

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

DRAFT

MEMORANDUM

May 1, 2017

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

THROUGH: Rick Groshong, Environmental Manager, Compliance and Enforcement

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

THROUGH: Peer Review

FROM: David Schutz, P.E., New Source Permit Section

SUBJECT: Evaluation of Operating Permit Application No. **2015-0545-C (M-1)**
ONEOK Field Services Company, LLC
Ward Compressor Station/Northern Rows Compressor Station
FAC ID 7252
Latitude N 35.65296°, Longitude W 98.26452°
Sections 28, Township 14N, Range 10W
Geary, Canadian County, Oklahoma.
Directions: From the intersection of Highway 281 and Highway 270 in Geary, proceed 3.25 miles east on Highway 270. Turn north and proceed 2 miles on N. Niles Rd. Turn west and proceed 0.25 miles on Edmond Rd. The station is located on the north side of the road.

SECTION I. INTRODUCTION

ONEOK Field Services Company, LLC (ONEOK) has requested a major source construction permit for their Ward Compressor Station/Northern Rows Compressor Station (SIC 1311). The Ward Compressor Station and Northern Rows Compressor Station are collocated facilities and the combined facility-wide emissions exceed major source thresholds for NO_x, CO, and VOCs. Hazardous Air Pollutant (HAP) emissions will now exceed major source thresholds. The facilities are currently operating under Permit No. 2015-0545-TV issued July 14, 2016.

The combined facilities currently include the following emissions units:

- The Ward Compressor Station includes five 1,380-hp Caterpillar G-3516B four-stroke lean-burn compressor engines with oxidation catalysts, compressor blowdowns, three 300-bbl condensate storage tanks, one 300-bbl produced water tank, condensate loading, produced water loading, one 210-bbl methanol tank, and fugitive sources.

- The Northern Rows Compressor Station includes four 2,370-hp Caterpillar G-3608 LE compressor engines with oxidation catalysts, compressor blowdowns, three 400-bbl condensate tanks, two 400-bbl produced water tanks, condensate loading, produced water loading, one 400-bbl methanol tank, and fugitive sources.

ONEOK proposed to add four 2,370-HP Caterpillar G-3608 compressor engines with oxidation catalysts to the Northern Rows Compressor Station. Those added engines will be placed in EUG-1B along with four existing engines which are also subject to NSPS Subpart JJJJ. With the addition of those engines, fugitive emissions counts and emissions and blowdown emissions will be updated. The added emissions will make the facility a major source of HAPs since formaldehyde emissions will exceed 10 TPY following installation of the four engines. Older limits on formaldehyde emissions which were taken to keep the facility an “area” source of HAPs will be removed. Formaldehyde emissions will be calculated based on the limit of NESHAP Subpart ZZZZ: 14 ppm_d@ 15% oxygen.

The facility is currently subject to New Source Performance Standards (NSPS) Subpart OOOO, and NSPS Subpart OOOOa will affect the proposed modifications. The compressors at the Northern Rows facility associated with the existing Caterpillar G-3608LE engines are subject to Subpart OOOO. The compressor units in the proposed modification have a manufacture date of 12/1/2013, therefore the engines are subject to NSPS Subpart JJJJ and the associated compressors are subject to NSPS Subpart OOOO. The three 300-bbl condensate tanks and one 300-bbl produced water storage tank at the Ward facility were constructed prior to August 23, 2011. The tanks at the Ward facility are not subject to NSPS Subpart OOOO. The three 400-bbl condensate tanks and two 400-bbl produced water tanks at the Northern Rows facility were manufactured, constructed or reconstructed after August 23, 2011. The applicant has a federally enforceable emission limit of less than 6.0 TPY for the three 400-bbl condensate tanks and two 400-bbl produced water tanks associated with the Northern Rows Compressor Station. The tank limits were authorized by Permit No. 2010-202-C (M-1), issued June 3, 2014, and will be carried forward in this permit. The tanks are therefore not subject to NSPS Subpart OOOO. The pneumatic controllers at the site do not exceed a 6 SCFH bleed rate and are not subject to Subpart OOOO.

However, since the compressor capacity is increasing, the project is a “modification” under NSPS Subpart OOOOa. The project meets the criteria of a “significant modification” and a Tier II construction permit is required.

Since the facility emits more than 100 TPY of a regulated pollutant, it is subject to Title V permitting requirements. Emission units (EUs) have been arranged into Emission Unit Groups (EUGs) in the following outline. Pipeline-grade natural gas is the primary fuel with the generators being operated continuously.

SECTION II. EQUIPMENT

EUG 1A Ward Internal Combustion Engines

EU ID#	Name/Model	Serial No.	Installation Date
WC-1	1,380-hp Caterpillar G-3516B 4-stroke lean-burn with oxidation catalyst	JEF01026	March 2011 Mfg Date 8/26/10
WC-2	1,380-hp Caterpillar G-3516B 4-stroke lean-burn with oxidation catalyst	JEF01021	March 2011 Mfg Date 8/18/2010
WC-3	1,380-hp Caterpillar G-3516B 4-stroke lean-burn with oxidation catalyst	JEF01025	March 2011 Mfg Date 8/25/2010
WC-4	1,380-hp Caterpillar G-3516B 4-stroke lean-burn with oxidation catalyst	JEF01020	March 2011 Mfg Date 8/18/2010
WC-5	1,380-hp Caterpillar G-3516B 4-stroke lean-burn with oxidation catalyst	JEF01031	March 2011 Mfg Date 9/02/2010

EUG 1B Northern Rows Internal Combustion Engines

EU ID#	Name/Model	Serial No.	Installation Date
C-1	2,370-hp Caterpillar G-3608 LE 4-stroke lean-burn with oxidation catalyst	BEN00834	October 2014 Mfg Date post 2010
C-2	2,370-hp Caterpillar G-3608 LE 4-stroke lean-burn with oxidation catalyst	BEN00833	October 2014 Mfg Date post 2010
C-3	2,370-hp Caterpillar G-3608 LE 4-stroke lean-burn with oxidation catalyst	BEN00831	October 2014 Mfg Date post 2010
C-4	2,370-hp Caterpillar G-3608 LE 4-stroke lean-burn with oxidation catalyst	BEN00832	October 2014 Mfg Date post 2010
C-5	2,370-hp Caterpillar G-3608 LE 4-stroke lean-burn with oxidation catalyst	BEN00896	2017 Mfg Date 12/1/2013
C-6	2,370-hp Caterpillar G-3608 LE 4-stroke lean-burn with oxidation catalyst	BEN00911	2017 Mfg Date 12/1/2013
C-7	2,370-hp Caterpillar G-3608 LE 4-stroke lean-burn with oxidation catalyst	BEN00912	2017 Mfg Date 12/1/2013
C-8	2,370-hp Caterpillar G-3608 LE 4-stroke lean-burn with oxidation catalyst	BEN00897	2017 Mfg Date 12/1/2013

EUG 2A Ward Storage Tanks

EU ID#	Contents	Capacity		Installation Date
		Barrels	Gallons	
WTK-1	Condensate	300	12,600	March 2011
WTK-2	Condensate	300	12,600	March 2011
WTK-3	Condensate	300	12,600	March 2011

EUG 2B Northern Rows Storage Tanks

EU ID#	Contents	Capacity		Installation Date
		Barrels	Gallons	
TK-1	Condensate	400	16,800	January 2014
TK-2	Condensate	400	16,800	January 2014
TK-3	Condensate	400	16,800	January 2014
TK-4	Produced Water	400	16,800	January 2014
TK-5	Produced Water	400	16,800	January 2014

