

**DRAFT/PROPOSED**

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

**MEMORANDUM**

**July 29, 2020**

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

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

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

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

**FROM:** Kyle Walker, E.I., New Source Permit Section

**SUBJECT:** Evaluation of Permit Application No. **2020-0055-TVR4**  
Panhandle Eastern Pipeline Company  
Seiling Compressor Station  
Facility ID# 1375  
Location: Section 4, Township 19N, Range 17W  
Latitude 36.14594° N Longitude 99.01443° W  
Dewey County, Oklahoma  
Directions: From Seiling, Oklahoma, travel 5.25 miles west on Highway 60 and then north into facility.

**SECTION I. INTRODUCTION**

Panhandle Eastern Pipeline Company has requested renewal of their Part 70 operating permit for their turbine driven Seiling Compressor Station (SIC 4922/NAICS 486210). The facility is currently operating under Permit No. 2015-1390-TVR3, issued December 14, 2015. The facility is a minor source for Prevention of Significant Deterioration (PSD) and a minor source of Hazardous Air Pollutants (HAPs).

The permit will undergo Tier II review because it is for a major source permit renewal. No changes were requested in the application for the permit renewal. The facility can be operated continuously.

**SECTION II. FACILITY DESCRIPTION**

The facility is a pipeline booster station that compresses natural gas. The only significant emission unit is one (1) 10,860-hp General Electric M3002 natural gas-fired turbine compressor engine. The engine was de-rated from 14,600-hp by order of the Federal Energy Regulation Commission (FERC) when it was installed in 1981. Equipment on-site is fueled by pipeline-quality natural gas.

The 225-bbl condensate storage tank on-site is a pressure vessel which is a source of volatile organic carbon (VOC) fugitive emissions. Fluids drop out in the inlet scrubber and are sent to the

pressurized tank via a dump valve. Tank vapors are sent back into the process. Condensate is loaded onto trucks via a closed system that results in fugitive emissions from hose connections. Also present is one 0.25 MMBtu/hr fuel gas heater, and one 150-gal methanol storage tank, which are listed as Insignificant Activities. Site fugitives were calculated by the applicant and determined to be negligible. There is a 30-hp natural gas-fired emergency generator on site.

The Seiling Compressor Station is located adjacent to the Hemphill-Seiling Compressor Station owned and operated by DCP Midstream, LP. Even though these facilities are contiguous and adjacent properties; they are not under common control, are not a support facility for the other adjacent facility, and they do not belong to the same industrial grouping. As such, they are each considered separate entities.

**SECTION III. EQUIPMENT**

**EUG-1 Turbine**

EU ID	Point ID	Make/Model	HP	Serial #	Installed Date
E-301	E-1	General Electric M3002	10,860	282142	1981

**EUG-2 Fugitives**

EU ID	Point ID	Component	Number of Components
Fugitives	Fugitives	Valves	40
		Flanges	82
		Screwed fittings (flange)	1
		Blowdown valves	8
		Pressure relief valves	4
		Compressor seals	1

EU ID	Point ID	Activity	Fugitive Source
Fugitives	Fugitives	Pressurized Condensate Truck Loading	truck loading connections, fittings

**EUG-3 Internal Combustion Engine**

EU ID	Make/Model	hp	Serial #	Construction Date
COMM-01	Generac/QT022	30	SGM4475	2009

**SECTION IV. AIR EMISSIONS**

Emission estimates are based on maximum operation of 8,760 hrs/yr. Emission estimates for NOx and CO for the 10,860-hp General Electric M3002 natural gas-fired turbine compressor engine are based on the NSPS Subpart GG initial performance test for this unit conducted January 28, 1999. Emissions were extrapolated to 100% load and a 10% safety factor added for NOx. CO emissions were based on the 1999 test result at a lower (corrected) horsepower of 2,639 where CO emissions were the highest. No safety factor was added for CO, VOC, SO<sub>2</sub> and PM. VOC and PM emission

estimates are based on factors from AP-42 (4/00), Table 3.1-2a. Formaldehyde emissions are based on the factor from AP-42 (4/00), Table 3.1-3.

Brake-specific fuel consumption for the 10,860-hp General Electric M3002 natural gas-fired turbine compressor engine is estimated at 8,186 BTU/hp-hr for a fuel consumption of 88,899 SCFH. Air emissions from the engine are discharged through a square stack (eight feet per side), 50.0 feet above grade, at a rate of 193,560 ACFM and 721°F. Moisture content of stack gases has been estimated at 3% from fuel usage and the stoichiometric ratio of two SCF of water per SCF of natural gas fuel.

**Turbine Emission Factors**

Pollutant	Emission Factor / Units
NO <sub>x</sub>	42.94 lb/hr
CO	7.23 lb/hr
VOC	0.19 lb/hr
Formaldehyde	7.1E-04 lb/MMBtu
SO <sub>2</sub>	3.4E-03 lb/MMBtu
PM	6.6E-03 lb/MMBtu

Process piping fugitive emission estimates were prepared from an equipment inventory, a recent gas analysis that measured 2.25% VOC, and emission factors taken from EPA’s “Protocol for Equipment Leak Emission Estimates” (November 1995, EPA-453/R-95-017) Table 2-4 *Oil and Gas Production Operations Average Emission Factors* for gas/vapor service.

**Fugitive Emissions**

EU ID	Point ID	Component	Count	Emission Factor (lb/hr/component)	VOC <sup>(1)</sup>	
					lb/hr	TPY
Fugitives	Fugitives	Valves	52	0.00992	0.01	0.05
		Flanges	83	0.00086	<0.01	0.01
		Compressor seals	1	0.01940	<0.01	<0.01

(1) VOC = 2.25%

VOC emissions from truck loading are fugitive in nature because the pressurized tank unloads into pressurized tank trucks. Fugitive emissions result from loading pipe connections and from the fittings of the loading unit. No calculations were provided since the loaded condensate is typically less than 5-bbl/yr, and result in fugitive emissions only.

