleum or natural gas process 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. Gas produced from oil and gas wells having 343 ppmv or less total sulfur will ensure compliance with Subchapter 31. The permit requires the use of pipeline-grade natural gas or field gas with a maximum sulfur content of 343 ppmv to ensure compliance with Subchapter 31.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]  
This subchapter limits NO<sub>x</sub> emissions from new fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.2 lb of NO<sub>x</sub> per MMBTU. There are no equipment items that exceed the 50 MMBTUH threshold.

OAC 252:100-35 (Carbon Monoxide) [Not Applicable]  
None of the following affected processes are located at this facility: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic cracking unit, or petroleum catalytic reforming unit.

OAC 252:100-37 (Volatile Organic Compounds) [Part 7 Applicable]  
Part 3 requires 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 at maximum storage temperature to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. No condensate at the facility is covered under this permit. The lube oil and antifreeze tanks contain organic liquids with vapor pressures below 1.5 psia.  
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. Any painting operation will involve maintenance coating of buildings and equipment and emit less than 100 pounds per day of VOCs and is exempt.  
Part 7 requires fuel-burning and refuse-burning equipment to be operated to minimize emissions of VOCs. The equipment at this location is subject to this requirement.  
Part 7 also regulates effluent water separators that receive water containing more than 200 gallons per day of VOC. There is no effluent water separator at this location.

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 anywhere in the state, 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 required 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 eligible
OAC 252:100-15	Mobile Sources	not in source category
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 VI. FEDERAL REGULATIONS

PSD, 40 CFR Part 52

[Not Applicable]

For NO<sub>x</sub>, total facility emissions exceed the PSD major source threshold of 250 TPY. Therefore, the facility is considered to be an existing major source for PSD and any future emissions increase may be required to undergo a PSD evaluation if threshold levels are exceeded. The PSD significance levels are 40 TPY NO<sub>x</sub>, 100 TPY CO, 40 TPY SO<sub>2</sub>, 40 TPY VOCs, 15 TPY PM-10, 10 TPY Total Reduced Sulfur, or 0.6 TPY lead. However, this permitting action does not require PSD evaluation as no new construction or modification of any equipment is authorized. The increases in facility-wide emissions for this permit are due to the incorporation of emissions from the 253-hp Waukesha F1197 emergency backup engine and the 3.0-MMBTUH plant boiler into the facility-wide emissions estimates. There has been no change in equipment or method of operation.

NSPS, 40 CFR Part 60

[Subpart GG Applicable]

Subparts K, Ka, Kb, VOL Storage Vessels. The tanks on-site are not subject to Subparts K and Ka since their capacities do not exceed the threshold size of 40,000 gallons. The tanks are also not subject to Kb since their capacities are less than the smallest threshold level (19,812 gallons) of this subpart. This subpart is not applicable.

Subpart GG, Stationary Gas Turbines. This subpart affects turbines which commenced construction, reconstruction, or modification after October 3, 1977, with heat input at peak load of greater than or equal to 10 MMBTUH based on the lower heating value of the fuel. Gas turbines CG-07, CG-08, and CG-09 each have a heat input capacity at peak load of 16.03 MMBTUH and, therefore, are subject to this subpart. In accordance with § 60.332(e), these turbines are not subject to the NO<sub>x</sub> standard since they commenced construction prior to October 3, 1982. Sulfur dioxide standards specified in Subpart GG are that no fuel shall be used which exceeds 0.8% by weight sulfur nor shall exhaust gases contain in excess of 150 ppm SO<sub>2</sub>. The revision of this subpart on July 8, 2004 exempts fuel nitrogen content sampling if the allowance for fuel-bound nitrogen is not claimed and fuel sulfur content sampling if firing gaseous fuel meeting the definition of natural gas in § 60.331(u). Natural gas must contain 20 grains or less of total sulfur per 100 standard cubic feet (0.068 weight percent total sulfur, 680 parts per million by weight [ppmw] total sulfur, and 338 parts per million by volume [ppmv] at 20 degrees Celsius

total sulfur) and either be composed of at least 70 percent methane by volume or have a gross calorific value between 950 and 1100 British thermal units (Btu) per standard cubic foot. CIG elects exemption from sulfur content monitoring of the fuel gas for the gas turbines since the fuel gas meets the definition of natural gas. Annual compliance certification will include a statement that pipeline-quality or field-grade natural gas containing less than 338 ppmv total sulfur was used to fuel the turbines throughout the report year.

