

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

MEMORANDUM

April 6, 2020

TO: Phillip Fielder, P.E., Chief Engineer

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

THROUGH: Eric L. Milligan, P.E., Engineering Manager, Engineering Section

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

FROM: Jian Yue, P.E., New Source Permits Section

SUBJECT: Evaluation of Construction Permit Application **No. 2019-1323-C**
Superior Pipeline Company
Reeding Compressor Station (Facility ID: 19584)
Latitude: 35.76899°N, Longitude: 97.73638°W
Section 21, Township 15N, Range 5W, Kingfisher County, Oklahoma
Directions: From Cashion, take N2990 Rd south for 2 miles. Turn right (west)
onto E0860 Rd. Travel 3.5 miles. Facility is on the left (south) side of the road.

SECTION I. INTRODUCTION

Superior Pipeline Company (Superior) has requested a construction permit for its Reeding Compressor Station (SIC 4922, NAICS 486210). The facility was constructed under Permit No. 2018-1139-NOI, issued August 13, 2018. The applicant modified the construction permit under Permit No. 2018-1139-NOI (M-1) issued on November 30, 2018. The applicant now proposes to expand the facility by further construction, in anticipation of potential incremental volume increase from newly acquired gathering system. The proposed construction will expand the facility from eleven engine/compressor sets to fifteen engine/compressor sets.

The applicant expects most of the engines to be constructed after June 12, 2006, and manufactured after July 1, 2008 and subject to 40 CFR Part 60, New Source Performance Standards (NSPS) Subpart JJJJ. All engines are subject to 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart ZZZZ. Some of the compressors associated with the compressor engines are expected to be constructed after August 23, 2011, or September 18, 2015, and therefore will be subject to NSPS Subpart OOOO or NSPS Subpart OOOOa, respectively. The condensate and produced water storage tanks will be constructed after September 18, 2015, and will be potentially subject to NSPS Subpart OOOOa. Superior has requested a federally enforceable emission limitation of less than 6 TPY for each storage tank so that they will not be subject to this subpart.

Since the facility will emit 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. The facility will be a minor source for Prevention of Significant Deterioration (PSD) and an area source of Hazardous Air Pollutants (HAPs).

SECTION II. PROJECT DESCRIPTION

The proposed project is considered a separate project from projects authorized by Permit No. 2018-1139-NOI, issued August 13, 2018, and Permit No. 2018-1139-NOI (M-1) issued on November 30, 2018, respectively.

In April 2018, an oil and gas producer requested Superior to build a compressor station to handle 25 MMCFD gas (Superior provided drilling schedule and An Authorization for Expenditure (AFE) dated April 24, 2018). Superior was issued Permit No. 2018-1139-NOI to construct the compressor station.

In August 2018, the producer notified Superior that they planned to accelerate their drilling program and ramp up volume projection. In response to changes in the producer's projected drilling program, Superior submitted a Notices of Modification on November 11, 2018 and March 12, 2019, to request authorization to construct more residue compressors, a 60 MMCFD processing skid, a dehydration unit, heaters, a condensate stabilization skid, and condensate tanks. Superior provided the AFE dated August 22, 2018, detailing the need for these changes.

In November 2019, Superior performed due diligence and had an opportunity to purchase an additional gathering system which includes addition of approximately 17 MMCFD mid-pressure gas. The current facility and compressor configuration were not set up for this operating condition; hence more compression capacity will be needed. Superior provided a press release, dated January 7, 2020, about acquiring the new gathering and compression assets, along with a new AFE dated January 13, 2020, for all items related to integrating the new gathering system.

As a result of purchasing the new gathering system, Superior is now requesting a construction permit to install five (5) compressor engines at the facility. This new project is economically independent of past projects and will not be looked at as part of the previous permit action.

After the changes proposed in this application, total emissions of NO_x, CO, and VOCs will be over 100 TPY but less than 250 TPY. However, emission increases resulted from this project will be less than 100 TPY for NO_x, CO and VOCs. Therefore, BACT and modeling are not required.

SECTION III. PROCESS DESCRIPTION

Natural gas is gathered at low pressure in the field and piped to the plant site. The inlet gas stream flows through inlet separation where liquids are separated and sent to one (1) pressurized condensate vessel at varying pressures (5-20 psig). This tank remains slightly pressurized and has no emissions. It acts as an intermediate separator and allows flash gas to be recycled back to inlet using the electric vapor recovery unit. The liquids in this tank separate and form two layers: water and hydrocarbon. The water is cut and piped to an atmospheric water storage tank. After the water cut, the remaining hydrocarbon liquid is pumped through the condensate stabilizer skid where it is heated and separated into light and heavy hydrocarbons. The light hydrocarbons are flashed and returned to the inlet of the facility. The heavy hydrocarbons are considered a stabilized condensate and flow to six (6) atmospheric condensate storage tanks. These six condensate tanks share a common header. These liquids are collected by trucks and either sold (hydrocarbons) or sent for disposal (water).

Inlet compression (EU ID# C-1, C-3a, C-4, C-8, C-9, C-11, and C-13) increases the pressure of the natural gas to facilitate processing. As the gas is compressed, heavier components in the gas condense out and are sent back to the lower pressure inlet separator and allowed to flash again.

The high pressure gas is then dehydrated. Dehydration is accomplished on two steps. First, the gas is contacted with tri-ethylene glycol (TEG) in a contact tower. Second, the gas passes through vessels containing solid media (mole sieve). The TEG system is equipped with two 25-hp electric recirculation pumps but only one will operate at a given time. Both media (TEG and mole sieve) become saturated with water and must then be regenerated using heat from a burner. The TEG is regenerated in the TEG reboiler (H-3) to drive the water off. The mole sieve is regenerated with heat from H-2. Hot oil from H-4 is used in the natural gas liquid (NGL) extraction process.

Once dehydrated, the natural gas then goes through a variety of heat exchangers and vessels to condense and separate the heavier hydrocarbons from the natural gas stream. The NGLs are pumped to the liquid sales pipeline. The processed natural gas that remains is recompressed in residue compressors (C-5, C-6, C-7, C-10, C-12, C-15, and C-16) to a higher pressure for delivery into the sales pipeline.

SECTION IV. EQUIPMENT

Emission units (EUs) have been arranged into Emission Unit Groups (EUGs) as follows.

