

DRAFT

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

MEMORANDUM

June 22, 2021

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

THROUGH: Rick Groshong, Compliance and Enforcement Group Manager

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

THROUGH: Joseph K. Wills, P.E., Engineering Section

FROM: Jennie Doan, E.I., Engineering Section, Regional Office at Tulsa (ROAT)

SUBJECT: Evaluation of Permit Application No. **2020-0199-TVR4**
Mustang Gas Products, LLC
Facility: Gooden Compressor Station
Facility ID: 1625
Section 14, Township 17N, Range 9W, Kingfisher County
Latitude 35.94284°N, Longitude 98.12128°W;
Directions: From Loyal, OK travel 2 miles south on N2740 Rd., the facility is on west side of road.

SECTION I. INTRODUCTION

Mustang Gas Products, LLC (Mustang) has requested a renewal of the operating permit for the Gooden Compressor Station (SIC 1311/NAICS 211130). The facility is currently operated under Permit No. 2015-0928-TVR3 (M-1) issued March 20, 2017. There have been no major changes to the site since issuance of Permit No. 2015-0928-TVR3 (M-1). The facility is a natural gas compressor station responsible for gas gathering, dehydration, and compression into a pipeline.

This permit updates all current rules and regulations and incorporates all updated applicable State of Oklahoma and Federal regulations and requirements. Since the facility emits more than 100 TPY of a regulated pollutant, it is subject to Title V permitting requirements. This facility is not a PSD major source or a major source of HAP.

SECTION II. FACILITY DESCRIPTION

The facility consists of two (2) 588-hp Waukesha L7042 compressor engines, one (1) dehydration unit with a condenser, one (1) 0.35-MMBTUH reboiler, and storage tanks. Engine CM-2823 and CM-2824 were installed in 1961 and 1969 and are “grandfathered” sources/units (before May 31, 1972) as defined in the ODEQ’s Title V Permit Application Guide (1/12).

The facility is a natural gas compressor station. Natural gas enters the facility through an inlet separator where it is compressed by two compressor engines and sent to the glycol dehydration

unit which is equipped with a condenser. In the dehydration unit, wet natural gas passes through a contactor vessel in which water is absorbed by triethylene glycol (TEG). The dried natural gas exits the contactor and exits the facility. The glycol containing water is sent to the TEG reboiler where applied heat boils off the water. The still vent is equipped with a condenser where uncondensed vapors are routed to the reboiler, and the off-gases from the flash tank are routed to the station’s inlet. The water lean glycol is routed back into the contactor.

The liquids generated at the inlet separator are pipelined to atmospheric condensate storage tanks. The condensate is trucked out for sale.

SECTION III. PERMIT HISTORY

| Permit No. | Date Issued | Description |
|----------------------|-------------|--|
| 97-233-TV | 1/4/1999 | Initial Title V Permit |
| 2003-224-TVR | 1/3/2006 | Renewal Operating Permit |
| 2003-224-C (M-1) | 7/24/2008 | Modification: installation of one (1) 588-hp Waukesha L7042GU engine, replace glycol dehydration, replace one condensate tank with two (2) smaller tanks, and increase permitted gas throughput from 6 to 9 MMSCFD |
| 2003-224-TVR (M-2) | 5/27/2009 | Modification: replace existing 300-bbl condensate tank with new 300-bbl condensate tank. |
| 2003-224-TVR (M-3) | 6/11/2009 | Modification: administrative amendment to revise permit’s specific condition(s) pertaining ACC compliance date. |
| 2010-264-TVR2 | 11/29/2010 | Renewal Operating Permit |
| 2010-264-TVR2 (M-1) | 1/27/2011 | Modification: administrative amendment to revise natural gas throughput and glycol pump rate for the dehydration unit. |
| 2015-0928-TVR3 | 10/28/2015 | Renewal Operating Permit |
| 2015-0928-TVR3 (M-1) | 3/20/2017 | Modification: replacing glycol dehydration unit and reboiler with like-kind dehydration unit (TEGV-2) and reboiler (TEGH-2) |

SECTION IV. REQUESTED CHANGES

The facility does not request changes in this Title V Renewal application, but they did request some naming changes and emission calculations during company review.

- Change EUCM-1 and EUCM-2 to CM-2823 and CM-2824, respectively; and
- Change glycol dehydration unit’s names from TEGV-1 and TEGH-1 to TEGV-2 and TEGH-2.
- Changes to tanks and glycol dehydration that reduce the emissions:
 - Using updated AP-42 factors instead of TANKS 4.09d program for tank’s emissions;
 - Including TK-5’s emissions;
 - Using new gas analysis (dated in 1/11/2021);

- Correction on circulation rate: using 0.67gpm instead of 1.33 gpm; and
- Updates on control devices and control efficiency:
 - Still vent has both condenser and reboiler’s firebox, but facility only wants to take credit for the reboiler control efficiency.
 - Flash tank’s emissions are routed to station’s inlet.

SECTION V. EQUIPMENT

Emission units (EUs) have been arranged into Emission Unit Groups (EUGs). Field-grade natural gas is the primary fuel with the facility being operated continuously.

EUG A. Natural Gas-Fired Internal Combustion Engines

| EU # | Make/Model | HP | Serial # | Installed Date |
|---------|-------------------|-----|----------|----------------|
| CM-2823 | Waukesha L7042 GU | 588 | 185216 | 1961 |
| CM-2824 | Waukesha L7042 GU | 588 | 171833 | 1969 |

EUG B. Natural Gas-Fired Dehydration Reboiler/Still Vent

| EU # | Description | Rating, MMBTUH | Installed Date |
|--------|----------------------------------|----------------|----------------|
| TEGV-2 | Glycol Dehydrator with Condenser | --- | 2016 |
| TEGH-2 | Reboiler | 0.35 | 2016 |

EUG C1. Storage Tanks with Insignificant Emissions

| EU # | Capacity (gallons) | Material Stored | Installed Date |
|------|--------------------|-------------------------------------|----------------|
| TK-1 | 518 | Glycol Condensate / Processed Water | 1969 |
| TK-3 | 575 | Triethylene Glycol | 1969 |
| TK-4 | 3,200 | Lube oil | 1969 |
| TK-5 | 575 | Methanol | 1969 |
| TK-6 | 518 | Antifreeze | 1969 |
| TK-7 | 518 | Antifreeze | 1969 |