EUG 3 Truck Loading

EU ID#	Source Description	Throughput
WTL-1	Ward Compressor Station Condensate Loading	1,500,000
WTL-2	Ward Compressor Station Produced Water Loading	3,300,000
TL-1	Northern Rows Compressor Station Condensate Loading	1,762,500
TLW-1	Northern Rows Compressor Station Produced Water Loading	17,000,000

EUG 4 Additional Storage Tanks

EU ID#	Contents	Capacity		Installation Date
		Barrels	Gallons	
WTK-4	Methanol	210	8,820	March 2011
WTK-5	Produced H ₂ O	300	12,600	March 2011
TK-6	Methanol	400	16,800	January 2014

EUG 5 Fugitive VOC Emission Sources

EU ID#	Source Description	Installation Date
WFUG	Ward Compressor Station Fugitives	March 2011
FUG	Northern Rows Compressor Station Fugitives	January 2014/TBD

EUG 6 Compressor Blowdown Emissions

EU ID#	Source Description	Installation Date
WBD	Ward Compressor Station Blowdowns	March 2011
BD	Northern Rows Compressor Station Blowdowns	January 2014

SECTION III. AIR EMISSIONS

Compressor engine emission factors are presented in Table 1. Emission factors are based on manufacturer's specifications and oxidation catalyst control efficiency. The oxidation catalysts control CO and formaldehyde for WC-1 through WC-5 with 80% efficiency. The oxidation catalysts control CO and formaldehyde for C-1 through C-8 with 85% efficiency. NO_x and VOC limitations are based on 40 CFR 60 NSPS JJJJ limitations or manufacturer supplied emission factors. Compressor engine emissions are estimated based on 8,760 hours per year operation and 1,020 BTU/SCF average heating value. Table 2 lists the engine specifications and stack parameters.

Table 1 Engine Emission Factors

Emissions Source	NOx g/hp-hr	CO g/hp-hr	VOC g/hp-hr	HCHO ppmd@15% O ₂
WC-1 through WC-5	1.00	0.59	0.70	14
C-1 through C-4	0.70	0.41	0.70	14
C-5 through C-8	0.70	0.41	0.70	14

Table 2 Engine Specifications and Stack Parameters

Parameter	WC-1 through WC-5	Parameter	C-1 through C-8
Manufacturer	Caterpillar	Manufacturer	Caterpillar
Model	G-3516B	Model	G-3608 LE
Control	Oxidation Catalyst	Control	Oxidation Catalyst
Input Parameter		Input Parameter	
Horsepower (max)	1,380	Horsepower (max)	2,370
Fuel Consumption	7,051 BTU/hp-hr	Fuel Consumption	6,600 BTU/hp-hr
Stack Diameter	12 in.	Stack Diameter	20 in.
Height above Grade	15 ft.	Height above Grade	30 ft.
Exhaust Flow	8,738 ACFM	Exhaust Flow	16,144 ACFM
Exhaust Temperature	993 °F	Exhaust Temperature	857 °F

Process vent blowdown emissions from the Ward Compressor Station were calculated based on a maximum blowdown volume of 1.2 million cubic feet per year (100 venting episodes and the volume of piping) and a VOC content of gas of 13.66%. Process vent blowdown emissions from the Northern Rows Compressor Station were calculated based on a maximum blowdown volume of 2.4 million cubic feet per year (100 venting episodes and the volume of piping) and a VOC content of gas of 14.83%.

Working and breathing VOC emissions from the condensate tanks (WTK-1 through WTK-3 and TK-1 through TK-3) were estimated using EPA TANKS 4.09d. Emissions for the Ward facility were estimated based on 1,500,000 gallons/year throughput. Emissions for the Northern Rows facility were estimated based on 1,762,500 gallons/year throughput. Flashing emissions from the condensate storage tanks were estimated using a Promax computer simulation. Flashing emissions from the Ward facility were based on a conservative representative condensate analysis. Flashing emissions from the Northern Rows facility were based on a site specific condensate analysis and include a 20% safety factor. The condensate tanks are equipped with vapor recovery units which provide 100% control efficiency when working. VOC emissions from the condensate shall be calculated using approved methods and representative analyses for the throughputs.

Working and breathing VOC emissions from produced water tanks (WTK-5, TK-4, and TK-5) were estimated using EPA TANKS 4.09d. Flashing emissions from produced water tanks were based on a site specific condensate analysis and include a 20% safety factor. Produced water VOC emissions were estimated assuming produced water has 1% of the emissions for an equal volume of condensate. Emissions from the Ward produced water tank (WTK-5) were estimated based on 3,300,000 gallons/year throughput. Emissions from the Northern Rows produced water tanks (TK-4 and TK-5) were estimated based on 17,000,000 gallons/year throughput. Working and breathing VOC emissions from the methanol tanks (WTK-4 and TK-6) were estimated using EPA TANKS 4.09d.

Fugitive emissions are 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 lists the fugitive VOC emissions from the Ward Compressor Station. Table 4 lists the fugitive VOC emissions from the Northern Rows Compressor Station.

Table 3 Ward Facility Fugitive VOC Emissions

Source Type/Service	No. of Sources	Em. Factor (lb/hr/source)*	TOC lb/hr	TOC TPY	VOC Wt % **
Valves – Gas	540	9.92E-03	5.3571	23.4643	13.6549
Connectors – Gas	1,080	4.41E-04	0.4762	2.0857	13.6549
Flanges - Gas	675	8.60E-04	0.5804	2.5420	13.6549
Relief Valves - Gas	36	1.94E-02	0.6984	3.0590	13.6549
Open-Ended Lines – Gas	18	4.41E-03	0.0794	0.3476	13.6549
Compressor Seals - Gas	10	1.94E-02	0.1940	0.8497	13.6549
Other – Gas	20	1.94E-02	0.3880	1.6995	13.6549
Valves - Light Oil	18	5.51E-03	0.0992	0.4345	100.0000%
Connectors - Light Oil	39	4.63E-04	0.0181	0.0791	100.0000%
Flanges - Light Oil	6	2.43E-04	0.0015	0.0064	100.0000%
Pump Seals - Light Oil	2	2.87E-02	0.0573	0.2511	100.0000%
Other - Light Oil	4	1.65E-02	0.0661	0.2897	100.0000%
TOTALS			8.02	35.11	

* Total organic compound (TOC) emission rates multiplied by VOC content of the gas stream (weight percent) to obtain VOC emissions. Light Oil/Light Liquid composition conservatively assumed to be 100% VOC.

** Speciated gas analysis from the site attached to permit application for Permit No. 2010-202-O.

Table 4 Northern Rows Facility Fugitive VOC Emissions

Source Type/Service	No. of Sources	Em. Factor (lb/hr/source)*	TOC lb/hr	TOC TPY	VOC Wt % **
Valves – Gas	750	9.92E-03	7.44	32.59	14.829
Connectors – Gas	1,900	4.41E-04	0.84	3.67	14.829
Flanges - Gas	1,000	8.60E-04	0.86	3.77	14.829
Relief Valves - Gas	60	1.94E-02	1.16	5.10	14.829
Compressor Seals - Gas	16	1.94E-02	0.31	1.36	14.829
Other – Gas	10	1.94E-02	0.19	0.85	14.829
Valves - Light Oil	380	5.51E-03	2.09	9.17	100.0000%
Connectors - Light Oil	1,100	4.63E-04	0.51	2.23	100.0000%
Flanges - Light Oil	40	2.43E-04	0.01	0.04	100.0000%
Pump Seals - Light Oil	2	2.87E-02	0.06	0.25	100.0000%
Other - Light Oil	5	1.65E-02	0.08	0.36	100.0000%
TOTALS			13.55	59.39	

* Total organic compound (TOC) emission rates multiplied by VOC content of the gas stream (weight percent) to obtain VOC emissions. Light Oil/Light Liquid composition conservatively assumed to be 100% VOC.

