

## DRAFT/PROPOSED

### OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

#### MEMORANDUM

August 9, 2018

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

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

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

**THROUGH:** Amalia Talty, P.E., Existing Source Permits Section

**FROM:** Morgan McGrath, E.I., Engr. Section, Regional Office at Tulsa (ROAT)

**SUBJECT:** Evaluation of Permit Application No. **2017-1801-O**  
Enable Gas Gathering, LLC  
Verden Compressor Station  
DEQ Facility ID: 4285  
SW/4, Section 23, T7N, R9W, Caddo County, Oklahoma  
Latitude 35.058°N, Longitude 98.122°W  
Driving Directions: From the west side of Verden, travel 1 mile west on  
Highway 62 and turn south on county road. Travel 1 mile south and turn  
west on county road. Travel ½ mile west until reaching facility on the  
north side of the road.

#### INTRODUCTION

Enable Gas Gathering, LLC (EGG) has applied for renewal of the Part 70 operating permit for their Verden Compressor Station (SIC 4922, NAIC 48621). The facility currently operates under Permit No. 2011-157-TVR (M-1) issued on September 24, 2013.

With this permit application, the facility has updated the flash emissions from the two (2) condensate storage tanks onsite based on the updated DEQ guidance for the default Vasquez Beggs Input Parameters (02/2016). Total VOC emissions from the condensate tanks have decreased by 1.12 TPY. The facility has also revised the emissions from the glycol dehydrator by utilizing an updated gas analysis. Total VOC emissions from the glycol dehydrator have decreased by 26.64 TPY and total HAPs from the glycol dehydrator have decreased by 11.36 TPY.

Facility is requesting enforceable limitations on their potential emissions of HAPs to remain below major source levels. The facility has requested no changes to the control equipment.

On January 25, 2018, EPA issued guidance replacing the maximum achievable control technology

(MACT) "once in, always in" (OIAI) policy under the federal Clean Air Act (CAA). Memorandum from William L. Wehrum, Assistant Administrator, to Regional Air Division Directors, "Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act," (Jan. 25, 2018) (Guidance). The Guidance allows major sources subject to a MACT standard under CAA §112 to be reclassified as area sources and, thus, to avoid being subject thereafter to major source MACT requirements. Specifically, the Guidance allows major sources to take enforceable limits on their potential to emit (PTE) hazardous air pollutants (HAP) below major source thresholds (i.e., 10 tons per year of any single HAP or 25 of any combination of HAP). Notice of memo published in Federal Register on February 8, 2018, the policy becomes effective on the date of publication.

Under prior EPA OIAI guidance, the facility was subject to NESHAP Subpart HH and the facility was determined to be a major source of HAPs after the initial compliance date of Subpart HH and the facility was subject to all major source requirements of that subpart including the requirement of a Part 70 permit. For NESHAP Subparts HH facilities that are production field facilities, only HAP emissions from glycol dehydration units and storage vessels shall be aggregated for a major source determination. Under the updated EPA OIAI guidance stated above, the applicant has taken limits on hazardous air pollutants from the glycol dehydration unit as described in this memorandum. Therefore, this facility will be an area source of HAP emissions as defined in NESHAP Subpart HH contingent upon public and EPA review.

### *Permit History*

#### Permit No. 2011-157-TVR (M-1) issued on 9/24/2013

This was an administrative amendment to change the company name from Enogex Gas Gathering, LLC to Enable Gas Gathering, LLC. The content of the Memorandum and Specific Conditions of Permit No. 2011-157-TVR remained unchanged.

#### Permit No. 2011-157-TVR issued on 5/24/2013

Enogex Gas Gathering, LLC (Enogex) submitted an application to renew their Title V operating permit for its Verden Compressor Station (SIC 4922, NAIC 48621). Both 1,340-hp Caterpillar G3516 TALE engines were removed from the facility on May 23, 2011.

#### Permit No. 2001-210-TV (M-1) issued on 5/28/2009

Enogex Gas Gathering, LLC (Enogex) submitted an application to install two (2) 1,340-HP Caterpillar G3516 TALE natural-gas fired engines.

#### Permit No. 2001-210-TV issued on 9/18/2006

The facility was constructed in 1999 without an Air Quality Permit. It was operated until 2001 without any emission controls on the glycol dehydrator. The NOV states that the potential emissions of hazardous air pollutants (HAPs) from the unit were reported to be 133.64 tons per year (TPY). The listed HAPs include benzene, toluene, ethylbenzene, xylene (BTEX) and n-hexane. Enogex installed a condenser and an enclosed combustion device on the glycol dehydrator to control the emissions of VOCs and HAPs. After issuance of Permit No. 2001-210-TV, the potential to emit from this facility was less than major source levels. However, since the facility is subject to NESHAP Subpart HH and the facility was a major source after the initial compliance

date of Subpart HH, the facility became subject to all major source requirements including the requirement to get a Part 70 permit. Even though the facility will become a minor source, the facility was determined to be subject to NESHAP, Subpart HH and will remain subject to this subpart because of the EPA “once in always in” policy.

