

DRAFT

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

MEMORANDUM

September 8, 2020

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

THROUGH: Rick Groshong, Environmental Manager, Compliance and Enforcement

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

THROUGH: Peer Review

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

SUBJECT: Evaluation of Permit Application No. **2020-0257-TV R4**
Natural Gas Pipeline Company of America
Compressor Station 102 (FAC ID 1055)
Section 15 – T1N – R20ECM, Beaver County
From Bryan’s Corner, South 4 Miles, West 3 Miles
Latitude: 36.55689°, Longitude: -100.88419°

SECTION I. INTRODUCTION

Natural Gas Pipeline Company of America (NGPL) has requested renewal of their current Part 70 operating permit. The facility is currently operating under Permit No. 2015-0910-TV R3 (M-1), issued on April 10, 2017. The facility is a major source for Prevention of Significant Deterioration (PSD) and a major source of Hazardous Air Pollutants (HAPs).

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

SECTION II. FACILITY DESCRIPTION

Station 102 is a natural gas pipeline compressor station (SIC 4922). Originally constructed in the 1920s on an Amarillo-to-Chicago pipeline, the facility currently consists of 5 internal combustion engines and 2 gas-fired heaters in fuel gas heating and hot water generation service. The facility handles pipeline-quality natural gas which has already been sweetened, dehydrated, and stripped of most natural gas liquids. In 1994-1995, the existing generators, most of the old engine/compressor units, and a 10 MMBTUH boiler were replaced by one new 375 HP internal combustion (IC) engine/generator unit, a nominal 5,520 HP (maximum 6,900 HP below 40°F ambient temperature) IC engine, and a 3.35 MMBTUH boiler. The project was a major modification to an existing PSD-major source and PSD review was conducted in 1994.

SECTION III. PERMIT HISTORY

Permit No.	Date Issued	Description
2015-0910-TVR3 M-1	4/10/2017	increased hours of operation of emergency generator; change horsepower of generator
2015-0910-TVR3	1/6/2016	third Title V permit renewal
2010-128-TVR2	12/15/2010	second Title V permit renewal
2005-058-TVR	9/27/2005	first Title V permit renewal
96-373-TV	9/19/2000	initial Title V permit
94-388-C PSD	3/9/1995	5,520-hp IC engine compressor unit

SECTION IV. REQUESTED CHANGES

The application requested the following changes to the facility permit:

- The produced water tank E1 has been replaced with a 21,000 gallon vessel with a construction date of 2018. Based on E&P Tank v3.0 calculations for flashing emissions and working/breathing emissions using AP-42, Section 7.1.3.1, total emissions are 0.06 TPY VOC and <0.01 TPY total HAP.
- Tank E5 has been removed from service.
- Two 0.1 MMBTUH space heaters have been added. These units are classified as “trivial activities.”

SECTION V. EQUIPMENT

EUG 1 Grandfathered Engines

EU	Point	Make/Model	Hp	Serial #	Const./Mod. Date
C-8	P-2	Clark TCV-10	3,400	107009	1965
C-9	P-3	Clark TCV-12	4,000	111509	1968

EUG 2 Permitted Engines

EU	Point	Make/Model	Hp	Serial #	Const./Mod. Date
C-1	P-4	Cooper-Bessemer Model 12W330C2	6,900	49152	1995
G-2	G-2	Caterpillar G3406	375	4FD00997	1995
G-3	G-3	Generac 3.0GN emergency generator	40	2043595	1999

EUG 3 Insignificant Activities

EU	Point	Description	Size	Const./Mod. Date
E1	P1	Condensate / produced water tank	21,000	2018
E3	P3	Lube oil tank	9,000	pre-1971
E4	P4	Used oil tank	9,000	pre-1971
E6	P6	Antifreeze tank	2,100	1995
E7	P7	Antifreeze tank	2,100	1995
E8	P8	Methanol tank	6,052	1974
E-11	E-11	Fugitive VOC leakage components	--	1959 – 1995
E-12	P-12	Blowdowns	5 MMSCFY	1959
E-50	P-50	Condensate loading	9,000 gal/yr	1986
E-51	P-51	Comfort space heaters	4 Units, each 0.25 MMBTUH; 2 Units, each 0.1 MMBTUH	1959 – 1995

EUG 5 Boiler

EU	Point	Equipment	MMBTUH	Const. Date
B-1	B-1	Boiler	3.35	1995

The above unit would be an Insignificant Activity except that it is subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart DDDDD.

Engine Stack Parameters

EU	Source (make/model)	Height (feet)	Diameter (inches)	Flow (acfm)	Temp (°F)
C-8	Clark TCV-10	33	37	42,000	600
C-9	Clark TCV-12	34	41	42,000	600
C-1	Cooper-Bessemer Model 12W330C2	68	48	49,000	530
G-2	Caterpillar G3406	25	8	797	500
G-3	Generac 3.0GN	11	24	500	860

SECTION VI. EMISSIONS

Emissions estimates for engines are based on continuous operation and manufacturer’s emission data, except for the Caterpillar engine, which is based on 250 hours per year:

Engine Specification	NOx, g/hp-hr	CO, g/hp-hr	VOC, g/hp-hr	Formaldehyde, g/hp-hr
Clark TCV-10	12.0	2.70	0.55	0.18
Clark TCV-12	15.5	3.60	0.42	0.18
Cooper-Bessemer 12W330C2	2.0	2.0	0.6	0.17
Caterpillar G3406	12.0	1.6	0.7	--
Generac 3.0GN	10.5	17.67	0.14	0.10

The VOC factors above do not include formaldehyde. Formaldehyde will be added to later VOC emissions.