EUG A Natural Gas-Fired Reciprocating Internal Combustion Engines

EUG	EU ID	Source	Capacity	Date	
				Manufacture	Installation
A	C-1	Caterpillar G3516J w/OC	1,377-hp	5/2008	2018
	C-3a	Caterpillar G3606TALE w/OC	1,775-hp	2/2012	2020
	C-4	Caterpillar G3516B w/OC	1,380-hp	11/2013	2018
	C-5	Caterpillar G3516BLE w/OC	1,380-hp	4/2014	2019
	C-6	Caterpillar G3516BLE w/OC	1,380-hp	10/2014	2019
	C-7	Caterpillar G3516BLE w/OC	1,380-hp	10/2011	2019
	C-8	Caterpillar G3606 TALE w/OC	1,775-hp	10/2012	2019

EUG	EU ID	Source	Capacity	Date	
				Manufacture	Installation
	C-9	Caterpillar G3606 TALE w/OC	1,775-bhp	11/2012	2019
	C-10	Caterpillar G3516BLE w/OC	1,380-hp	7/2011	2019
	C-11	Caterpillar G3606 TALE w/OC	1,775-hp	10/2014	2019
	C-12	Caterpillar G3606 TALE w/OC	1,775-hp	TBD	TBD
	C-13	Caterpillar G3606 TALE w/OC	1,775-hp	TBD	TBD
	C-14	Caterpillar G3516B w/OC	1,380-hp	TBD	TBD
	C-15	Caterpillar G3508 TALE w/OC	690-hp	5/2005	TBD
	C-16	Caterpillar G3508 BLE w/OC	690-hp	2/2020	TBD

w/OC - with Oxidation Catalyst; w/CC - with Catalytic Converter

EUG B Heaters

EUG	EU ID	Source	Capacity	Date	
				Manufacture	Installation
B	H-1	Condensate Stabilizer Heater	0.75-MMBTUH	2019	2019
	H-2	Glycol Heater	2.0-MMBTUH	2019	2019
	H-3	Regen Heater	4.0- MMBTUH	2019	2019
	H-4	Hot Oil Heater	2.9- MMBTUH	2019	2019

EUG C Glycol Dehydrator

EUG	EU ID	Source	Capacity (MMSCFD)
C	SC-1	Glycol Dehydrator	60

EUG D Storage Tanks

EUG	EU ID	Source	Capacity	Date	
				Manufacture	Installation
D	TK-1	Condensate Storage Tank	400-bbl	2018	2018
	TK-2	Condensate Storage Tank	400-bbl	2018	2018
	TK-3	Condensate Storage Tank	400-bbl	2018	2018
	TK-4	Water Storage Tank	400-bbl	2018	2018
	TK-5	Water Storage Tank	400-bbl	2019	2019
	TK-6	Condensate Storage Tank	400-bbl	2019	2019
	TK-7	Condensate Storage Tank	400-bbl	2019	2019

EUG E Truck Loading

EUG	EU ID	Source	Capacity (gal/yr)
E	TL-1	Condensate Truck Loading	20,696,000

EUG F Fugitive Emissions

EUG	EU ID	Source	Capacity
F	FUG	Fugitives	N/A

EUG G Engine Blowdowns

EUG	EU ID	Source	Capacity
G	MSS-1	Engine Blowdowns	N/A

SECTION V. EMISSIONS

EUG A Natural Gas-Fired Reciprocating Internal Combustion Engines

Engine emissions are calculated using manufacturer’s data and continuous operations as shown in following tables. The VOC emission factors, except for C-1, do not include formaldehyde. Formaldehyde emissions will be added to engine VOC emissions, except for C-1, in the facility-wide emission table.

Emission Point	NOx Emission Factor	VOC	
		Emission Factor	Control Efficiency
	g/hp-hr	g/hp-hr	%
C-1	0.5	0.465	70
C-3a	0.5	0.315	50
C-4	0.5	0.4	79
C-5	0.5	0.15	70
C-6	0.5	0.15	70
C-7	0.5	0.15	70
C-8	0.5	0.315	50
C-9	0.5	0.315	50
C-10	0.5	0.15	70
C-11	0.5	0.315	50
C-12	0.5	0.315	50
C-13	0.5	0.315	50
C-14	0.5	0.15	70
C-15	2.0	0.3	50
C-16	0.5	0.3025	45

Emission Point	CO			Formaldehyde		
	Uncontrolled Emission Factor	Controlled Emission Factor	Control Efficiency	Uncontrolled Emission Factor	Controlled Emission Factor	Control Efficiency
	g/hp-hr	g/hp-hr	%	g/hp-hr	g/hp-hr	%
C-1	3.1	0.357	88.5	0.36	0.04	88.5
C-3a	2.75	0.433	84.25	0.26	0.04	84.25
C-4	2.43	0.383	84.25	0.39	0.060	84.25
C-5	2.43	0.25	89.75	0.43	0.044	89.75
C-6	2.43	0.25	89.75	0.43	0.044	89.75
C-7	2.43	0.25	89.75	0.43	0.044	89.75
C-8	2.75	0.433	84.25	0.26	0.04	84.25
C-9	2.75	0.55	80	0.25	0.050	80.00
C-10	2.91	0.30	89.75	0.43	0.044	89.75
C-11	2.75	0.433	84.25	0.26	0.04	84.25
C-12	2.75	0.433	84.25	0.26	0.04	84.25
C-13	2.75	0.433	84.25	0.26	0.04	84.25
C-14	2.43	0.25	89.75	0.43	0.044	89.75
C-15	1.84	0.4416	76	0.25	0.060	76
C-16	2.58	0.6192	76	0.42	0.1008	76

Emission Point	NOx		CO		VOC		Formaldehyde	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
C-1	1.52	6.65	1.08	4.73	1.41	6.18	0.1213	0.5313
C-3a	1.96	8.57	1.69	7.40	1.23	5.40	0.1564	0.6850
C-4	1.52	6.66	1.16	5.08	1.22	5.33	0.1824	0.7989
C-5	1.52	6.66	0.76	3.33	0.46	2.00	0.1337	0.5856
C-6	1.52	6.66	0.76	3.33	0.46	2.00	0.1337	0.5856
C-7	1.52	6.66	0.76	3.33	0.46	2.00	0.1337	0.5856
C-8	1.96	8.57	1.69	7.40	1.23	5.40	0.1564	0.6850
C-9	1.96	8.57	2.15	9.42	1.25	5.48	0.1955	0.8563
C-10	1.52	6.66	0.91	3.99	0.46	2.00	0.1337	0.5856
C-11	1.96	8.57	1.69	7.40	1.23	5.40	0.1564	0.6850
C-12	1.96	8.57	1.69	7.40	1.23	5.40	0.1564	0.6850
C-13	1.96	8.57	1.69	7.40	1.23	5.40	0.1564	0.6850
C-14	1.52	6.66	0.76	3.33	0.46	2.00	0.1337	0.5856
C-15	2.95	12.94	0.67	2.93	0.44	1.94	0.0912	0.3995
C-16	0.76	3.33	0.94	4.12	0.46	2.02	0.1532	0.6710
Total	26.10	114.31	18.43	80.59	13.23	57.94	2.19	9.59

EUG B Heaters

Emissions from the heaters are based on AP-42 (7/98), Section 1.4 and continuous operation and the burner ratings shown in the following table.

