

DRAFT

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

MEMORANDUM

August 24, 2021

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

THROUGH: Rich Groshong, Compliance and Enforcement Group Manager

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

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. **2020-0203-TVR4**
Mustang Gas Products, LLC
Facility: State School Compressor Station
Facility ID: 1080
Section 33, Township 23N, Range 6W, Garfield County
Latitude 36.43294°N, Longitude 97.85098°W;
Directions: From the intersection of North 16th Street and Breckenridge Road, east on Breckenridge Road 0.3 mile, then south into the facility.

SECTION I. INTRODUCTION

Mustang Gas Products, LLC (Mustang) has requested a renewal of the operating permit for the State School Compressor Station (SIC 4922/NAICS 211130). The facility is currently operated under Permit No. 2015-1172-TVR3 issued November 3, 2015. There have been no major changes to the site since issuance of Permit No. 2015-1172-TVR3. The facility was constructed before 1972 and is a natural gas compressor station.

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 is a compressor station, responsible for the compression and dehydration of natural gas. The natural gas stream enters the facility and is compressed by two (2) natural gas-fired compressor engines into a pipeline for transmission from the facility. Condensate is stored in the condensate storage tanks before being removed from site via tanker truck.

Prior to exiting the facility, the glycol dehydrator is used to remove water from the gas stream. In the dehydration process, gas passes through the contactor vessel where water is absorbed by the

glycol. The “rich” glycol-containing water goes to the TEG reboiler, where heat is used to boil off the water. The glycol dehydrator is equipped with a flash tank. Flash tank vapors are routed to the inlet of the facility or reboiler for fuel while still vent emissions are routed to the condenser and reboiler.

SECTION III. PERMIT HISTORY

Permit No.	Date Issued	Description
96-411-TV	3/16/1999	Initial Title V Permit
2003-282-TVR	8/5/2005	Renewal Operating Permit
2003-282-TVR (M-1)	10/9/2009	Modification: increase natural gas throughput from 2.2 MMSCFD to 5.0 MMSCFD, and requested to remove natural gas throughput & recirculation rate limitations for the glycol dehydration unit.
2010-078-TVR2	10/28/2010	Renewal Operating Permit
2015-1172-TVR3	11/3/2015	Renewal Operating Permit

SECTION IV. REQUESTED CHANGES

In this Title V Renewal application, the facility requested following changes:

- The addition of one (1) 500-gallon glycol storage tank to the facility.
- Change the naming of CM-1 and CM-3 to CM-2384 and CM-2385, respectively.
- The increased VOC emissions are due following reasons:
 - Glycol dehydration: new gas analysis, using Promax simulation instead of GRI-GLYCalc.
 - Tanks: new gas analysis, updated AP-42 factors were used instead of TANKS 4.09d, the increased condensate throughput, and the addition of methanol tank’s emissions.
 - Fugitive: new gas analysis and the increased condensate throughput.
 - The addition of loading emissions.

In addition, the “EUG 1 – Facility Wide” in previous permit has been removed, and the rest of the EUGs have been rearranged.

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 1. Natural Gas-Fired Internal Combustion Engines

EU #	Make/Model	HP	Serial #	Installed Date
CM-2384	White-Superior 6G825	495	18737	Pre-1972
CM-2385 ⁽¹⁾	White-Superior 8G825	660	19201	Pre-1972

⁽¹⁾ Equipped with Non-Selective Catalytic Reduction (NSCR).