**FACILITY DESCRIPTION**

EGG owns and operates the Verden Compressor Station, which provides compression and dehydration of natural gas. Current emission sources include one glycol dehydrator, one glycol dehydrator reboiler, two condensate storage tanks, and various support operations. In addition, there are two compressors at the facility, which are powered by electric motors. The permit memorandum will be updated to reflect current rules and regulations.

**EQUIPMENT**

**Table 1 Natural Gas Burners**

EU	Point	Name	MMBTUH	Const. Date
H-1	Heater-1	Glycol Reboiler Heater <sup>1</sup>	1.0	1999
H-2	Heater-2	Glycol Reboiler Heater <sup>1</sup>	1.0	1999
H-3	Heater-3	Enclosed Combustion Device	1.0	2001

<sup>1</sup>The glycol dehydration unit is equipped with two (2) 1.0 MMBTUH burners.

**Table 2 Glycol Dehydration Unit Still Vent and Combustion Device**

EU	Point	Name	Const. Date
D-1	SV-1	Glycol Dehydration Still Vent	1999
E-1	ECD-1	Enclosed Combustion Device	2001

The still vent is currently connected to a condenser, which is vented to the enclosed combustion device.

**Table 3 Tanks**

EU	Point	Contents	Barrels	Gallons
Tanks	T-1	Condensate	400	16,800
	T-2	Condensate	400	16,800

**EMISSIONS**

- The uncontrolled emissions from the glycol dehydration unit are based on GRI-GLYCalc Version 4.0, using a maximum design capacity of 65 MMSCF/day gas throughput, a glycol circulation rate of 24.0 gpm, a recent inlet gas analysis, and a recent rich/lean glycol analysis. The controlled emissions use recycle/recompression of the flash gas (which assumes 100% efficiency), a condenser and an enclosed flare combustion device with a combined 95% efficiency on the still vent and a 200% safety factor.
- The glycol dehydrator reboiler is equipped with two 1.0 MMBTUH burners. The

emissions from the reboiler burners were calculated based on the manufacturers rated fuel consumption, 8,760 hours of operation, and AP-42 (7/98), Tables 1.4-1 and 1.4-2.

- Estimated working and breathing emissions for the tanks are based on AP-42 (1/95), Chapter 7.1 and were calculated using TANKS4.0 with a throughput of 300,000 gallons per year per tank. Flash emissions of VOCs from the condensate tanks were estimated using the Vasquez-Beggs Gas/Oil Correlation Method and the following factors. HAP emissions are estimated using the default ODEQ HAP speciation factors (weight percent of total VOC emissions) taken from the GP-OGF.

**Table 4 Vasquez-Beggs Factors**

Inputs	Units	Air Quality Default Values	Values Used For Calculation
Stock Tank API Gravity	API	70.0	70.0
Separator Temperature	°F	60.0	60.0
Separator Gas Specific Gravity	--	0.9	0.9
Stock Tank Gas Molecular Weight	lb/lb-mole	60.0	60.0
VOC Fraction of the Stock Tank Gas	Fraction	0.8	0.8
Atmospheric Pressure	psia	14.7	14.7
Separator Pressure	psig	--	50
Tank Throughput	BOPD	--	39.14
<b>Emission Total (Includes Breathing, Working, and Flash)</b>			<b>50.94 TPY (both tanks)</b>

**Table 5 Total HAP Emissions from Storage Tanks**

Constituent	Percentage (%)	TPY
Benzene	3	1.53
Toluene	2	1.02
Ethyl Benzene	1	0.51
Xylene	1	0.51
n-Hexane	3	1.53
<b>Total HAP</b>	<b>10</b>	<b>5.09</b>

- Fugitive VOC emissions are based on EPA's *1995 Protocol for Equipment Leak Emission Estimates* (EPA-453/R-95-017), an estimated number of components, and a recent gas analysis.
- Estimated emissions from the truck loading are based on AP-42 (1/95), Chapter 5.2, an emission factor of 5.7 lb/1,000 gallons, and an estimated throughput of 600,000 gallons/year. No emissions reduction was claimed by the applicant.