EU ID	Source	Capacity
H-1	Condensate Stabilizer Heater	0.75-MMBTUH
H-2	Glycol Heater	2.0-MMBTUH
H-3	Regen Heater	4.0- MMBTUH
H-4	Hot Oil Heater	2.9- MMBTUH

EUG C Glycol Dehydrator

VOC and HAP emissions from the TEG dehydrator (SC-1) are estimated using GRI-GLYCalc™ Version 4.0, Atmospheric Rich/Lean” (ARL) data, an extended gas analysis, a maximum glycol recirculation rate of 15.0 gallons per minute (gpm), and a natural gas throughput of 60 million standard cubic feet per day (MMSCFD). The vapors from the dehydrator still vent are routed through the condenser, with the uncondensed vapors routed to the firebox of the reboiler when it is firing or an in-stack igniter when the reboiler is not firing, resulting in an overall control efficiency of 95%. The glycol dehydrator is equipped with a flash tank. The flash tank off-gases are recycled/recompressed to the inlet.

SC-1	Data
Calculation Tool	GRI-GLYCalc 4.0
Dry Gas Flow Rate, MMSCFD	60.0
Glycol Pump Type	Gas
Glycol Pump Design Capacity, gpm	15.0
Regenerator Still Vent	
Control Type	Condenser & Firebox
Condenser Outlet Temperature, °F	100
Overall Control Efficiency, %	95
VOC Emissions, lb/hr	0.99
VOC Emissions, TPY	4.35
Flash Tank	
Flash Tank Temperature, °F	121
Flash Tank Pressure, psig	50
Control Type or Recycle	Recompressed to Inlet
Control Efficiency, %	100
VOC Emissions, lb/hr	0
VOC Emissions, TPY	0
Total VOC Emissions (TPY)	4.35

EUG D Storage Tanks

All condensate is sent through the condensate stabilization system to be stabilized prior to storage. Therefore, there is no flash emissions from storage tanks. Estimated emissions of working and breathing losses for the condensate tanks are based on EPA TANKS 4.0.9d computer program and throughput listed in the table below. Water tank emissions are assumed to be 1% of condensate emissions.

Tank Emissions (per Tank)

Parameter	Condensate Tank	Water Tank
Throughput, gal/yr	3,679,200	2,299,500
Breathing and Working VOC Emissions, TPY	4.91	0.05
Control Type	None	None
Total VOC Emissions from Each Tank, TPY	4.91	0.05

EUG E Truck Loading

Potential VOC emissions from loading condensate into the trucks were estimated using AP-42 (1/95), Section 5.2, Equation 1, maximum annual condensate throughputs, and parameters listed in the following table.

Loading Factors

Emission Unit ID	Throughput 1,000 gal/yr	Saturation Factor	Temp. °R	TVP psia	MW lb/lbmol	Emission Factor lb/1000 gal	VOC Wt. %	VOC TPY
TL-1*	20,696,000	0.6	540	5.0	62	4.29	100	44.41

*Includes water loading.

EUG F Fugitive Emissions

Fugitive VOC emissions are based on EPA’s 1995 Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017, 1995), an estimated percent C3+, and an estimated number of components. Since fugitive emissions are subject to NSPS Subpart OOOOa which requires a comprehensive leak detection and repair (LDAR) program, control efficiency is applied according to TCEQ-Control Efficiency for TCEQ LDAR program guidance.

Component	Number of Items	Emission Factor lb/hr/item	VOC Wt. %	Control Efficiency %	VOC Leakage	
					lb/hr	TPY
Valves - Gas	1,928	0.009920	33.4075	97	0.19	0.84
Flanges - Gas	1,667	0.000860	33.4075	30	0.34	1.47
Connectors - Gas	14,442	0.000441	33.4075	30	1.49	6.52
Compressor Seals - Gas	17	0.0194	33.4075	95	0.01	0.02
Relief Valves - Gas	1,128	0.0194	33.4075	97	0.22	0.96
Open-Ended Lines-Gas	0	0.00441	33.4075	0	0.00	0.00
Valves - Light Oil	1,373	0.00551	100.000	97	0.23	0.99
Flanges - Light Oil	833	0.000243	100.000	30	0.14	0.62
Connectors - Light Oil	6,458	0.000463	100.000	30	2.09	9.17
Pump Seals - Light Oil	32	0.028700	100.000	93	0.01	0.03
Other - Light Oil	0	0.016500	100.000	0	0.00	0.00
TOTALS	27,878				4.72	20.62

EUG H Engine Blowdowns

Blowdown emissions were calculated using a blowdown volume of 11,945 scf per event, VOC percentage from the gas composition multiplied by an estimated thirty-six (30) blowdowns per engine per year.

FACILITY-WIDE CRITERIA POLLUTANT EMISSIONS (TPY)