Subpart VV, Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry. This facility is not a SOCOMI plant.

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 subpart applies to natural gas processing plants that commenced construction, reconstruction, or modification after January 20, 1984 and on or before August 23, 2011. The compressors which are involved in natural gas liquid processing were manufactured and/or installed before the effective date of the regulations and have not been modified. Therefore, the compressors are not subject to Subpart KKK.

Subpart LLL, Onshore Natural Gas Processing: SO<sub>2</sub> Emissions. There is no natural gas sweetening operation at this site.

Subpart IIII, Stationary Compression Ignition Internal Combustion Engines, affects stationary compression ignition (CI) internal combustion engines (ICE) based on power and displacement ratings, depending on date of construction, beginning with those constructed after July 11, 2005. There are no CI ICE on site.

Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI-ICE). This subpart was published in the Federal Register on January 18, 2008. It promulgates emission standards for new SI engines ordered after June 12, 2006, that are manufactured after certain dates, and for SI engines modified or reconstructed after June 12, 2006. The specific emission standards (either in g/hp-hr or as a concentration limit) vary based on engine class, engine power rating, lean-burn or rich-burn, fuel type, duty (emergency or non-emergency), and manufacture date. Engine manufacturers are required to certify certain engines to meet the emission standards and may voluntarily certify other engines. Each of the engines located at the facility was constructed prior to the dates that would have made them subject to this subpart.

Subpart KKKK, Stationary Combustion Turbines. This subpart establishes emission standards and compliance schedules for the control of emissions from stationary combustion turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the higher heating value of the fuel, that commenced construction, modification, or reconstruction after February 18, 2005. Stationary combustion turbines regulated under this subpart are exempt from the requirements of subpart GG of this part. Heat recovery steam generators and duct burners regulated under this subpart are exempted from the requirements of subparts Da, Db, and Dc of this part (§60.4310 lists additional exemptions). Turbines at this facility were constructed before February 18, 2005.

Subpart OOOO, Crude Oil and Natural Gas Production, Transmission, and Distribution. This subpart establishes emission standards and compliance schedules for the control of VOC and SO<sub>2</sub> emissions from affected facilities that commence construction, modification, or reconstruction after August 23, 2011. Emission sources which are subject to this subpart include single gas wells, centrifugal compressors, reciprocating compressors, pneumatic controllers, storage vessels, and equipment associated with natural gas processing plants and sweetening units. All of the equipment items located at this site were manufactured (and/or installed) prior to August 23, 2011 and, therefore, are not subject.



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 applies to process streams which contain more than 10% benzene by weight. Analysis of Oklahoma natural gas indicates a maximum benzene content of less than 1%. Subpart M, Asbestos, in the case of asbestos demolition, Subpart M would be applicable.

NESHAP, 40 CFR Part 63

[Subparts HH, ZZZZ, and DDDDD Applicable]

Subpart HH, Oil and Natural Gas Production Facilities. This subpart applies to affected emission points that are located at facilities which are major 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. Subpart HH affects glycol dehydration units (unless benzene emissions are less than 1 TPY), unit process vents, storage vessels with potential for flash emissions (which are defined to include only those vessels with a daily throughput of 21,000 gallons or more), and compressors and ancillary equipment in volatile hazardous air pollutant (VHAP) service (i.e., more than 10% by weight VHAP). ODEQ Consent Order 06-181 requires CIG to address the applicability of Subpart HH. However, the first, second, and third stages of compression are exempt from the provisions of Subpart HH as defined by 40 CFR 63.760 (b)(3), because the units are not in VHAP service. Therefore, the compression is exempt from the provisions of 40 CFR 63.760 Subpart HH. The ancillary equipment (pumps, pressure relief devices, sampling connection systems, open-ended valves, or lines, valves, flanges, or other connectors) is potentially subject to this subpart, as per §63.764 (c)(3). However, CIG has performed a determination that the ancillary equipment located at the Mocane Compressor Station does not operate in VHAP service equal to or greater than 300 hours per calendar year. Therefore, this equipment is not subject to the monitoring requirements of §63.769. To comply with NESHAP, Subpart HH, CIG is required to maintain records documenting this exemption. The other emission points affected by Subpart HH are owned and operated by Regency and are required to comply with the applicable provisions.