EUG C2. Condensate Storage Tank

| EU # | Capacity (gallon) | Material Stored | Date Manufactured |
|-------|-------------------|-----------------|-------------------|
| TK-2A | 12,600 | Condensate | 2007 |

EUG D. Fugitive VOC Emission Leaks

| EU # | Description | Number of Units |
|------|------------------------|-----------------|
| FUG | Valves | 362 |
| | Compressor Seals | 9 |
| | Pressure relief valves | 11 |
| | Flanges | 204 |
| | Screwed connections | 1,341 |

EUG E. Condensate Loading

| EU # | Equipment | Throughput (gallons/year) |
|------|--------------------|---------------------------|
| TL-1 | Condensate Loading | 308,952 |

SECTION VI. EMISSIONS

ENGINES

NO_x, CO, VOC, and formaldehyde’s (H₂CO) emission factors for the Waukesha L-7042 GU engines are based on manufacturer’s data. Potential emissions are based on continuous operations and manufacturer’s emission data as shown in below. The VOC emissions do not include H₂CO emissions. H₂CO will be added to the VOC emission in the facility-wide table.

EUG A: Engine’s Emission Factors

| EU # | NO _x | CO | VOC | H ₂ CO |
|---------|-----------------|---------|---------|-------------------|
| | g/hp-hr | g/hp-hr | g/hp-hr | g/hp-hr |
| CM-2823 | 18.0 | 6.0 | 2.0 | 0.05 |
| CM-2824 | 18.0 | 6.0 | 2.0 | 0.05 |

EUG A: Engines’ Emissions

| EU # | NO _x | | CO | | VOC | | H ₂ CO | |
|---------|-----------------|--------|-------|-------|-------|-------|-------------------|------|
| | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY |
| CM-2823 | 23.31 | 102.11 | 7.77 | 34.04 | 2.59 | 11.35 | 0.06 | 0.28 |
| CM-2824 | 23.31 | 102.11 | 7.77 | 34.04 | 2.59 | 11.35 | 0.06 | 0.28 |

GLYCOL DEHYDRATION UNIT

The VOC and HAP emissions from the glycol dehydration unit still vent are based on a GRI-GLYCalc Version 4.0 and the gas analysis from 1/11/2021. Additional information for this unit are provided in the table below. The dehydration unit’s still vent is routed to a condenser. Uncondensed vapors from the condenser are routed to the reboiler firebox. Since the reboiler does not run continuously, the still’s vent emissions are conservatively estimated using a 50% control efficiency. The emissions from flash tank are routed to the station inlet for recompression, resulting in 100% control efficiency. Emissions from the TEG reboiler are based on AP-42 (7/98) Tables 1.4-1 and 1,020 BTU/SCF.

EUG B: Glycol Dehydration’s Parameters

| Parameter | Data |
|---|--|
| Type of Glycol | Triethylene |
| Gas Flow Rate, MMSCFD | 12.00 |
| Glycol Pump Type | Kimray 4015 |
| Lean Glycol Pump Design Capacity, gpm | 0.67 |
| Lean Glycol Circulation Rate Input, gpm | 0.67 |
| Still Vent | |
| Control Type or Recycle | Condenser/Reboiler or route to station’s inlet |
| Condenser Outlet Temperature, °F | 100 |

| Parameter | Data |
|---|--------------------------|
| Overall Control Efficiency ⁽¹⁾ , % | 50 |
| Flash Tank | |
| Control Type or Recycle | Route to station's inlet |
| Overall Control Efficiency, % | 100 |

⁽¹⁾ – Facility only want to take credit for the reboiler's firebox control efficiency.

EUG B: Controlled Emissions from Glycol Dehydrator

| Pollutant | Uncontrolled Emissions (TPY) | | Controlled Emissions (TPY) | | Total Emissions ⁽³⁾ (TPY) |
|-------------------|------------------------------|--------------|----------------------------|---------------------------|--------------------------------------|
| | Still Vent | Flash Tank | Still Vent ⁽¹⁾ | Flash Tank ⁽²⁾ | |
| Benzene | 0.45 | 0.03 | 0.225 | 0.00 | 0.45 |
| Toluene | 0.25 | 0.01 | 0.125 | 0.00 | 0.25 |
| Ethylbenzene | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Xylene | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| n-Hexane | 0.66 | 1.33 | 0.33 | 0.00 | 0.66 |
| Total HAPs | 1.36 | 1.37 | 0.68 | 0.00 | 1.36 |
| Total VOC | 3.49 | 13.42 | 1.75 | 0.00 | 3.49 |

⁽¹⁾ – Still vent's emissions are controlled by routing to the reboiler with 50% control efficiency.

⁽²⁾ – Flash tank's emissions are controlled by routing to the station inlet, resulting in a 100% control efficiency.

⁽³⁾ – The total emissions are the total controlled emissions with safety factor of 100%.

EUG B: Glycol Dehydration Reboiler's Emission Factors

| EU # | Description | NOx | CO | VOC |
|--------|---------------------------------|----------|----------|----------|
| | | lb/MMSCF | lb/MMSCF | lb/MMSCF |
| TEGH-2 | 0.35-MMBTUH Dehydrator Reboiler | 100 | 84 | 5.5 |

EUG B: – Total Emissions

| EU # | NOx | | CO | | VOC | |
|--------|-------|------|-------|------|-------|------|
| | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY |
| TEGV-2 | --- | --- | --- | --- | 0.796 | 3.49 |
| TEGH-2 | 0.036 | 0.16 | 0.03 | 0.13 | 0.002 | 0.01 |

TANKS

The VOC working and breathing emissions for the condensate tank (TK-2A) and the methanol tank (TK-5) are estimated using AP-42 (6/20) Section 7.1. The VOC flash emissions due to the condensate transfer from the natural gas inlet separator to the atmospheric storage tanks are estimated using the Vasquez-Beggs solution gas/oil ratio correlation method and are combined with the condensate tank working and breathing emissions. Since the vapor pressures of materials stored in tanks TK-1, 3, 4, 6, and 7 are less than 1.5 psia, the VOC emissions are negligible.