** Based on a speciated gas analysis.

VOC emissions for the condensate and produced water truck loadout operations were estimated using AP-42 (1/95), Equation (1) in Section 5.2, “Transportation and Marketing of Petroleum Liquids”, using 1,500,000 gallons per year of condensate throughput for the Ward facility and 1,762,500 gallons per year of condensate throughput for the Northern Rows facility. Produced water truck loading emissions were estimated based on 3,300,000 gallons per year throughput for the Ward facility and 17,000,000 gallons per year throughput for the Northern Rows facility. It was assumed produced water has 1% of the emissions for an equal volume of condensate. Produced water loading emissions are insignificant.

Table 5 Northern Rows Facility Fugitive VOC Emissions

Source ID #	Throughput Gal/yr	Emission Factor lb/1000 gal	Reduction Claimed Wt. %	API Gravity Degrees*
WTL-1	1,500,000	8.82	0	N/A
TL-1	1,762,500	6.07	0	N/A

Table 6 lists total facility-wide controlled emissions.

Table 6 Total Facility-Wide Controlled Emissions

ID #	Source	NOx		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
WC-1	1,380-hp Caterpillar G-3516B ¹	3.04	13.33	1.78	7.81	2.13	9.33
WC-2	1,380-hp Caterpillar G-3516B ¹	3.04	13.33	1.78	7.81	2.13	9.33
WC-3	1,380-hp Caterpillar G-3516B ¹	3.04	13.33	1.78	7.81	2.13	9.33
WC-4	1,380-hp Caterpillar G-3516B ¹	3.04	13.33	1.78	7.81	2.13	9.33
WC-5	1,380-hp Caterpillar G-3516B ¹	3.04	13.33	1.78	7.81	2.13	9.33
WBD	Ward Blowdowns	--	--	--	--	44.88	4.04
C-1	2,370-hp Caterpillar G-3608 LE ¹	3.66	16.02	2.14	9.38	3.66	16.02
C-2	2,370-hp Caterpillar G-3608 LE ¹	3.66	16.02	2.14	9.38	3.66	16.02
C-3	2,370-hp Caterpillar G-3608 LE ¹	3.66	16.02	2.14	9.38	3.66	16.02
C-4	2,370-hp Caterpillar G-3608 LE ¹	3.66	16.02	2.14	9.38	3.66	16.02
C-5	2,370-hp Caterpillar G-3608 LE ¹	3.66	16.02	2.14	9.38	3.66	16.02
C-6	2,370-hp Caterpillar G-3608 LE ¹	3.66	16.02	2.14	9.38	3.66	16.02
C-7	2,370-hp Caterpillar G-3608 LE ¹	3.66	16.02	2.14	9.38	3.66	16.02
C-8	2,370-hp Caterpillar G-3608 LE ¹	3.66	16.02	2.14	9.38	3.66	16.02
BD	Northern Rows Blowdowns	--	--	--	--	49.99	8.99
WTK-1	300-bbl Condensate Tank ²	--	--	--	--	--	6.27
WTK-2	300-bbl Condensate Tank ²	--	--	--	--	--	
WTK-3	300-bbl Condensate Tank ²	--	--	--	--	--	
WTK-4	210-bbl Methanol Tank ³	--	--	--	--	--	0.25
WTK-5	300-bbl Produced Water Tank ²	--	--	--	--	--	1.13
WTL-1	Ward Condensate Loading	--	--	--	--	--	6.61
WTL-2	Ward Water Loading	--	--	--	--	--	0.07
TK-1	400-bbl Condensate Tank ²	--	--	--	--	--	5.99
TK-2	400-bbl Condensate Tank ²	--	--	--	--	--	
TK-3	400-bbl Condensate Tank ²	--	--	--	--	--	
TK-4	400-bbl Produced Water Tank ²	--	--	--	--	--	5.99
TK-5	400-bbl Produced Water Tank ²	--	--	--	--	--	
TK-6	400-bbl Methanol Tank ³	--	--	--	--	--	0.35
TL-1	Northern Rows Cond. Loading	--	--	--	--	--	5.35
TLW-1	Northern Rows Water Loading	--	--	--	--	--	0.52
WFUG	Ward Fugitives	--	--	--	--	1.30	5.71
FUG	Northern Rows Fugitives	--	--	--	--	4.36	19.08
Total Emissions		44.48	194.81	26.02	114.09	140.46	245.16
Emissions from Permit No. 2015-0545-TV		29.84	130.73	17.54	76.81	124.34	170.01
Change in Emissions		14.64	64.08	8.48	37.28	16.012	75.15

1 – Equipped with an oxidation catalyst.
 2 – Includes working, breathing, and flashing losses.
 3 – Includes working and breathing losses.

Based on Table 5, the facility is considered a major source since NO_x and VOC emissions exceed the major source threshold of 100 TPY for criteria pollutants.

The primary hazardous air pollutant (HAP) emission from the facility is formaldehyde. Formaldehyde emissions from the Caterpillar engines are estimated based on manufacturer's data. Table 6 lists formaldehyde emissions based on 8,760 hours per year operation. There are negligible HAP emissions from all other sources. Controlled individual HAP emissions are greater than 10 TPY. The facility is, therefore, a major source of HAPs.

Table 6 Formaldehyde Emissions

Emissions Source	Formaldehyde	
	lb/hr	TPY
WC-1, 1,380-hp Caterpillar G-3516B with Oxid.Cata.	0.40	1.73
WC-2, 1,380-hp Caterpillar G-3516B with Oxid.Cata.	0.40	1.73
WC-3, 1,380-hp Caterpillar G-3516B with Oxid.Cata.	0.40	1.73
WC-4, 1,380-hp Caterpillar G-3516B with Oxid.Cata.	0.40	1.73
WC-5, 1,380-hp Caterpillar G-3516B with Oxid.Cata.	0.40	1.73
C-1, 2,370-hp Caterpillar G-3608 LE with Oxid.Cata.	0.42	1.85
C-2, 2,370-hp Caterpillar G-3608 LE with Oxid.Cata.	0.42	1.85
C-3, 2,370-hp Caterpillar G-3608 LE with Oxid.Cata.	0.42	1.85
C-4, 2,370-hp Caterpillar G-3608 LE with Oxid.Cata.	0.42	1.85
C-5, 2,370-hp Caterpillar G-3608 LE with Oxid.Cata.	0.42	1.85
C-6, 2,370-hp Caterpillar G-3608 LE with Oxid.Cata.	0.42	1.85
C-7, 2,370-hp Caterpillar G-3608 LE with Oxid.Cata.	0.42	1.85
C-8, 2,370-hp Caterpillar G-3608 LE with Oxid.Cata.	0.42	1.85
Totals	5.36	23.45

Greenhouse gas (GHG) emissions were stated as a potential of 111,467 TPH CO_{2e} following modification.

SECTION IV. BEST AVAILABLE CONTROL TECHNOLOGY

The emissions increases of regulated air pollutants are less than 100 TPY each. According to OAC 252:100-8-5(d)(1)(A), a BACT review is not required.

SECTION V. INSIGNIFICANT ACTIVITIES

The insignificant activities identified and justified in the application are duplicated below. Records are available to confirm the insignificance of the activities. Appropriate recordkeeping of activities indicated below with “*” is specified in the Specific Conditions.

1. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas).
2. * Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature.
3. Emissions from crude oil and condensate marine and truck loading equipment operations at crude oil and natural gas production sites where the loading rate does not exceed 10,000 gallons per day averaged over a 30 day period.
4. * Emissions from crude oil and condensate storage tanks with a capacity of less than or equal to 420,000 gallons that store crude oil and condensate prior to custody transfer.
5. * Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature.
6. * Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant.

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 and fees paid for the past years.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]
Part 5 includes the general administrative requirements for part 70 permits. Any planned changes in the operation of the facility 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.

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

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

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

OAC 252:100-19 (Particulate Matter) [Applicable]
Section 19-4 regulates emissions of PM from new and existing fuel-burning equipment, with emission limits based on maximum design heat input rating. Fuel-burning equipment is defined in OAC 252:100-19 as any internal combustion engine or gas turbine, or other combustion device used to convert the combustion of fuel into usable energy. Thus, the engines are subject to the requirements of this subchapter. Appendix C specifies a PM emission limitation of 0.60 lbs/MMBTU for all equipment at this facility with a heat input rating of 10 MMBTUH or less. Appendix C specifies a PM emission limitation for all equipment at this facility with a heat input rating of greater than 10 MMBTUH but less than 1,000 MMBTUH based on the following calculation: $E = 1.0428080X^{-0.238561}$, where E is the allowable emission rate and X is the maximum heat input. Table 3.2-2 of AP-42 (7/00) lists total PM emissions from 4-stroke lean burn natural gas-fired engines to be 0.01 lbs/MMBTU.

Equipment	Maximum Heat Input (MMBTUH)	Emissions (lbs/MMBTU)	
		Limit	Potential
1380-hp Cat G-3516B engines	9.73 each	0.60	0.01
2370-hp Cat G-3608 LE engines	15.64 each	0.54	0.01

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 originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. Under normal operating conditions, this facility will not cause a problem in this area, therefore it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds) [Applicable]
Part 2 limits the ambient air impact of hydrogen sulfide emissions from any new or existing source to 0.2 ppm for a 24-hour average (equivalent to 280 µg/m³). A typical engine burning fuel gas with 343 ppmv sulfur will produce ambient impacts of 22 ug/m³ (1-hour average). The sum of H₂S impacts from the engines at the facility are 198 µg/m³, which is in compliance with the Subchapter 31 limit. Fuel-burning equipment at the facility fired with natural gas with less than 343 ppmv H₂S will not have the potential to exceed the ambient standard.
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 for all fuel-burning equipment to ensure compliance with Subchapter 31.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]
 This subchapter limits NO_x 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_x 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) [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. The condensate storage tanks are subject to this requirement.

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

Part 5 limits the VOC content of coatings from any coating line or other coating operation. This facility does not normally conduct coating or painting operations except for routine maintenance of the facility and equipment. No coating operation is located at this facility.

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

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

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

This Subchapter regulates toxic air contaminants (TAC) that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]

This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data 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 252:100-7	Permits For Minor Facilities	Not in source category
OAC 252:100-11	Alternative Emissions Reduction	Not requested
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	Grain Elevators	Not in source category
OAC 252:100-39	Nonattainment Areas	Not in area category
OAC 252:100-47	Municipal Solid Waste Landfills	Not in source category

SECTION VII. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Not Applicable]
 Final total emissions are less than the threshold of 250 TPY of any single regulated pollutant and the facility is not one of the 26 specific industries with a threshold of 100 TPY.

NSPS, 40 CFR Part 60 [Subparts JJJJ, OOOO, and OOOOa Applicable]
Subpart Kb, VOL Storage Vessels. This subpart regulates hydrocarbon storage tanks larger than 19,813-gallons capacity and built after July 23, 1984. All storage tank capacities at this facility are smaller than the threshold level.

Subpart GG, Stationary Gas Turbines. This subpart sets standards for stationary gas turbines, however, the compressors here are powered by reciprocating engines.

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. These operations are not conducted at this plant.

Subpart LLL, Onshore Natural Gas Processing: SO₂ Emissions. This subpart sets standards for natural gas sweetening units. Subpart LLL affects units which sweeten "sour" natural gas, which is defined as gas having more than 4 ppm H₂S. Since H₂S is non-detectable in the inlet gas and will be limited, the unit is not subject.

Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI-ICE), promulgates emission standards for all new SI engines ordered after June 12, 2006, and all SI engines modified or reconstructed after June 12, 2006, regardless of size. All engines at this facility were ordered after June 12, 2006. According to §60.4230(a)(4)(i), which concerns owners and operators of SI-ICE, engines larger than 500 hp (excluding lean-burn engine with hp between 500 and 1350) manufactured after July 1, 2007 are affected facilities. The Caterpillar G-3516B and G-3608 LE engines are subject to this subpart.

Subpart OOOO, Crude Oil and Natural Gas Production, Transmission, and Distribution. This subpart was promulgated on August 16, 2012, and affects the following sources that commence construction, reconstruction, or modification after August 23, 2011:

- (a) Each gas well affected facility, which is a single natural gas well.
- (b) Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals that is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment.
- (c) Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment.
- (d) Each pneumatic controller affected facility, which is:
 - (1) For the oil production segment (between the wellhead and the point of custody transfer to an oil pipeline): a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 SCFH.
 - (2) For the natural gas production segment (between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not including natural gas processing plants): a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 SCFH.
 - (3) For natural gas processing plants: a single continuous bleed natural gas-driven pneumatic controller.
- (e) Each storage vessel affected facility, which is a single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment. On April 12, 2013, EPA proposed revisions to NSPS, Subpart OOOO revising the affected facilities to only those storage vessels that emit more than 6 TPY and revising the definition to only include those storage vessels that contain crude oil, condensate, intermediate hydrocarbon liquids, or produced water.
- (f) The group of all equipment, except compressors, within a process unit is an affected facility.
 - (1) Addition or replacement of equipment for the purpose of process improvement that is accomplished without a capital expenditure shall not by itself be considered a modification under this subpart.
 - (2) Equipment associated with a compressor station, dehydration unit, sweetening unit, underground storage vessel, field gas gathering system, or liquefied natural gas unit is covered by §§ 60.5400, 60.5401, 60.5402, 60.5421, and 60.5422 if it is located at an onshore natural gas processing plant.
- (g) Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.
 - (1) Each sweetening unit that processes natural gas is an affected facility; and
 - (2) Each sweetening unit that processes natural gas followed by a sulfur recovery unit is an affected facility.
 - (3) Facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H₂S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423(c) but are not required to comply with §§60.5405 through 60.5407 and §§60.5410(g) and 60.5415(g) of this subpart.

For each reciprocating compressor the owner/operator must replace the rod packing before 26,000 hours of operation or prior to 36 months. If utilizing the number of hours, the hours of operation must be continuously monitored. Commenced construction is based on the date of installation of the compressor (excluding relocation) at the facility. The four existing

compressors at the Northern Rows facility associated with Caterpillar G-3608LE engines C-1 through C-4 are subject to this subpart. The new compressors were manufactured in 2013, also making them subject to Subpart OOOO.

All pneumatic controllers will have a bleed rate less than 6 SCFH. The five new condensate tanks (TK-1 through TK-5) will have emissions less than 6 TPY and will therefore be exempt from this subpart. All equipment associated with the existing Ward Compressor Station were installed prior to August 23, 2011 and are not subject to this subpart.

The permit will require the facility to comply with all applicable requirements of NSPS, Subpart OOOO.

Subpart OOOOa, Crude Oil and Natural Gas Production Facilities. This subpart was signed final on May 12, 2016, and published in the Federal Register on June 3, 2016. The rule becomes effective 60 days after Federal Register publication, on August 3, 2016, and affects the following sources that commence construction, reconstruction, or modification on or after September 18, 2015, including, but not limited to, the following.