Subpart HHH, Natural Gas Transmission and Storage Facilities. This subpart was published in the Federal Register on June 17, 1999. This subpart applies to owners and operators of natural gas transmission and storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user (if there is no local distribution company), and that are major sources of HAP emissions as defined in §63.1271. For the purposes of determining whether a facility is a “major source,” only the emissions from the affected units (glycol dehydration units) are counted. The Mocane Compressor Station portion of the facility does not have a glycol dehydration unit and, therefore, is not subject to the subpart.

Subpart YYYY, Stationary Combustion Turbines. This subpart was published in the Federal Register on March 5, 2004 and affects stationary combustion turbines located at major sources of HAP emissions. This facility is a major source of HAP, but the turbines were constructed before January 14, 2003 and are, therefore, considered to be existing sources. The existing stationary combustion turbines do not have to meet the requirements of this subpart and of subpart A of this part. No initial notification is necessary for any existing stationary combustion turbine.

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart affects RICE that are located at area and major sources of HAP emissions. This facility is a major source of HAPs. The applicability of this subpart to the engines located at the site is addressed as follows.

Four 1,420-hp Clark HRA8T, 2-stroke, lean-burn engines (CG-01, CG-02, CG-03, and CG-04): these engines were manufactured in 1964, 1967, and 1969 and they are considered to be “existing” engines under this subpart. In accordance with § 63.6590(c)(3)(i), there are no requirements for these engines under this subpart.

One 253-hp Waukesha F1197 GU, 4-stroke, rich-burn engine (A-Aux-1): this engine was constructed in 1974 and it is considered to be an “existing” engine under this subpart. Table 2c to this subpart summarizes the requirements for emergency, stationary RICE as (a) requiring a change of oil and filter every 500 hours or annually (whichever comes first), (b) inspection of spark plugs every 1,000 hours or operation or annually (whichever comes first), and (c) inspection of all hoses and belts every 500 hours of operation or annually (whichever comes first). In accordance with §63.6595(a)(1), the owner/operator was required to comply with these work practice standards beginning on October 19, 2013.

The permit includes specific conditions requiring compliance with the applicable portions of this subpart. The applicant should consult the rule proper for a more detailed description of notification, testing, monitoring, operation, maintenance, and recordkeeping requirements applicable to the engines subject to this subpart.

Subpart DDDDD, Industrial, Commercial and Institutional Boilers and Process Heaters. On January 31, 2013, the EPA took final action on its reconsideration of certain issues in the emission standards for the control of HAPs from industrial, commercial, and institutional boilers and process heaters at major sources of HAPs. The compliance dates for the rule are January 31, 2016, for existing sources and, January 31, 2013, or upon startup, whichever is later, for new sources. The plant boiler is an existing unit.

**Boilers/Process Heaters <10 MMBTUH**

EU	Point	Description	MMBTUH	Const. Date
PB-1	EP11	Beaver Boiler BG3000-30HW, Series 636N	3.0	1964

This unit is designed to burn gas 1 fuels. *Unit(s) designed to burn gas 1 subcategory* includes any boiler or process heater that burns only natural gas, refinery gas, and/or other gas 1 fuels. The unit has a heat input capacity of less than or equal to 5 MMBTUH. As such, it will be required to complete a tune-up every five years as specified in § 63.7540(a)(12). Units in the gas 1 subcategory will conduct these tune-ups as a work practice for all regulated emissions under Subpart DDDDD. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or 11 through 13 of Subpart DDDDD, or the operating limits in Table 4 of Subpart DDDDD. All applicable requirements have been incorporated into the permit.

CAM, 40 CFR Part 64 [Applicable]  
Compliance Assurance Monitoring (CAM), as published in the Federal Register on October 22, 1997, applies to any pollutant specific emission unit at a major source that is required to obtain a Title V 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 at least 100% of the amount required to be defined as a major source.