EUG C1 & C2: Tanks' Data & Emissions

| Parameter | Data | Data |
|--------------------|--------|------|
| Tank ID | TK-2A | TK-5 |
| Tank Capacity, gal | 12,600 | 575 |

| Parameter | Data | Data |
|--|--------------------------|--------------------------|
| Throughput, gal/year | 308,952 | 153,300 |
| Content | Condensate | Methanol |
| Flash Calculation Method/Tool | Vasquez-Beggs | N/A |
| Working/Breathing Method/Tool | AP-42 (6/20) Section 7.1 | AP-42 (6/20) Section 7.1 |
| Control Type | None | None |
| Flash VOC Emissions, TPY | 17.28 | None |
| Working & Breathing VOC Emissions, TPY | 2.07 | 0.03 |
| Total VOC Emissions, TPY | 19.35 | 0.03 |

FUGITIVES

Fugitive VOC emissions from the valves, seals, and flanges are based on EPA document, “1995 Protocol for Equipment Leak Emission Estimates” (EPA-453/R-95-017), the EUG D equipment list, and the percentage of C3+ organic compound of 24.12% from the gas analysis.

EUG D: Fugitive VOC Emissions

| EU # | Description | # of Units | VOC Emission Factor | Emissions | |
|------------------------|------------------------|------------|---------------------|-------------|-------------|
| | | | lb/hr-source | lb/hr | TPY |
| FUG | Valves | 362 | 0.00992 | 0.87 | 3.80 |
| | Compressor Seals | 9 | 0.0194 | 0.04 | 0.18 |
| | Pressure relief valves | 11 | 0.0194 | 0.05 | 0.23 |
| | Flanges | 204 | 0.00086 | 0.04 | 0.18 |
| | Screwed connections | 1,341 | 0.0004 | 0.13 | 0.57 |
| Total Emissions | | | | 1.13 | 4.96 |

LOADING

The emission factor for truck loading losses in the following table was based on AP-42, Section 5.2 (7/08), Equation 1, and condensate throughput of 308,952 gallons/year.

EUG E: Truck Loading’s Parameters & VOC Emissions

| Parameter | Data |
|--|------------|
| EU # | LOAD |
| Liquids Loaded | Condensate |
| Throughput, gal/yr | 308,952 |
| Saturation Factor | 0.6 |
| Temperature, °F | 65.69 |
| True Vapor Pressure (TVP), psia | 5.78 |
| Molecular Weight (MW), lb/lbmol | 66 |
| VOC, wt% | 100 |
| Emission Factor, lb/10 ³ gal ⁽¹⁾ | 5.43 |
| VOC Emissions, TPY | 0.84 |

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

FACILITY-WIDE EMISSIONS

Overall, only NO_x emissions exceed the major threshold, which makes this facility a major source. The HAPs emissions from this facility are under 10 TPY for individual HAPs and under 25 TPY for aggregated HAPs; therefore, this facility is an area source of HAPs.

Facility-Wide Emissions

| EU # | NO _x | | CO | | VOC ⁽¹⁾ | | HAPs | |
|---------------|-----------------|---------------|--------------|--------------|--------------------|--------------|-------------|-------------|
| | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY |
| CM-2823 | 23.31 | 102.11 | 7.77 | 34.04 | 2.59 | 11.35 | 0.06 | 0.26 |
| CM-2824 | 23.31 | 102.11 | 7.77 | 34.04 | 2.59 | 11.35 | 0.06 | 0.26 |
| TEGV-2 | --- | --- | --- | --- | 0.796 | 3.49 | 0.321 | 1.36 |
| TEGH-2 | 0.036 | 0.16 | 0.03 | 0.13 | 0.002 | 0.01 | --- | --- |
| TK-2A | --- | --- | --- | --- | 4.42 | 19.35 | --- | --- |
| TK-5 | --- | --- | --- | --- | 0.01 | 0.03 | --- | --- |
| FUG | --- | --- | --- | --- | 1.14 | 5.00 | --- | --- |
| LOAD | --- | --- | --- | --- | 0.19 | 0.84 | --- | --- |
| Totals | 46.66 | 204.38 | 15.57 | 68.21 | 11.74 | 51.42 | 0.44 | 1.92 |

⁽¹⁾ – VOC emissions for engines include H₂CO emissions.

SECTION VII. INSIGNIFICANT ACTIVITIES

The insignificant activities identified and justified in the application and listed in OAC 252:100-8, Appendix I, are listed below. Appropriate recordkeeping on activities indicated below with “*”, is required. Any activity to which a State of federal applicable requirement applies is not insignificant even if it is included on this list.

1. Emissions from crude oil and condensate marine and truck loading equipment operations at crude oil and natural gas production sites where the loading rate does not exceed 10,000 gallons per day averaged over a 30-day period. Throughput of condensate loading at this facility is 308,952 gallons per year, an average of 846 gallons per day.
2. * Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature. Vapor pressures of materials stored in tanks TK-3 and 4 are less than 1.5 psia and capacities of the tanks are less than de minimis level.
3. * Emissions from crude oil and condensate storage tanks with a capacity of less than or equal to 420,000 gallons that store crude oil or condensate prior to custody transfer. TK-2 has a capacity of 12,600 gallons.
4. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas). Glycol dehydration reboiler (TEGH-2) has input of 0.35 MMBUTH.
5. * Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant. There is a 575-gallon methanol storage tank.

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]
The purpose of this Subchapter is to incorporate by reference applicable provisions of Title 40 of the Code of Federal Regulations listed in OAC 252:100, Appendix Q. These requirements are addressed in the “Federal Regulations” section.

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

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

OAC 252:100-8 (Permits for Part 70 and Major NSR 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 HAP that EPA may establish by rule

Emissions limitations have not been established for CM-2823 and CM-2824 since they are "grandfathered." Emission limitations and operational requirements necessary to assure compliance with all applicable requirements for all sources are taken from the operating permit application, previous issued permits, or are developed from the applicable requirement.