- (a) Hydraulically fractured wildcat wells, delineation wells, or low pressure wells;
- (b) Other hydraulically fractured wells;
- (c) Centrifugal compressors with wet seals (not on well sites, up to the local distribution company);
- (d) Pneumatic controllers at natural gas processing plants;
- (e) Continuous bleed pneumatic controllers between the wellhead and the LDC (not at gas processing plants);
- (f) Pneumatic pumps at well sites;
- (g) Storage vessels;
- (h) Equipment leaks at gas processing plants;
- (i) Equipment leaks at well sites and compressor stations
- (j) And sweetening units at gas processing plants.

Adding four compressors to the facility constitutes a “modification,” making the facility subject to the leak detection and repair (LDAR) requirements of Subpart OOOOa with a compliance date of June 3, 2017 or 60 days after startup of the additional compressors. The new compressors themselves were manufactured in 2013, pre-dating Subpart OOOOa.

NESHAP, 40 CFR Part 61

[Not Applicable]

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

NESHAP, 40 CFR Part 63 [Subpart ZZZZ Applicable]
Subpart HH, Oil and Natural Gas Production Facilities. This final rule affects each TEG dehydration unit located at an area source natural gas production facility that processes, upgrades, or stores hydrocarbon liquids to the point of custody transfer and natural gas from the well up to and including the natural gas processing plant. There is no TEG dehydration unit at this facility. Therefore, this facility is not subject to this subpart.

Subpart HHH, Natural Gas Transmission and Storage. This subpart was published in the Federal Register on June 17, 1999, and affects Natural Gas Transmission and Storage Facilities. It applies to affected emission points that are located at facilities that are major sources of HAPs, as defined in this subpart, and that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user. This facility is a major source of HAPs but is not a transmission or storage facility.

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE) affects new and existing engines at major and area sources. All engines at this location are “new” sources. Table 2a of Subpart ZZZZ provides the following requirements for new and reconstructed 4SLB engines located at major sources of HAPs:

For Each	You must meet the following emission limitation, except during periods of startup . . .
4SLB stationary RICE	a. Reduce CO emissions by 93 percent or more; or b. Limit concentration of formaldehyde in the stationary RICE exhaust to 14 ppmvd or less at 15 percent O ₂

The operator plans to use Option “b.”

CAM, 40 CFR Part 64 [Not Applicable]
 Compliance Assurance Monitoring (CAM) as published in the Federal Register on October 20, 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 100 TPY or 10 TPY of any one HAP or 25 TPY total of all HAPs.

No engine has potential emissions exceeding the 10/25 TPY HAP emissions levels or 100 TPY of a criteria pollutant, therefore, CAM is not applicable.

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. 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.

Stratospheric Ozone Protection, 40 CFR Part 82 [Subpart A and F Applicable]
These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).

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

Subpart F requires that any persons servicing, maintaining, or repairing appliances except for motor vehicle air conditioners; persons disposing of appliances, including motor vehicle air conditioners; refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment comply with the standards for recycling and emissions reduction.

The standard conditions of the permit address the requirements specified at §82.156 for persons opening appliances for maintenance, service, repair, or disposal; §82.158 for equipment used during the maintenance, service, repair, or disposal of appliances; §82.161 for certification by an approved technician certification program of persons performing maintenance, service, repair, or disposal of appliances; §82.166 for recordkeeping; § 82.158 for leak repair requirements; and §82.166 for refrigerant purchase records for appliances normally containing 50 or more pounds of refrigerant.

SECTION VIII. COMPLIANCE

Tier Classification and Public Review

This application has been classified as **Tier II** based on the request for a construction permit for a “significant modification” to an existing major source. The applicant published the “Notice of Filing a Tier II Application” in the *Geary Star* on December 8, 2016, a daily newspaper of general circulation in Canadian County. The notice said that the application was available for public review at the El Reno Carnegie Library or at the AQD office in Oklahoma City. A draft of this permit will also be made available for public review for a period of thirty days as stated in another published announcement. The facility is not located within 50 miles of the Oklahoma border with any other state.

The permittee 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. Information on all permits is available for review by the public in the Air Quality Section of DEQ Web Page: <http://www.deq.state.ok.us>.

Fees Paid

Construction permit application fee of \$7,500.

SECTION IX. SUMMARY

The applicant has demonstrated the ability to comply with the requirements of the applicable Air Quality rules and regulations. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance and enforcement issues concerning this facility. Issuance of the construction permit is recommended, contingent on public and EPA review.

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

DRAFT

ONEOK Field Services Company, LLC **Permit No. 2015-0545-C (M-1)**
Ward Compressor Station/Northern Rows Compressor Station

The permittee is authorized to construct in conformity with the specifications submitted to the Air Quality Division on November 21, 2016. The Evaluation Memorandum dated May 1, 2017, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Commencing construction or 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)]

EUG 1A: Emission limits for Ward Compressor Station permitted engines.

EUG 1A Emission Limitations for Ward Compressor Station Engines

EU ID#	Source	NOx		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
WC-1	1,380-hp Caterpillar G-3516B w/OC	3.04	13.33	1.78	7.81	2.13	9.33
WC-2	1,380-hp Caterpillar G-3516B w/OC	3.04	13.33	1.78	7.81	2.13	9.33
WC-3	1,380-hp Caterpillar G-3516B w/OC	3.04	13.33	1.78	7.81	2.13	9.33
WC-4	1,380-hp Caterpillar G-3516B w/OC	3.04	13.33	1.78	7.81	2.13	9.33
WC-5	1,340-hp Caterpillar G-3516B w/OC	3.04	13.33	1.78	7.81	2.13	9.33

w/OC = with oxidation catalyst

EUG 1B: Emission limits for Northern Rows Compressor Station permitted engines.

EUG 1B Emission Limitations for Northern Rows Compressor Station Engines

EU ID#	Source	NOx		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
C-1	2,370-hp Caterpillar G-3608 LE w/OC	3.66	16.02	2.14	9.38	3.66	16.02
C-2	2,370-hp Caterpillar G-3608 LE w/OC	3.66	16.02	2.14	9.38	3.66	16.02
C-3	2,370-hp Caterpillar G-3608 LE w/OC	3.66	16.02	2.14	9.38	3.66	16.02
C-4	2,370-hp Caterpillar G-3608 LE w/OC	3.66	16.02	2.14	9.38	3.66	16.02

w/OC = with oxidation catalyst

EU ID#	Source	NOx		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
C-5	2,370-hp Caterpillar G-3608 LE w/OC	3.66	16.02	2.14	9.38	3.66	16.02
C-6	2,370-hp Caterpillar G-3608 LE w/OC	3.66	16.02	2.14	9.38	3.66	16.02
C-7	2,370-hp Caterpillar G-3608 LE w/OC	3.66	16.02	2.14	9.38	3.66	16.02
C-8	2,370-hp Caterpillar G-3608 LE w/OC	3.66	16.02	2.14	9.38	3.66	16.02

EUG 2: Storage tank VOC emissions are estimated based on existing equipment items. The Storage tanks from EUG 2A shall be controlled by a vapor recovery unit (VRU) with a 95% capture/control efficiency. The off-gases from the VRU shall be recycled to the station inlet manifolds. The permittee shall estimate uncontrolled emissions from the condensate tanks, which shall not exceed the emission limitations listed for EUG2A below. The condensate tanks shall be bottom filled or equipped with submerged fill pipes.