No engine or turbine uses a control device to achieve compliance with an applicable emission limit. Therefore, no equipment of this facility is subject to CAM.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]  
The definition of a stationary source does not apply to transportation, including storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the provisions of this part. The definition of a stationary source also does not include naturally occurring hydrocarbon reservoirs. Naturally occurring hydrocarbon mixtures, prior to entry into a natural gas processing plant or a petroleum refining process unit, including: condensate, crude oil, field gas, and produced water, are exempt for the purpose of determining whether more than a threshold quantity of a regulated substance is present at the stationary source. More information on this federal program is available on the web page: [www.epa.gov/rmp](http://www.epa.gov/rmp).

Stratospheric Ozone Protection, 40 CFR Part 82 [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 produce, consume, recycle, import, or export any controlled substances or controlled products as defined in this part, nor does this facility perform service on motor (fleet) vehicles that involves ozone-depleting substances. Therefore, as currently operated, this facility

is not subject to these requirements. To the extent that the facility has air-conditioning units that apply, the permit requires compliance with Part 82.

## **SECTION VII. COMPLIANCE**

### **Tier Classification and Public Review**

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 application involves only land owned by the applicant (or applicant business).

This application has been classified as Tier II, because it requests renewal of a Part 70 operating permit. Information on all permit actions is available for review by the public on the Air Quality section of the DEQ web page at <http://www.deq.state.ok.us>.

The applicant published a “Notice of Filing a Tier II Application” in *The Herald Democrat*, a weekly newspaper in Beaver County. The notice – which appeared on May 24, 2012 – stated that the application was available for public review at the Beaver County Pioneer Library, 201 Douglas Avenue in Beaver or at the Air Quality Division’s (AQD’s) main office in Oklahoma City. The applicant will also publish the “Notice of Draft Permit” in *The Herald Democrat*. The notice will state that the draft permit is available for public review for a period of 30 days at the Beaver County Pioneer Library and that the draft permit is also available for public review at the Air Quality Division main office and on the Air Quality section of the DEQ web page at <http://www.deq.state.ok.us>.

### **State Review**

This facility is located within 50 miles of the Oklahoma border with the states of Kansas and Texas. Those states will be notified of the draft permit.

### **EPA Review**

After the close of the 30-day public comment period, the “proposed” permit will be submitted to EPA Region 6 for a 45-day review period.

### **Inspection**

A full compliance inspection of the Mocane Compressor Station was conducted on March 12, 2015. The inspection was performed by Jason Ballard and Alex McCumber (both from DEQ, Air Quality). They were accompanied by Ronnie Anderson and Shane Mathis (both representing CIG). The facility appeared to be operating as described in the application and no compliance issues were observed which would need to be addressed in this Title V permit renewal.

### **Testing**

The four 1,420-hp Clark HRA8T engines are “grandfathered” and the two 3,830-hp Solar Centaur turbines are “statutory exempt.” These engines and turbines are not subject to emission limits as long as the equipment is maintained at the site as is. The 253-hp Waukesha F1197 GU

engine was previously considered to be an “insignificant activity” and this engine was not required to be tested. On October 19, 2013, it became subject to work practice standards under NESHAP, Subpart ZZZZ, but it is not subject to emission limits.

The results of periodic testing (for the turbines which are subject to emissions limits) were provided and these results show compliance with the applicable emission limits. It should be noted that the three 1,160-hp Solar Saturn Turbines are on an annual testing schedule.

**Table 6. Emission Test Results**

Source	PERMIT LIMITS		TEST RESULTS		Test Date
	NO <sub>x</sub> lb/hr	CO lb/hr	NO <sub>x</sub> lb/hr	CO lb/hr	
CG-07: 1,160-hp Solar Saturn Turbine Serial Number: 20724	4.60	4.60	1.77	2.46	10/7/2015
CG-08: 1,160-hp Solar Saturn Turbine Serial Number: 30791	4.60	4.60	2.58	1.36	10/7/2015
CG-09: 1,160-hp Solar Saturn Turbine Serial Number: OHH14-S6090	4.60	4.60	2.54	1.56	10/6/2015

**Fees Paid**

The applicant submitted a Title V renewal fee of \$1,000 on May 3, 2012. That was the proper fee amount at that time.

**SECTION VIII. SUMMARY**

The facility was constructed and is operating as described in the permit application. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues concerning this facility that would prohibit issuance of the permit. Issuance of the permit is recommended, contingent on public and EPA review.