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 (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 (Control of Emissions of Particulate Matter) [Applicable]
 Subchapter 19 regulates emissions of particulate matter from fuel-burning equipment. Particulate emission limits are based on maximum design heat input rating. Appendix C of this chapter specifies a PM emissions limitation of 0.6 lb/MMBTU from fuel-burning units with a rated heat input of 10 MMBTUH or less. The combustion units located at the facility are subject to this subchapter and will be in compliance as indicated below. This permit requires the use of natural gas for all fuel-burning equipment to ensure compliance with Subchapter 19.

| EU # | Maximum Heat Input, (MMBTUH) | Appendix C Emission Limit, (lb/MMBtu) | Potential Emission Rate, (lb/MMBtu) |
|------------------------|------------------------------|---------------------------------------|-------------------------------------|
| CM-2823 ⁽¹⁾ | 4.23 | 0.60 | 0.01 |
| CM-2824 ⁽¹⁾ | 4.23 | 0.60 | 0.01 |
| TEGH-2 ⁽²⁾ | 0.35 | 0.60 | 7.45 E-3 |

⁽¹⁾ – Potential emission rates of the engines are based on AP-42 Table 3.2.3 (8/20) for 4SRB engines.

⁽²⁾ – Potential emission rate of the heater is based on AP-42 Table 1.4.2 (7/98).

This subchapter also limits emissions of particulate matter from industrial processes and direct-fired fuel-burning equipment based on their process weight rates. Since there are no significant particulate emissions from the non fuel-burning processes at the facility compliance with the standard is assured without any special monitoring provisions.

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. When burning natural gas, there is very little possibility of exceeding the opacity standards.

OAC 252:100-29 (Control of 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 (Control of Emissions of Sulfur Compounds) [Applicable]
Part 2 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 modeling conducted for the general permit for oil and gas facilities, 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 H₂S 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. Initial compliance testing of the fuel sulfur content and

further testing annually will be used to ensure compliance with this limitation. Amine treating of the gas streams is not conducted at this site.

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

This subchapter limits new gas-fired fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.2 lb of NO_x per MMBTU. There are no equipment items that exceed the 50 MMBTUH threshold.

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

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

OAC 252:100-37 (Control of Emissions of 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. This part is applicable to the condensate storage tank TK-2A and the methanol tank TK-5.

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 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. This facility does not perform any coating operation.

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. There are no effluent water separators located at this facility.

OAC 252:100-42 (Control of 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 Quality Rules are not applicable to this facility:

| | | |
|----------------|---------------------------------|---------------------------|
| OAC 252:100-11 | Alternative Emissions Reduction | Not requested |
| OAC 252:100-17 | Incinerators | Not type of emission unit |
| OAC 252:100-23 | Cotton Gins | Not type of emission unit |
| OAC 252:100-24 | Grain Elevators | Not in source category |
| OAC 252:100-33 | Nitrogen Dioxides | Not in source category |
| OAC 252:100-35 | Carbon Monoxide | Not type of emission unit |
| OAC 252:100-39 | Nonattainment Areas | Not in area category |

SECTION XI. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Not Applicable At This Time]
 Total potential emissions for NO_x, CO, and SO₂ are less than the major source threshold of 250 TPY and this facility is not one of the listed categories with a threshold of 100 TPY.

NSPS, 40 CFR Part 60 [Not Applicable]
Subpart K, Ka, Kb, Volatile Organic Liquid (VOL) Storage Vessels. All of the tanks at the site are not subject because they were constructed prior to the effective dates of these standards and are smaller than the de minimis size (19,813 gallons).

Subpart VV, Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (SOCMI) for Which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006. This facility is not a SOCMI plant.

Subpart VVa, Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (SOCMI) for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006. This facility is not a SOCMI plant.

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

Subpart LLL, SO₂ Emissions from Onshore Natural Gas Processing for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011. There is no natural gas sweetening operation at this site.

Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI_ICE). This subpart promulgates emission standards for all new SI engines ordered after June 12, 2006, and all SI engines modified or reconstructed after June 12, 2006, regardless of size. The specific emission standards (either in g/hp-hr or as a concentration limit) vary based on engine class, engine power rating, lean-burn or rich-burn, fuel type, duty (emergency or non-emergency), and numerous manufacture dates. Engine manufacturers are required to certify certain engines to meet the emission standards and may voluntarily certify other engines. An initial notification is required only for owners and operators of engines greater than 500 HP that are non-certified. Emergency

engines will be required to be equipped with a non-resettable hour meter and are limited to 100 hours per year of operation excluding use in an emergency (the length of operation and the reason the engine was in operation must be recorded). The engines at this facility were constructed prior to the applicability date of this subpart and have not been modified or reconstructed.

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

1. Each gas well affected facility, which is a single natural gas well.
2. Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals that is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment.
3. Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment.
4. Each pneumatic controller affected facility, which is:
 - a. For the oil production segment (between the wellhead and the point of custody transfer to an oil pipeline): a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 SCFH.
 - b. For the natural gas production segment (between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not including natural gas processing plants): a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 SCFH.
 - c. For natural gas processing plants: a single continuous bleed natural gas-driven pneumatic controller.
5. Each storage vessel affected facility, which is a single storage vessel located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment, that contains an accumulation of crude oil, condensate, intermediate hydrocarbon liquids, or produced water and has the potential for VOC emissions equal to or greater than 6 TPY.
6. The group of all equipment, except compressors, within a process unit located at an onshore natural gas processing plant is an affected facility.
7. Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.

There are no affected gas wells, centrifugal compressors, continuous bleed pneumatic controllers, or sweetening units are located at this facility and this facility is not a gas plant.

For each new reciprocating compressor the owner/operator must replace the rod packing before 26,000 hours of operation or prior to 36 months. If utilizing the number of hours, the hours of operation must be continuously monitored. Commenced construction is based on the date of installation of the compressor (excluding relocation) at the facility. All the compressors at the facility were manufactured prior to August 23, 2011, and have not been modified or reconstructed. Any compressors constructed, reconstructed or modified during the applicability dates will have to comply with this subpart.