**Table 6 Loading Loss**

EU ID#	Content	Throughput (gal/yr)	Emission Factor (lb/1,000 gal)	Reduction Claimed (Wt.%)	Total VOC Emissions (TPY)
LOAD-1	Condensate	600,000	5.713	0	1.71

**Table 7 Total Emissions**

EU	Description	NO <sub>x</sub>		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
H-1	1.0 MMBTUH Dehydration Reboiler <sup>1</sup>	0.1	0.43	0.08	0.36	0.01	0.02
H-2	1.0 MMBTUH Dehydration Reboiler <sup>1</sup>	0.1	0.43	0.08	0.36	0.01	0.02
H-3	1.0 MMBTUH Combustion Device Burner <sup>2</sup>	0.1	0.43	0.08	0.36	0.01	0.02
SV-1	Still Vent With Condenser and Combustion Device	---	---	---	---	0.73	3.20
T-1, T-2	Condensate Tanks <sup>3</sup>	---	---	---	---	---	50.94
TL-1	Truck Loading	---	---	---	---	---	1.71
FUG-1	Fugitives	---	---	---	---	0.93	1.90
<b>Total</b>		<b>0.3</b>	<b>1.29</b>	<b>0.24</b>	<b>1.08</b>	<b>1.1</b>	<b>57.81</b>

<sup>1</sup>The glycol dehydration unit is equipped with two 1.0 MMBTUH burners;

<sup>2</sup>The emissions are from the burner only. The emissions from the still vent combustion are included in the SV-1 estimate;

<sup>3</sup>Includes breathing, working losses and flash emissions from both tanks.

### **Hazardous Air Pollutants (HAPs)**

The dehydration unit uses a glycol desiccant and will emit benzene, toluene, ethyl benzene, xylene, and n-hexane from the still vent stack. These compounds are regulated as HAPs. The applicant has analyzed the inlet gas and the rich/lean glycol for concentrations of BTEX and estimated the HAP emissions using GRI-GLYCalc™ version 4.0 software model with a gas throughput of 65.0 MMSCFD, a lean glycol pump rate of 24 gallons per minute, a condenser on the still vent with the uncondensed gases routed to an enclosed combustion device with a combined 95% control efficiency, and a 200% safety factor. The glycol dehydration unit is equipped with a flash tank and the flash gas is recycled and recompressed. All controlled emissions of HAPs are below the major source levels.

**Table 7 HAPs Emissions from the Glycol Dehydrator**

Pollutant	CAS No.	Controlled Emissions	
		lb/hr	TPY
Benzene	71-4-32	0.12	0.52
Toluene	108-88-3	0.11	0.47
Ethyl Benzene	100-41-4	0.01	0.01
Xylene	1330-20-7	0.03	0.14
n-Hexane	110-54-3	0.37	1.64
<b>Total</b>		<b>0.64</b>	<b>2.78</b>

**Table 8 Facility-Wide Emissions of HAPs**

Pollutant	CAS No.	Total HAPs
		TPY
Benzene	71-4-32	2.05
Toluene	108-88-3	1.49
Ethyl Benzene	100-41-4	0.52
Xylene	1330-20-7	0.65
n-Hexane	110-54-3	3.17
<b>Total</b>		<b>7.88</b>

Total HAP are below 25 TPY and single HAP is below 10 TPY, therefore the facility is not a major source for HAP.

**OKLAHOMA AIR POLLUTION CONTROL RULES**

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

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

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

OAC 252:100-5 (Registration, Emissions Inventory and Annual Operating Fees) [Applicable]  
 Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Required annual information (Turn-Around Document) shall be provided to Air Quality.

OAC 252:100-7 (Permits for Minor Facilities) [Applicable]  
 Subchapter 7 sets forth the permit application fees and the basic substantive requirements of permits for minor facilities. Since criteria pollutant emissions are less than 100 TPY for each pollutant, and emissions of Hazardous Air Pollutants (HAP) will not exceed 10 TPY for any one HAP or 25 TPY for any aggregate of HAP, the facility is defined as a minor source. As such, BACT is not required.

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

OAC 252:100-8 (Permits for Part 70 Sources) [Not Applicable]  
Part 5 includes the general administrative requirements for Part 70 permits. Any planned changes in the operation of the facility that result in emissions not authorized in the permit and that exceed

the “Insignificant Activities” or “Trivial Activities” thresholds require prior notification to AQD and may require a permit modification. Insignificant activities refer to those individual emission units either listed in Appendix I or whose actual calendar year emissions do not exceed the following limits.