Estimated emission factors from Boiler B-1 were taken from the heat input on the unit's nameplate and AP-42 (7/98), Section 1.4.

NOx (lb/MMBTU)	CO (lb/MMBTU)	VOC (lb/MMBTU)
0.098	0.082	0.005

Fugitive emission factors were taken from EPA's "Protocol for Equipment Leak Emission Estimates" (EPA-453/R-93-026), adjusted for a maximum VOC content of 1%. Blowdown emissions assumed a maximum annual volume of 5.0 MMSCF, an extremely conservative procedure.

Tank E1 emissions were calculated using the methods of AP-42 (4/20), Section 7.1. Flash emissions were calculated using "E&PTANKS." Since the facility handles gas from which liquids have already been extracted, emissions from these units are insignificant. All other tanks contain organic liquids with negligible vapor pressures.

Tank E1 Emissions

Parameter	Data
Throughput, gal/yr	9,000
Flash Calculation Method/Tool	E&P Tanks
Working/Breathing Method/Tool	AP-42, Section 7.1
Control Type	None
Capture Efficiency	--
Control Efficiency	--
VOC Emissions, TPY	0.06

Truck loadout emissions are based on AP-42 (01/1995), Section 5.2 for tank trucks. An emission factor of 12 lb/Mgal was used based on splash-loading gasoline, a conservative procedure.

Loading Parameters and Emissions

Point	E50
Liquids Loaded	Condensate
Throughput, gal/yr	9,000
Temp., °F	64
TVP, psia	5.52
MW, lb/lbmol	66
VOC, wt.%	100%
Emission Factor, lb/10 ³ gal ⁽¹⁾	5.20
VOC Emissions, TPY	0.02

(1) - Final factor considering any VOC reduction stated for methane/ethane

EUG 1 Grandfathered Engines

		NO _x		CO		VOC*	
EU	Engine	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
C-8	Clark TCV-10	89.95	393.97	20.24	88.64	5.47	23.96
C-9	Clark TCV-12	136.68	598.68	31.75	139.05	5.26	23.02
TOTALS		226.63	992.65	51.99	227.69	10.73	46.98

*includes formaldehyde.

EUG 2 Permitted Engines

		NO _x		CO		VOC***	
EU	Engine	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
C-1	Cooper-Bessemer 12W330C2 *	30.20	132.10	30.20	132.10	11.63	50.91
G-2	Caterpillar G3406 **	9.90	1.24	1.32	0.16	0.60	0.11
G-3	Generac 3.0GN	0.93	4.07	1.56	6.83	0.01	0.04
TOTALS		41.03	137.41	33.08	139.09	12.24	51.06

* Short-term emission rates for this engine were based on higher-than-rated power output.

** Emissions from the unit were based on a limit of 250 hours per year.

***VOC includes formaldehyde.

EUG 3 Insignificant Activities

		NO _x		CO		VOC	
EU	Engine	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
P1	Condensate tank	--	--	--	--	0.01	0.06
P3	Lube oil tank	--	--	--	--	0.06	0.27
P4	Used oil tank	--	--	--	--	0.06	0.27
P5	Antifreeze tank	--	--	--	--	0.01	0.01
P7	Antifreeze tank	--	--	--	--	0.01	0.01
P8	Methanol tank	--	--	--	--	0.02	0.07
E-11	Fugitive VOC leakage	--	--	--	--	0.02	0.07
P-12	Blowdowns	--	--	--	--	--	3.82

		NO _x		CO		VOC	
EU	Engine	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
P-50	Condensate loading	--	--	--	--	0.01	0.05
P-51	Comfort space heaters	0.12	0.52	0.10	0.43	0.01	0.03
TOTALS		0.12	0.52	0.10	0.43	0.21	4.66

EUG 5 Boilers

		NO _x		CO		VOC	
EU	Equipment	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
B-1	Kewanee Boiler	0.35	1.54	0.30	1.30	0.02	0.08

Total Emissions

EU	NO _x		CO		VOC	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
C-8	89.95	393.97	20.24	88.64	5.47	23.96
C-9	136.68	598.68	31.75	139.05	5.26	23.02
C-1	30.20	132.10	30.20	132.10	11.63	50.91
G-2	9.90	1.24	1.32	0.16	0.60	0.11
G-3	0.93	4.07	1.56	6.83	0.01	0.04
Tanks	---	---	---	---	0.17	0.69
B-1	0.35	1.54	0.30	1.30	0.02	0.08
Fugitives	---	---	---	---	0.02	0.07
E-12	---	---	---	---	--	3.82
E-50	0.12	0.52	0.10	0.43	0.01	0.02
TOTALS	268.13	1,132.12	85.47	368.51	23.19	102.72

Formaldehyde Emissions

Unit ID	Description	Capacity, Hp	Emission Factor, g/hp-hr	Formaldehyde	
				lb/hr	TPY
C-8	Clark TCV-10	3,400	0.18	1.35	5.90
C-9	Clark TCV-12	4,000	0.18	1.56	6.80
C-1	Cooper-Bessemer Model 12W330C2	6,900	0.17	2.51	10.97
G-3	Generac 3.0GN	40	0.10	0.01	0.01
TOTALS				5.43	23.67

The facility is a major source of HAPs.