Storage vessels constructed, modified, or reconstructed after August 23, 2011, but prior to September 18, 2015, with VOC emissions equal to or greater than 6 TPY must reduce VOC emissions by 95.0 % or greater. All storage vessels are considered existing and have not been modified or reconstructed and are not subject to this subpart.

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

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

There are no affected gas wells, centrifugal compressors, continuous bleed pneumatic controllers, or sweetening units are located at this facility and this facility is not a gas plant.

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

facility were manufactured prior to September 18, 2015, and have not been modified or reconstructed. Any new, modified, or reconstructed compressors will have to comply with this subpart.

Storage vessels constructed, modified, or reconstructed after September 18, 2015, with VOC emissions equal to or greater than 6 TPY must reduce VOC emissions by 95.0 % or greater. All storage vessels are considered existing and have not been modified or reconstructed and are not subject to this subpart.

The collection of fugitive equipment at this facility is not subject because this facility was constructed prior to the applicability date and it has not been modified.

NESHAP, 40 CFR Part 61

[Not Applicable]

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

NESHAP, 40 CFR Part 63

[Subparts HH and ZZZZ Applicable]

Subpart HH, Oil and Natural Gas Production Facilities: Area Sources. This subpart affects each TEG dehydration unit located at an area source oil and natural gas facility that processes, upgrades, or stores hydrocarbon liquids to the point of custody transfer and natural gas from the well up to and including the natural gas processing plant. Sources with either an annual average natural gas flowrate less than 3 MMSCFD or benzene emissions less than 1.0 TPY are exempt from control requirements. This facility has an annual average natural gas flowrate of 12.0-MMSCFD and emits 0.45 TPY of benzene. The facility is therefore not subject to the control requirements of Subpart HH. However, the facility must maintain records of the de minimis determination as required in §63.774(d)(1). The applicable recordkeeping requirements have been incorporated into the permit.

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

1. Stationary RICE located at an area source;
2. The following Stationary RICE located at a major source of HAP emissions:
 - a. 2SLB and 4SRB stationary RICE with a site rating of ≤ 500 brake HP;
 - b. 4SLB stationary RICE with a site rating of < 250 brake HP;
 - c. Stationary RICE with a site rating of ≤ 500 brake HP which combust landfill or digester gas equivalent to 10% or more of the gross heat input on an annual basis;
 - d. Emergency or limited use stationary RICE with a site rating of ≤ 500 brake HP; and
 - e. CI stationary RICE with a site rating of ≤ 500 brake HP.

No further requirements apply for engines subject to NSPS under this part. Based on emission calculations, this facility is a minor source of HAP. A stationary RICE located at an area source of HAP emissions is new if construction commenced on or after June 12, 2006.

Affected existing stationary RICE with a maximum engine power greater than 500 HP are subject to emission limitations unless they meet the definition of remote stationary RICE. Existing remote stationary RICE will be subject to management practices. CM-2823 and CM-2824 are existing engines located at an area source and must comply with all applicable emission limitations and operating limitations in accordance with Subpart ZZZZ by the timeline provided in the federal regulations.

| EU # | Compliance Requirements ⁽¹⁾ |
|---------------------|---|
| CM-2823, CM-2824 | (Non-emergency, non-black start 4SRB remote stationary RICE > 500 HP) 1) Change oil and filter every 2,160 hours of operation or annually, whichever comes first ⁽²⁾ . 2) Inspect spark plugs every 2,160 hours of operation or annually, whichever comes first, and replaces as necessary 3) Inspect all hoses and belts every 2,160 hours of operation of annually, whichever comes first and replace as necessary. |

- (1) During periods of startup you must minimize the engine’s time spent at idle and minimize the engine’s startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.
- (2) Sources have the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement.

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

1. Stationary RICE located on a pipeline segment that meets both of the following criteria:
 - i. A pipeline segment with 10 or fewer buildings intended for human occupancy and no buildings with four or more stories within 220 yards (200 meters) on either side of the centerline of any continuous 1-mile (1.6 kilometers) length of pipeline. Each separate dwelling unit in a multiple dwelling unit building is counted as a separate building intended for human occupancy.
 - ii. The pipeline segment does not lie within 100 yards (91 meters) of either a building or a small, well-defined outside area (such as a playground, recreation area, outdoor theater, or other place of public assembly) that is occupied by 20 or more persons on at least 5 days a week for 10 weeks in any 12-month period. The days and weeks need not be consecutive. The building or area is considered occupied for a full day if it is occupied for any portion of the day.
2. Stationary RICE that are not located on gas pipelines and that have 5 or fewer buildings intended for human occupancy and no buildings with four or more stories within a 0.25 mile radius around the engine. A building is intended for human occupancy if its primary use is for a purpose involving the presence of humans.

Based on information submitted by the applicant, the existing engines installed at the facility are considered remote. All applicable requirements have been incorporated into the permit.

Subpart CCCCCC, Gasoline Dispensing Facilities. This facility has no affected sources at the site and is not considered subject to this subpart.

Subpart JJJJJJ, Industrial, Commercial and Institutional Boilers at area sources of HAPs. This facility is an area source of HAPs but all the heaters are natural gas-fired and therefore not subject to this subpart.

Compliance Assurance Monitoring, 40 CFR Part 64 [Not Applicable]
Compliance Assurance Monitoring, as published in the Federal Register on October 22, 1997, applies to any pollutant specific emission unit at a major source, that is required to obtain a Title V permit if it meets all of the following criteria:

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

The glycol dehydration unit uses a condenser and a reboiler to control the uncondensable vapor from still vent while the flash tank's emissions are routed to the station's inlet. Prior to the control devices, the potential emissions are less than the VOC and HAP major source thresholds. Therefore, the dehydration unit is not subject to CAM.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]
The definition of a stationary source does not apply to transportation, including storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the provisions of this part. Naturally occurring hydrocarbon mixtures, prior to entry into a natural gas processing plant or a petroleum refining process unit, including: condensate, crude oil, field gas, and produced water, are exempt for the purpose of determining whether more than a threshold quantity of a regulated substance is present at the stationary source. This facility does not process or store more than the threshold quantity of any regulated substance (Section 112r of the Clean Air Act 1990 Amendments). More information on this federal program is available on the web page: <https://www.epa.gov/rmp>.