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

**Colorado Interstate Gas Company, L.L.C.  
Mocane Compressor Station**

**Permit No. 2012-304-TVR**

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on February 27, 2012 and supplemental information submitted after that date. The Evaluation Memorandum, dated January 25, 2017, 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 emissions limitations for each point: [OAC 252:100-8-6(a)(1)]

**EUG 1. “Grandfathered” Internal Combustion Engines:** Units CG-01, CG-02, CG-03, and CG-04 are “grandfathered” internal combustion engines based on DEQ regulations enacted from 1972 to 1979. There are no hourly or annual emission limits applied to these units under Title V, but they are limited to the existing equipment as it is.

EU ID	Point	Make/Model	HP	Serial #	Const./Install. Date
CG-01	EP1	Clark HRA8T	1,420	94032	1964
CG-02	EP2	Clark HRA8T	1,420	94033	1964
CG-03	EP3	Clark HRA8T	1,420	94045	1967
CG-04	EP4	Clark HRA8T	1,420	94050	1969

**EUG 2. Statutory Exempt Turbine/NSPS Exempt:** These emission units are “NSPS Exempt” and are not required to comply with NSPS Subpart GG. In addition, there are no hourly or annual emission limits applied to these units under Title V, but they are limited to the existing equipment as it is.

EU	Point	Make/Model	HP	Serial #	Const./Install. Date
CG-05	EP5	Solar Centaur	3,830	OHI11-C2373	1973
CG-06	EP6	Solar Centaur	3,830	OHC10-C0586	1973

**EUG 3. Gas Turbines/NSPS Affected:** These emission units are “NSPS Affected” and are required to comply with the NSPS Subpart GG standard for sulfur dioxide only.

EU	Point	Make/Model	HP	Const./Install. Date
CG-07	EP7	Solar Saturn	1,160	1980
CG-08	EP8	Solar Saturn	1,160	1980
CG-09	EP9	Solar Saturn	1,160	1980

Emission limitations of the turbines are as follows:

EU	Point	Make/Model	HP	NO <sub>x</sub>		CO		VOC	
				lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
CG-07	EP7	Solar Saturn	1,160	4.60	20.16	4.60	20.16	2.30	10.08
CG-08	EP8	Solar Saturn	1,160	4.60	20.16	4.60	20.16	2.30	10.08
CG-09	EP9	Solar Saturn	1,160	4.60	20.16	4.60	20.16	2.30	10.08

**EUG 4. Fugitive VOC Sources:** Fugitive VOC emissions are estimated based on existing equipment items but do not have a specific limitation. These emission units are not subject to NSPS Subpart KKK.

EU ID #	Equipment	Number of Items
Compressors and Turbines	Piping Components	1027 Valves
		2411 Flanges
		5 Pump Seals
		26 Comp. Seals
		4 Open End Lines
		36 RV

**EUG 5. Emergency Generator Engine:** The following engine is an emergency engine used to power a backup generator. The emergency engine is used for critical circuits when power is not available. This engine is subject to work practice standards under NESHAP, Subpart ZZZZ, but the engine is not subject to hourly or annual emission limits.

EU ID #	Point	Make/Model	HP	Serial #	Const. Date
A-Aux-1	EP10	Waukesha F1197 GU	253	267789	1974

- (a) Engine A-Aux-1 shall be equipped with a non-resettable hour meter.
- (b) Engine A-Aux-1 shall be limited to a maximum of 500 hours of operation in any 12-month period.
- (c) For this engine, the permittee shall record hours of operation monthly and provide 12-month rolling totals.

**EUG 6. Heaters and Boilers Subject to NESHAP, Subpart DDDDD:** The following boiler is used to provide space heat, but also provides fuel gas heat and heat for three compressor skids. This boiler is subject to work practice standards under NESHAP, Subpart DDDDD, but the boiler is not subject to hourly or annual emission limits.