SECTION VII. INSIGNIFICANT ACTIVITIES

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

1. Space heaters, boilers, process heaters and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas). Now that NESHAP Subpart DDDDD affects the small boiler, it is no longer in this category.
2. Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature. The antifreeze and lube oil / waste oil tanks are in this category.
3. * Emissions from condensate tanks with a design capacity of 420,000 gallons or less used prior to custody transfer. Tank P1 is in this category.
4. * Activities that have the potential to emit no more than 5 TPY (actual) of any criteria pollutant. The methanol tank is in this category.

SECTION VIII. OKLAHOMA AIR POLLUTION CONTROL RULES

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

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

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

OAC 252:100-5 (Registration, Emission Inventory, and Annual Operating Fees) [Applicable]
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Emission inventories were 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 mean individual emission units that either are on the list in Appendix I (OAC 252:100) or whose actual calendar year emissions do not exceed the following limits:

- 5 TPY of any one criteria pollutant
- 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 single HAP that the EPA may establish by rule.

Emissions limitations have been incorporated from the permit application and the previous Title V operating permit.

OAC 252:100-9 (Excess Emission Reporting Requirements) [Applicable]
 Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for 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 (Prohibition of Open Burning) [Applicable]
 Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter (PM)) [Applicable]
 Section 19-4 regulates emissions of PM from new and existing fuel-burning equipment, with emission limits based on maximum design heat input rating. Appendix C specifies a PM emission limitation based on heat input capacity. AP-42 (7/00), Sec. 3.2 lists the total PM emissions from 4-stroke lean-burn natural gas-fired engines to be 0.0099 lbs/MMBTU. AP-42 (7/98), Table 1.4-2 lists PM emissions for natural gas combustion from heaters, boilers, etc., to be 0.0076 lbs/MMBTU. These emissions are in compliance with Subchapter 19

Unit	Heat Input Capacity, MMBTUH	PM Emission Limitation of OAC 252:100-19, lb/MMBTU	Anticipated PM Emission Rate, lb/MMBTU
C-1	49.7	0.40	0.0099
C-8	27.2	0.44	0.0099
C-9	32.0	0.43	0.0099
B-1	3.35	0.60	0.0076
G-2	2.63	0.60	0.0099
G-3	0.42	0.60	0.22

OAC 252:100-25 (Visible Emissions and Particulate Matter) [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. When burning natural gas there is little possibility of exceeding the opacity standards.

OAC 252:100-29 (Fugitive Dust) [Applicable]
No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. Under normal operating conditions, this facility will not cause a problem in this area, therefore it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds) [Applicable]
Part 2, Section 31.7 limits the ambient air concentration of hydrogen sulfide (H₂S) emissions from any facility to 0.2 ppmv (24-hour average) at standard conditions which is equivalent to 283 µg/m³ (based on EPA standard conditions). Based on modeling conducted for the General Permit for Oil and Gas Facilities (GP-OGF), the ambient impacts of H₂S from oil and gas facilities handling, treating, and combusting sweet natural gas and storing sweet crude oil or condensate will be in compliance with the 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 of 1,203 ppmv. The permit requires the use of gaseous fuel with sulfur content less than 343 ppmv to ensure compliance with Subchapter 31.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]
This subchapter limits NO_x emissions from new fuel-burning equipment with a rated heat input greater than or equal to 50 MMBTUH. None of the engines or heaters exceed the 50 MMBTUH threshold.

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

OAC 252:100-37 (Volatile Organic Compounds) [Applicable]
Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The condensate (P1) and methanol (P8) tanks are subject to this requirement.
Part 3 requires VOC loading facilities with a throughput equal to or less than 40,000 gallons per day to be equipped with a system for submerged filling of tank trucks or trailers if the capacity of the vehicle is greater than 200 gallons. This facility does not have the physical equipment (loading arm and pump) to conduct this type of loading and is not subject to this requirement.

Part 5 limits the VOC content of coatings from any coating line or other coating operation. This facility does not normally conduct coating or painting operations except for routine maintenance of the facility and equipment, which is exempt.

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

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

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]
 This subchapter regulates toxic air contaminants (TAC) that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]
 This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

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

OAC 252:100-7	Minor Facilities	not in source category
OAC 252:100-11	Alternative Emissions Reduction	not eligible
OAC 252:100-15	Mobile (Motor Vehicle) 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 Elevators	not in source category
OAC 252:100-39	Nonattainment Areas	not in area category
OAC 252:100-47	Municipal Solid Waste Landfills	not in source category

SECTION IX. FEDERAL REGULATIONS

PSD, 40 CFR Part 52

[Not Applicable at This Time]

Total potential emissions of NO_x and CO are above the level of significance of 250 TPY. The proposed project adds emissions which are below PSD levels of significance. Any future increases must be evaluated in comparison to the significance levels: CO 100 TPY, NO_x 40 TPY, SO₂ 40 TPY, PM 25 TPY, PM₁₀ 15 TPY, VOC 40 TPY, or 75,000 TPY CO_{2e}.