VOC and formaldehyde emissions from the emergency generator were calculated using the emission factors from AP-42 (7/00), Table 3.2-3. NO<sub>x</sub> and CO emissions were based on the emission standards in Table 1 to New Source Performance Standards (NSPS) Subpart JJJJ for emergency engines rated between 25-hp and 130-hp. Emissions are based on 500 hours of operations per year.

**Engine Emission Factors**

<b>Pollutant</b>	<b>Emission Factor / Units</b>
NO <sub>x</sub>	10 g/hp-hr
CO	387 g/hp-hr
VOC	0.0296 lb/MMBtu
Formaldehyde	0.0205 lb/MMBtu

The 225-bbl pressurized condensate storage tank is not a point source of emissions. The tank is a source of fugitive emissions that have been accounted for in the fugitive inventory. Since the storage vessel is pressurized, condensate is removed from the site via hard shelled (pressurized) condensate tank trucks.

The facility wide emissions are presented in the following table.

**Facility Wide Air Emissions**

<b>Source</b>	<b>NO<sub>x</sub></b>		<b>CO</b>		<b>VOC</b>		<b>SO<sub>2</sub></b>		<b>PM<sub>10</sub></b>	
	<b>lb/hr</b>	<b>TPY</b>	<b>lb/hr</b>	<b>TPY</b>	<b>lb/hr</b>	<b>TPY</b>	<b>lb/hr</b>	<b>TPY</b>	<b>lb/hr</b>	<b>TPY</b>
E-301	42.94	188.12	7.23	31.67	0.19	0.82	0.27	1.20	0.59	2.60
COMM-01	0.66	0.17	25.60	6.40	0.01	<0.01	--	--	--	--
Fugitives	--	--	--	--	--	0.06	--	--	--	--
<b>Total</b>	<b>43.60</b>	<b>188.29</b>	<b>32.83</b>	<b>38.07</b>	<b>0.20</b>	<b>0.89</b>	<b>0.27</b>	<b>1.20</b>	<b>0.59</b>	<b>2.60</b>

The turbine and emergency generator will have emissions of HAPs, the most significant being formaldehyde. Uncontrolled emissions of formaldehyde were calculated based on the aforementioned emission factors and conditions. The following table lists estimated formaldehyde emissions for the emergency generator and turbine. Total formaldehyde emissions are below the major source threshold.

**Formaldehyde Emissions**

<b>Source</b>	<b>Formaldehyde</b>	
	<b>lb/hr</b>	<b>TPY</b>
E-301, 10,860-hp General Electric M3002 natural gas-fired turbine compressor	0.063	0.28
COMM-01, 30-hp Generac QT022 natural gas-fired emergency generator	0.006	<0.01
<b>Total</b>	<b>0.069</b>	<b>0.30</b>

Uncontrolled emissions for each HAP are less than 10 TPY, and uncontrolled emissions of total HAP are less than 25 TPY. The facility is an area source of HAPs.

**SECTION V. INSIGNIFICANT ACTIVITIES**

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

1. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBtu/hr heat input (commercial natural gas). One 0.25 MMBtu/hr process unit is present.
2. \* Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature.
3. \* Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store a VOC with a vapor pressure less than 1.5 psia at maximum storage temperature. None identified but may be added in the future.
4. Hazardous waste and hazardous materials drum staging areas.
5. \* Surface coating operations which do not exceed a combined total usage of more than 60 gallons/month of coatings, thinners, and clean-up solvents at any one emissions unit.
6. Hand wiping and spraying of solvents from containers with less than 1 liter capacity used for spot cleaning and/or degreasing in ozone attainment areas.
7. \* Activities that have the potential to emit no more than 5 TPY (actual) of any criteria pollutant. The methanol tank has the potential to emit less than 5 TPY of any criteria pollutant and other activities may be used in the future.

Panhandle may install and operate other insignificant activities as authorized under OAC 252:100-8.

## SECTION VI. OKLAHOMA AIR POLLUTION CONTROL RULES

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

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

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]  
Primary Standards are in Appendix E and Secondary Standards are in Appendix F of the Air Pollution Control Rules. At this time, all of Oklahoma is in attainment of these standards.

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

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

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

Emissions limitations have been incorporated from the previously issued permits and updated to reflect current operations.

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) [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. This subchapter specifies a PM emissions limitation of 0.36 lbs/MMBtu from fuel-burning units with a rated heat input of 89 MMBtu/hr such as the gas turbine engine at this facility. For natural gas-fired turbine engines, AP-42 (4/00), Table 3.1-2a lists the total PM emissions for natural gas to be 0.0066 lbs/MMBtu. The permit requires the use of natural gas for all fuel-burning units to ensure compliance with Subchapter 19. The equipment at this facility is in compliance with the requirements of this subchapter.

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

No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. The facility has minimal chance of violating this requirement when using natural gas fuel.

## OAC 252:100-29 (Fugitive Dust)

[Applicable]

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

## OAC 252:100-31 (Sulfur Compounds)

[Applicable]

Part 2 limits the ambient air concentration of hydrogen sulfide (H<sub>2</sub>S) emissions from any facility to 0.2 ppmv (24-hour average) at standard conditions which is equivalent to 283 µg/m<sup>3</sup>. Based on modeling conducted for the general permit for oil and gas facilities, the ambient impacts of H<sub>2</sub>S, from facilities combusting natural gas with a maximum H<sub>2</sub>S content of 343 ppmv, will be in compliance with the H<sub>2</sub>S ambient air concentration limit.

Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBtu heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,000 Btu/scf, this limit corresponds to fuel sulfur content 1,203 ppmv. Gas produced from oil and gas wells meeting the NSPS GG definition of “natural gas” having 343 ppmv or less total sulfur will ensure compliance with Subchapter 31. Applicant states that maintaining records of the gas tariff sheet will be used to ensure and demonstrate compliance with this limitation.

## 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 MMBtu/hr to emissions of 0.2 lb of NO<sub>x</sub> per MMBtu. For gas turbines, “new” is defined as “any existing gas turbine that was altered, replaced, or rebuilt after July 1, 1977, resulting in an increase in nitrogen oxide emissions.” The turbine at this facility exceeds 50 MMBtu/hr and is a replacement unit installed in 1981; however, the original Title V operating permit for this facility, Permit No. 96-364-TV, determined that “air contaminants did not increase” due to the replacement. The turbine therefore does not meet the applicability criteria of this subchapter and is not subject to this requirement.

## OAC 252:100-35 (Carbon Monoxide)

[Not Applicable]

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

## OAC 252:100-37 (Volatile Organic Compounds)

[Applicable]

Part 3 requires VOC storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The 225-bbl pressurized condensate storage tank at this facility is subject to this requirement and is compliant with OAC 252:100-37-15(b) by complying with OAC 252:100-37-15(a)(2).

Part 3 requires VOC loading facilities with a throughput equal to or less than 40,000 gallons per day to be equipped with a system for submerged filling of tank trucks or trailers if the capacity of the vehicle is greater than 200 gallons. This facility is subject to this requirement and is compliant by conducting vapor-tight pressurized submerged loading.

Part 5 limits the VOC content of coatings used in coating lines or operations. Any painting operation will involve maintenance coating of buildings and equipment and emit less than 100 pounds per day of VOCs and is exempt.

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

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

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

[Applicable]

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

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

[Applicable]

This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. The turbine is subject to testing using a portable engine analyzer in accordance with a protocol meeting the requirements of the "AQD Portable Analyzer Guidance" document or an equivalent method approved by Air Quality. This testing satisfies the requirements of agency testing protocols. The engine at the facility does not require testing because it is an emergency stationary internal combustion engine as defined by §60.4248.



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

OAC 252:100-11	Alternative Reduction	not eligible
OAC 252:100-15	Mobile Sources	not in source category
OAC 252:100-17	Incinerators	not type of emission unit
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Feed & Grain Facility	not in source category
OAC 252:100-39	Nonattainment Areas	not in a subject area
OAC 252:100-47	Landfills	not type of source category

**SECTION VII. FEDERAL REGULATIONS**

PSD, 40 CFR Part 52

[Not Applicable]

Final total emissions are less than the threshold of 250 TPY of any single regulated pollutant and the facility is not one of the 26 specific industries with a threshold of 100 TPY.

NSPS, 40 CFR Part 60

[Subparts GG and JJJJ Applicable]

Subpart Kb, VOL Storage Vessels. This subpart regulates hydrocarbon storage tanks larger than 19,812 gallons capacity and built after July 23, 1984. The 225-bbl condensate storage tank is below this threshold, and is a pressure vessel. Therefore, this subpart is not applicable.

Subpart GG, Stationary Gas Turbines. This subpart affects turbines which commenced construction, reconstruction, or modification after October 3, 1977, with heat input at peak load of greater than or equal to 10 MMBtu/hr based on the lower heating value of the fuel. The turbine has a heat input capacity at peak load of 88.9 MMBtu/hr and therefore is subject to this subpart. Using the formula in NSPS Subpart GG, §60.332 ( $STD=0.0150 (14.4/Y) +F$ ), and calculating Y as KJ/W-hr using a heat input of 88.9 MMBtu/hr, 1.0542 KJ/BTU, 1 hp/745.7 W, and F=0 since there is no fuel bound nitrogen, a NO<sub>x</sub> limit of 187 ppm was calculated. NO<sub>x</sub> emissions are limited to 187 ppm<sub>dv</sub> or less. Sulfur dioxide standards specified in Subpart GG are that no fuel shall be used which exceeds 0.8% by weight sulfur nor shall exhaust gases contain in excess of 150 ppm SO<sub>2</sub>. The revision of this subpart on July 8, 2004 exempts fuel nitrogen content sampling if the allowance for fuel-bound nitrogen is not claimed, and also exempts fuel sulfur content sampling if firing natural gas which is defined as containing 680 ppm<sub>w</sub> or 338 ppm<sub>v</sub> total sulfur. Panhandle Eastern elects exemption from sulfur content monitoring of the fuel gas for the gas turbine since the fuel gas meets the definition of natural gas. Annual compliance certification will include a statement that pipeline-quality or field-grade natural gas containing less than 338 ppm<sub>v</sub> total sulfur was used to fuel the turbines throughout the report year. Further amendment of this rule on February 24, 2006, was designed to clarify language subject to misinterpretation, and does not impose any additional requirement on the turbine at Seiling.

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

Subpart LLL, Onshore Natural Gas Processing: SO<sub>2</sub> Emissions. This subpart affects sweetening units and sweetening units followed by a sulfur recovery unit. This facility does not have a sweetening unit.

Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI-ICE). This subpart promulgates emission standards for new SI engines ordered after June 12, 2006, that are manufactured after certain dates, and for SI engines modified or reconstructed after June 12, 2006. The specific emission standards (either in g/hp-hr or as a concentration limit) vary based on engine class, engine power rating, lean-burn or rich-burn, fuel type, duty (emergency or non-emergency), and manufacture date. Engine manufacturers are required to certify certain engines to meet the emission standards and may voluntarily certify other engines. An initial notification is required only for owners and operators of engines greater than 500 HP that are non-certified. The emergency generator, COMM-01, was ordered after June 12, 2006, but was manufactured prior to January 1, 2009; therefore, this facility is only subject to the requirement to comply with the definition in §60.4248 of an emergency stationary internal combustion engine.