Emission Unit ID #	Description	NO _x	CO	VOC
		TPY	TPY	TPY
C-1	1,377-hp Caterpillar G3516J w/OC	6.65	4.73	6.18
C-3a	1,775-hp Caterpillar G3606TALE w/OC	8.57	7.40	6.09
C-4	1,380-hp Caterpillar G3516B w/OC	6.66	5.08	6.13
C-5	1,380-hp Caterpillar G3516BLE w/OC	6.66	3.33	2.59
C-6	1,380-hp Caterpillar G3516BLE w/OC	6.66	3.33	2.59
C-7	1,380-hp Caterpillar G3516BLE w/OC	6.66	3.33	2.59
C-8	1,775-hp Caterpillar G3606 TALE w/OC	8.57	7.40	6.09
C-9	1,775-hp Caterpillar G3606 TALE w/OC	8.57	9.42	6.34
C-10	1,380-hp Caterpillar G3516BLE w/OC	6.66	3.99	2.59
C-11	1,775-hp Caterpillar G3606 TALE w/OC	8.57	7.40	6.09
C-12	1,775-hp Caterpillar G3606 TALE w/OC	8.57	7.40	6.09
C-13	1,775-hp Caterpillar G3606 TALE w/OC	8.57	7.40	6.09
C-14	1,380-hp Caterpillar G3516B w/OC	6.66	3.33	2.59
C-15	690-hp Caterpillar G3508 TALE w/OC	12.94	2.93	2.34
C-16	690-hpCaterpillar G3508 BLE w/OC	3.33	4.12	2.69
H-1	0.75-MMBTUH Condensate Stabilizer Heater	0.32	0.27	0.02
H-2	2.0-MMBTUH Glycol Heater	0.86	0.72	0.05
H-3	4.0-MMBTUH Regen Heater	1.72	1.44	0.09
H-4	2.9-MMBTUH Hot Oil Heater	1.25	1.05	0.07
SC-1	60-MMSCFD Dehydrator	-	-	4.35
TK-1	400-bbl Condensate Tank	-	-	4.91
TK-2	400-bbl Condensate Tank	-	-	4.91
TK-3	400-bbl Condensate Tank	-	-	4.91
TK-4	400-bbl Water Tank	-	-	0.05
TK-5	400-bbl Stabilizer Water Tank	-	-	-
TK-6	400-bbl Condensate Tank	-	-	4.91
TK-7	400-bbl Condensate Tank	-	-	4.91
TL-1	Condensate Truck Loading	-	-	44.41
FUG	Fugitive Emissions	-	-	20.62
MSS-1	Engine Blowdowns	-	-	17.46
Total		118.45	84.07	178.75
Total Before This Project		78.67	97.26	97.29
Difference		39.78	-13.19	81.46

Hazardous Air Pollutants (HAP)

The internal combustion engine has emissions of hazardous air pollutants, the most significant being formaldehyde, which was calculated in previous tables under EUG A. Total formaldehyde emissions from the 15 engines are 9.59 TPY.

The dehydration unit using a glycol desiccant will emit benzene, toluene, ethyl benzene, xylene, and n-hexane from the glycol still vent and flash tank. These compounds are hazardous air pollutants (HAPs). The applicant analyzed the incoming gas and estimated the HAP emissions using GRI-GLYCalc. The following tables list estimates of the HAP emissions from the dehydrator still vent.

Table 14: Controlled Dehydrator Still Vent

Pollutant	Total Controlled Emissions	
	lb/hr	TPY
n-Hexane	0.03	0.13
Benzene	0.07	0.29
Toluene	0.06	0.26
Ethylbenzene	0.001	0.005
Xylene	0.01	0.05
Total HAPs	0.171	0.735

Facility-wide HAP emissions are less than the 10/25 TPY major source thresholds.

SECTION VI. INSIGNIFICANT ACTIVITIES

The insignificant activities are identified below. Appropriate recordkeeping is required for those activities indicated below with an asterisk.

1. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas). The four heaters on-site falls in this category.
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. Facility may have lube oil storage tanks and glycol tanks in this category.
3. Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant.

SECTION VII. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Not Applicable]
 Total potential emissions of each pollutant are less than the significance level of 250 TPY after this modification, thus not subject to PSD.

NSPS, 40 CFR Part 60 [Subparts JJJJ, OOOO, and OOOOa Applicable]
Subpart Dc, Small Steam Generating Units. This subpart affects boilers with a rated heat input between 10 and 100 MMBtu/hr (2.9 and 29 megawatts) that commenced construction, reconstruction, or modification after June 9, 1989. All boilers at this facility are below 10 MMBTUH.

Subpart Kb, VOL Storage Vessels. This subpart regulates hydrocarbon storage tanks larger than 19,813-gallons capacity and built after July 23, 1984. All tanks at this facility are smaller than the threshold.

Subpart GG, Stationary Gas Turbines. This subpart sets standards for stationary gas turbines; however, the compressors here will be 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 for which construction, reconstruction, or modification commenced after January 20, 1984, and on or Before August 23, 2011. All equipment at this facility was constructed after September 18, 2015; therefore, it is not subject to this subpart but it is subject to Subpart OOOOa.

Subpart LLL, Onshore Natural Gas Processing: SO₂ Emissions. This subpart sets standards for natural gas sweetening units. There are no gas sweetening units at this facility.

Subpart IIII, Stationary Compression Ignition (CI) Internal Combustion Engines (ICE). There are no CI-ICE at this facility.

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. The emission limits for the engines located at this facility are shown below.

**Emission Standards from Table 1, Subpart JJJJ, g/hp-hr (ppmvd @ 15%O₂)
 For Non-Emergency SI Engines Burning Natural Gas**

Engine Type	Rated Power (hp)	Mfg. Date	NO _x	CO	VOC
Lean Burn	500 ≤ hp < 1,350	< 7/1/10	2.0 (160)	4.0 (540)	1.0 (86)
Rich/Lean Burn	≥ 500 hp	> 7/1/2010	1.0 (80)	2.0 (270)	0.7 (60)

Owners and operators of certified engines may demonstrate compliance by operating and maintaining their stationary engine and 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. Engine C-15 was manufactured in 2005 and is not subject to this subpart. All other engines were manufactured after June 12, 2006 and are subject to this subpart. All applicable requirements have been incorporated into the permit.

Subpart OOOO, Crude Oil and Natural Gas Production, Transmission, and Distribution for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015. This subpart affects the following onshore affected facilities:

- (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, that contains an accumulation of crude oil, condensate, intermediate hydrocarbon liquids, or produced water and has the potential for VOC emissions equal to or greater than 6 TPY.
- (f) The group of all equipment, except compressors, within a process unit located at an onshore natural gas processing plant is an affected facility.
- (g) Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.

There are no gas wells, centrifugal compressors, continuous bleed natural gas-driven pneumatic controllers, or sweetening units located at this facility. The storage vessels and the equipment within the process units, except compressors, at the gas plant commenced construction after September 18, 2015, and are not subject to this subpart. The reciprocating compressors at this

facility that commenced construction after August 23, 2011, and on or before September 18, 2015, are subject to this subpart. All applicable requirements have been incorporated into the permit. 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:

1. Each single hydraulically fractured or refractured oil or gas well;
2. Single centrifugal compressors using wet seals that are located at production gathering and boosting stations, compressor stations in the natural gas transmission and storage segment, and natural gas plants;
3. Reciprocating compressors which are single reciprocating compressors located at production gathering and boosting stations, compressor stations in the natural gas transmission and storage segment, and natural gas plants;
4. Single continuous bleed natural gas driven pneumatic controllers that are not low-bleed (< 6 SCFH) devices located at oil or gas wellheads, production gathering and boosting stations, or compressor stations in the natural gas transmission and storage segment;
5. Single natural gas driven pneumatic controllers that are not zero-bleed devices 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. Pneumatic pumps located at oil or natural gas wells sites and natural gas processing plants;
8. Fugitive leaks from all equipment, except compressors, at oil and gas well sites, production gathering and boosting stations, compressor stations in the natural gas transmission and storage segment, and within a process unit at an onshore natural gas processing plant;
9. 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 compressors that commenced construction, reconstruction, or modification after September 18, 2015 are subject to this subpart.