EUG 2. Natural Gas-Fired Glycol Dehydration Unit

EU #	Description	Rating	Installed Date
TEGV-1	Glycol Dehydrator's Still Vent	5-MMSCFD	1995
TEGF-1	Glycol Dehydrator's Flash Tank	5-MMSCFD	1995
TEGH-1	Reboiler	0.075-MMBTUH	1995

EUG 3a. Storage Tanks with Insignificant Emissions

EU #	Point #	Capacity (gallons)	Material Stored	Const. Date
TANKS	TK-1	518	Processed water from glycol extraction	1995
	TK-4	518	Antifreeze	1995
	TK-5	5,082	Processed water from compression of natural gas	1995
	TK-6	1,129	Methanol	11/13/1942
	TK-8	55	Glycol	Removed
	TK-9	564	Lube Oil	1995
	TK-10	500	Glycol	2020

EUG 3b. Condensate Storage Tanks

EU #	Point #	Capacity (gallons)	Material Stored	Const. Date
TANKS	TK-2.1	8,820	Condensate	2010
	TK-3.1	8,820	Condensate	2010

EUG 4. Fugitive VOC Emission Leaks

EU #	Description	Type of Service	Number of Units
FUG-1	Valves	Gas/Vapor	100
	Flanges	Gas/Vapor	110
	Compressor Seals	Gas/Vapor	60
	Relief Valves	Gas/Vapor	25
	Valves	Light Liquid	10
	Flanges	Light Liquid	6
	Compressor Seals	Light Liquid	15
	Relief Valves	Light Liquid	5

EUG 5. Condensate Loading

EU #	Equipment	Throughput (gallons/year)
LOAD-1	Condensate Truck Loading	459,900

SECTION VI. EMISSIONS

EUG 1 – ENGINES

The engines' potential emissions are base uncontrolled emission factors from AP-42 (7/00) Table 3.2-3 for 4SRB engines with 30% safety factor, brake specific fuel consumption of 7,000 btu/hp-hr, and 8,760 hours of operation per year. VOC emissions include H₂CO.

EUG 1: Engine's Emission Factors

EU #	NO _x	CO	VOC	H ₂ CO
	lb/MMBTUH	lb/MMBTUH	lb/MMBTUH	lb/MMBTUH
CM-2384	2.87	4.84	0.04	0.03
CM-2385 ⁽¹⁾	2.87	4.84	0.04	0.03

⁽¹⁾ Equipped with NSCR.

EUG 1: Engines' Emissions

EU #	NO _x		CO		VOC		H ₂ CO	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
CM-2384	9.94	43.56	16.76	73.39	0.13	0.58	0.09	0.40
CM-2385 ⁽¹⁾	13.27	58.14	22.34	97.86	0.18	0.78	0.12	0.53

⁽¹⁾ Equipped with NSCR.

EUG 2 – GLYCOL DEHYDRATION UNIT

The VOC and HAP emissions from the glycol dehydration unit still vent and flash tank are based on Promax and the gas analysis from 11/5/2020. The dehydration unit's still vent is routed to a condenser with 50% control efficiency and the uncondensed vapors are routed to the reboiler fuel system. Due to the reboiler not running continuously, facility used the conservative control efficiency of 50%. The flash tank off gases are routed to the facility 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 1.4-2, fuel heating value of 1,020 Btu/scf, and 8,760 hours of operation per year.

EUG 2: Glycol Dehydration's Parameters

Parameter	Data
Type of Glycol	Triethylene
Gas Flow Rate, MMSCFD	5.0
Glycol Pump Type	Kimray
Lean Glycol Pump Design Capacity, gpm	0.67
Still Vent	
Control Type or Recycle	Condenser & reboiler firebox
Condenser Outlet Temperature, °F	206
Overall Control Efficiency, %	75%
Flash Tank	
Control Type or Recycle	Recycle to station's inlet
Flash Tank Temperature, °F	109
Flash Tank Pressure, psig	60
Overall Control Efficiency, %	100

EUG 2: Glycol Dehydration’s VOC & HAPs Emissions

Pollutant	Uncontrolled Emissions (TPY)		Controlled Emissions (TPY)		Total Emissions (TPY)
	Still Vent	Flash Tank	Still Vent	Flash Tank	
n-Hexane	3.12	0.65	0.78	0.00	0.78
Benzene	3.03	0.03	0.76	0.00	0.76
Toluene	2.99	0.02	0.75	0.00	0.75
Xylene	0.14	0.0004	0.04	0.00	0.04
Total HAPs	9.28	0.70	2.32	0.00	2.32
Total VOC	16.99	6.40	0.87	0.00	5.98