Subpart KKKK, Stationary Combustion Turbines. This subpart establishes emission standards and compliance schedules for the control of emissions from stationary combustion turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the higher heating value of the fuel, that commenced construction, modification, or reconstruction after February 18, 2005. Stationary combustion turbines regulated under this subpart are exempt from the requirements of subpart GG of this part. Heat recovery steam generators and duct burners regulated under this subpart are exempted from the requirements of subparts Da, Db, and Dc of this part. The turbine at this facility was constructed prior to the effective date of this subpart and has not been modified or reconstructed and is not subject to this subpart.

NESHAP, 40 CFR Part 61

[Not Applicable]

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

NESHAP, 40 CFR Part 63

[Subpart ZZZZ Applicable]

Subpart HH, Oil and Natural Gas Production Facilities. This subpart applies to affected emission points that are located at facilities which are major and area sources of HAPs and either process, upgrade, or store hydrocarbons prior to the point of custody transfer or prior to which the natural gas enters the natural gas transmission and storage source category. For purposes of this subpart natural gas enters the natural gas transmission and storage source category after the natural gas processing plant. If no natural gas plant is present, natural gas enters the natural gas transmission and storage source category after the point of custody transfer. This facility is a minor source of HAP. The only affected source at an area source is triethylene glycol (TEG) dehydration unit. There is no dehydration unit at the facility and the potential HAP emissions are below the 10/25 TPY threshold, and in any case this is a transmission facility therefore, this subpart is not applicable.

Subpart HHH, Natural Gas Transmission and Storage. This subpart applies to affected emission points that are located at facilities that are major sources of HAP, as defined in this subpart, and that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user. This facility is a minor source of HAP.

Subpart YYYY, Combustion Turbines. This subpart applies to combustion turbines that are located at facilities which are major sources of HAPs. This facility isn't a major source of HAPs.

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart affects RICE that are located at area and major source of HAP emissions. Owners and operators of new or reconstructed engines at area sources and of new or reconstructed engines with a site rating equal to or less than 500 HP located at a major source (except new or reconstructed 4-stroke lean-burn engines with a site rating greater than or equal to 250 HP and less than or equal to 500 HP located at a major source) must meet the requirements of Subpart ZZZZ by complying with either 40 CFR Part 60 Subpart IIII (for CI engines) or 40 CFR Part 60 Subpart JJJJ (for SI engines). The emergency generator engine, COMM-01, is considered a new stationary reciprocation internal combustion engine, since construction of the engine was conducted after June 12, 2006, at an area source of HAPs. The facility is required to comply with Subpart ZZZZ and meet the requirements of this subpart by meeting the requirements of 40 CFR part 60 Subpart JJJJ, for spark ignition engines.

CAM, 40 CFR Part 64

[Not Applicable]

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

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

The turbine is not equipped with add-on emissions controls. CAM is therefore not applicable.

Chemical Accident Prevention Provisions, 40 CFR Part 68

[Not Applicable]

The definition of a stationary source does not apply to transportation, including storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the provisions of this part. Panhandle Eastern Pipeline Company's compressor stations are part of an interstate natural gas pipeline, are subject to Department of Transportation [DOT] rules in 49 CFR Part 192, and as a result are exempt from this rule. More information on this federal program is available on the web page: [www.epa.gov/rmp](http://www.epa.gov/rmp).

Stratospheric Ozone Protection, 40 CFR Part 82

[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.

Conditions are included in the standard conditions of the permit to 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 lbs. or more of refrigerant.

**SECTION VIII. COMPLIANCE**

**Inspection**

A full compliance evaluation was conducted on October 15, 2018, by Oba Hughes, Environmental Programs Specialist, for the Department of Environmental Quality, Air Quality Division. Terry Buchman, Senior Environmental Specialist, represented Panhandle Eastern Pipeline Company. Based on the information provided or obtained during the evaluation, no compliance issues were discovered.

**Testing**

Turbine emission tests were conducted on August 8, 2019, using a portable engine analyzer. Engine test results were provided and are in compliance with the applicable permit limits. These results are listed in the following table.

**Table 4. Engine Test Results**

Source	Permit Limits		Test Results		Test Date
	NOx (lb/hr)	CO (lb/hr)	NOx (lb/hr)	CO (lb/hr)	
10,860-hp General Electric M3002 NG Turbine compressor engine Serial No. 282142	42.94	7.23	10.53	4.28	08/08/2019

**Tier Classification and Public Review**

This application has been determined to be a Tier II based on a request for renewal of the Title V operating permit. The applicant has requested concurrent Public and EPA review.

The applicant will publish a “Notice of Filing a Tier II Application” in a newspaper in general circulation in Dewey County. The notice will state the application is available for review on the Air Quality Division’s (AQD) web page at [www.deq.ok.gov](http://www.deq.ok.gov). A “Notice of Draft Permit” will be published in a newspaper in general circulation in Dewey County to inform the public of the 30 day review period. The notice shall state the permit is available through the Air Quality Section of the DEQ web page at [www.deq.ok.gov](http://www.deq.ok.gov).

The proposed permit will be submitted to EPA Region 6 for a review period of 45 days. The EPA review shall run concurrently with the public review. The EPA review period shall not expire prior to the public review period.

The permittee has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the real property. Information on all permits is available for review by the public in the Air Quality Section of DEQ web page at [www.deq.ok.gov](http://www.deq.ok.gov).

The facility is not located within 50 miles of the boarder of Oklahoma and any other state.