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

Under prior EPA OIAI guidance, the facility was subject to NESHAP Subpart HH and the facility was a major source for HAPs after the initial compliance date of Subpart HH and the facility was subject to all major source requirements including the requirement of a Part 70 permit. However, the facility is no longer a major source of HAPs; therefore, under the updated EPA OIAI guidance the facility is no longer required to obtain a Part 70.

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 mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

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

OAC 252:100-19 (Particulate Matter (PM)) [Applicable]  
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.

- The flare does not meet the definition of fuel-burning equipment and is therefore not subject to this requirement.
- The TEG reboiler heaters are rated at 1.0 MMBTUH. 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 Million BTU per hour (MMBTUH) or less. AP-42 (7/98) Table 1.4-2 lists natural gas total PM emissions to be 7.6 lbs/million scf or about 0.0076 lbs/MMBTU, which is in compliance with Section 19-4 requirements.
- The permit requires the use of natural gas for all fuel-burning equipment to ensure compliance with Subchapter 19.

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]

This subchapter states that no person shall allow the discharge of any fumes, aerosol, mist, gas, smoke, vapor, particulate matter, or any combination thereof 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 very little possibility of exceeding the opacity standards.

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

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

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

Part 2 limits the ambient air impact of sulfur dioxide (SO<sub>2</sub>) emissions from any one existing source or any one new petroleum and natural gas process source subject to OAC 252:100-31-26(a)(1). This part also limits the impact of hydrogen sulfide (H<sub>2</sub>S) emissions from any new or existing source to 2 ppm. A typical engine burning field gas with a sulfur content of 343 ppmv will produce a maximum SO<sub>2</sub> ambient air concentration of less than 22 µg/m<sup>3</sup>, which is in compliance. There are no detectable concentrations of H<sub>2</sub>S in the gas processed by this facility.

Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBTU heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,000 BTU/SCF, this limit corresponds to fuel sulfur content of 1,200 ppmv. The permit requires the use of gaseous fuel with sulfur content less than 343 ppmv to ensure compliance with Subchapter 31.

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

This subchapter limits new gas-fired fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.2 lbs of NO<sub>x</sub> per MMBTU, three-hour average. There are no equipment items that exceed the 50 MMBTUH threshold.

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

This subchapter affects gray iron cupolas, blast furnaces, basic oxygen furnaces, petroleum catalytic cracking units, and petroleum catalytic reforming units. There are no affected sources.

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 to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The condensate tanks are subject to this requirement.

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

arm and pump) to conduct this type of loading and is not subject to this requirement.

Part 5 limits the VOC content of coatings 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, which is exempt.

Part 7 requires fuel-burning and refuse-burning equipment to be operated to minimize emissions of VOC. Temperature and available air must be sufficient to provide essentially complete combustion.

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. There are no effluent water separators 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 252:100-11	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	Feed & Grain Facility	not in source category
OAC 252:100-39	Nonattainment Areas	not in area category
OAC 252:100-47	Landfills	not in source category

**FEDERAL REGULATIONS**

PSD, 40 CFR Part 52

[Not Applicable]

PSD does not apply. Final total emissions are less than the threshold of 250 TPY of any single regulated pollutant and the facility is not one of the listed stationary sources with an emission threshold of 100 TPY.

NSPS, 40 CFR Part 60

[Not Applicable]

Subparts K, Ka, Kb, VOL Storage Vessels. The condensate tanks store condensate prior to “custody transfer” as defined in Subpart Kb; therefore they are exempt.

Subpart GG, Stationary Gas Turbines. There are no stationary gas turbines at this facility.

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

Subpart KKK, Equipment Leaks of VOC from Onshore Natural Gas Processing Plants. The facility does not engage in natural gas processing.

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

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. The specific emission standards (either in g/hp-hr or as a concentration limit) vary based on engine class, engine power rating, lean-burn or rich-burn, fuel type, duty (emergency or non-emergency), and numerous manufacture dates. Engine manufacturers are required to certify certain engines to meet the emission standards and may voluntarily certify other engines. An initial notification is required only for owners and operators of engines greater than 500 HP that are non-certified.