EUG 2A Ward Compressor Station Condensate Storage Tanks

EU ID #	Description	Throughput Limit	Emissions Limit
WTK-1, WTK-2, and WTK-3	300-bbl Condensate	1,500,000 gal/yr	6.27 TPY

Storage tanks TK-1, TK-2, and TK-3 from EUG 2B shall be controlled by a vapor recovery unit (VRU) with a 95% capture/control efficiency. The off-gases from the VRU shall be recycled to the station inlet manifolds. The permittee shall estimate uncontrolled emissions from the condensate and produced water tanks, which shall not exceed the emission limitations listed for EUG2B below. The condensate tanks shall be bottom filled or equipped with submerged fill pipes.

EUG 2B Northern Rows Compressor Station Condensate Storage Tanks

EU ID #	Description	Throughput Limit	Emissions Limit
TK-1, TK-2, and TK-3	400-bbl Condensate	1,762,500 gal/yr	5.99 TPY
TK-4 and TK-5	400-bbl Produced H ₂ O	17,000,000 gal/yr	5.99 TPY

All vessel gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place. The facility shall record condensate and produced water throughputs (monthly, 12 month rolling total). VOC emissions from the condensate and produced water tanks shall be calculated using approved methods and representative analyses for the throughputs (monthly, 12 month rolling total).

EUG 3: Emission limits for condensate truck loading:

EU ID #	Emission Unit	Throughput Limit
WTL-1	Ward	1,500,000 gal/yr
TL-1	Northern Rows	1,762,500 gal/yr

The facility shall record condensate throughputs (monthly, 12-month rolling total).

The facility shall keep records of produced water loading as required for insignificant activities.

EUG 4: Additional Storage Tank VOC emissions are estimated based on existing equipment items but do not have a specific limitation under normal operating conditions.

EU ID #	Capacity (barrel/gallon)	Material Stored	Constructed Date
WTK-4	210/8,820	Methanol	March 2011
WTK-5	300/12,600	Produced H ₂ O	March 2011
TK-6	400/16,800	Methanol	January 2014

EUG 5: Fugitive VOC emissions are estimated based on existing equipment items but do not have a specific limitation. [OAC 252:100-8-6 (a)(3)]

EUG 5 Fugitive Sources

EU ID#	Emission Unit	Gas	Water/Light Oil
WFUG	Valves	540	18
	Connectors	1,080	39
	Flanges	675	6
	Relief Valves	36	0
	Open-Ended Lines	18	0
	Compressor Seals	10	0
	Other	20	4
	Pump Seals	0	2
FUG	Valves	750	380
	Connectors	1,900	1,100
	Flanges	1,000	40
	Relief Valves	60	0
	Compressor Seals	16	0
	Other	10	5
	Pump Seals	0	2

EUG 6 Blowdown Emissions. Emissions from equipment blowdowns are based on the number of blowdowns, the volume of vented emissions, and the estimated VOC content of the vented emissions. Blowdown emissions do not have a specific limitation.

EUG #	EU ID#	Description
6	WBD	Ward Compressor Station Blowdowns
	BD	Northern Rows Compressor Station Blowdowns

2. The fuel-burning equipment shall be fired with pipeline grade natural gas or other gaseous fuel with a sulfur content less than 343 ppmv. Compliance can be shown by the following methods: for pipeline grade natural gas, a current gas company bill; for other gaseous fuel, a current lab analysis, stain-tube analysis, gas contract, tariff sheet, or other approved methods. Compliance shall be demonstrated at least once every calendar year. [OAC 252:100-31]

3. Upon issuance of an operating permit, the permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year). [OAC 252:100-8-6 (a)]

4. Each engine 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_x and CO emissions in exhaust gases from each engine in EUG-1 and each replacement engine when operating under representative conditions for that period. Testing is required for any engine or replacement engine, which runs for more than 220 hours during that calendar quarter. Engines shall be tested no sooner than 20 days after the last test. Testing shall be conducted using a portable engine analyzer in accordance with a protocol meeting the requirements of the “AQD Portable Analyzer Guidance” document or an equivalent method approved by Air Quality. When four consecutive quarterly tests show an engine 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 indicate that emissions are within 10% of the emission limitation, the testing frequency shall revert to quarterly. Reduced engine testing does not apply to engines with catalytic converter/oxidation catalyst. [OAC 252:100-8-6 (a)(3)(A)]

6. When periodic compliance testing shows engine exhaust emissions in excess of the lb/hr limits in Specific Condition Number 1, the permittee shall comply with the provisions of OAC 252:100-9 for excess emissions. Requirements of OAC 252:100-9 include immediate notification and written notification of Air Quality and demonstrations that the excess emissions meet the criteria specified in OAC 252:100-9. [OAC 252:100-9]

7. Replacement (including temporary periods of six months or less for maintenance purposes), of internal combustion engines/turbines with emissions limitations specified in this permit with engines/turbines of lesser or equal emissions of each pollutant (in lbs/hr and TPY) are authorized under the following conditions. [OAC 252:100-8-6 (f)]

- a. The permittee shall notify AQD in writing not later than 7 days in advance of the startup 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_x and CO emissions limitations. A copy of the first quarter testing shall be provided to AQD within 60 days of start-up of each replacement 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 (lbs/hr, and TPY) at maximum rated horsepower for the altitude/location.
 - c. Replacement equipment and emissions are limited to equipment and emissions which are not a modification under NSPS, NESHAP, or a significant modification under PSD.
 - d. Engines installed as allowed under the replacement allowances in this Specific Condition that are subject to 40 CFR Part 63, Subpart ZZZZ and/or 40 CFR Part 60, Subpart JJJJ shall comply with all applicable requirements.
8. The following records shall be maintained on-site to verify Insignificant Activities. No recordkeeping is required for those operations which qualify as Trivial Activities.
[OAC 252:100-8-6 (a)(3)(B)]
- a. Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature: capacity and materials stored.
 - b. Storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature: capacity and materials stored.
 - c. For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant: The type of activity and the amount of emissions from that activity (annual).
9. Engines subject to 40 CFR Part 60, Subpart JJJJ, shall comply with all applicable standards for owners or operators of stationary spark ignition internal combustion engines:
[40 CFR 60.4230 to 60.4248]
- a. § 60.4230: Am I subject to this subpart?
 - b. § 60.4231: What emission standards must I meet if I am a manufacturer of stationary SI internal combustion engines?
 - c. § 60.4232: How long must my engines meet the emissions standards if I am a manufacturer of stationary SI internal combustion engines?
 - d. § 60.4233: What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?
 - e. § 60.4234: How long must I meet the emissions standards if I am an owner or operator of a stationary SI internal combustion engine?