NSPS, 40 CFR Part 60

[Not Applicable]

Subparts K, Ka, Kb, VOL Storage Vessels. All of the tanks are below the de minimis of 19,813-gallons for Subpart Kb and 40,000-gallons for Subparts K and Ka.

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

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

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

Subpart LLL, Onshore Natural Gas Processing: SO₂ Emissions. There is no natural gas sweetening operation at this site.

Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI-ICE), promulgates emission standards for all new SI engines ordered after June 12, 2006, and all SI engines modified or reconstructed after June 12, 2006, regardless of size. All engines at this facility were manufactured prior to the effective date of Subpart JJJJ.

Subpart OOOO, Crude Oil and Natural Gas Production, Transmission, and Distribution. This subpart was promulgated on August 16, 2012, and affects the following sources that commence construction, reconstruction, or modification after August 23, 2011, and before September 18, 2015:

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

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

There are no pneumatic controllers with a bleed rate of 6 SCFH and this facility is not a gas plant.

Storage vessels constructed, modified or reconstructed after August 23, 2011, and before September **18, 2015**, with VOC emissions equal to or greater than 6 TPY must reduce VOC emissions by 95.0 % or greater. The replacement condensate tank was constructed in 2018, and all other tanks were constructed prior to the applicability date.

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

This facility is located in the natural gas transmission and storage segment. All existing equipment is not subject to this subpart because it was constructed prior to August 23, 2011, and has not been modified or reconstructed. Additionally, EPA recently proposed a rule change that would remove the transmission and storage segment from this subpart.

Subpart OOOOa, Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015. This subpart affects the following onshore facilities

1. Well affected facilities
2. Centrifugal compressor affected facilities
3. Reciprocating compressor affected facilities
4. Pneumatic controller affected facilities
5. Pneumatic pump affected facilities
6. Storage vessel affected facilities
7. Fugitive emissions components at a well site and the collection of fugitive emissions components at a compressor station
8. Onshore natural gas processing plants
9. Sweetening unit affected facilities

All equipment was constructed prior to the effective date of Subpart OOOOa except for the one tank. This facility is located in the natural gas transmission and storage segment. All existing equipment except the new replacement tank is not subject to this subpart because it was constructed prior to September 18, 2015, and has not been modified or reconstructed. The replacement condensate tank was constructed in 2018, but the PTE is less than 6 TPY of VOC; therefore, it is not subject to Subpart OOOOa. Additionally, EPA recently proposed a rule change that would remove the transmission and storage segment from this Subpart.

NESHAP, 40 CFR Part 61

[Not Applicable]

There are no emissions of any of the regulated pollutants: arsenic, asbestos, beryllium, benzene, coke oven emissions, mercury, radionuclides or vinyl chloride except for trace amounts of benzene. Subpart J, Equipment Leaks of Benzene, only affects process streams that contain more than 10% benzene by weight. All process streams at this facility are below this threshold.

NESHAP, 40 CFR Part 63

[Subparts ZZZZ and DDDDD Applicable]

Subpart HH, Oil and Natural Gas Production Facilities. This subpart applies to affected emission points that are located at facilities which are major sources of HAPs and either process, upgrade, or store hydrocarbons prior to the point of custody transfer or prior to which the natural gas enters the natural gas transmission and storage source category. This facility is a “transmission facility.”

Subpart HHH, Natural Gas Transmission and Storage. This subpart was published in the Federal Register on June 17, 1999, and affects Natural Gas Transmission and Storage Facilities. It applies to glycol dehydration units that are located at facilities that are major sources of HAPs, as defined in this subpart, and that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user. No dehydration is conducted at this facility, therefore, Subpart HHH is not applicable per 40 CFR Part 63.1270(c).

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). The final rule of this subpart was published in the Federal Register on January 18, 2008, and affects existing, new, and reconstructed spark ignition 4-stroke rich-burn (4SRB) RICE, new or reconstructed spark ignition 2-stroke lean-burn (2SLB) RICE, new or reconstructed 4-stroke lean-burn (4SLB) RICE, and new or reconstructed compression ignition (CI) RICE, with a site-rating greater than 500 brake horsepower, that are located at a major source of HAP emissions. This facility is a major source of HAPs.

This subpart previously only affected RICE with a site-rating greater than 500 brake horsepower that are located at a major source of HAP emissions. The EPA published a final rule that promulgates standards for new and reconstructed engines (after June 12, 2006) with a site rating of less than or equal to 500 HP located at major sources, and for new and reconstructed engines (after June 12, 2006) located at area sources. Owners and operators of new or reconstructed 4SLB engines with a site rating of greater than or equal to 250 HP and less than or equal to 500 HP located at a major source are subject to the same MACT standards previously established for 4SLB engines above 500 HP at a major source, and must also meet the requirements of 40 CFR Part 60 Subpart JJJJ, except for the emissions standards for CO. Owner and operators of new or reconstructed stationary RICE located at an area source, must meet the requirements of 40 CFR Subpart III or Subpart JJJJ. All engines pre-date NSPS Subpart JJJJ, therefore, there are no standards applicable under Subpart ZZZZ.

A summary of the requirements for the SI RICE located at this facility are shown below. These standards affect the two generator engines. There are no standards specified for the large existing 4SLB engines at a major source of HAPs.