EU ID #	Point	Make/Model	Heat Input MMBTUH	Const. Date
PB-1	EP11	Beaver Boiler BG3000-30HW, Series 636N	3.0	1964

2. 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)]
3. 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 each calendar year. [OAC 252:100-31]
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. At least once per calendar quarter, the permittee shall conduct tests of NO<sub>x</sub> and CO emissions in exhaust gases from turbines CG-07, CG-08, and CG-09 and from 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. Reduced testing frequency does not apply to engines with catalytic converters or oxidative catalysts. Any reduction in the testing frequency shall be noted in the next required semi-annual monitoring report. [OAC 252:100-8-6 (a)(3)(A)]
6. The permittee shall keep operation and maintenance (O&M) records for those engines/turbines with emission limits 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)(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. [OAC 252:100-9]
8. Replacement (including temporary periods of 6 months or less for maintenance purposes), of the internal combustion engines with emissions specified in this permit with engines/turbines of lesser or equal emissions of each pollutant (in lbs/hr and TPY) is authorized under the following conditions. [OAC 252:100-8-6 (f)]



- (a) The permittee shall notify AQD in writing at least 7 days in advance of start-up of the replacement engine(s)/turbine(s). Said notice shall identify the old engine/turbine and shall include the new engine/turbine make and model, horsepower rating, fuel usage, stack flow (ACFM), stack temperature (°F), stack height (feet), stack diameter (inches), and pollutant emission rates (g/hp-hr, lb/hr, and TPY) at maximum horsepower for the altitude/location.
  - (b) Quarterly emissions tests for the replacement engine(s)/turbine(s) shall be conducted to confirm continued compliance with NO<sub>x</sub> and CO emission 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 emission rates (lb/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) Permanent replacement of an exempted/grandfathered engine/turbine shall subject the new engine/turbine to emission limits and shall require a permit modification.
  - (e) 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 facility is subject to the Standards of Performance for Stationary Gas Turbines, NSPS, Subpart GG, for emission units CG-07, CG-08, and CG-09 and shall comply with all applicable requirements. [40 CFR 60.330 to 60.335]
- (a) § 60.330 Applicability and designation of affected facility.
  - (b) § 60.331 Definitions.
  - (c) § 60.333 Standard for sulfur dioxide.
  - (d) § 60.334 Monitoring of operations.
  - (e) § 60.335 Test methods and procedures.
10. The facility is subject to 40 CFR Part 63, Subpart HH, and shall comply with all applicable requirements. [40 CFR 63.760 - 777]
- (a) § 63.760 Applicability and designation of affected source.
  - (b) § 63.761 Definitions.
  - (c) § 63.762 Startups, shutdowns, and malfunctions.
  - (d) § 63.764 General standards.
  - (e) § 63.769 Equipment leak standards.

- (f) § 63.771 Control equipment requirements.
- (g) § 63.772 Test methods, compliance procedures, and compliance determinations.
- (h) § 63.773 Inspection and monitoring requirements.
- (i) § 63.774 Recordkeeping requirements.
- (j) § 63.775 Reporting requirements.

11. The permittee shall abide by all applicable requirements of NESHAP, 40 CFR Part 63, Subpart ZZZZ affecting any of the engines subject to these requirements, including, but not limited to, the following. [40 CFR 63.6585 through 63.6675]

- (a) § 63.6585 Am I subject to this subpart?
- (b) § 63.6590 What parts of my plant does this subpart cover?
- (c) § 63.6595 When do I have to comply with this subpart?
- (d) § 63.6600 What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?
- (e) § 63.6601 What emission limitations must I meet if I own or operate a new or reconstructed 4SLB stationary RICE with a site rating of greater than or equal to 250 brake HP and less than or equal to 500 brake HP located at a major source of HAP emissions?
- (f) § 63.6602 What emission limitations must I meet if I own or operate an existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?
- (g) § 63.6604 What fuel requirements must I meet if I own or operate a stationary CI RICE?
- (h) § 63.6605 What are my general requirements for complying with this subpart?
- (i) § 63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?
- (j) § 63.6611 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a new or reconstructed 4SLB SI stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions?.
- (k) § 63.6612 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?
- (l) § 63.6615 When must I conduct subsequent performance tests?
- (m) § 63.6620 What performance tests and other procedures must I use?
- (n) § 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?
- (o) § 63.6630 How do I demonstrate initial compliance with the emission limitations, operating limitations, and other requirements?
- (p) § 63.6635 How do I monitor and collect data to demonstrate continuous compliance?
- (q) § 63.6640 How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?
- (r) § 63.6645 What notifications must I submit and when?
- (s) § 63.6650 What reports must I submit and when?

- (t) § 63.6655 What records must I keep?
- (u) § 63.6660 In what form and how long must I keep my records?
- (v) § 63.6665 What parts of the General Provisions apply to me?
- (w) § 63.6675 What definitions apply to this subpart?