- f. § 60.4235: What fuel requirements must I meet if I am an owner or operator of a stationary SI internal combustion engine?
 - g. § 60.4236: What is the deadline for importing or installing stationary SI ICE produced in the previous model year?
 - h. § 60.4237: What are the monitoring requirements if I am an owner or operator of a stationary SI internal combustion engine?
 - i. § 60.4238: What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines ≤ 19 KW (25 HP).
 - j. § 60.4239: What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines ≥ 19 KW (25 HP) that use gasoline?
 - k. § 60.4240: What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines ≥ 19 KW (25 HP) that use LPG?
 - l. § 60.4241: What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines participating in the voluntary certification program?
 - m. § 60.4242: What other requirement must I meet if I am a manufacturer of stationary SI internal combustion engines?
 - n. § 60.4243: What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?
 - o. § 60.4244: What test methods and other procedures must I use if I am an owner or operator of a stationary SI internal combustion engine?
 - p. § 60.4245: What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?
 - q. § 60.4246: What parts of the General Provisions apply to me?
 - r. § 60.4247: What parts of the mobile source provisions apply to me if I am a manufacturer of stationary SI internal combustion engines?
 - s. § 60.4248: What definitions apply to this subpart?
10. The permittee shall comply with NSPS, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transportation, and Distribution, for all affected facility located at this facility.
- a. § 60.5360 What is the purpose of this subpart?
 - b. § 60.5365 Am I subject to this subpart?
 - c. § 60.5370 When must I comply with this subpart?
 - d. § 60.5375 What standards apply to gas well affected facilities?
 - e. § 60.5380 What standards apply to centrifugal compressor affected facilities?
 - f. § 60.5385 What standards apply to reciprocating compressor affected facilities?
 - g. § 60.5390 What standards apply to pneumatic controller affected facilities?
 - h. § 60.5395 What standards apply to storage vessel affected facilities?
 - i. § 60.5400 What equipment leak standards apply to affected facilities at an onshore natural gas processing plant?
 - j. § 60.5401 What are the exceptions to the equipment leak standards for affected facilities at onshore natural gas processing plants?
 - k. § 60.5402 What are the alternative emission limitations for equipment leaks from onshore natural gas processing plants?

- l. § 60.5405 What standards apply to sweetening units at onshore natural gas processing plants?
- m. § 60.5406 What test methods and procedures must I use for my sweetening units affected facilities at onshore natural gas processing plants?
- n. § 60.5407 What are the requirements for monitoring of emissions and operations from my sweetening unit affected facilities at onshore natural gas processing plants?
- o. § 60.5408 What is an optional procedure for measuring hydrogen sulfide in acid gas-Tutwiler Procedure?
- p. § 60.5410 How do I demonstrate initial compliance with the standards for my gas well affected facility, my centrifugal compressor affected facility, my reciprocating compressor affected facility, my pneumatic controller affected facility, my storage vessel affected facility, and my equipment leaks and sweetening unit affected facilities at onshore natural gas processing plants?
- q. § 60.5411 What additional requirements must I meet to determine initial compliance for my closed vent systems routing emissions from storage vessels or centrifugal compressor wet seal fluid degassing systems?
- r. § 60.5412 What additional requirements must I meet for determining initial compliance with control devices used to comply with the emission standards for my storage vessel or centrifugal compressor affected facility?
- s. § 60.5413 What are the performance testing procedures for control devices used to demonstrate compliance at my storage vessel or centrifugal compressor affected facility?
- t. § 60.5415 How do I demonstrate continuous compliance with the standards for my gas well affected facility, my centrifugal compressor affected facility, my stationary reciprocating compressor affected facility, my pneumatic controller affected facility, my storage vessel affected facility, and my affected facilities at onshore natural gas processing plants?
- u. § 60.5416 What are the initial and continuous cover and closed vent system inspection and monitoring requirements for my storage vessel or centrifugal compressor affected facility?
- v. § 60.5417 What are the continuous control device monitoring requirements for my storage vessel or centrifugal compressor affected facility?
- w. § 60.5420 What are my notification, reporting, and recordkeeping requirements?
- x. § 60.5421 What are my additional recordkeeping requirements for my affected facility subject to VOC requirements for onshore natural gas processing plants?
- y. § 60.5422 What are my additional reporting requirements for my affected facility subject to VOC requirements for onshore natural gas processing plants?
- z. § 60.5423 What additional recordkeeping and reporting requirements apply to my sweetening unit affected facilities at onshore natural gas processing plants?
- aa. § 60.5425 What parts of the General Provisions apply to me?
- bb. § 60.5430 What definitions apply to this subpart?

11. The owner/operator shall comply with all applicable requirements of the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), Subpart ZZZZ, for any engine at the facility subject to Subpart ZZZZ, including but not limited to:

[40 CFR 60.630 to 60.636]

- a. § 63.6580 What is the purpose of subpart ZZZZ?
 - b. § 63.6585 Am I subject to this subpart?
 - c. § 63.6590 What parts of my plant does this subpart cover?
 - d. § 63.6595 When do I have to comply with this subpart?
 - e. § 63.6600 What emission limitations and operating limitations must I meet?
 - f. § 63.6605 What are my general requirements for complying with this subpart?
 - g. § 63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations?
 - h. § 63.6615 When must I conduct subsequent performance tests?
 - i. § 63.6620 What performance tests and other procedures must I use?
 - j. § 63.6625 What are my monitoring, installation, operation, and maintenance requirements?
 - k. § 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?
 - l. § 63.6635 How do I monitor and collect data to demonstrate continuous compliance?
 - m. § 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?
 - n. § 63.6645 What notifications must I submit and when?
 - o. § 63.6650 What reports must I submit and when?
 - p. § 63.6655 What records must I keep?
 - q. § 63.6660 In what form and how long must I keep my records?
 - r. § 63.6665 What parts of the General Provisions apply to me?
 - s. § 63.6670 Who implements and enforces this subpart?
 - t. § 63.6675 What definitions apply to this subpart?
12. The permittee shall comply with all applicable requirements in 40 CFR Part 60, Subpart OOOOa, Crude Oil and Natural Gas Production, Transmission, and Distribution. This subpart was signed final on May 12, 2016, and published in the Federal Register on June 3, 2016. The rule becomes effective 60 days after Federal Register publication, on August 3, 2016, and affects the following sources that commence construction, reconstruction, or modification on or after September 18, 2015, including, but not limited to, the following.
- a. § 60.5360a What is the purpose of this subpart?
 - b. § 60.5365a Am I subject to this subpart?
 - c. § 60.5370a When must I comply with this subpart?
 - d. § 60.5375a What GHG and VOC standards apply to well affected facilities?
 - e. § 60.5380a What GHG and VOC standards apply to centrifugal compressor affected facilities?
 - f. § 60.5385a What GHG and VOC standards apply to reciprocating compressor affected facilities?

- g. §60.5390a What GHG and VOC standards apply to pneumatic controller affected facilities?
- h. §60.5393a What GHG and VOC standards apply to pneumatic pump affected facilities?
- i. §60.5395a What VOC standards apply to storage vessel affected facilities?
- j. §60.5397a What fugitive emissions GHG and VOC standards apply to the affected facility which is the collection of fugitive emissions components at a well site and the affected facility which is the collection of fugitive emissions components at a compressor station?
- k. §60.5398a What are the alternative means of emission limitations for GHG and VOC from well completions, reciprocating compressors, the collection of fugitive emissions components at a well site and the collection of fugitive emissions components at a compressor station?
- l. §60.5400a What equipment leak GHG and VOC standards apply to affected facilities at an onshore natural gas processing plant?
- m. §60.5401a What are the exceptions to the equipment leak GHG and VOC standards for affected facilities at onshore natural gas processing plants?
- n. §60.5402a What are the alternative means of emission limitations for GHG and VOC equipment leaks from onshore natural gas processing plants?
- o. §60.5405a What standards apply to sweetening unit affected facilities at onshore natural gas processing plants?
- p. §60.5406a What test methods and procedures must I use for my sweetening unit affected facilities at onshore natural gas processing plants?
- q. §60.5407a What are the requirements for monitoring of emissions and operations from my sweetening unit affected facilities at onshore natural gas processing plants?
- r. §60.5408a What is an optional procedure for measuring hydrogen sulfide in acid gas—Tutwiler Procedure?
- s. §60.5410a How do I demonstrate initial compliance with the standards for my well, centrifugal compressor, reciprocating compressor, pneumatic controller, pneumatic pump, storage vessel, collection of fugitive emissions components at a well site, and collection of fugitive emissions components at a compressor station, and equipment leaks and sweetening unit affected facilities at onshore natural gas processing plants?
- t. §60.5411a What additional requirements must I meet to determine initial compliance for my covers and closed vent systems routing emissions from centrifugal compressor wet seal fluid degassing systems, reciprocating compressors, pneumatic pump and storage vessels?
- u. §60.5412a What additional requirements must I meet for determining initial compliance with control devices used to comply with the emission standards for my centrifugal compressor, and storage vessel affected facilities?
- v. §60.5413a What are the performance testing procedures for control devices used to demonstrate compliance at my centrifugal compressor, pneumatic pump and storage vessel affected facilities?
- w. §60.5415a How do I demonstrate continuous compliance with the standards for my well, centrifugal compressor, reciprocating compressor, pneumatic controller, pneumatic pump, storage vessel, collection of fugitive emissions components at a