EUG 2: Glycol Dehydration Reboiler’s Emission Factors

EU #	Description	NOx	CO	VOC
		lb/MMSCF	lb/MMSCF	lb/MMSCF
TEGH-1	0.075-MMBTUH Dehydrator Reboiler	100	84	5.5

EUG 2: Emissions - Dehydration Unit/Reboiler

EU #	NOx		CO		VOC		HAPs	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
TEGV-1	---	---	---	---	1.37	5.98	0.53	2.32
TEGF-1	---	---	---	---	0.00	0.00	0.00	0.00
TEGH-1	0.01	0.03	0.01	0.03	0.0004	0.002	0.00	0.00

EUG 3b – TANKS

The VOC emissions for the condensate tanks (TK-2.1 and TK-3.1) and the methanol tank (TK-6) 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, 4,5,8,9, and 10 are less than 1.5 psia, the VOC emissions are negligible.

EUG 3b: Condensate Tanks’ Data & Emissions

Parameter	Data	Data	Data
EU #	TANKS	TANKS	TANKS
Tank ID	TK-2.1	TK-3.1	TK-6
Tank Capacity, gal	8,820	8,820	1,129
Throughput, gal/year	229,950	229,950	153,300
Content	Condensate	Condensate	Methanol
Flash Calculation Method/Tool	Vasquez-Beggs	Vasquez-Beggs	N/A
Working/Breathing Method/Tool	AP-42 (6/20) Section 7.1	AP-42 (6/20) Section 7.1	AP-42 (6/20) Section 7.1
Control Type	None	None	None
Flash VOC Emissions, TPY	12.86	12.86	----
Working & Breathing VOC Emissions, TPY	1.54	1.54	0.03

Parameter	Data	Data	Data
Total VOC Emissions, TPY	14.40	14.40	0.03

EUG 4 – 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 4 equipment list, and the percentage VOC for Gas/Vapor and Light Liquid are 33.08% and 100% respectively.

EUG 4. Fugitive VOC Emission Leaks

EU #	Description	Number of Units	Emission Factors	VOC Emissions	
			lb/hr-component	lb/hr	TPY
FUG-1	Valves	100	0.00992	0.33	1.44
	Flanges	110	0.00086	0.03	0.14
	Compressor Seals	60	0.0194	0.39	1.69
	Relief Valves	25	0.0194	0.16	0.70
	Valves	10	0.0055	0.06	0.24
	Flanges	6	0.0287	0.17	0.75
	Compressor Seals	15	0.0002	0.004	0.02
	Relief Valves	5	0.0165	0.08	0.36
Total		----	----	1.22	5.34

EUG 5 – LOADING

The emission factor for truck loading losses in the following table was based on AP-42 (7/08) Section 5.2 Equation 1, and condensate throughput of 459,900 gallons/year.

EUG 5: Truck Loading’s Parameters & VOC Emissions

Parameter	Data
EU #	LOAD-1
Liquids Loaded	Condensate
Throughput, gal/yr	459,900
Saturation Factor	0.6
Temperature, °F	65.53
True Vapor Pressure (TVP), psia	5.77
Molecular Weight (MW), lb/lbmol	66
VOC, wt%	100
Emission Factor, lb/10 ³ gal	5.414
VOC Emissions, TPY	1.24