For each . . .	You must meet the following requirement, except during periods of startup . . .
2. Non-Emergency, non-black start stationary CI RICE <100 HP	a. Change oil and filter every 1,000 hours of operation or annually, whichever comes first. ² b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. ³

Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. Natural gas fired heaters smaller than 10 MMBTUH capacity are subject to the following work-practice standard.

For each . . .	You must meet the following requirement
2. A new or existing boiler or process heater without a continuous oxygen trim system and with heat input capacity of less than 10 million Btu per hour in the unit designed to burn heavy liquid or unit designed to burn solid fuel subcategories; or a new or existing boiler or process heater with heat input capacity of less than 10 million Btu per hour, but greater than 5 million Btu per hour, in any of the following subcategories: unit designed to burn gas 1; unit designed to burn gas 2 (other); or unit designed to burn light liquid	Conduct a tune-up of the boiler or process heater biennially as specified in §63.7540.

CAM, 40 CFR Part 64 [Not Applicable]
 Compliance Assurance Monitoring (CAM) applies to any pollutant specific emission unit at a major source, that is required to obtain a Part 70 permit, if it meets all of the following criteria:

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

No emission unit utilizes an add-on control device to achieve compliance with an applicable standard.

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

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

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

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

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.

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

SECTION X. COMPLIANCE

The Specific Conditions of this permit contain various testing, monitoring, recordkeeping, and reporting requirements in order to document on-going compliance with emission limits. The specific method used to document compliance was based on the type of emission unit, the type of process equipment, the specific pollutants emitted, and the amount of permitted emissions taking into account other regulatory requirements that an emission unit may be subject to.

In addition to the permitting requirements, the following periodic inspections were conducted since issuance of the last Title V renewal permit.

Inspection Type	Date	Summary/Results
Full Inspection	5/19/2019	Failed to submit complete 2017 Emission Inventory
Full Inspection	10/17/2016	In compliance

There have been no other enforcement actions since issuance of the last Title V renewal permit.

Testing

The results from recent testing (March 10, 2020) that show compliance with the applicable permit conditions are shown below.

		Permit Limitations		Test Results	
		NOx	CO	NOx	CO
EU	Source	lbs/hr	lbs/hr	lbs/hr	lbs/hr
C-1	Cooper-Bessemer 12W330C2	30.20	30.20	12.65	12.05

SECTION XI. TIER CLASSIFICATION, PUBLIC AND EPA REVIEW

This application has been determined to be **Tier II** based on the request for renewal of a Part 70 operating permit. Part 70 operating permit renewal fee of \$7,500 has been received.

The applicant published the “Notice of Filing a Tier II Application” on July 8, 2020, in the *Guymon Herald*, a weekly newspaper in Beaver County. The notice stated that the application was available for review at the Beaver Public Library, 201 Douglas, Beaver, OK. The facility is within 50 miles of the borders of the states of Kansas and Texas; those states will be notified of the draft permit.

The applicant will also publish a “Notice of Tier II Draft Permit” the *Guymon Herald*. The “proposed” permit will be submitted to EPA for a 45-day review period.

The information on all permit actions is available for review by the public in the Air Quality section of the DEQ web page at <http://www.deq.ok.gov>.

If the Administrator does not object in writing during the 45-day EPA review period, any person that meets the requirements of this subsection may petition the Administrator within 60 days after the expiration of the Administrator's 45-day review period to make such objection. Any such petition shall be based only on objections to the permit that the petitioner raised with reasonable specificity during the public comment period provided for in 27A O.S. § 2-14-302.A.2., unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period. If the Administrator objects to the permit as a result of a petition filed under this subsection, the DEQ shall not issue the permit until EPA's objection has been resolved, except that a petition for review does not stay the effectiveness of a permit or its requirements if the permit was issued after the end of the 45-day review period and prior to an EPA objection. If the DEQ has issued a

permit prior to receipt of an EPA objection under this subsection, the DEQ will modify, terminate, or revoke such permit, and shall do so consistent with the procedures in 40 CFR §§ 70.7(g)(4) or (5)(i) and (ii) except in unusual circumstances. If the DEQ revokes the permit, it may thereafter issue only a revised permit that satisfies EPA's objection. In any case, the source will not be in violation of the requirement to have submitted a timely and complete application.

SECTION XII. SUMMARY

The facility was constructed 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. Issuance of the permit is recommended, contingent on public and EPA review.

DRAFT

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

**Natural Gas Pipeline Company of America
Station 102**

Permit Number 2020-0257-TVR4

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on May 26, 2020. The Evaluation Memorandum dated September 8, 2020, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operation under this permit constitutes acceptance of, and consent to, the conditions contained herein:

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

EUG 1 Grandfathered Engines

The following emissions units are “grandfathered” (constructed prior to any applicable rule). There are no emission limits applied to these units under Title V but they are limited to the existing equipment as it is.

EU	Point	Make/Model	HP	Serial #	Const./Mod. Date
C-8	P-2	Clark TCV-10	3,400	107009	1965
C-9	P-3	Clark TCV-12	4,000	111509	1968

EUG 2 Permitted Engines

These engines’ emissions are limited as follows:

		NO_x		CO		VOC	
EU	Engine	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
C-1	Cooper-Bessemer 12W330C2	30.20	132.10	30.20	132.10	11.63	50.91
G-2	Caterpillar G3406	9.90	1.24	1.32	0.16	0.60	0.11
G-3	Generac 3.0GN	0.93	4.07	1.56	6.83	0.01	0.04

Engine G-2 shall not operate more than 250 hours per year.