Owners and operators of certified engines may demonstrate compliance by operating and maintaining their stationary engine and after-treatment control device (if any) according to the manufacturer’s emission-related written instructions and do not have to conduct any performance testing. Owners and operators of all SI engines (certified and non-certified) must keep records of maintenance conducted on the engine. If an owner or operator of a certified engine does not follow the manufacturer’s emission-related operation and maintenance instructions, that engine is considered a non-certified engine and is subject to performance testing, unless the engine is less than 100 HP. Owners and operators of non-certified engines, which include certified engines operating in a non-certified manner, must keep a maintenance plan. An initial performance test must be conducted within the first year of operation for any certified engine operating in a non-certified manner that is equal to or greater than 100 HP. In addition, non-certified engines, including certified engines operating in a non-certified manner, that are greater than 500 HP must conduct the initial performance test and a performance test every 8,760 hours of operation or every 3 years thereafter, whichever comes first. Subpart JJJJ specifies the following emission limits for gas-fired lean-burn engines with capacities between 500-hp and 1,350-hp manufactured between January 1, 2008 and December 31, 2010: NO<sub>x</sub>, 2.0 g/hp-hr; CO, 4.0 g/hp-hr; and VOC, 1.0 g/hp-hr. There are no SI-ICE engines at this facility. Therefore, there are no applicable requirements under 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:

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

For each reciprocating compressor the owner/operator must replace the rod packing before 26,000 hours of operation or prior to 36 months. If utilizing the number of hours, the hours of operation must be continuously monitored. Commenced construction is based on the date of installation of the compressor (excluding relocation) at the facility. All reciprocating compressors at this facility were installed prior to the affected date of August 23, 2011. All new or modified reciprocating compressors will have to comply with this subpart.

There are no pneumatic controllers with a bleed rate of 6 SCFH installed after the affected date of August 23, 2011, and this facility is not a gas plant. All new pneumatic controllers with a bleed rate of 6 SCFH or greater will have to comply with this subpart.

Storage vessels constructed, modified or reconstructed after August 23, 2011, with VOC emissions equal to or greater than 6 TPY after enforceable limits must reduce VOC emissions by 95.0 % or greater. All storage tanks at this facility were installed prior to the affected date of August 23, 2011. All new or modified storage vessels will have to comply with this subpart.

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

A sweetening unit means a process device that removes hydrogen sulfide and/or carbon dioxide from the sour natural gas stream. There are no sweetening units at this facility.

None of the existing equipment at the facility is subject to NSPS Subpart OOOO.

Subpart OOOOa, Crude Oil and Natural Gas Facilities for which construction, modification, or reconstruction commenced after September 18, 2015. This subpart affects the following onshore affected facilities:

- (a) Each well affected facility, which is a single well that conducts a well completion operation following hydraulic fracturing or refracturing.
- (b) Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.
- (c) Each reciprocating compressor affected facility, which is a single reciprocating compressor. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.
- (d) Each pneumatic controller affected facility:
  - (1) Each pneumatic controller affected facility not located at a natural gas processing plant, which is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 SCFH.
  - (2) Each pneumatic controller affected facility located at a natural gas processing plant, which is a single continuous bleed natural gas-driven pneumatic controller.
- (e) Each storage vessel affected facility, which is a single storage vessel with the potential for VOC emissions equal to or greater than 6 TPY as determined according to §60.5365a(e).
- (f) The group of all equipment within a process unit located at an onshore natural gas processing plant is an affected facility. Equipment within a process unit of an affected facility located at onshore natural gas processing plants are exempt from this subpart if they are subject to and controlled according to Subparts VVa, GGG, or GGGa.
- (g) Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.
- (h) Each pneumatic pump affected facility:
  - (1) For natural gas processing plants, each pneumatic pump affected facility, which is a single natural gas-driven diaphragm pump.
  - (2) For well sites, each pneumatic pump affected facility, which is a single natural gas-driven diaphragm pump.
- (i) The collection of fugitive emissions components at a well site, as defined in §60.5430a, is an affected facility, except as provided in § 60.5365a(i)(2).
- (j) The collection of fugitive emissions components at a compressor station, as defined in § 60.5430a, is an affected facility.

The applicability date for Subpart OOOOa is September 18, 2015. None of the equipment at the facility was constructed, modified, or reconstructed after September 18, 2015.

NESHAP, 40 CFR Part 61

[Not Applicable]

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

NESHAP, 40 CFR Part 63

[Subparts HH Applicable]

Subpart HH, Oil and Natural Gas Production Facilities. This subpart applies to affected emission points that are located at facilities that are major sources of HAP and either process, upgrade, or store hydrocarbons prior to the point of custody transfer or prior to which the natural gas enters the natural gas transmission and storage source category. The facility was a previously a major source of HAP after the initial compliance date of this subpart and therefore under prior EPA OIAI guidance the facility was subject to this subpart. However, the facility is currently an area source of HAP; therefore, under the updated EPA OIAI guidance the facility is no longer subject to the major source requirements of this subpart. This MACT was extended to area sources on January 3, 2007. Even though the dehydration unit at this facility will be considered an affected area source it is exempt from the requirements of § 63.764(d)(2). The TEG dehydration unit at this facility has benzene emissions less than one (1) TPY; therefore, it will only be subject to the recordkeeping provisions of this subpart. All applicable requirements have been incorporated into the permit.