**Fee Paid**

Title V permit renewal fee of \$7,500 has been paid.

**SECTION IX. SUMMARY**

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



**DRAFT/PROPOSED**

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

**Panhandle Eastern Pipeline Company  
Seiling Compressor Station**

**Permit No. 2020-0055-TVR4**

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on January 23, 2020. The Evaluation Memorandum dated July 29, 2020, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein:

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

**EUG-1 Turbine**

EU ID	NOx		CO		VOC	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
E-301	42.94	188.12	7.23	31.67	0.19	0.82

**EUG-2 Fugitive Emission Sources**

Fugitive VOC emissions are estimated based on existing equipment items but do not have a specific limitation.

EU	Number Items	Type of Equipment
Fugitives	40	Valves
	82	Flanges
	1	Screwed fittings (flange)
	8	Blowdown valves
	4	Pressure relief valves
	1	Compressor seals

**EUG-3 Internal Combustion Engine**

Use of the engine during emergencies is unlimited. Emissions from EU COMM-01 are considered insignificant.

EU ID	Make/Model	hp	Engine Serial #	Construction Date
COMM-01	Generac/QT022	30	SGM4475 <sup>(1)</sup>	2009

<sup>(1)</sup>Note this is the engine serial number and not the generator set serial number.

2. 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)]

3. The fuel-burning equipment shall be fired with pipeline grade natural gas or other gaseous fuel with a sulfur content less than 343 ppmv. Compliance can be shown by the following methods: for pipeline grade natural gas, a current gas company bill; for other gaseous fuel, a current lab analysis, stain-tube analysis, gas contract, tariff sheet, or other approved methods. Compliance shall be demonstrated at least once every calendar year.  
[OAC 252:100-31]
4. At least once per calendar quarter, the permittee shall conduct tests of NO<sub>x</sub> and CO emissions in exhaust gases from each turbine in EUG 1 and each replacement turbine/engine when operating under representative conditions for that period. Testing is required for any turbine/engine or replacement turbine/engine, which runs for more than 220 hours during that calendar quarter. Turbines/engines shall be tested no sooner than 20 days after the last test. Testing shall be conducted using a portable engine analyzer in accordance with a protocol meeting the requirements of the "AQD Portable Analyzer Guidance" document or an equivalent method approved by Air Quality. When four consecutive quarterly tests show a 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 indicate that emissions are within 10% of the emission limitation, the testing frequency shall revert to quarterly. Reduced turbine/engine testing does not apply to turbines/engines with catalytic converter/oxidation catalyst.  
[OAC 252:100-8-6 (a)(3)(A)]
5. The permittee shall keep operation and maintenance (O&M) records for those emission units which do not conduct quarterly testing. Such records shall at a minimum include the dates of operation, and maintenance, type of work performed, and the increase, if any, in emissions as a result.  
[OAC 252:100-8-6 (a)(3)(B)]
6. The following records shall be maintained on-site to verify Insignificant Activities. No recordkeeping is required for those operations which qualify as Trivial Activities.  
[OAC 252:100-8-6 (a)(3)(B)]
  - a. For 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 contents.
  - b. Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store a VOC with a vapor pressure less than 1.5 psia at maximum storage temperature: records of tank capacity and contents. None identified but may be added in the future.
  - c. For surface coating operations which do not exceed a combined total usage of more than 60 gallons/month of coatings, thinners, and clean-up solvents at any one emissions unit: records of type and volume of coating used.



- d. For activities that have the potential to emit no more than 5 TPY (actual) of any criteria pollutant: emission estimates, including appropriate documentation, for such activities. The methanol tank has the potential to emit less than 5 TPY of any criteria pollutant and other activities may be used in the future.
7. The permittee shall comply with NSPS Subpart GG, Standards of Performance for Stationary Gas Turbines, for operation of the turbine, including but not limited to the following: [40 CFR §§60.330 to 60.335]
    - a. No turbine shall discharge into the atmosphere any gases that contain nitrogen oxides in excess of the limitation of §60.332(a)(2) except when firing emergency fuel.
    - b. Each turbine shall comply with either the sulfur dioxide emission limitation of §60.333(a) or the fuel sulfur content limitation of §60.333(b).
    - c. Emissions monitoring for NO<sub>x</sub> per §60.334.
    - d. Monitoring of the sulfur and nitrogen content of the turbine fuel pursuant to §60.334(h)(1) and (2), and §60.334(i). Per §60.334(h)(2), monitoring of the fuel nitrogen content is not required if the owner or operator does not take a NO<sub>x</sub> allowance for fuel-bound nitrogen. Monitoring of fuel sulfur content is not required when a gaseous fuel is fired in the turbine and the owner or operator demonstrates that the gaseous fuel meets the definition of "natural gas" using one of the methods in §60.334(h)(3)(i) or (ii). §60.331 defines natural gas as containing 20 grains or less of total sulfur per 100 standard cubic feet and is either composed of at least 70 percent methane by volume or has a gross caloric value between 950 and 1100 BTU/scf.
  8. The permittee shall comply with all applicable requirements of the New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines, Subpart JJJJ, for each affected engine including but not limited to the following: [40 CFR §§60.4230 to 60.4248]
    - a. § 60.4230: Am I subject to this subpart?
    - b. § 60.4231: What emission standards must I meet if I am a manufacturer of stationary SI internal combustion engines?
    - c. § 60.4232: How long must my engines meet the emissions standards if I am a manufacturer of stationary SI internal combustion engines?
    - d. § 60.4233: What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?
    - e. § 60.4234: How long must I meet the emissions standards if I am an owner or operator of a stationary SI internal combustion engine?
    - f. § 60.4235: What fuel requirements must I meet if I am an owner or operator of a stationary SI internal combustion engine?
    - g. § 60.4236: What is the deadline for importing or installing stationary SI ICE produced in the previous model year?
    - h. § 60.4237: What are the monitoring requirements if I am an owner or operator of a stationary SI internal combustion engine?
    - i. § 60.4238: What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines ≤ 19 KW (25 HP).