EUG 3 Insignificant Activities

EU	Point	Description	Size	Const./Mod. Date
E1	P1	Produced water / condensate tank	21,000	2018
E3	P3	Lube oil tank	9,000	pre-1971
E4	P4	Used oil tank	9,000	pre-1971
E6	P6	Antifreeze tank	2,100	1995
E7	P7	Antifreeze tank	2,100	1995
E8	P8	Methanol tank	6,052	1974
E-11	E-11	Fugitive VOC leakage components	--	1959 – 1995
E-12	P-12	Blowdowns	5 MMSCFY	1959
E-50	P-50	Condensate loading	9,000 gal/yr	1986
E-51	P-51	Comfort space heaters	4 Units, each 0.25 MMBTUH; 2 units, each 0.1 MMBTU	1959 - 1995

Tanks E1 and E8 shall be operated with submerged fill pipes.

EUG 5 Boiler

EU	Equipment	NO_x		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
B-1	Boiler	0.35	1.54	0.30	1.30	0.02	0.07

The above heaters shall be equipped with burners capable of achieving 0.10 lb/MMBTU or less NOx emissions.

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

3. The permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year). [OAC 252:100-8-6(a)(1)]

4. Engines shall have a permanent identification plate attached that shows the make, model, and serial number. [OAC 252:100-43]

5. At least once per calendar quarter, the permittee shall conduct tests of NO_x and CO emissions from Engine C-1 and from each replacement engine/turbine when operating under representative conditions for that period. Testing is required for any engine/turbine that runs for more than 220 hours during that calendar quarter. A quarterly test may be conducted no sooner than 20 calendar days after the most recent test. Testing shall be conducted using a portable analyzer in accordance with a protocol meeting the requirements of the latest AQD Portable Analyzer Guidance document, or an equivalent method approved by Air Quality. When four consecutive quarterly tests show the engine/turbine to be in compliance with the emissions limitations shown in the permit, then the testing frequency may be reduced to semi-annual testing. A semi-annual test may be conducted no sooner than 60 calendar days nor later than 180 calendar days after the most recent test. Likewise, when the following two consecutive semi-annual tests show compliance, the testing frequency may be reduced to annual testing. An annual test may be conducted no sooner than 120 calendar days nor later than 365 calendar days after the most recent test. Upon any showing of non-compliance with emissions limitations or testing that indicates that emissions are within 10% of the emission limitations, the testing frequency shall revert to quarterly. Reduced testing frequency does not apply to engines with catalytic converters. Any reduction in the testing frequency shall be noted in the next required semiannual monitoring and deviation report. [OAC 252:100-8-6 (a)(3)(A)]
6. When periodic testing shows emissions in excess of the established emission limits in the Specific Conditions (lbs/hr), the owner or operator shall comply with the provisions for reporting excess emissions in Subchapter 9. [OAC 252:100-9]
7. 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_x and CO emission limitations. A copy of the first quarter testing shall be provided to AQD within 60 days of start-up of each replacement engine/turbine. The test report shall include the engine/turbine fuel usage, stack flow (ACFM), stack temperature (°F), 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. Turbines whose installation and operation are authorized under this Specific Condition which are subject to 40 CFR Part 60, Subpart KKKK shall comply with all applicable requirements.
8. The following records shall be maintained on-site to verify Insignificant Activities. No recordkeeping is required for those operations that qualify as Trivial Activities.
[OAC 252:100-8-6 (a)(3)(B)]
 - a. For fluid storage tanks with a capacity of less than 39,894 gallons and a true vapor pressure less than 1.5 psia: records of capacity of the tanks and contents.
 - b. For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant: the type of activity and the amount of emissions from that activity (annual).
9. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site or at a local field office for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-8-6 (a)(3)(B)]
 - a. Periodic emission testing for the engines and each replacement engine/turbine.
 - b. Operating hours for Engine C-1 if less than 220 hours per quarter and not tested.
 - a. For fuel(s) burned, the appropriate document(s) as described in Specific Condition No. 2.
 - c. Records as required by 40 CFR Part 63, Subpart ZZZZ.
 - d. Records as required by 40 CFR Part 63, Subpart DDDDD.
10. No later than 30 days after each anniversary date of the issuance of the original Title V operating permit (September 18, 2000), 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)]

11. 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. OAC 252:100-11 Alternative Emissions Reduction
- b. OAC 252:100-15 Mobile Sources
- c. OAC 252:100-23 Cotton Gins
- d. OAC 252:100-24 Grain Elevators
- e. OAC 252:100-39 Nonattainment Areas
- f. OAC 252:100-47 Landfills

12. The owner/operator shall comply with all applicable requirements of the NESHAP: Reciprocating Internal Combustion Engines, Subpart ZZZZ, for each affected facility including but not limited to:

[40 CFR §§ 63.6580 through 63.6675]

- 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. § 63.6603 What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?
- f. § 63.6605 What are my general requirements for complying with this subpart?
- g. § 63.6625 What are my monitoring, installation, operation, and maintenance requirements?
- h. § 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?
- i. § 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?
- j. § 63.6650 What reports must I submit and when?
- k. § 63.6655 What records must I keep?
- l. § 63.6660 In what form and how long must I keep my records?