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

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

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

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

SECTION X. COMPLIANCE

Inspection & Testing

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 | 3/15/2021 | In compliance |
| Full Inspection | 5/3/2019 | In compliance |
| Full Inspection | 3/16/2017 | In compliance |
| Full Inspection | 1/14/2015 | In compliance |

Since there have been no equipment or emissions changes at the facility, an additional inspection is not warranted at this time.

Tier Classification and Public Review

This application has been determined to be **Tier II** based on the request for renewal of a Part 70 operating permit.

The applicant published the “Notice of Filing a Tier II Application” in the *Enid News & Eagle* newspaper, a local newspaper in Garfield County on May 13, 2020. The notice stated that the application was available for review at the Kingfisher Memorial Library in Kingfisher, Oklahoma, and also at the Air Quality Division’s main office in Oklahoma City. The information on all permit actions is available for review by the public in the Air Quality section of the DEQ web page at <https://www.deq.ok.gov>.

The applicant will publish the “Notice of Draft Permit” in the *Enid News & Eagle* newspaper, a local newspaper in Garfield County. The notice will state that the application is available for review at the Kingfisher Memorial Library in Kingfisher, Oklahoma, and also at the Air Quality Division’s main office in Oklahoma City.

Information on all permit actions is available for review by the public in the Air Quality section of the DEQ Web page: <https://www.deq.ok.gov/>

Landowner Notification

The applicant 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 possesses a current lease or easement given by the landowner for the purposes stated in the application.

State Review

This facility is not located within 50 miles of the border of Oklahoma and any other state.

EPA Review

The proposed permit will be forwarded to EPA for a 45-day review period.

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.

Fee Paid

Part 70 operating permit renewal fee of \$7,500 has been received on April 17, 2020.

SUMMARY

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

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

**Mustang Gas Products, LLC
Gooden Compressor Station**

Permit No. 2020-0199-TVR4

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on April 21, 2020. The Evaluation Memorandum dated June 22, 2021, 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)]

EUG A: Emission units CM-2823 and CM-2824 are existing internal combustion engines. There are no hourly or annual emission limits applied to these units under Title V, but they are limited to the existing equipment as it is.

| EU # | Make/Model | Serial # |
|---------|-------------------|----------|
| CM-2823 | Waukesha L7042 GU | 185216 |
| CM-2824 | Waukesha L7042 GU | 171833 |

EUG B: Emission unit TEGV-2 is a TEG glycol dehydrator with a condenser.

| EU # | Description | VOC | HAPs |
|--------|----------------------------------|------|------|
| | | TPY | TPY |
| TEGV-2 | Glycol Dehydrator with Condenser | 3.49 | 1.36 |

Emissions from glycol dehydrator reboiler are limited to the levels listed.

| EU | Description | NO _x | | CO | | VOC | |
|--------|----------------------------|-----------------|------|-------|------|-------|------|
| | | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY |
| TEGH-2 | Glycol Dehydrator Reboiler | 0.036 | 0.16 | 0.03 | 0.13 | 0.002 | 0.01 |

EUG C1: VOC emissions from the following storage tanks are estimated based on existing equipment items but do not have a specific limitation.

| EU # | Capacity (gallons) | Material Stored |
|------|--------------------|----------------------------|
| TK-1 | 518 | Condensate/Processed Water |
| TK-3 | 575 | Triethylene glycol |
| TK-4 | 3,200 | Lube oil |
| TK-5 | 575 | Methanol |
| TK-6 | 518 | Antifreeze |
| TK-7 | 518 | Antifreeze |

EUG C2A: VOC emissions from the following storage tanks are limited to the levels listed.

| EU # | Capacity, gallon | lb/hr | TPY |
|-------|------------------|-------|-------|
| TK-2A | 12,600 | --- | 19.35 |

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

| EU # | Description | Number of Units |
|------|------------------------|-----------------|
| FUG | Valves | 362 |
| | Compressor Seals | 9 |
| | Pressure relief valves | 11 |
| | Flanges | 204 |
| | Screwed connections | 1,341 |

EUG E: Loading VOC emissions are estimated based on the facility’s throughput and are limited to the levels listed.

| EU # | Throughput, gal/yr | Emissions, TPY |
|------|--------------------|----------------|
| LOAD | 308,954 | 0.84 |

2. The fuel-burning equipment shall be fired with pipeline quality natural gas or other gaseous fuel with a sulfur content below 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)]
4. Each engine/turbine at the facility shall have a permanent identification plate attached, which shows the make, model number, and serial number. [OAC 252:100-43]
5. The permittee shall keep operation and maintenance (O&M) records for those “grandfathered” emission units identified in EUG A which have not been modified. Such records shall at a minimum include the maintenance, type of work performed, and the increase, if any, in emissions as a result. [OAC 252:100-8-6]
6. The following records shall be maintained on site to verify insignificant activities. [OAC 252:100-8-6(a)(3)(B)]
 - (a) Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature. Tank contents and annual throughput.
 - (b) Emissions from crude oil and condensate storage tanks with a capacity of less than or equal to 420,000 gallons that store crude oil or condensate prior to custody transfer.

(c) Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant. List the activity with estimated actual annual emissions.

7. The condensate storage tank (TK-2A) and the methanol storage tank (TK-5) shall be equipped with a permanent submerged fill pipe or an organic vapor recovery system. The condensate storage tank (TK-2A) is limited to a total condensate throughput of 308,952 gallons per year (12 month rolling total). [OAC 252:100-37]

- 8. The glycol dehydration unit shall be installed and operated as follows:
 - (a) Maximum throughput of natural gas (monthly average) shall be no greater than 12.0-MMSCFD.
 - (b) Glycol circulation rate shall be 0.67 gallons/minute (gpm) or less.
 - (c) The glycol dehydrator’s still vent shall be equipped with a condenser.
 - (d) All emissions from the glycol dehydration unit’s still vent shall be routed to the condenser.
 - (e) The condenser’s outlet vapors shall be routed to the reboiler firebox as fuel. An equally effective emissions control system may be used with a combined 50% efficiency VOC / 50% efficiency HAP.
 - (f) The off-gasses from the flash tank shall be route to the station’s inlet, or an equally-effective approved emissions control system (100% control).
 - (g) The permittee shall monitor and record the lean glycol circulation rate at least once a month. When three consecutive months show no exceedance of the limit, the frequency may be reduced to quarterly. Upon any showing of non-compliance, the monitoring and recordkeeping frequency shall revert to monthly. With each inspection the lean glycol circulation rate shall be recorded as follows:

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

The requirement to monitor and record glycol circulation rate shall not apply if the pump capacity does not exceed 0.67 gpm. If so, the manufacturer’s rating or the performance data for the model of pump that verifies the maximum pump rate at any operational conditions shall be maintained and available for inspection.