This is a gas plant and all pneumatic controllers must have a bleed rate of 0 SCFH.

Storage vessels constructed, modified, or reconstructed after September 18, 2015, with VOC emissions equal to or greater than 6 TPY, after enforceable limits, must reduce VOC emissions by 95.0 % or greater. Superior has requested a federally enforceable emission limitation of less than 6 TPY for all storage tanks so that they will not be subject to this subpart.

The group of all equipment, except compressors, within a process unit at a natural gas processing plant must comply with the equipment leak standards of NSPS, Subpart OOOOa, except as provided in §60.5401a. All applicable requirements have been incorporated into the permit.

NESHAP, 40 CFR Part 61

[Not Applicable]

There will be 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. No process streams will contain more than a trace of benzene.

NESHAP, 40 CFR Part 63 [Subparts HH and ZZZZ Applicable]
Subpart HH, Oil and Natural Gas Production Facilities. This subpart affects major and area sources of HAP that process, upgrade, or store natural gas prior to the point at which it enters the natural gas transmission and storage source category or is delivered to a final end user. The affected source at area sources is triethylene glycol (TEG) dehydration units. The facility will be a minor source of HAP. Even though the new dehydration unit at this facility is considered an affected new 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 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 located at an area source 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). No further requirements apply for engines subject to NSPS under this part. A stationary RICE located at an area source of HAP emissions is existing if construction commenced before June 12, 2006. Based on emission calculations, this facility is a minor source of HAP. Engine C-15 shall comply with existing engine standards of this subpart. All other engines are manufactured after June 12, 2006 and must meet the requirements of Subpart ZZZZ by complying with 40 CFR Part 60 Subpart JJJJ. A summary of the requirements for the SI RICE located at this facility are shown below.

Engine Category	Requirements
Remote	Requirements
Existing Non-Emergency, Non-Black Start, 4SRB & 4SLB HP > 500-hp	Change oil and filter every 2,160 hours of operation or annually, whichever comes first
	Inspect spark plugs every 2,160 hours of operation or annually, whichever comes first, and replace as necessary; and
	Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.
Not Remote	Requirements
Existing Non-Emergency, Non-Black Start, 4SRB HP > 500-hp	Install NSCR to reduce HAP emissions from the stationary RICE. 270 ppmvd CO or 75% CO reduction @ 15% O ₂ .
Existing Non-Emergency, Non-Black Start, 4SLB HP > 500-hp	Install an oxidation catalyst to reduce HAP emissions. 47 ppmvd CO or 93% CO reduction @ 15% O ₂ .

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

1. Stationary RICE located on a pipeline segment that meets both of the following criteria:
 - i. A pipeline segment with 10 or fewer buildings intended for human occupancy and no buildings with four or more stories within 220 yards (200 meters) on either side of the centerline of any continuous 1-mile (1.6 kilometers) length of pipeline. Each separate dwelling unit in a multiple dwelling unit building is counted as a separate building intended for human occupancy.
 - ii. The pipeline segment does not lie within 100 yards (91 meters) of either a building or a small, well-defined outside area (such as a playground, recreation area, outdoor

theater, or other place of public assembly) that is occupied by 20 or more persons on at least 5 days a week for 10 weeks in any 12-month period. The days and weeks need not be consecutive. The building or area is considered occupied for a full day if it is occupied for any portion of the day.

2. Stationary RICE that are not located on gas pipelines and that have 5 or fewer buildings intended for human occupancy and no buildings with four or more stories within a 0.25 mile radius around the engine. A building is intended for human occupancy if its primary use is for a purpose involving the presence of humans.

Based on information submitted by the applicant, this facility and the engines within the facility are considered remote. All applicable requirements have been incorporated into the permit.

Compliance Assurance Monitoring (CAM), 40 CFR Part 64 [Applicable]

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

- It is subject to an emission limit or standard for an applicable regulated air pollutant;
- It uses a control device to achieve compliance with the applicable emission limit or standard; and
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant greater than major source thresholds (100 TPY of a criteria pollutant, 10 TPY of a HAP, or 25 TPY of total HAP).

Dehydration unit (SC-1) has uncontrolled VOC emissions over 100 TPY and is subject to this subpart. CAM plan shall be included in the Title V Operating permit application.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Applicable]

This facility handles naturally occurring hydrocarbon mixtures at a natural gas processing plant and the Accidental Release Prevention Provisions are applicable to this facility. The facility is required to submit the appropriate accidental release emergency response program plan to EPA. More information on this federal program is available on the web page: www.epa.gov/rmp.

Stratospheric Ozone Protection, 40 CFR Part 82 [Subparts A and F are 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. 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 listed in OAC 252:100, Appendix Q. 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, Emission 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 252:100-7 (Permits for Minor Facilities) [Not Applicable]
Subchapter 7 sets forth the permit application fees and the basic substantive requirements of permits for minor facilities. The proposed facility is a major source and it will not be covered by Subchapter 7.

OAC 252:100-8 (Permits for Part 70 Sources)

[Applicable]

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

- 5 TPY of any one criteria pollutant
- 2 TPY of any one hazardous air pollutant (HAP) or 5 TPY of multiple HAP 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 construction 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 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. Thus, the engines and heaters will be subject to the requirements of this subchapter. Appendix C specifies a PM emission limitation of 0.60 lbs/MMBTU for all equipment with a heat input rating of 10 Million BTU per hour (MMBTUH) or less. 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 and Table 1.4-2 of AP-42 (7/98) lists natural gas total PM emissions to be 7.6 lbs/million scf or about 0.0076 lbs/MMBTU.