- well site, and collection of fugitive emissions components at a compressor station affected facilities, and affected facilities at onshore natural gas processing plants?
- x. §60.5416a What are the initial and continuous cover and closed vent system inspection and monitoring requirements for my centrifugal compressor, reciprocating compressor, pneumatic pump, and storage vessel affected facilities?
 - y. §60.5417a What are the continuous control device monitoring requirements for my centrifugal compressor, pneumatic pump, and storage vessel affected facilities?
 - z. §60.5420a What are my notification, reporting, and recordkeeping requirements?
 - aa. §60.5421a What are my additional recordkeeping requirements for my affected facility subject to GHG and VOC requirements for onshore natural gas processing plants?
 - bb. §60.5422a What are my additional reporting requirements for my affected facility subject to GHG and VOC requirements for onshore natural gas processing plants?
 - cc. §60.5423a What additional recordkeeping and reporting requirements apply to my sweetening unit affected facilities at onshore natural gas processing plants?
 - dd. §60.5425a What parts of the General Provisions apply to me?
 - ee. §60.5430a What definitions apply to this subpart?
 - ff. §60.5432a How do I determine whether a well is a low pressure well using the low pressure well equation?
13. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site or at a local field office for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-8-6 (a)(3)(B)]
- a. Periodic testing of NO_x and CO exhaust from each engine and each replacement engine.
 - b. Operating hours for each engine if less than 220 hours per quarter and not tested.
 - c. For the fuel(s) burned, the appropriate document(s) as described in Specific Condition No. 2.
 - d. Calculated emissions from EUG 2A and EUG 2B (monthly and 12-month rolling totals).
 - e. Condensate throughputs (monthly and 12-month rolling totals).
 - f. Produced water throughputs for tanks TK-4 and TK-5 at the Northern Rows facility.
 - g. Records as required by 40 CFR Part 60, Subpart JJJJ.
 - h. Records as required by 40 CFR Part 60, Subpart OOOO.
 - i. Records as required by 40 CFR Part 63, Subpart ZZZZ.
 - j. Records of insignificant activities.
14. The Permit Shield (Standard Conditions, Section VI) is extended to the following requirements that have been determined to be inapplicable to this facility: [OAC 252:100-8-6(d)(2)]
- a. 40 CFR Part 52, NSR
 - b. OAC 252:100-8, Part 7, PSD
 - c. OAC 252:100-33, Control of Emissions of Nitrogen Oxides
 - d. OAC 252:100-35, Control of Emission of Carbon Monoxide
 - e. OAC 252:100-39, Emissions of VOCs in Non-attainment Areas and Former Non-attainment Areas

16. No later than 30 days after each anniversary date of the issuance of the Part 70 operating permit, the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit.

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

17. No later than 180 days of start of normal operation of any new emission unit authorized under this construction permit, the permittee shall apply for a modified Title V operating permit and request that the specific conditions of this construction permit be incorporated into the Title V permit.

[OAC 252:100-8-6]

Mr. Kale Hanner, Environmental Engineer
ONEOK Field Services Company, L.L.C.
100 West Fifth Street
Tulsa, OK 74103

SUBJECT: Construction Permit No. **2015-0545-C (M-1)**
ONEOK Field Services Company, LLC
Ward Compressor Station/Northern Rows Compressor Station (FAC ID 7252)
Sections 28, Township 14N, Range 10W
Geary, Canadian County, Oklahoma.

Dear Mr. Hanner:

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

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

If you have any questions, please refer to the permit number above and contact me at David.Schutz@deq.state.ok.us or at (405) 702-4198.

Sincerely,

David S. Schutz, P.E.
New Source Permits Section
AIR QUALITY DIVISION

Enclosures



PART 70 PERMIT

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

Permit No. 2015-0545-C (M-1)

ONEOK Field Service Company, L.L.C.,

having complied with the requirements of the law, is hereby granted permission to modify the Ward Compressor Station/Northern Rows Compressor Station, Section 28, T14N, R10W, Canadian County, Oklahoma subject to the Standard Conditions dated June 21, 2016 and Specific Conditions, both attached.

In the absence of commencement of construction, this permit shall expire 18 months from the issuance date, except as authorized under Section VIII of the Standard Conditions.

Division Director
Air Quality Division

Date

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

SECTION I. DUTY TO COMPLY

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

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

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

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

D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations. [OAC 252:100-8-6(a)(7)(B)]

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

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

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

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

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

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

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

B. Records of required monitoring shall include:

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

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

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

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

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

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

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

[OAC 252:100-43]

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

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

G. Any owner or operator subject to the provisions of New Source Performance Standards ("NSPS") under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants ("NESHAPs") under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other

information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

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

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

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

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

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

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

SECTION IV. COMPLIANCE CERTIFICATIONS

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

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

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

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

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete." [OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

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

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

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification. [OAC 252:100-8-6(c)(6)]

SECTION VI. PERMIT SHIELD

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit. [OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit. [OAC 252:100-8-6(d)(2)]

SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

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

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

SECTION VIII. TERM OF PERMIT

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

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

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

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

SECTION IX. SEVERABILITY

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [OAC 252:100-8-6 (a)(6)]

SECTION X. PROPERTY RIGHTS

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

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

SECTION XI. DUTY TO PROVIDE INFORMATION

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing, terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit. [OAC 252:100-8-6(a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment. [OAC 252:100-8-6(a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

SECTION XII. REOPENING, MODIFICATION & REVOCATION

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

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

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

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

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

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

[OAC 100-8-7.3(d)]

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

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

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited.

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

SECTION XIII. INSPECTION & ENTRY

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

- (1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

- (3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

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

SECTION XIV. EMERGENCIES

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

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

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance.

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

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

[OAC 252:100-8-2]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that:

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

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

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof.

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

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.

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

SECTION XV. RISK MANAGEMENT PLAN

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

SECTION XVI. INSIGNIFICANT ACTIVITIES

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

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

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

SECTION XVII. TRIVIAL ACTIVITIES

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

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

SECTION XVIII. OPERATIONAL FLEXIBILITY

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

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

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

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The

permit shield provided by this permit does not apply to any change made pursuant to this paragraph. [OAC 252:100-8-6(f)(2)]

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

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

- (1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]
- (2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]
- (3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for: [OAC 252:100-25]
 - a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
 - b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
 - c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
 - d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.
- (4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]
- (5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
- (6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]
- (7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

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

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

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

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

- (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
- (2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
- (3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161;
- (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
- (5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
- (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

SECTION XXI. TITLE V APPROVAL LANGUAGE

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

- (1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
- (2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).
- (3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).
- (4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R. § 70.8(a) and (c).
- (5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.
- (6) The DEQ complies with 40 C.F.R. § 70.8(d).
- (7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).
- (8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
- (9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).
- (10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

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

SECTION XXII. CREDIBLE EVIDENCE

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

[OAC 252:100-43-6]