



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

February 28, 2022

Choctaw Nation of Oklahoma
Attn: Gary Batton, Chief
P.O. Box 1210
Durant, OK 74702

Re: Permit Application No. 2021-5034-TVR4
Enable Gas Transmission, LLC, Chandler Compressor Station (FAC ID 1133)
Latimer County
Date Received: March 12, 2021

Dear Mr. Batton:

The Oklahoma Department of Environmental Quality (ODEQ), Air Quality Division (AQD), has received the Tier II/Tier III application referenced above. A Tier II/III application requires the facility provide a 30-day public comment period on the draft Tier II/III permit and a 20-day public comment period on a proposed Tier III permit at a public location within the county of the facility. The process requires the facility to notify the public by newspaper notice in a newspaper in the county of the proposed project. Since the proposed project falls within your Tribal jurisdiction, AQD is providing this direct notice. This letter notification is in addition to the newspaper notice.

Copies of draft permits and comment opportunities are also provided to the public on the ODEQ website at the following location:

<https://www.deq.ok.gov/air-quality-division/air-permits/public-participation-issued-permits/>

If you prefer a copy of the draft and/or proposed permit, or direct notification by letter for any remaining public comment opportunities, if applicable, on the referenced permit action, please notify me by e-mail at phillip.fielder@deq.ok.gov, or by letter at:

Department of Environmental Quality, Air Quality Division
Attn: Phillip Fielder, Chief Engineer
707 N Robinson
Oklahoma City, OK, 73102

Thank you for your cooperation. If you have any questions, I can also be contacted at (405) 702-4185.

Sincerely,

Phillip Fielder

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





SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Enable Gas Transmission, LLC
Attn: Mr. Sean Walker
P.O. Box 24300 MC LS700
Oklahoma City, OK 73124

Subject: Operating Permit No. **2021-5034-TVR4**
Chandler Compressor Station
AQD Facility ID: 1133
Section 21, Township 5N, Range 18E, Latimer County, Oklahoma.

Dear Mr. Walker:

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. Submit sample notice and provide date of publication to **AQD 5 days prior to notice publishing;**
3. 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;
4. 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,

Phillip Fielder

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



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

APPLICANT RESPONSIBILITIES

Permit applicants are required to give public notice that a Tier II or Tier III draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Note that if either the applicant or the public requests a public meeting, this must be arranged by the DEQ.

1. Complete the public notice using the samples provided by AQD below. Please use the version applicable to the requested permit action;
Version 1 – Traditional NSR process for a construction permit
Version 2 – Enhanced NSR process for a construction permit
Version 3 – initial Title V (Part 70 Source) operating permit, Title V operating permit renewal, Significant Modification to a Title V operating permit, and any Title V operating permit modification incorporating a construction permit that followed Traditional NSR process
2. Determine appropriate newspaper local to facility for publishing;
3. Submit sample notice and provide date of publication to AQD 5 days prior to notice publishing;
4. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD.

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.

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., significant modification to a Title V permit or Title V/Title V renewal permit)... 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 operating permit [modification] (Permit Number: ...xxxx-xxxx-x...), which may be reviewed at ...locations (one must be in the county where the site/facility is located)... or at the Air Quality Division's main office (see address below). The draft permit is also available for review under Permits for Public Review on the DEQ 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)) [For facility modifications only, either add: , which represents (identify the emissions change involved in the modification), or add: . The modification will not result in a change in emissions]

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 or as directed through the corresponding online notice. [Modifications only, add: Only those issues relevant to the proposed modification(s) are open for comment.] A public meeting on the draft permit [modification] may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ staff.

In addition to the public comment opportunity offered under this notice, this draft permit is subject to U.S. Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8.

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 including draft permits, proposed permits, final issued permits and applicable review timelines are 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, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677. Phone No. (405) 702-4100.