Equipment	Maximum Heat Input (MMBTUH)	Emissions (lbs/MMBTU)	
		Appendix	Potential
1377-hp Cat G3516J engine	11.54	0.58	0.01
1775-hp Cat G3606TALE Engines (6)	13.4 each	0.56	0.01
1380-hp Cat G3516BLE Engines (6)	11.39 each	0.58	0.01
690-hp Cat G3508LE engine (2)	7.25 each	0.60	0.01
MMBTUH Condensate Stabilizer	0.75	0.60	< 0.01
MMBTUH Glycol Heater	2.0	0.60	< 0.01
MMBTUH Regen Heater	4.0	0.60	< 0.01
MMBTUH Hot Oil Heater	2.9	0.60	< 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 very little possibility of exceeding these 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 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, so it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds) [Applicable]
Part 2, limits the ambient air concentration of hydrogen sulfide (H₂S) emissions from any facility to 0.2 ppmv at standard conditions (24-hour average) which is equivalent to 283 µg/m³. Based on modeling conducted for the general permit for oil and gas facilities, ambient impacts of H₂S from the engines, heaters, and boilers is insignificant and there are no significant emissions of H₂S from the condensate or “sweet” crude oil storage. Therefore, the facility as a whole would be in compliance with the H₂S ambient air concentration limit.
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 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_x per MMBTU. There will be 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 will be 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 storage tanks at this facility are subject to this requirement.

Part 3 requires 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 will not have the physical equipment (loading arm and pump) to conduct this type of loading. Therefore, this requirement is not applicable.

Part 5 limits the VOC content of coating of parts and products. This facility will not normally conduct coating or painting operations except for routine maintenance of the facility and equipment, which is not an affected operation.

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

Part 7 also requires effluent water separators which receive water containing more than 200 gallons per day of any VOC to be equipped with vapor control devices. There will be no effluent water separator at this location.

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

[Applicable]

This subchapter regulates toxic air contaminants (TAC) that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated 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 remain not applicable to this facility.

OAC 252:100-11	Alternative 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	VOC in Non-Attainment Areas	not in area
OAC 252:100-47	Municipal Solid Waste Landfills	not in source category

SECTION XI. COMPLIANCE

Tier Classification and Public Review

This application has been determined to be Tier II based on the request for a permit modification that when completed would turn a minor facility into a Part 70 source.

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 given to accomplish the permitted purpose. Information on all permit actions is available for review by the public on the Air Quality section of the DEQ web page at: www.deq.ok.gov.

Public Review

The applicant will publish the “Notice of Filing a Tier II Application” and the “Notice of Draft Permit” in a local newspaper for 30 days of public review. A copy of the draft permit and application will be available at the AQD office in Oklahoma City, and on the Air Quality section of the DEQ web page at www.deq.ok.gov.

State Review

The facility is not located within 50 miles of the State of Oklahoma border.

EPA Review

The draft permit will also be proposed to EPA for a 45-day concurrent review.

Fees Paid

Major source construction permit fee of \$7,500 was paid on November 27, 2019.

SECTION X. SUMMARY

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

DRAFT/PROPOSED

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

**Superior Pipeline Company
Reeding Compressor Station**

Permit No. 2019-1323-C

The permittee is authorized to construct in conformity with the specifications submitted to the Air Quality Division on November 25, 2019, with supplemental information submitted on February 28, March 20, and April 2, 2020. The Evaluation Memorandum dated April 6, 2020, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Commencing construction or operations under this permit constitutes acceptance of, and consent to, the conditions contained herein.

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

EUG A Natural Gas-Fired Reciprocating Internal Combustion Engines

EU	Source	NO _x		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
C-1	1,377-hp Caterpillar G3516J w/OC	1.52	6.65	1.08	4.73	1.41	6.18
C-3a	1,775-hp Caterpillar G3606TALE w/OC	1.96	8.57	1.69	7.40	1.23	5.40
C-4	1,380-hp Caterpillar G3516B w/OC	1.52	6.66	1.16	5.08	1.22	5.33
C-5	1,380-hp Caterpillar G3516BLE w/OC	1.52	6.66	0.76	3.33	0.46	2.00
C-6	1,380-hp Caterpillar G3516BLE w/OC	1.52	6.66	0.76	3.33	0.46	2.00
C-7	1,380-hp Caterpillar G3516BLE w/OC	1.52	6.66	0.76	3.33	0.46	2.00
C-8	1,775-hp Caterpillar G3606 TALE w/OC	1.96	8.57	1.69	7.40	1.23	5.40
C-9	1,775-hp Caterpillar G3606 TALE w/OC	1.96	8.57	2.15	9.42	1.25	5.48
C-10	1,380-hp Caterpillar G3516BLE w/OC	1.52	6.66	0.91	3.99	0.46	2.00
C-11	1,775-hp Caterpillar G3606 TALE w/OC	1.96	8.57	1.69	7.40	1.23	5.40
C-12	1,775-hp Caterpillar G3606 TALE w/OC	1.96	8.57	1.69	7.40	1.23	5.40
C-13	1,775-hp Caterpillar G3606 TALE w/OC	1.96	8.57	1.69	7.40	1.23	5.40
C-14	1,380-hp Caterpillar G3516B w/OC	1.52	6.66	0.76	3.33	0.46	2.00
C-15	690-hp Caterpillar G3508 TALE w/OC	2.95	12.94	0.67	2.93	0.44	1.94
C-16	690-hpCaterpillar G3508 BLE w/OC	0.76	3.33	0.94	4.12	0.46	2.02

w/OC - with Oxidation Catalyst; w/CC - with Catalytic Converter

- a. Each engine at the facility shall have a permanent identification plate attached that is accessible and legible, which shows the make, model number, and serial number. The operating permit application shall supply the serial numbers for each engine. [OAC 252:100-43]
- b. Each engine shall be operated with the exhaust gas passing through a properly functioning oxidation catalyst to control emissions of CO, VOCs and HAPs. [OAC 252:100-8-6(a)(1)]
- c. At least once per calendar quarter, the permittee shall conduct tests of NO_x and CO emissions in exhaust gases from each engine and from each replacement engine/turbine when operating under representative conditions for that period. Testing is required for each engine or any replacement engine/turbine that runs for more than 220 hours during that

calendar quarter. A quarterly test may be conducted no sooner than 20 calendar days after the most recent test. Testing shall be conducted using a portable analyzer in accordance with a protocol meeting the requirements of the latest "AQD Portable Analyzer Guidance" document, or an equivalent method approved by Air Quality. When four consecutive quarterly tests show the engine/turbine to be in compliance with the emissions limitations shown in the permit, then the testing frequency may be reduced to semi-annual testing. A semi-annual test may be conducted no sooner than 60 calendar days nor later than 180 calendar days after the most recent test. Likewise, when the following two consecutive semi-annual tests show compliance, the testing frequency may be reduced to annual testing. An annual test may be conducted no sooner than 120 calendar days nor later than 365 calendar days after the most recent test. Upon any showing of non-compliance with emissions limitations or testing that indicates that emissions are within 10% of the emission limitations, the testing frequency shall revert to quarterly. Reduced testing frequency does not apply to engines with catalytic converters. [OAC 252:100-43]

- d. When periodic compliance testing shows exhaust emissions from the engines in excess of the lb/hr limits in Specific Condition No. 1, the permittee shall comply with the provisions of OAC 252:100-9 for excess emissions. [OAC 252:100-9]
- e. Replacement, including temporary periods (6 months or less for maintenance purposes) of any internal combustion engine shown in this permit with an engine of lesser or equal emissions of each pollutant, is authorized under the following conditions.