12. The permittee shall comply with all applicable requirements of NESHAP, Subpart DDDDD, Industrial, Commercial, and Institutional Boilers and Process Heaters, including but not limited to: [40 CFR §§ 63.7480-7575]

What This Subpart Covers

- (a) § 63.7480 What is the purpose of this subpart?
- (b) § 63.7485 Am I subject to this subpart?
- (c) § 63.7490 What is the affected source of this subpart?
- (d) § 63.7491 Are any boilers or process heaters not subject to this subpart?
- (e) § 63.7495 When do I have to comply with this subpart?

Emission Limitations and Work Practice Standards

- (f) § 63.7499 What are the subcategories of boilers and process heaters?
- (g) § 63.7500 What emission limitations, work practice standards, and operating limits must I meet?
- (h) § 63.7501 Affirmative Defense for Violation of Emission Standards During Malfunction.

General Compliance Requirements

- (i) § 63.7505 What are my general requirements for complying with this subpart?

Testing, Fuel Analyses, and Initial Compliance Requirements

- (j) § 63.7510 What are my initial compliance requirements and by what date must I conduct them?
- (k) § 63.7515 When must I conduct subsequent performance tests, fuel analyses, or tune-ups?
- (l) § 63.7520 What stack tests and procedures must I use?
- (m) § 63.7521 What fuel analyses, fuel specification, and procedures must I use?
- (n) § 63.7522 Can I use emissions averaging to comply with this subpart?
- (o) § 63.7525 What are my monitoring, installation, operation, and maintenance requirements?
- (p) § 63.7530 How do I demonstrate initial compliance with the emission limitations, fuel specifications and work practice standards?
- (q) § 63.7533 Can I use efficiency credits earned from implementation of energy conservation measures to comply with this subpart?

Continuous Compliance Requirements

- (r) § 63.7535 Is there a minimum amount of monitoring data I must obtain?
- (s) § 63.7540 How do I demonstrate continuous compliance with the emission limitations, fuel specifications and work practice standards?
- (t) § 63.7541 How do I demonstrate continuous compliance under the emissions averaging provision?

Notification, Reports, and Records

- (u) § 63.7545 What notifications must I submit and when?
- (v) § 63.7550 What reports must I submit and when?
- (w) § 63.7555 What records must I keep?
- (x) § 63.7560 In what form and how long must I keep my records?

Other Requirements and Information

- (y) § 63.7565 What parts of the General Provisions apply to me?
  - (z) § 63.7570 Who implements and enforces this subpart?
  - (aa) § 63.7575 What definitions apply to this subpart?
13. The following records shall be maintained on site or at a local field office to verify insignificant activities. Some or all of these records may be maintained electronically.  
[OAC 252:100-8-6(a)(3)(B)]
- (a) For fluid storage tanks with a capacity of less than 39,894 gallons and a true vapor pressure less than 1.5 psia at maximum storage temperature, records of capacity of the tanks, monthly throughput, and true vapor pressure of contents.
  - (b) For activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant, the type of activity and the amount of emissions from that activity (cumulative annual).
14. 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. Some or all of these records may be maintained electronically.  
[OAC 252:100-8-6(a)(3)(B)]
- (a) Operating hours for engine A-Aux-1 (monthly and 12-month rolling totals).
  - (b) Periodic testing for turbines CG-07, CG-08, and CG-09 and each engine/turbine replacement.
  - (c) Operating hours for each engine/turbine if less than 220 hours/quarter and not tested. This requirement does not apply to “grandfathered” engines or “statutory exempt” turbines.
  - (d) O&M records for any engine/turbine not tested in each 6-month period. This requirement does apply to “grandfathered” engines and “statutory exempt” turbines.
  - (e) For the fuel gas, the appropriate document(s) as described in Specific Condition Number 3.
  - (f) Records as required by NSPS, Subpart GG.
  - (g) Records as required by NESHAP, Subparts HH, ZZZZ, and DDDDD.
15. The permittee shall submit to the Air Quality Division of the DEQ, with a copy to the USEPA Region 6, semi-annual and annual certifications of compliance with the terms and conditions of this permit. The next annual compliance report shall be due September 30, 2017. Subsequent to that date, the compliance-reporting schedule shall be adjusted as follows: the first semi-annual period shall be from January 1 to June 30; the second semi-annual period shall be from July 1 to December 31. The semi-annual and annual compliance reports shall be submitted no later than 30 days after the end of the appropriate period. The annual report shall be due on January 30 of each subsequent year, starting in 2018.  
[OAC 252:100-8-6 (c)(5)(A) & (D)]
11. This permit supersedes and replaces all previous Air Quality operating permits issued to this facility, which are now canceled.