- j. § 60.4239: What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines  $\geq$  19 KW (25 HP) that use gasoline?
  - k. § 60.4240: What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines  $\geq$  19 KW (25 HP) that use LPG?
  - l. § 60.4241: What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines participating in the voluntary certification program?
  - m. § 60.4242: What other requirement must I meet if I am a manufacturer of stationary SI internal combustion engines?
  - n. § 60.4243: What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?
  - o. § 60.4244: What test methods and other procedures must I use if I am an owner or operator of a stationary SI internal combustion engine?
  - p. § 60.4245: What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?
  - q. § 60.4246: What parts of the General Provisions apply to me?
  - r. § 60.4247: What parts of the mobile source provisions apply to me if I am a manufacturer of stationary SI internal combustion engines?
  - s. § 60.4248: What definitions apply to this subpart?
9. The owner/operator shall comply with all applicable requirements of the NESHAP: Reciprocating Internal Combustion Engines (RICE), Subpart ZZZZ, for each affected facility including but not limited to: [40 CFR §§63.6580 to 63.6660]
- a. §63.6580 What is the purpose of subpart ZZZZ?
  - b. §63.6585 Am I subject to this subpart?
  - c. §63.6590 What parts of my plant does this subpart cover?
  - d. §63.6595 When do I have to comply with this subpart?
  - e. §63.6600 What emission limitations and operating limitations must I meet 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?
  - f. §63.6601 What emission limitations must I meet if I own or operate a new or reconstructed 4SLB stationary RICE with a site rating of greater than or equal to 250 brake HP and less than or equal to 500 brake HP located at a major source of HAP emissions?
  - g. §63.6602 What emission limitations and other requirements must I meet if I own or operate an existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?
  - h. §63.6603 What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?
  - i. §63.6604 What fuel requirements must I meet if I own or operate a stationary CI RICE?
  - j. §63.6605 What are my general requirements for complying with this subpart?
  - k. §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?

- l. §63.6611 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a new or reconstructed 4SLB SI stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions?
  - m. §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?
  - n. §63.6615 When must I conduct subsequent performance tests?
  - o. §63.6620 What performance tests and other procedures must I use?
  - p. §63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?
  - q. §63.6630 How do I demonstrate initial compliance with the emission limitations, operating limitations, and other requirements?
  - r. §63.6635 How do I monitor and collect data to demonstrate continuous compliance?
  - s. §63.6640 How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?
  - t. §63.6645 What notifications must I submit and when?
  - u. §63.6650 What reports must I submit and when?
  - v. §63.6655 What records must I keep?
  - w. §63.6660 In what form and how long must I keep my records?
10. Each emission unit at the facility (E-301 and COMM-01) shall have a permanent identification plate attached which shows the make, model number, and serial number.  
[OAC 252:100-43]
11. When periodic compliance testing shows engine/turbine exhaust emissions in excess of the pound per hour limits in Specific Condition #1, the permittee shall comply with the provisions of OAC 252:100-9. Requirements of OAC 252:100-9 include immediate notification and written notification of Air Quality and demonstrations that the excess emissions meet the criteria specified in OAC 252:100-9.  
[OAC 252:100-9]
12. The permittee is authorized to replace any internal combustion engine or turbine with emissions limitations specified in this permit with an engine or turbine that meets the following requirements:  
[OAC 252:100-8-6(f)(2)]
- a. The replacement engine or turbine shall comply with the same emissions limits as the engine or turbine that it replaced. This applies to lb/hr and TPY limits specified in this permit.
  - b. The authorization of replacement of an engine or turbine includes temporary periods of 6 months or less for maintenance purposes.
  - c. The permittee shall notify AQD in writing not later than 7 days prior to start-up of the replacement engine or turbine. Said notice shall identify the old engine/turbine and shall include the new engine/turbine make and model, serial number, horsepower rating, and pollutant emission rates (g/hp-hr, lb/hr, and TPY) at maximum horsepower for the altitude/location.