FACILITY-WIDE EMISSIONS

Overall, both NO_x and CO emissions exceed the major threshold, which made 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		HAPs	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
CM-2384	9.94	43.56	16.76	73.39	0.13	0.58	0.09	0.40
CM-2385 ⁽¹⁾	13.27	58.14	22.34	97.86	0.18	0.78	0.12	0.53
TEGV-1	----	----	----	----	1.37	5.98	0.53	2.32
TEGH-1	0.01	0.03	0.01	0.03	0.0004	0.002	----	----
TANKS	----	----	----	----	----	14.40	----	----
	----	----	----	----	----	14.40	----	----
	----	----	----	----	----	0.03	----	----
LOAD-1	----	----	----	----	----	1.24	----	----
FUG-1	----	----	----	----	1.22	5.34	----	----
Totals, TPY	23.22	101.73	39.11	171.28	2.90	42.75	0.74	3.25
Permit No. 2015-1172- TVR3 Limits, TPY	23.26	101.78	39.1	171.26	2.12	32.86	0.69	3.05
Difference, TPY	(0.04)	(0.05)	0.01	0.02	0.78	9.89	0.05	0.20

⁽¹⁾ Equipped with NSCR.

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 or 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 459,900 gallons per year, an average of 1,260 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-1, TK-4, TK-5, and TK-8 through TK-10) 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. The condensate tanks are limited tanks and not considered insignificant. However, additional tanks may be added in the future.
4. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas). The facility currently contains a 0.075 MMBTUH glycol reboiler.

5. * Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant. None were identified but may be in the future.

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.

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

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

Emission limitations for the facility are based on the previous Title V permit [Permit No. 2015-1172-TVR3] and information in the Title V permit renewal application.

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 (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. This subchapter 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-2384 ⁽¹⁾	3.47	0.60	0.02
CM-2385 ⁽¹⁾	4.62	0.60	0.02
TEGH-1 ⁽²⁾	0.075	0.60	0.0076

⁽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) and 7,000 btu/hp-hr.

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

OAC 252:100-31 (Sulfur Compounds) [Applicable]
Part 2 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 combusting natural gas with a maximum H₂S content of 343 ppmv, storing “sweet” crude oil/condensate, and with a dehydration unit treating “sweet” (<4 ppmv H₂S) natural gas, 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.

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

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

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

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

OAC 252:100-37 (Volatile Organic Compounds) [Applicable]

Part 3 requires VOC storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. This part is applicable to the condensate storage tanks TK-2.1 and TK-3.1 and the methanol tank TK-6, and these tanks are equipped with submerged fill pipe.

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 (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]

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 their capacities are smaller than the de minimis size (19,813 gallons).

Subpart VV, Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (SOCMI). 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, Onshore Natural Gas Processing: SO₂ Emissions. There is no natural gas sweetening operation at this site.

Subpart JJJ, 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 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. Condensate storage tanks (TK-2.1 and TK-3.1) were constructed prior to the effective, and thus, these tanks are not subject to this subpart. As for TK-10, it was constructed after the effective date and stored glycol, and so, it is 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. Condensate storage tanks (TK-2.1 and TK-3.1) were constructed prior to the effective, and thus, these tanks are not subject to this subpart. As for TK-10, it was constructed after the effective date and stored glycol, and so, it is 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. Even though the TEG dehydration unit at this facility is considered an affected area source, it is exempted from the requirement §63.764(d)(2) since the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 1 TPY, as determined by the procedures specified in §63.774(b)(2). 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-2384 and CM-2385 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-2384	(Non-emergency, non-black start 4SRB stationary RICE ≤ 500 HP) 1) Change oil and filter every 1,440 hours of operation or annually, whichever comes first. ⁽²⁾ 2) Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replaces as necessary 3) Inspect all hoses and belts every 1,440 hours of operation of annually, whichever comes first and replace as necessary.
CM-2385 ⁽³⁾	(Non-emergency, non-black start 4SRB stationary RICE > 500 HP that are not remote stationary RICE and that operate more than 24 hours per calendar year) 1) Install NSCR to reduce HAP emissions from the stationary RICE.

- (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 in Table 2d of Subpart ZZZZ.
- (3) Equipped with NSCR.

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.

According to the table above, CM-2384 and CM-2385 are existing and non-remote engine. Since Subpart ZZZZ requires CM-2385 to install NSCR, CM-2385 is no longer a grandfathered engine and subjects to emission limitations, which will be listed in the specific conditions.