- m. § 63.6665 What parts of the General Provisions apply to me?
 - n. § 63.6670 Who implements and enforces this subpart?
 - o. § 63.6675 What definitions apply to this subpart?
13. The owner/operator shall comply with all applicable requirements of the Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, for each affected facility including but not limited to: [40 CFR §§ 63.7480 through 63.7575]
- a. §63.7480 What is the purpose of this subpart?
 - b. §63.7485 Am I subject to this subpart?
 - c. §63.7490 What is the affected source of this subpart?
 - d. §63.7491 Are any boilers or process heaters not subject to this subpart?
 - e. §63.7495 When do I have to comply with this subpart?
 - f. §63.7499 What are the subcategories of boilers and process heaters?
 - g. §63.7500 What emission limitations, work practice standards, and operating limits must I meet?
 - h. §63.7501 Affirmative Defense for Violation of Emission Standards During Malfunction.
 - i. §63.7505 What are my general requirements for complying with this subpart?
 - j. §63.7510 What are my initial compliance requirements and by what date must I conduct them?
 - k. §63.7515 When must I conduct subsequent performance tests, fuel analyses, or tune-ups?
 - l. §63.7520 What stack tests and procedures must I use?
 - m. §63.7521 What fuel analyses, fuel specification, and procedures must I use?
 - n. §63.7522 Can I use emissions averaging to comply with this subpart?
 - o. §63.7525 What are my monitoring, installation, operation, and maintenance requirements?

- p. §63.7530 How do I demonstrate initial compliance with the emission limitations, fuel specifications and work practice standards?
 - q. §63.7533 Can I use efficiency credits earned from implementation of energy conservation measures to comply with this subpart?
 - r. §63.7535 Is there a minimum amount of monitoring data I must obtain?
 - s. §63.7540 How do I demonstrate continuous compliance with the emission limitations, fuel specifications and work practice standards?
 - t. §63.7541 How do I demonstrate continuous compliance under the emissions averaging provision?
 - u. §63.7545 What notifications must I submit and when?
 - v. §63.7550 What reports must I submit and when?
 - w. §63.7555 What records must I keep?
 - x. §63.7560 In what form and how long must I keep my records?
 - y. §63.7565 What parts of the General Provisions apply to me?
 - z. §63.7570 Who implements and enforces this subpart?
 - aa. §63.7575 What definitions apply to this subpart?
14. Upon issuance, Permit No. 2020-0257-TVR4 replaces and supersedes Permit No. 2015-0910-TVR3, which will be cancelled.
15. This facility is considered an existing Prevention of Significant Deterioration (PSD) facility. As such, the facility is subject to the provisions of OAC 252:100-8-36.2(c) for any project as defined therein



PART 70 PERMIT
AIR QUALITY DIVISION
STATE OF OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY
707 N. ROBINSON STREET, SUITE 4100
P.O. BOX 1677
OKLAHOMA CITY, OKLAHOMA 73101-1677

Permit No: 2020-0257-TVR4

Natural Gas Pipeline Company of America,
having complied with the requirements of the law, is hereby granted permission to operate
a natural gas compressor station located in Sec. 15 – T 1N – R 20ECM, near Balko, Beaver
County, Oklahoma, subject to standard conditions dated June 21, 2016, and specific
conditions, both attached.

This permit shall expire five (5) years from the issuance date below, except as authorized under Section VIII of the Standard Conditions.

Director, Air Quality Division

Date



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Mr. Douglas Hamm
Natural Gas Pipeline Company of America
2 North Nevada Avenue
Colorado Springs, CO 80903

SUBJECT: Permit Application No. **2020-0257-TV R4**
Station 102 (FAC ID 1055)
Sec. 15 – T1N – R20ECM
Balko, Beaver County, Oklahoma

Dear Mr. Hamm:

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

Also, note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed through DEQ's electronic reporting system by April 1st 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 in this matter. If we may be of further service, please contact our office at (405)702-4100.

Sincerely,

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

Enclosures



Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
7-1-20

ACFM	Actual Cubic Feet per Minute
AD	Applicability Determination
AFRC	Air-to-Fuel Ratio Controller
API	American Petroleum Institute
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BHP	Brake Horsepower (bhp)
BTU	British thermal unit (Btu)
C&E	Compliance and Enforcement
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS	Chemical Abstract Service
CAAA	Clean Air Act Amendments
CC	Catalytic Converter
CD	Consent Decree
CEM	Continuous Emission Monitor
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CI	Compression Ignition
CNG	Compressed Natural Gas
CO	Carbon Monoxide or Consent Order
COM	Continuous Opacity Monitor
D	Day
DEF	Diesel Exhaust Fluid
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)
EGU	Electric Generating Unit
EI	Emissions Inventory
EPA	Environmental Protection Agency
ESP	Electrostatic Precipitator
EUG	Emissions Unit Group
EUSGU	Electric Utility Steam Generating Unit
FCE	Full Compliance Evaluation
FIP	Federal Implementation Plan
FR	Federal Register
GACT	Generally Achievable Control Technology
GAL	Gallon (gal)
GDF	Gasoline Dispensing Facility
GEP	Good Engineering Practice
GHG	Greenhouse Gases
GR	Grain(s) (gr)
HAP	Hazardous Air Pollutants
HC	Hydrocarbon
HCFC	Hydrochlorofluorocarbon
HON	Hazardous Organic NESHAP
HP	Horsepower (hp)