- d. Quarterly emissions tests for the replacement engine(s)/turbine(s) shall be conducted to confirm continued compliance with NO<sub>x</sub> and CO emission limitations. A copy of the first quarter testing shall be provided to AQD within 60 days of start-up of each replacement engine/turbine. The test report shall include the engine/turbine fuel usage, stack flow (ACFM), stack temperature (°F), and pollutant emission rates (g/hp-hr, lbs/hr, and TPY) at maximum rated horsepower for the altitude/location.
  - e. Replacement equipment and emissions are limited to equipment and emissions which are not a modification under NSPS or NESHAP.
  - f. Replacement equipment and emissions are limited to equipment and emissions which are not a modification 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 paragraph (c) of this Specific Condition. The permittee shall attach each such notice to their copy of the relevant 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 described in OAC 252:100-8-6(d) does not apply to any change made pursuant to this paragraph.
  - g. Engines whose installation and operation are authorized under this Specific Condition which are subject to 40 CFR Part 63, Subpart ZZZZ and/or 40 CFR Part 60, Subpart JJJJ shall comply with all applicable requirements.
  - h. Turbine whose installation and operation are authorized under this Specific Condition which are subject to 40 CFR Part 60, Subpart GG shall comply with all applicable requirements. Turbines subject to 40 CFR Part 60, Subpart KKKK are not authorized replacements for E-301.
13. The permittee shall maintain, and update annually, an inventory record of fugitive emission sources at the facility. [OAC 252:100-8-6 (a)(3)]
  14. The following records shall be maintained on-site to verify insignificant activities. No records are required for trivial activities. [OAC 252:100-43]
    - a. Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature: records of capacity of the tanks and contents.
    - b. For fluid storage tanks with a capacity of less than 39,894 gallons and a true vapor pressure less than 1.5 psia: records of capacity of the tanks and contents.
    - c. Surface coating operations which do not exceed a combined total usage of more than 60 gallons/month of coatings, thinners, and clean-up solvents at any one emissions unit: records of monthly volume of coatings used.
    - d. For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant: the type of activity and the amount of emissions from that activity (annual).
  15. The permittee shall keep records of operations as listed below. 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 the turbine and engine for NO<sub>x</sub> and CO emissions.
  - b. Hours of operation of the turbine and/or engine for each quarter when testing is not conducted.
  - c. Documents as required by Specific Condition No. 3.
  - d. Operation and maintenance (O&M) records for the EUG-1 emission unit when quarterly testing is not conducted.
  - e. Records of insignificant activities.
  - f. Records as required by 40 CFR Part 60, Subparts GG and JJJJ.
  - g. Records as required by 40 CFR Part 63, Subpart ZZZZ.
16. No later than 30 days after each anniversary date of the issuance of the original Title V operating permit (March 30, 1999), the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit. [OAC 252:100-8-6 (c)(5)(A) & (D)]
17. The Permit Shield (Standard Conditions, Section VI) is extended to the following requirements that have been determined to be inapplicable to this facility:  
[OAC 252:100-8-6(d)(2)]
- a. 40 CFR Part 52, NSR
  - b. OAC 252:100-8, Part 7, PSD
  - c. OAC 252:100-33, Control of Emissions of Nitrogen Oxides
  - d. OAC 252:100-35, Control of Emission of Carbon Monoxide
18. Upon issuance, this permit supersedes all previous Air Quality operating permits for this facility, which are now cancelled.



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

**SECTION I. DUTY TO COMPLY**

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

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

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

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

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

**SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS**

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

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

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

**SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING**

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

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

B. Records of required monitoring shall include:

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

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

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

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

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

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

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

[OAC 252:100-43]

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

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



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

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

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

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer’s instructions and in accordance with a protocol meeting the requirements of the “AQD Portable Analyzer Guidance” document or an equivalent method approved by Air Quality. [OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

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

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

#### **SECTION IV. COMPLIANCE CERTIFICATIONS**

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

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

B. The compliance certification shall describe the operating permit term or condition that is the

basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source. [OAC 252:100-8-6(c)(5)(C)(i)-(v)]

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

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

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

## **SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM**

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

## **SECTION VI. PERMIT SHIELD**

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

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

## **SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT**

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

shall be based on the best available information accepted by AQD.

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

### **SECTION VIII. TERM OF PERMIT**

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

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

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

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

### **SECTION IX. SEVERABILITY**

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

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

### **SECTION X. PROPERTY RIGHTS**

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

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

### **SECTION XI. DUTY TO PROVIDE INFORMATION**

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

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

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

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

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

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

## SECTION XII. REOPENING, MODIFICATION & REVOCATION

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

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

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

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

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

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

[OAC 100-8-7.3(d)]

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

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

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

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

**SECTION XIII. INSPECTION & ENTRY**

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

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

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

**SECTION XIV. EMERGENCIES**

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

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

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

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

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

- (1) an emergency occurred and the permittee can identify the cause or causes of the emergency;
- (2) the permitted facility was at the time being properly operated;

- (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

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

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

#### **SECTION XV. RISK MANAGEMENT PLAN**

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

#### **SECTION XVI. INSIGNIFICANT ACTIVITIES**

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

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

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

#### **SECTION XVII. TRIVIAL ACTIVITIES**

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

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

#### **SECTION XVIII. OPERATIONAL FLEXIBILITY**

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

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

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

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

#### **SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS**

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

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

adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]

- (5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBtu. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
- (6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]
- (7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

## **SECTION XX. STRATOSPHERIC OZONE PROTECTION**

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

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

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

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

- (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
- (2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;



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

## SECTION XXI. TITLE V APPROVAL LANGUAGE

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

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

to demonstrate that the source is operating in substantial compliance with all permit requirements.

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

## **SECTION XXII. CREDIBLE EVIDENCE**

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [OAC 252:100-43-6]

**DRAFT/PROPOSED**



SCOTT A. THOMPSON  
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT  
Governor

Panhandle Eastern Pipeline Company  
Attn: Mr. Terry Buchman, Senior Environmental Specialist  
8111 Westchester Drive  
Dallas, TX 75225

RE: Operating Permit No. **2020-0055-TVR4**  
Panhandle Eastern Pipeline Company  
Seiling Compressor Station (Fac ID 1375)  
Section 4, Township 19N, Range 17W  
Dewey County, Oklahoma

Dear Mr. Buchman:

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

Also note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed through DEQ's electronic reporting system by April 1<sup>st</sup> of every year. Any questions concerning the submittal process should be referred to the Emissions 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 the permit writer at (405) 702-4100.

Sincerely,

**DRAFT/PROPOSED**

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





DRAFT/PROPOSED



# PART 70 PERMIT

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

Permit No. 2020-0055-TV4

Panhandle Eastern Pipe Line Company

having complied with the requirements of the law, is hereby granted permission to operate the Seiling Compressor Station located in Sections 4, Township 19N, Range 17W, Seiling, Dewey County, Oklahoma, subject to Major Source Standard Conditions dated June 21, 2016, and Specific Conditions, both attached.