Subpart JJJJJ, 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 grandfathered unit (CM-2384) located at this source are not subject to an emission limit or standard for any regulated air pollutant. Specific Condition (S.C.) No. 5 requires recordkeeping of operation and maintenance activities and maintenance activities for the grandfathered unit.

For CM-2385, NESHAP Subpart ZZZZ required this engine to install NSCR, which made this engine no longer qualify as “grandfathered” unit. The PTE of NO_x and CO for this engine are estimated with 30% control factor, and the final uncontrolled PTE of NO_x and CO are less than 100 TPY for each pollutant. Therefore, this engine is not subject to CAM.

The glycol dehydration unit has a condenser as a control device. However, prior to control device, the uncontrolled VOC emissions are less than 100 TPY. The uncontrolled HAP emissions are less than 10 TPY and 25 TPY for individual HAP and aggregated HAPs, respectively. Therefore, this glycol dehydration unit is not subject to CAM.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]
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). Three (3) 250-gal propane tanks are on-site, with a maximum total capacity of 3,200 lb, well under the 10,000 lb threshold. 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	4/9/2021	In compliance

Inspection Type	Date	Summary/Results
Full Inspection	7/12/2018	In compliance
Full Inspection	5/18/2017	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 New & Eagle* newspaper, a local newspaper in Garfield County on May 13, 2020. The notice stated that the application was available for review at Enid Public Library in Enid, 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 Tier II Draft Permit” in the *Enid New & Eagle* newspaper, a local newspaper in Garfield County. The notice will state that the application is available for review at the Enid Public Library in Enid, 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 located within 50 miles of the border of Oklahoma and Kansas; the State of Kansas will be notified of this draft permit.

EPA Review

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

Fee Paid

Part 70 operating permit renewal fee of \$7,500 has been received on April 29, 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.

DRAFT

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

**Mustang Gas Products, LLC
State School Compressor Station**

Permit No. 2020-0203-TVR4

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on April 22, 2020. The Evaluation Memorandum dated August 24, 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 1: Emission units CM-2384 and CM-2385 are existing internal combustion engines. There are no hourly or annual emission limits applied to CM-2384 and CM-2385 under Title V, but it is limited to the existing equipment as it is.

EU #	Make/Model	Serial #	Installed Date
CM-2384	White-Superior 6G825	18737	Pre-1972
CM-2385	White-Superior 8G825	19201	Pre-1972

- (a) Engine CM-2385 shall be operated with exhaust gas passing through a properly functioning catalytic converter.

EUG 2: Emission unit TEGV-1 is a TEG glycol dehydrator with a condenser and firebox as control devices.

EU #	Description	VOC		HAPs	
		lb/hr	TPY	lb/hr	TPY
TEGV-1	Glycol Dehydrator with Condenser and Reboiler	1.37	5.98	0.53	2.32

Emissions from glycol dehydrator reboiler are counted as an insignificant activity.

EUG 3a: These emission units (EUs) are insignificant. There are no emission limits applied to these units under Title V but they are limited to the existing equipment as it is.

EU #	Point #	Capacity (gallons)	Material Stored	Const. Date
TANKS	TK-1	518	Processed water from glycol extraction	1995
	TK-4	518	Antifreeze	1995
	TK-5	5,082	Processed water from compression of natural gas	1995
	TK-6	1,129	Methanol	11/13/1942

EU #	Point #	Capacity (gallons)	Material Stored	Const. Date
	TK-8	55	Glycol	Removed
	TK-9	564	Lube Oil	1995
	TK-10	500	Glycol	2020

EUG 3b: VOC emissions from the following storage tanks are limited to the levels listed.

EU #	Point #	Capacity (gallon)	VOC Emissions	
			lb/hr	TPY
TANKS	TK-2.1	8,820	----	14.40
	TK-3.1	8,820	----	14.40
	TK-6	1,129	----	0.03

EUG 4: Fugitive VOC emissions are estimated based on existing equipment items but do not have a specific limitation.