9. The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Oil and Natural Gas Production, Subpart HH, for each affected dehydration unit including but not limited to the following:

[40 CFR §63.764(e)(1)]

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

10. The permittee shall comply with all applicable requirements of the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), Subpart ZZZZ, for engines CM-2823 and CM-2824, including but not limited to: [40 CFR §§63.6580 through 63.6675]

- (a) § 63.6585 Am I subject to this subpart?
 - (b) § 63.6590 What parts of my plant does this subpart cover?
 - (c) § 63.6595 When do I have to comply with this subpart?
 - (d) § 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?
 - (e) § 63.6605 What are my general requirements for complying with this subpart?
 - (f) § 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?
 - (g) § 63.6615 When must I conduct subsequent performance tests?
 - (h) § 63.6620 What performance tests and other procedures must I use?
 - (i) § 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?
 - (j) § 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?
 - (k) § 63.6635 How do I monitor and collect data to demonstrate continuous compliance?
 - (l) § 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?
 - (m) § 63.6645 What notifications must I submit and when?
 - (n) § 63.6650 What reports must I submit and when?
 - (o) § 63.6655 What records must I keep?
 - (p) § 63.6660 In what form and how long must I keep my records?
 - (q) § 63.6665 What parts of the General Provisions apply to me?
 - (r) § 63.6675 What definitions apply to this subpart?
11. No later than 30 days after each anniversary date of the issuance of the original Title V operating permit (January 4, 1999), the permittee shall submit to the 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)]
12. 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) For the fuel(s) burned, the appropriate document(s) as described in S.C. No. 2.
 - (b) Operating and maintenance (O&M) log for the EUG A.
 - (c) Gas throughput of the glycol dehydration unit (monthly average and 12-month rolling total) to demonstrate compliance with S.C. 8(a).
 - (d) Glycol pump circulation rate (monthly/quarterly) if applicable, based on S.C. No. 8(b).
 - (e) Condensate throughput of the facility (monthly total and 12-month rolling total).
 - (f) Records for insignificant activities listed in the S.C. No.6.
 - (g) GRI-GLYCalc Aggregate Emissions Report demonstrating compliance for VOC emission limitation at the glycol dehydration unit (calendar year basis).
 - (h) Records required by 40 CFR Pat 63, NESHAP, Subparts HH and ZZZZ

13. This permit supersedes and replaces all previous Air Quality operating permits issued to this facility, which are now canceled.

DRAFT



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. 2020-0199-TV4

Mustang Gas Products, LLC

having complied with the requirements of the law, is hereby granted permission to operate the Gooden Compressor Station located in Section 14, Township 17N, Range 9W, Kingfisher County, Oklahoma, subject to Specific Conditions and Standard Conditions dated June 21, 2016, both of which are attached:

This permit shall expire on five years from the issuance, except as Authorized under Section VIII of the Standard Conditions.

Kendal Stegmann, Division Director
AIR QUALITY DIVISION

Date

DRAFT



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Mustang Gas Products LLC
Attn: Ms. Sunni Stephenson
9800 North Oklahoma Ave
Oklahoma City, OK 73114

Subject: Operating Permit No. **2020-0199-TVR4**
Gooden Compressor Station
Facility ID: 1625
Section 14, Township 17N, Range 9W
Enid, Kingfisher County, Oklahoma

Dear Ms. Stephenson:

Enclosed is the permit authorizing operation of the referenced facility. Please note that this permit is issued subject to the certain 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 emission inventory for this facility. An emission inventory must be completed through DEQ's electronic reporting system by April 1st of every year. Any questions concerning the form or submittal process should be referred to the Emission Inventory Staff at (405) 702-4100.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact Jennie Doan, the permit writer, at jennie.doan@deq.ok.gov or at (918) 293-1615.

Sincerely,

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

Enclosures



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

SECTION I. DUTY TO COMPLY

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

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

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

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

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

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

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

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

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

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

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

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

B. Records of required monitoring shall include:

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

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

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

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

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

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

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

[OAC 252:100-43]

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

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

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

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

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

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

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

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

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

SECTION IV. COMPLIANCE CERTIFICATIONS

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

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

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

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

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

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

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

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification.

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

SECTION VI. PERMIT SHIELD

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

[OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit.

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

SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

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

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

SECTION VIII. TERM OF PERMIT

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

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

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

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

SECTION IX. SEVERABILITY

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

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

SECTION X. PROPERTY RIGHTS

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

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

SECTION XI. DUTY TO PROVIDE INFORMATION

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing,

terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit.

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

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

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

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

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

SECTION XII. REOPENING, MODIFICATION & REVOCATION

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

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

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

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

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

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

[OAC 100-8-7.3(d)]

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

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

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

SECTION XIII. INSPECTION & ENTRY

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

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

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

SECTION XIV. EMERGENCIES

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

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

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

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

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

- (1) an emergency occurred and the permittee can identify the cause or causes of the emergency;

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

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

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

SECTION XV. RISK MANAGEMENT PLAN

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

SECTION XVI. INSIGNIFICANT ACTIVITIES

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

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

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

SECTION XVII. TRIVIAL ACTIVITIES

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

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

SECTION XVIII. OPERATIONAL FLEXIBILITY

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

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

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

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

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

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

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

- adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]
- (5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
- (6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]
- (7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

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

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

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

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

- (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
- (2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
- (3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161;

- (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
- (5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
- (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

SECTION XXI. TITLE V APPROVAL LANGUAGE

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

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

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

SECTION XXII. CREDIBLE EVIDENCE

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

[OAC 252:100-43-6]



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Mustang Gas Products, LLC
Attn: Sunni Stephenson
9800 North Oklahoma Ave
Oklahoma City, OK 73114

Re: Permit No. **2020-0199-TV4**
Mustang Gas Products, LLC
Gooden Compressor Station (SIC 1321)
Facility ID: 1625

Dear Ms. Stephenson:

Air Quality has received the permit application for the referenced facility and completed initial review. This application has been determined to be a Tier II application. In accordance with 27A O.S. 2-14-301 and 302 and OAC 252:4-7-13(c), the enclosed draft permit is now ready for public review. The requirements for public review of the draft permit include the following steps, which you must accomplish.