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

\_\_\_\_\_  
Eddie Terrill, Division Director  
Air Quality Division

\_\_\_\_\_  
Date





SCOTT A. THOMPSON  
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT  
Governor

Panhandle Eastern Pipeline Company  
Attn: Mr. Terry Buchman, Senior Environmental Specialist  
8111 Westchester Drive  
Dallas, TX 75225

SUBJECT: Facility: Seiling Compressor Station  
Facility ID: 1375  
Location: Dewey County  
Permit No. **2020-0055-TV4**  
Date Received: January 23, 2020

Dear Mr. Hanner:

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. § 2-14-301 & 302 and OAC 252:4-7-13(c) the application and enclosed draft permit are 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) of a “Notice of Filing a Tier II Application” and a “Notice of Tier II Draft Permit” 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, Kyle Walker, at (405) 702-4193.

Sincerely,

A handwritten signature in black ink that reads 'Phillip Fielder'.

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



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

## **APPLICANT RESPONSIBILITIES**

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

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

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

**SAMPLE NOTICE on page 2.**



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

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

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

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

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

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

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

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

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

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

<b>ACFM</b>	Actual Cubic Feet per Minute	<b>HP</b>	Horsepower (hp)
<b>AD</b>	Applicability Determination	<b>HR</b>	Hour (hr)
<b>AFRC</b>	Air-to-Fuel Ratio Controller	<b>H<sub>2</sub>S</b>	Hydrogen Sulfide
<b>API</b>	American Petroleum Institute	<b>I&amp;M</b>	Inspection and Maintenance
<b>ASTM</b>	American Society for Testing and Materials	<b>IBR</b>	Incorporation by Reference
		<b>IC</b>	Internal Combustion
<b>BACT</b>	Best Available Control Technology	<b>LAER</b>	Lowest Achievable Emission Rate
<b>BHP</b>	Brake Horsepower (bhp)	<b>LB</b>	Pound(s) [Mass] (lb, lbs, lbm)
<b>BTU</b>	British thermal unit (Btu)	<b>LB/HR</b>	Pound(s) per Hour (lb/hr)
		<b>LDAR</b>	Leak Detection and Repair
<b>C&amp;E</b>	Compliance and Enforcement	<b>LNG</b>	Liquefied Natural Gas
<b>CAA</b>	Clean Air Act	<b>LT</b>	Long Ton(s) (metric)
<b>CAM</b>	Compliance Assurance Monitoring	<b>M</b>	Thousand (Roman Numeral)
<b>CAS</b>	Chemical Abstract Service	<b>MAAC</b>	Maximum Acceptable Ambient Concentration
<b>CAAA</b>	Clean Air Act Amendments	<b>MACT</b>	Maximum Achievable Control Technology
<b>CC</b>	Catalytic Converter	<b>MM</b>	Prefix used for Million (Thousand-Thousand)
<b>CD</b>	Consent Decree	<b>MMBTU</b>	Million British Thermal Units (MMBtu)
<b>CEM</b>	Continuous Emission Monitor	<b>MMBTUH</b>	Million British Thermal Units per Hour (MMBtu/hr)
<b>CFC</b>	Chlorofluorocarbon	<b>MMSCF</b>	Million Standard Cubic Feet (MMscf)
<b>CFR</b>	Code of Federal Regulations	<b>MMSCFD</b>	Million Standard Cubic Feet per Day
<b>CI</b>	Compression Ignition	<b>MSDS</b>	Material Safety Data Sheet
<b>CNG</b>	Compressed Natural Gas	<b>MWC</b>	Municipal Waste Combustor
<b>CO</b>	Carbon Monoxide or Consent Order	<b>MWe</b>	Megawatt Electrical
<b>COM</b>	Continuous Opacity Monitor	<b>NA</b>	Nonattainment
<b>D</b>	Day	<b>NAAQS</b>	National Ambient Air Quality Standards
<b>DEF</b>	Diesel Exhaust Fluid	<b>NAICS</b>	North American Industry Classification System
<b>DSCF</b>	Dry Standard (At Standard Conditions) Cubic Foot (Feet)	<b>NESHAP</b>	National Emission Standards for Hazardous Air Pollutants
<b>EGU</b>	Electric Generating Unit	<b>NH<sub>3</sub></b>	Ammonia
<b>EI</b>	Emissions Inventory	<b>NMHC</b>	Non-methane Hydrocarbon
<b>EPA</b>	Environmental Protection Agency	<b>NO<sub>2</sub></b>	Nitrogen Dioxide
<b>ESP</b>	Electrostatic Precipitator	<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>EUG</b>	Emissions Unit Group	<b>NOI</b>	Notice of Intent
<b>EUSGU</b>	Electric Utility Steam Generating Unit	<b>NSCR</b>	Non-Selective Catalytic Reduction
<b>FCE</b>	Full Compliance Evaluation	<b>NSPS</b>	New Source Performance Standards
<b>FIP</b>	Federal Implementation Plan	<b>NSR</b>	New Source Review
<b>FR</b>	Federal Register	<b>O<sub>3</sub></b>	Ozone
<b>GACT</b>	Generally Achievable Control Technology	<b>O&amp;G</b>	Oil and Gas
<b>GAL</b>	Gallon (gal)	<b>O&amp;M</b>	Operation and Maintenance
<b>GDF</b>	Gasoline Dispensing Facility	<b>O&amp;NG</b>	Oil and Natural Gas
<b>GEP</b>	Good Engineering Practice	<b>OAC</b>	Oklahoma Administrative Code
<b>GHG</b>	Greenhouse Gases	<b>OC</b>	Oxidation Catalyst
<b>GR</b>	Grain(s) (gr)		
<b>HAP</b>	Hazardous Air Pollutants		
<b>HC</b>	Hydrocarbon		
<b>HCFC</b>	Hydrochlorofluorocarbon		
<b>HON</b>	Hazardous Organic NESHAP		