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 minor source of HAPs and is not a transmission facility. Therefore, this subpart is not applicable.

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart affects any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions. Owners and operators of the following new or reconstructed RICE must meet the requirements of Subpart ZZZZ by complying with either 40 CFR Part 60 Subpart IIII (for CI engines) or 40 CFR Part 60 Subpart JJJJ (for SI engines):

- 1) Stationary RICE located at an area source;
- 2) The following Stationary RICE located at a major source of HAP emissions:
  - i) 2SLB and 4SRB stationary RICE with a site rating of  $\leq 500$  brake HP;
  - ii) 4SLB stationary RICE with a site rating of  $< 250$  brake HP;
  - iii) Stationary RICE with a site rating of  $\leq 500$  brake HP which combust landfill or digester gas equivalent to 10% or more of the gross heat input on an annual basis;
  - iv) Emergency or limited use stationary RICE with a site rating of  $\leq 500$  brake HP; and
  - v) CI stationary RICE with a site rating of  $\leq 500$  brake HP.

There are no RICE engines at this facility. Therefore, there are no applicable requirements under this subpart.

CAM, 40 CFR Part 64

[Not Applicable]

Compliance Assurance Monitoring (CAM), as published in the Federal Register on October 22, 1997, applies to any pollutant specific emission unit at a major source, that is required to obtain a Title V permit, if it meets all of the following criteria:

- It is subject to an emission limit or standard for an applicable regulated air pollutant

- It uses a control device to achieve compliance with the applicable emission limit or standard
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant greater than major source levels.

Upon issuance of this permit, the facility will no longer be a major source and required to obtain a Title V permit; therefore, the facility is not subject to this Subpart.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]

This facility will not process or store more than the threshold quantity of any regulated substance (Section 112r of the Clean Air Act 1990 Amendments). The definition of a stationary source does not apply to transportation, including storage incident to transportation, of any substance or any other extremely hazardous substance under the provisions of this part. More information on this federal program is available on the web page: [www.epa.gov/rmp](http://www.epa.gov/rmp).

Stratospheric Ozone Protection, 40 CFR Part 82 [Not Applicable]

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

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

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

## COMPLIANCE

### Inspection

There have been no technical changes since the last inspection; therefore, an initial compliance inspection for this permit is not required.

### Testing

The engines at the facility are electric driven. Therefore, no testing is required.

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

This application has been determined to be a Tier II based on the request to change the status of a facility from a Part 70 operating permit to a minor source operating permit.

The permittee has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant has a current lease or easement which is given to accomplish the permitted purpose and that the landowner has been notified. Information on all permit actions is available for review by the public on the Air Quality section of the DEQ web page at: <http://www.deq.state.ok.us>.

The applicant published the "Notice of Filing a Tier II Application" in The Anadarko Daily News, a daily newspaper printed in the English language, in the city of Anadarko, Caddo County, Oklahoma, on October 19 & 26, 2017. The notice stated that the application can be reviewed at the Anadarko Community Library, located at 215 West Broadway, Anadarko, OK or at the Air Quality Division's main office.

At the time of issuance of this draft permit, the applicant shall also publish the required 30-day notice of "Notice of Draft Permit." The 45-day EPA Region 6 review will run concurrently with public notice.

This facility is not located within 50 miles of the Oklahoma border with another state. Therefore, no notice is required to be sent to any state adjoining the State of Oklahoma.

### **Fee Paid**

Part 70 operating permit renewal application fee of \$7,500.

### **SUMMARY**

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

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

**Enable Gas Gathering, LLC  
Verden Compressor Station**

**Permit Number 2017-1801-O**

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on October 20, 2017 and subsequent information received. The Evaluation Memorandum dated August 9, 2018, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operation under this permit constitutes acceptance of, and consent to, the conditions contained herein:

1. Points of emissions and emissions limitations for each point:

Source	NO <sub>x</sub>		CO		VOC	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
H-1 1.0 MMBTUH Dehydration Reboiler <sup>1</sup>	0.10	0.43	0.08	0.36	0.01	0.02
H-2 1.0 MMBTUH Dehydration Reboiler <sup>1</sup>	0.10	0.43	0.08	0.36	0.01	0.02
H-3 1.0 MMBTUH Combustion Device Burner <sup>2</sup>	0.10	0.43	0.08	0.36	0.01	0.02
SV-1 Still Vent With Condenser and Combustion Device	---	---	---	---	0.73	3.20
Condensate Tanks (T-1 & T-2) <sup>3</sup>	---	---	---	---	---	50.94
Truck Loading	---	---	---	---	---	1.71

<sup>1</sup> The glycol dehydration unit is equipped with two (2) 1.0 MMBTUH burners;

<sup>2</sup> The emissions are from the burner only. The emissions from the still vent combustion are included in the SV-1 estimate;

<sup>3</sup> Includes breathing and working losses and flash emissions.