EU #	Description	Number of Units
FUG-1	Valves	100
	Flanges	110
	Compressor Seals	60
	Relief Valves	25
	Valves	10
	Flanges	6
	Compressor Seals	15
	Relief Valves	5

EUG 5: 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-1	459,900	1.24

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 252:100-8-6 (a)(3)(B)], [OAC 252:100-43]

- 5. The permittee shall keep operation and maintenance (O&M) records for those “grandfathered” emission units identified in EUG 1 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) Records of capacity of the tanks and the amount of annual throughput for crude oil and condensate storage tanks with a capacity of less than or equal to 420,000 gallons that store crude oil and condensate prior to custody transfer.
 - (b) Records of capacity of the tanks and contents for storage tanks containing volatile organic liquids with the vapor pressures less than 1.5 psia and having capacities less than 39,894 gallons.

- 7. The condensate storage tanks (TK-2.1 and TK-3.1) and the methanol storage tank (TK-6) shall be equipped with a permanent submerged fill pipe or an organic vapor recovery system. The condensate storage tanks (TK-2.1 and TK-3.1) are limited to a total condensate throughput of 459,900 gallons per year (12 month rolling total). [OAC 252:100-37-15(b)]

- 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 5.0-MMSCFD.
 - (b) Glycol circulation rate shall be 0.67 gallons/minute (gpm) or less.
 - (c) The glycol dehydrator still vent shall be equipped with a condenser.
 - (d) All emissions from the glycol dehydration unit’s still vent shall be routed to the condenser.
 - (e) The condenser’s outlet vapors shall be routed reboiler fuel system as fuel or an equally effective emissions control system may be used for control of the still vent with a combined 75% efficiency VOC/ 75% efficiency HAP.
 - (f) The off-gasses from the flash tank shall be routed to the station inlet, or an equally effective approved emission control system (100 % control).
 - (g) Benzene emissions shall not exceed 0.99 TY. The methods of 40 CFR Part 63, Subpart HH shall be used to demonstrate compliance with this limitation.
 - (h) 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-2384 and CM-2835, 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 TV permit (March 16, 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 1.
 - (c) Gas throughput of the glycol dehydration unit (monthly average and 12-month rolling total) to demonstrate compliance with S.C. 8(a).
 - (d) Condensate throughput of the facility (monthly total and 12-month rolling total).
 - (e) Records for insignificant activities listed in the S.C. No. 6.
 - (f) Glycol pump circulation rate (monthly/quarterly) if applicable, based on S.C. No. 8(b).
 - (g) Promax 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. 2020-0203-TVR4

Mustang Gas Products, LLC

having complied with the requirements of the law, is hereby granted permission to operate the State School Compressor Station located in Section 33, Township 23N, Range 6W, Garfield 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.

Division Director.
Air Quality Division

Date

**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

Kansas Department of Health & Environmental Bureau of Air
1000 SW Jackson, Suite 310
Topeka, KS 66612-1366

SUBJECT: Permit No. 2020-0203-TVR4
Mustang Gas Products, LLC
Facility ID: 1080
State School Compressor Station (SIC 4922/NAICS 211130)
Location: Section 33, Township 23N, Range 6W, Garfield County

Dear Sir/Madam:

The subject referenced facility has requested the renewal of a Title V operating permit. Air Quality Division has completed the initial review of the application and prepared a draft permit for public review. Since this facility is within 50 miles of the Oklahoma – Kansas border, a copy of the proposed permit will be provided to you upon request. Information on all permits and a copy of this draft permit are available for review by public in the Air Quality Section of the DEQ Web Page: <https://www.deq.ok.gov>.

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". The signature is written in a cursive style.

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





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. **2020-0203-TVR4**
State School Compressor Station
Facility ID: 1080
Location: Section 33, Township 23N, Range 6W, Garfield County, Oklahoma

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

Enclosures



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		