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located. (Instructions enclosed)
2. Provide for public review, for a period of 30 days following the date of the newspaper announcement, a copy of the application and draft permit at a convenient location (preferentially at a public location) within the county of the facility.
3. Send AQD a signed affidavit of publication for the notice(s) from Item #1 above within 20 days of publication of the draft permit. Any additional comments or requested changes you have for the draft permit or the application should be submitted within 30 days of publication.

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

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: ...xx-xxx-x...), which may be reviewed at ...locations (one must be in the county where the site/facility is located)... or at the Air Quality Division's main office (see address below). The draft permit is also available for review in the Air Quality Section of DEQ's Web Page: <http://www.deq.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/CSD staff.

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

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

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

| | | | |
|----------------|---|-----------------------|--|
| ACFM | Actual Cubic Feet per Minute | HCFC | Hydrochlorofluorocarbon |
| AD | Applicability Determination | HON | Hazardous Organic NESHAP |
| AFRC | Air-to-Fuel Ratio Controller | HP | Horsepower (hp) |
| API | American Petroleum Institute | HR | Hour (hr) |
| ASTM | American Society for Testing and Materials | H₂S | Hydrogen Sulfide |
| BACT | Best Available Control Technology | I&M | Inspection and Maintenance |
| BHP | Brake Horsepower (bhp) | IBR | Incorporation by Reference |
| BTU | British thermal unit (Btu) | IC | Internal Combustion |
| C&E | Compliance and Enforcement | LAER | Lowest Achievable Emission Rate |
| CAA | Clean Air Act | LB | Pound(s) [Mass] (lb, lbs, lbm) |
| CAM | Compliance Assurance Monitoring | LB/HR | Pound(s) per Hour (lb/hr) |
| CAS | Chemical Abstract Service | LDAR | Leak Detection and Repair |
| CAAA | Clean Air Act Amendments | LNG | Liquefied Natural Gas |
| CC | Catalytic Converter | LT | Long Ton(s) (metric) |
| CD | Consent Decree | M | Thousand (Roman Numeral) |
| CEM | Continuous Emission Monitor | MAAC | Maximum Acceptable Ambient Concentration |
| CFC | Chlorofluorocarbon | MACT | Maximum Achievable Control Technology |
| CFR | Code of Federal Regulations | MM | Prefix used for Million (Thousand-Thousand) |
| CI | Compression Ignition | MMBTU | Million British Thermal Units (MMBtu) |
| CNG | Compressed Natural Gas | MMBTUH | Million British Thermal Units per Hour (MMBtu/hr) |
| CO | Carbon Monoxide or Consent Order | MMSCF | Million Standard Cubic Feet (MMscf) |
| COM | Continuous Opacity Monitor | MMSCFD | Million Standard Cubic Feet per Day |
| D | Day | MSDS | Material Safety Data Sheet |
| DEF | Diesel Exhaust Fluid | MWC | Municipal Waste Combustor |
| DSCF | Dry Standard (At Standard Conditions) Cubic Foot (Feet) | MWe | Megawatt Electrical |
| EGU | Electric Generating Unit | NA | Nonattainment |
| EI | Emissions Inventory | NAAQS | National Ambient Air Quality Standards |
| EPA | Environmental Protection Agency | NAICS | North American Industry Classification System |
| ESP | Electrostatic Precipitator | NESHAP | National Emission Standards for Hazardous Air Pollutants |
| EUG | Emissions Unit Group | NH₃ | Ammonia |
| EUSGU | Electric Utility Steam Generating Unit | NMHC | Non-methane Hydrocarbon |
| FCE | Full Compliance Evaluation | NO₂ | Nitrogen Dioxide |
| FIP | Federal Implementation Plan | NO_x | Nitrogen Oxides |
| FR | Federal Register | NOI | Notice of Intent |
| GACT | Generally Achievable Control Technology | NSCR | Non-Selective Catalytic Reduction |
| GAL | Gallon (gal) | NSPS | New Source Performance Standards |
| GDF | Gasoline Dispensing Facility | NSR | New Source Review |
| GEP | Good Engineering Practice | O₃ | Ozone |
| GHG | Greenhouse Gases | O&G | Oil and Gas |
| GR | Grain(s) (gr) | O&M | Operation and Maintenance |
| HAP | Hazardous Air Pollutants | O&NG | Oil and Natural Gas |
| HC | Hydrocarbon | | |

| | | | |
|-------------------------|--|-------------------------|---------------------------------------|
| OAC | Oklahoma Administrative Code | TV | Title V of the Federal Clean Air Act |
| OC | Oxidation Catalyst | US EPA | U. S. Environmental Protection Agency |
| PAH | Polycyclic Aromatic Hydrocarbons | VMT | Vehicle Miles Traveled |
| PAL | Plant-wide Applicability Limit | VOC | Volatile Organic Compound |
| Pb | Lead | VRU | Vapor Recovery Unit |
| PBR | Permit by Rule | YR | Year |
| PCB | Polychlorinated Biphenyls | µg/m³ | Micrograms Per Cubic Meter |
| PCE | Partial Compliance Evaluation | 2SLB | 2-Stroke Lean Burn |
| PEA | Portable Emissions Analyzer | 4SLB | 4-Stroke Lean Burn |
| PFAS | Per-and Polyfluoroalkyl Substance | 4SRB | 4-Stroke Rich Burn |
| 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 | | |