2. Facility-wide emissions of HAPs shall not exceed the following limits based on a monthly, 12-month rolling total.

Pollutant	Facility-Wide Emission Limit <sup>1</sup>
Individual HAP	9.9 TPY
Combined HAPs	24.9 TPY

<sup>1</sup> TPY limits are based upon a 12-month rolling total.

3. The fuel-burning equipment shall be fired with pipeline grade natural gas or other gaseous fuel with a sulfur content of 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 per calendar year.
4. The permittee shall be authorized to operate this facility continuously (24 hours per day,

every day of the year).

5. The glycol dehydration unit shall be operated as follows:
  - a. The glycol dehydration unit shall be equipped with a condenser and an enclosed combustion device.
  - b. All emissions from the glycol dehydration unit’s still vent shall be vented through the condenser and then all uncondensed gases shall be routed to the enclosed combustion device.
  - c. The glycol dehydration unit shall be equipped with a flash tank on the rich glycol stream.
  - d. The off-gases from the flash tank shall be recycled/recompressed to the process.
  - e. The lean glycol recirculation rate shall not exceed 24 gallons per minute. The natural gas throughput of the facility shall not exceed 65 MMSCFD (monthly average).
  - f. The permittee shall monitor and record the lean glycol circulation rate at least once a month. When three consecutive months show no exceedance of the limit, the frequency may be reduced to quarterly. Upon any showing of non-compliance, the monitoring and recordkeeping frequency shall revert to monthly. With each inspection the lean glycol circulation rate shall be recorded as follows:

Circulation rate, as found (gal/min, strokes/min)	
Circulation rate, as left (gal/min, strokes/min)	
Date of inspection	
Inspected by	

The requirement to monitor and record glycol circulation rate shall not apply if the pump capacity does not exceed 24.0 GPM. If so, the manufacturer’s rating or the performance data for the model of pump that verifies the maximum pump rate at any operational conditions shall be maintained and available for inspection.

6. The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Oil and Natural Gas Production, Subpart HH, for each affected dehydration unit including but not limited to the following:
  - a. An owner or operator of a glycol dehydration unit that meets the exemption criteria of §63.764(e)(1) shall maintain the records specified in §§63.774(d)(1) for that glycol dehydration unit.
7. Condensate throughput at the facility shall not exceed 600,000 gallons (12-month rolling total). The condensate tanks shall be bottom filled or operated with submerged fill pipes.
8. 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.
  - a. For fuel(s) burned, the appropriate document(s) as described in Specific Condition

- No. 2;
  - b. Records required by NESHAP, 40 CFR Part 63, Subpart HH;
  - c. Facility-wide emissions of HAPs (monthly and 12-month rolling total);
  - d. Total condensate throughput (monthly and 12-month rolling total);
  - e. Natural gas throughput (monthly average);
  - f. Glycol pump circulation rate (monthly / quarterly) if applicable, based on S.C. No. 4(f).
9. This permit supersedes all other Air Quality permits for this facility, which are now cancelled.

*Mr. Sean Walker*  
Enable Gas Gathering, LLC  
PO Box 24300, MC LS700  
Oklahoma City, Oklahoma 73124

Permit Writer: *Morgan McGrath, E.I.*

SUBJECT: Operating Permit No. **2017-1801-O**  
Verden Compressor Station  
Location: SW/4, Section 23, T7N, R9W, Caddo County, Oklahoma

Dear Mr. Walker:

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

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located. (Instructions enclosed).
2. Provide for public review (for a period of 30 days following the date of the newspaper announcement) a copy of this draft permit at a convenient location **within the county** of the facility (preferably at a public library).
3. Send AQD a written affidavit of publication for the notice from Item #1 above together with any additional comments or requested changes which you may have for the permit application within 20 days of publication.
4. At the end of the public review period, send AQD a written notice of any public comments that you may have received from the public.

A Proposed Permit will be concurrently submitted for EPA review. Contingent on public and EPA review, the permit will be issued as a minor source operating permit. The permit review time is hereby tolled pending the receipt of the affidavit of publication. Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact the permit writer at (405) 702-4100.