HR	Hour (hr)
H₂S	Hydrogen Sulfide
I&M	Inspection and Maintenance
IBR	Incorporation by Reference
IC	Internal Combustion
LAER	Lowest Achievable Emission Rate
LB	Pound(s) [Mass] (lb, lbs, lbm)
LB/HR	Pound(s) per Hour (lb/hr)
LDAR	Leak Detection and Repair
LNG	Liquefied Natural Gas
LT	Long Ton(s) (metric)
M	Thousand (Roman Numeral)
MAAC	Maximum Acceptable Ambient Concentration
MACT	Maximum Achievable Control Technology
MM	Prefix used for Million (Thousand-Thousand)
MMBTU	Million British Thermal Units (MMBtu)
MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
MMSCF	Million Standard Cubic Feet (MMscf)
MMSCFD	Million Standard Cubic Feet per Day
MSDS	Material Safety Data Sheet
MWC	Municipal Waste Combustor
MWe	Megawatt Electrical
NA	Nonattainment
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NH₃	Ammonia
NMHC	Non-methane Hydrocarbon
NO₂	Nitrogen Dioxide
NO_x	Nitrogen Oxides
NOI	Notice of Intent
NSCR	Non-Selective Catalytic Reduction
NSPS	New Source Performance Standards
NSR	New Source Review
O₃	Ozone
O&G	Oil and Gas
O&M	Operation and Maintenance
O&NG	Oil and Natural Gas
OAC	Oklahoma Administrative Code
OC	Oxidation Catalyst
PAH	Polycyclic Aromatic Hydrocarbons
PAL	Plant-wide Applicability Limit
Pb	Lead
PBR	Permit by Rule
PCB	Polychlorinated Biphenyls
PCE	Partial Compliance Evaluation
PEA	Portable Emissions Analyzer
PFAS	Per- and Polyfluoroalkyl Substance
PM	Particulate Matter
PM_{2.5}	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers

PM₁₀	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers
POM	Particulate Organic Matter Or Polycyclic Organic Matter
ppb	Parts per Billion
ppm	Parts per Million
ppmv	Parts per Million Volume
ppmvd	Parts per Million Dry Volume
PSD	Prevention of Significant Deterioration
psi	Pounds per Square Inch
psia	Pounds per Square Inch Absolute
psig	Pounds per Square Inch Gage
RACT	Reasonably Available Control Technology
RATA	Relative Accuracy Test Audit
RICE	Reciprocating Internal Combustion Engine
RO	Responsible Official
ROAT	Regional Office at Tulsa
RVP	Reid Vapor Pressure
SCC	Source Classification Code
SCF	Standard Cubic Foot
SCFD	Standard Cubic Feet per Day
SCFM	Standard Cubic Feet per Minute
SCR	Selective Catalytic Reduction
SER	Significant Emission Rate
SI	Spark Ignition
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SNCR	Selective Non-Catalytic Reduction
SO₂	Sulfur Dioxide
SO_x	Sulfur Oxides
SOP	Standard Operating Procedure
T	Tons
TAC	Toxic Air Contaminant
THC	Total Hydrocarbons
TPY	Tons Per Year
TRS	Total Reduced Sulfur
TSP	Total Suspended Particulates
TV	Title V of the Federal Clean Air Act
US EPA	U. S. Environmental Protection Agency
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VRU	Vapor Recovery Unit
YR	Year
µg/m³	Micrograms Per Cubic Meter
2SLB	2-Stroke Lean Burn
4SLB	4-Stroke Lean Burn
4SRB	4-Stroke Rich Burn

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

SECTION I. DUTY TO COMPLY

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

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances.

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

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

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

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

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

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

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements.

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

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

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

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

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

B. Records of required monitoring shall include:

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

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

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

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

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

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

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

[OAC 252:100-43]

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

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

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

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

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

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

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

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

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

SECTION IV. COMPLIANCE CERTIFICATIONS

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.[OAC 252:100-8-6(c)(5)(

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)]

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

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited. [OAC 252:100-8-6(c)(6)]

SECTION XIII. INSPECTION & ENTRY

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

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

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

SECTION XIV. EMERGENCIES

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

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

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

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

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

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

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

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

SECTION XV. RISK MANAGEMENT PLAN

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

SECTION XVI. INSIGNIFICANT ACTIVITIES

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

- (1) 5 tons per year of any one criteria pollutant.
- (2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule. [OAC 252:100-8-2 and OAC 252:100, Appendix I]

SECTION XVII. TRIVIAL ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list. [OAC 252:100-8-2 and OAC 252:100, Appendix J]

SECTION XVIII. OPERATIONAL FLEXIBILITY

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

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

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

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

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

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

- (1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]
- (2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]
- (3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for: [OAC 252:100-25]
 - (a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
 - (b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
 - (c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or

- (d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.
- (4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]
- (5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
- (6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]
- (7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

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

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

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

[40 CFR 82, Subpart B]

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

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

SECTION XXI. TITLE V APPROVAL LANGUAGE

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

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

- (8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
- (9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).
- (10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

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

SECTION XXII. CREDIBLE EVIDENCE

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