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

- i. The permittee shall notify AQD in writing at least seven days in advance of start-up of the replacement engine(s)/turbine(s). Said notice shall identify the old engine/turbine and shall include the new engine/turbine make and model, horsepower rating, fuel usage, stack flow (ACFM), stack temperature (°F), stack height (feet), stack diameter (inches), and pollutant emission rates (g/hp-hr, lb/hr, and TPY) at maximum horsepower for the altitude/location.
 - ii. Quarterly emission tests for the replacement engine(s)/turbine(s) shall be conducted to confirm continued compliance with NO_x and CO emission limitations. A copy of the first quarter testing shall be provided to AQD within 60 days of start-up of each replacement 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 (g/hp-hr, lbs/hr, and TPY) at maximum rated horsepower for the altitude/location.
 - iii. Replacement equipment and emissions are limited to equipment and emissions that are not a modification under NSPS or NESHAP, or a significant modification under PSD. For existing PSD facilities, the permittee shall calculate the PTE or the net emissions increase resulting from the replacement to document that it does not exceed significance levels and submit the results with the notice required by (a.) of this Specific Condition.
 - iv. 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.
- f. The permittee shall comply with all applicable requirements of NESHAP, 40 CFR Part 63, Subpart ZZZZ affecting any of the engines subject to these requirements, including, but not limited to, the following. [40 CFR § 63.6585 through § 63.6675]

- i. § 63.6585 Am I subject to this subpart?
- ii. § 63.6590 What parts of my plant does this subpart cover?

- iii. § 63.6595 When do I have to comply with this subpart?
 - iv. § 63.6600 What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?
 - v. § 63.6603 What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?
 - vi. § 63.6605 What are my general requirements for complying with this subpart?
 - vii. § 63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?
 - viii. § 63.6612 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?
 - ix. § 63.6615 When must I conduct subsequent performance tests?
 - x. § 63.6620 What performance tests and other procedures must I use?
 - xi. § 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?
 - xii. § 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?
 - xiii. § 63.6635 How do I monitor and collect data to demonstrate continuous compliance?
 - xiv. § 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?
 - xv. § 63.6645 What notifications must I submit and when?
 - xvi. § 63.6650 What reports must I submit and when?
 - xvii. § 63.6655 What records must I keep?
 - xviii. § 63.6660 In what form and how long must I keep my records?
 - xix. § 63.6665 What parts of the General Provisions apply to me?
 - xx. § 63.6675 What definitions apply to this subpart?
- g. The permittee shall comply with all applicable requirements in 40 CFR Part 60, Subpart JJJJ for all stationary spark ignition (SI) internal combustion engines (ICE) including, but not limited to, the following. [40 CFR §§ 60.4230 to 60.4248]
- i. §60.4230 Am I subject to this subpart?
 - ii. §60.4233 What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?
 - iii. §60.4234 How long must I meet the emission standards if I am an owner or operator of a stationary SI internal combustion engine?
 - iv. §60.4236 What is the deadline for importing or installing stationary SI ICE produced in previous model years?
 - v. §60.4243 What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?
 - vi. §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?

- vii. §60.4245 What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?
- viii. §60.4246 What parts of the General Provisions apply to me?
- ix. §60.4248 What definitions apply to this subpart?

EUG B Heaters

Heaters at this facility are considered insignificant activities.

EU ID	Source
H-1	0.75-MMBTUH Condensate Stabilizer Heater
H-2	2.0-MMBTUH Glycol Heater
H-3	4.0-MMBTUH Regen Heater
H-4	2.9-MMBTUH Hot Oil Heater

EUG C Glycol Dehydrator

EU ID	Source	VOC	
		lb/hr	TPY
SC-1	Glycol Dehydrator	0.99	4.35

- a. Maximum throughput of natural gas (monthly average) shall be no greater than 60-MMSCFD.
- b. Glycol circulation rate shall be 15.0 gallons/minute or less.
- c. The glycol dehydrator still vent shall be equipped with a condenser.
- d. All emissions from the glycol dehydration unit’s still vent shall be routed to the condenser. The off-gases from the condenser shall be routed to the reboiler firebox when it is firing, an in-stack igniter when the reboiler is not firing, or equally effective emission control system with an overall combustion efficiency of at least 95% of the condenser emissions.
- e. The glycol dehydrator shall be equipped with a flash tank on the rich glycol stream.
- f. The off-gasses from the flash tank shall be routed to the facility inlet, the reboiler fuel system, or to an equally effective (100% efficiency VOC/98% efficiency HAP) emissions control system.
- g. 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 15.0 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.

EUG D Storage Tanks

EU ID	Source	VOC	
		lb/hr	TPY
TK-1	4000-bbl Condensate Storage Tank	---	4.91
TK-2	400-bbl Condensate Storage Tank	---	4.91
TK-3	400-bbl Condensate Storage Tank	---	4.91
TK-4	400-bbl Water Storage Tank	---	0.05
TK-5	400-bbl Condensate Stabilizer Water Tank	---	---
TK-6	400-bbl Condensate Storage Tank	---	4.91
TK-7	400-bbl Condensate Storage Tank	---	4.91

- a. The condensate throughput of the condensate tanks shall not exceed 3,679,200 gallons per tank in any one rolling 12-month period.
- b. The produced water throughput of the water tanks shall not exceed 2299500 gallons per tank in any one rolling 12-month period.

EUG E Truck Loading

EU ID	Source	VOC	
		lb/hr	TPY
TL-1	Condensate Truck Loading	---	44.41

- a. Total condensate throughput shall not exceed 20,696,000 gallons per tank in any one rolling 12-month period.