Sincerely,

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

<b>NOTICE OF DRAFT PERMIT TIER II or TIER III AIR QUALITY PERMIT APPLICATION</b>
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**APPLICANT RESPONSIBILITIES**

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

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

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

**SAMPLE NOTICE on page 2.**

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

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

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

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

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

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

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

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

**If the Administrator (EPA) does not object to the proposed permit, the public has 60 days following the Administrator's 45 day review period to petition the Administrator to make such an objection as provided in 40 CFR 70.8(d) and in OAC 252:100-8-8(j). Information on all permit actions and applicable review time lines is available in the Air Quality section of the DEQ Web page: <http://www.deq.state.ok.us/>.**

**For additional information, contact ...names, addresses and telephone numbers of contact persons for the applicant, or contact DEQ at: Chief Engineer, Permits & Engineering Group, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677. Phone No. (405) 702-4100.**

**DRAFT/PROPOSED**

*Mr. Sean Walker*  
Enable Gas Gathering, LLC  
PO Box 24300, MC LS700  
Oklahoma City, Oklahoma 73124

Permit Writer: *Morgan McGrath, E.I.*

SUBJECT: Operating Permit No. **2017-1801-O**  
Verden Compressor Station  
Location: SW/4, Section 23, T7N, R9W, Caddo County, Oklahoma

Dear Mr. Walker:

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

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

Thank you for your cooperation in this matter. If we may be of further service, please contact our office at (405) 702- 4100.

Sincerely,

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

Enclosure



# 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. 2017-1801-O

Enable Gas Gathering, LLC,

having complied with the requirements of the law, is hereby granted permission to operate the Verden Compressor Station located at S23, T7N, R9W in Caddo County, Oklahoma, subject to standard conditions dated July 12, 2012 and specific conditions, both attached.

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

\_\_\_\_\_  
Date

**MINOR SOURCE PERMIT TO OPERATE / CONSTRUCT  
AIR POLLUTION CONTROL FACILITY  
STANDARD CONDITIONS  
(July 12, 2012)**

A. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ) in accordance with and under the authority of the Oklahoma Clean Air Act. The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. This specifically includes compliance with the rules of the other Divisions of DEQ: Land Protection Division and Water Quality Division.

B. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-7-15(g)) 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 252:100-7-15]

C. 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 252:100-7-18(a)]

D. Unless specified otherwise, the term of an operating permit shall be unlimited.

E. Notification to the Air Quality Division of DEQ of the sale or transfer of ownership of this facility is required and shall be made in writing by the transferor within 30 days after such date. A new permit is not required.

[OAC 252:100-7-2(f)]

F. The following limitations apply to the facility unless covered in the Specific Conditions:

1. No person shall cause or permit the discharge of emissions such that National Ambient Air Quality Standards (NAAQS) are exceeded on land outside the permitted facility.  
[OAC 252:100-3]
2. All facilities that emit air contaminants are required to file an emission inventory and pay annual operating fees based on the inventory. Instructions and forms are available on the Air Quality section of the DEQ web page. [www.deq.state.ok.us](http://www.deq.state.ok.us)  
[OAC 252:100-5]
3. 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 252:100-9]
4. 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]
5. No particulate emissions from new fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lbs/MMBTU.  
[OAC 252:100-19]
6. No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity.  
[OAC 252:100-25]
7. 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]
8. No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lbs/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
  9. 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 an organic material vapor-recovery system. [OAC 252:100-37-15(b)]
  10. 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]
- G. Any owner or operator subject to provisions of NSPS shall provide written notification as follows: [40 CFR 60.7 (a)]
1. A notification of the date construction (or reconstruction as defined under §60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.
  2. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in §60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.
  3. A notification of the actual date of initial start-up of an affected facility postmarked within 15 days after such date.
  4. If a continuous emission monitoring system is included in the construction, a notification of the date upon which the test demonstrating the system performance will commence, along with a pretest plan, postmarked no less than 30 days prior to such a date.
- H. Any owner or operator subject to provisions of NSPS shall maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility or any malfunction of the air pollution control equipment. [40 CFR 60.7 (b)]
- I. Any owner or operator subject to the provisions of NSPS shall maintain a file of all measurements and other information required by this subpart recorded in a permanent file suitable for inspection. This file shall be retained for at least five years following the date of such measurements, maintenance, and records. [40 CFR 60.7 (f)]
- J. Any owner or operator subject to the provisions of NSPS shall conduct performance test(s) and furnish to AQD a written report of the results of such test(s). Test(s) shall be conducted within 60 days after achieving the maximum production rate at which the facility will be operated, but not later than 180 days after initial start-up. [40 CFR 60.8]