**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 (PM<sub>10</sub>). 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 MMBtu/hr 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]





DRAFT

# PART 70 PERMIT

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

Permit No. 2012-304-TV

Colorado Interstate Gas Company, L.L.C.,

having complied with the requirements of the law, is hereby granted permission to operate the Mocane Compressor Station, located in Section 18, Township 5N, Range 25E of the Cimarron Meridian, in Beaver County, Oklahoma, subject to the Standard Conditions dated June 21, 2016, and Specific Conditions, both of which are attached.

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

\_\_\_\_\_  
Director,  
Air Quality Division

\_\_\_\_\_  
Date

**DRAFT**

Mr. David J. Bieda  
Colorado Interstate Gas Company, L.L.C.  
2 North Nevada Avenue  
Colorado Springs, CO 80903

**SUBJECT:** Renewal of the Title V Operating Permit No. **2012-304-TVR**  
Mocane Compressor Station  
DEQ Facility ID: 271  
Section 18, Township 5N, Range 25E of the Cimarron Meridian  
Beaver County, Oklahoma

Dear Mr. Bieda:

Enclosed is the permit authorizing continued 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 emission inventory for this facility. An emission 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 Emission Inventory Staff at 405-702-4100.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or Sharon Alder, the permit writer, at (405) 702-4209.

Sincerely,

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

Enclosure

Mr. David J. Bieda  
Colorado Interstate Gas Company, L.L.C.  
2 North Nevada Avenue  
Colorado Springs, CO 80903

SUBJECT: Renewal of the Title V Operating Permit No. **2012-304-TVR**  
Mocane Compressor Station  
DEQ Facility ID: 271  
Section 18, Township 5N, Range 25E of the Cimarron Meridian  
Beaver County, Oklahoma

Dear Mr. Bieda:

Air Quality has completed initial review of the permit application for the referenced facility and completed a draft permit for public review. This application has been determined to be a Tier II application. In accordance with 27A O.S. 2-14-302 and OAC 252:4-7-13(c) the enclosed draft permit is ready for public review. The requirements for public review of the draft permit 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. (Instructions enclosed)
2. Provide for public review (for a period of 30 days following the date of the newspaper announcement) a copy of the application and draft permit at a convenient location (preferentially at a public location) within the county of the facility.
3. Send AQD a written affidavit of publication for the notices from Item #1 above together with any additional comments or requested changes, which you may have for the permit application within 20 days of publication.

The permit review time is hereby tolled pending the receipt of the affidavit of publication. Please submit the requested information as soon as possible. You should be aware that failure to submit an adequate response within 180 days may result in the withdrawal of your application and forfeiture of your application fees. Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or Sharon Alder, the permit writer, at (405) 702-4209.

Sincerely,

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

Enclosure

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

SUBJECT: Permit Number: **2012-304-TVR**  
Facility: Colorado Interstate Gas Company, L.L.C.  
Mocane Compressor Station  
DEQ Facility ID: 271  
Location: Section 18, T5N, R25E of the Cimarron Meridian  
Beaver County, Oklahoma  
Permit Writer: Sharon Alder

Dear Sir / Madam:

The owner/operator of the above-referenced facility has applied to renew the facility's 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 the permit writer at (405) 702-4100.

Sincerely,

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

KDHE, Bureau of Air  
Title V Permitting Group  
1000 SW Jackson, Suite 310  
Topeka, KS 66612-1366

SUBJECT: Permit Number: **2012-304-TVR**  
Facility: Colorado Interstate Gas Company, L.L.C.  
Mocane Compressor Station  
DEQ Facility ID: 271  
Location: Section 18, T5N, R25E of the Cimarron Meridian  
Beaver County, Oklahoma  
Permit Writer: Sharon Alder

Dear Sir / Madam:

The owner/operator of the above-referenced facility has applied to renew the facility's 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**