EUG F Fugitive Emissions

There are no emission limits applied to these EU but they are required to meet certain work practice standards.

Component	Number of Items
Valves - Gas	1,928
Flanges - Gas	1,667
Connectors - Gas	14,442
Compressor Seals - Gas	17
Relief Valves - Gas	1,128
Valves - Light Oil	1,373
Flanges - Light Oil	833
Connectors - Light Oil	6,458
Pump Seals - Light Oil	32

EUG H Engine Blowdowns

The total volume of engine blowdowns is limited to no more than 5,375,250 scf/yr, based on 450 engines blowdowns per year. The emission listed following are estimates of 5,375,250 scf/yr multiplied by the VOC percentage from the gas content.

EU ID	Source	VOC	
		lb/hr	TPY
MSS-1	Engine Blowdowns	---	17.46

2. The fuel-burning equipment shall be fueled only with gaseous fuel having 343 ppmv or less total sulfur. Compliance shall be shown at least once a calendar year by a current gas company bill, lab analysis, stain-tube analysis, gas contract, tariff sheet, or other approved method.

[OAC 252:100-31]

3. Upon issuance of an operating permit, the permittee shall be authorized to operate the facility continuously (24 hours per day, every day of the year).

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

4. The permittee shall comply with all applicable requirements in 40 CFR Part 60, Subpart OOOOa, Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015, for all affected facilities located at this site 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 pumps 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 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 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?
5. The permittee shall comply with NSPS, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution for which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015, for all affected facilities located at this site.
- 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 covers and closed vent systems routing emissions from storage vessels, reciprocating compressors and centrifugal compressor wet seal 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, centrifugal compressor and reciprocating compressor affected facilities?
 - 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?
6. The permittee shall comply with all applicable requirements of the NESHAP for Oil and Natural

Gas Production, Subpart HH, for each affected dehydration unit by the date specified in §63.760(f)(5)(ii) including but not limited to: [40 CFR §§63.760 to 60.779]

- a. The owner or operator of a glycol dehydration unit that meets the exemption criteria in §63.764(e)(1) shall maintain the records specified in §63.774(d)(1) for the affected glycol dehydration unit.

7. The following records shall be maintained on-site to verify Insignificant Activities. No recordkeeping is required for those operations that qualify as Trivial Activities.

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

- a. For stationary reciprocating engines burning natural gas, gasoline, aircraft fuels, or diesel fuel which are either used exclusively for emergency power generation or for peaking power service not exceeding 500 hours/year: records of engine service and annual operating hours.
 - i. For space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTUH heat input fired by commercial natural gas: records of design heat input and type of gas fired.
 - ii. For storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature: records of tank capacity and true vapor pressure at maximum storage temperature.
 - iii. For 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: records of tank capacity and true vapor pressure at maximum storage temperature.
 - iv. For activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant: records of the type of activity and the amount of emissions from that activity (annual).

8. The permittee shall keep records as follow. These records shall be retained on-site or at a local field office for a period of at least five years following dates of recording, and shall be made available to regulatory personnel upon request. [OAC 252:100-8-6 (a)(3)(B)]

- a. Periodic testing of NO_x and CO exhaust from the engines.
- b. Hours of operation for any quarter in which testing is not conducted.
- c. O&M records for any engine/turbine not tested in each quarter.
- d. Condensate throughput, 12-month rolling total.
- e. Produced water throughput, 12-month rolling total.
- f. For the fuel(s) burned, the appropriate document(s) as described in Specific Condition (SC) No. 2.
- g. Engine records required for NSPS Subpart JJJJ and NESHAP Subpart ZZZZ, as appropriate.
- h. Records required by NSPS Subparts OOOO and OOOOa.
- i. Records required by NESHAP Subpart HH.
- j. Glycol pump circulation rate (monthly/quarterly) if applicable, based on S.C. No. 1.EUG C.g.
- k. Facility natural gas throughput, MMSCFD (monthly average).

1. Records of blowdown events including estimates of blowdown volumes and emissions (monthly and 12-month rolling totals).

9. Within 60 days of achieving maximum achievable load, not to exceed 180 days from startup of each new engine, the permittee shall submit initial compliance testing for the engine to the DEQ. Within 180 days of first operation under this permit, the permittee shall submit an application for a Part 70 operating permit, noting any differences from the construction permit application.

**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]



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. 2019-1323-C

Superior Pipeline Company,

having complied with the requirements of the law, is hereby granted permission to construct within the boundaries of the Reeding Compressor Station located in Section 21, Township 15N, Range 5W, Kingfisher County, Oklahoma, subject to 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



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Jerry Farmer, Environmental Manager
Superior Pipeline Company
PO Box 702500
Tulsa, OK 74170

Re: Permit No. **2019-1323-C**
Reeding Compressor Station (Facility ID: 19584)
Section 21, Township 15N, Range 5W, Kingfisher County, Oklahoma

Dear Mr. Farmer:

Enclosed is the Title V permit authorizing construction of the referenced facility. Please note that this permit is issued subject to certain standard and specific conditions that are attached.

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

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

Sincerely,

Phillip Fielder, P.E., Chief Engineer
AIR QUALITY DIVISION
Enclosures

<p>NOTICE OF DRAFT PERMIT TIER II or TIER III AIR QUALITY PERMIT APPLICATION</p>

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 a public meeting is requested by either the applicant or the public, 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;
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 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)).

This public notice shall include notice to the public that this permit is subject to Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 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.

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.

For additional information, contact ...names, addresses and telephone numbers of contact persons for the applicant, or contact DEQ at: Chief Engineer, Permits Section, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677, (405) 702-4100.



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Jerry Farmer, Environmental Manager
Superior Pipeline Company
PO Box 702500
Tulsa, OK 74170

Re: Permit No. **2019-1323-C**
Reeding Compressor Station (Facility ID: 19584)
Section 21, Township 15N, Range 5W, Kingfisher County, Oklahoma

Dear Mr. Farmer:

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 252:004-7-13(c) the enclosed draft permit is now ready for public review. The requirements for public review include the following steps which you must accomplish:

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located. (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 on the DEQ website and access to the application through the DEQ website.
3. Send to AQD a copy of the proof of publication notice from Item #1 above together with any additional comments or requested changes which you may have on the draft permit.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me at (405) 702-4100 or the permit writer, Jian Yue, at (405) 702-4205.

Sincerely,

Phillip Fielder, P.E., Chief Engineer
AIR QUALITY DIVISION
Enclosures