DRAFT/PROPOSED

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

MEMORANDUM

February 16, 2022

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

THROUGH: Rick Groshong, Compliance and Enforcement Group Manager

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

THROUGH: Iftekhar Hossain, P.E., Engineering Section

FROM: Alex Johnson, E.I., Existing Source Permit Section

SUBJECT: Evaluation of Permit Application No. **2021-5034-TVR4**
Enable Gas Transmission, LLC
Chandler Compressor Station
AQD Facility ID: 1133
Section 21, Township 5N, Range 18E, Latimer County, Oklahoma
Latitude 34.88861° N and Longitude 95.40564° W
Directions: From the junction of SH 2 and US 270 near Wilburton, OK, travel approximately five (5) miles west on US 270, then one and one half (1 ½) mile south to the facility on the west side of the road.

SECTION I. INTRODUCTION

Enable Gas Transmissions, LLC (EGT) has submitted an application for renewal of the Part 70 operating permit for the Chandler Compressor Station. The facility is currently operating under Permit No. 2016-0555-TVR3, issued on September 27, 2016. The facility is a natural gas transmission station (SIC 4922/NAICS 486210) and is located in an attainment area. The facility is a Prevention of Significant Deterioration (PSD) major source and a major source of Hazardous Air Pollutants (HAPs).

SECTION II. FACILITY DESCRIPTION

The facility is a natural gas compressor station responsible for the compression of natural gas into a pipeline. Storage of condensate occurs on-site as well. Natural gas is transported to the facility via a pipeline gathering system. The gas stream enters the facility through an inlet separator, where water and condensate is removed from the inlet stream. The liquids then flow from the inlet separator into the one (1) 210-barrel (bbl) condensate storage tank (SN-09). The liquids are then removed from the facility via trucks (LOAD1).

The gas stream is then compressed by one (1) Worthington MLV-20 natural gas-fired engine (SN-01) driven compressor rated at 8,000-horsepower (Hp), one (1) Cooper-Bessemer 16W-330 natural gas-fired engine (SN-02) driven compressor rated at 8,000-Hp, and one (1) Cooper-Bessemer

GMWC-12 natural gas-fired engine (SN-03) driven compressor rated at 4,000-Hp. After the inlet gas passes through the compressors, the gas exits the facility for transmission via pipeline.

SECTION III. PERMIT HISTORY

Permits	Date Issued	Description
96-159-C	June 12, 1996	Initial Construction Permit
96-159-O	February 20, 1997	Initial Operating Permit
97-120-C PSD	May 5, 2000	Initial PSD Construction Permit; added a compressor engine (SN-03) and air compressor (SN-05)
97-152-TV	August 23, 2001	PSD Operating Permit; corrected VOC emission factors.
2004-310-TVR	December 7, 2005	Title V Renewal; added three insignificant storage tanks (SN-13 through SN-15)
2010-177-TVR2	December 1, 2011	Title V Renewal; removed smart ash incinerator.
2010-177-TVR2 M-1	August 6, 2013	Title V Modification to list air compressor as an emergency use compressor.
2016-0555-TVR3	September 27, 2016	Title V Renewal; with the following changes: <ul style="list-style-type: none"> • Removed lb/hr safety factors for the engines. • Revised fugitive emission component counts. • Revised insignificant storage tank data in EUG-4 • Added condensate truck loading. These emissions were previously considered insignificant. • Revised Specific Condition 5, as SN-04 and SN-05 achieved compliance with NESHAP Subpart ZZZZ

SECTION IV. REQUESTED CHANGES

The applicant has requested the following changes for the facility:

- Change the tank contents of SN-13 from used glycol to wastewater. This tank is still an insignificant source of emissions.
- Update names of the tank contents of insignificant tanks SN-06, SN-07, and SN-15. The contents are the same.
- Remove NSPS Subpart OOOO requirements from the specific conditions. The facility is not currently applicable to this subpart.
- Add a produced water storage tank SN-17. This tank is an insignificant source of emissions.
- Update emissions from condensate storage tank SN-09 to apply updated AP-42 (06/20) Section 7.1 emissions. Additionally, the applicant recalculated flashing emissions using the Vasquez-Beggs Equation (VBE) and requested a decreased condensate throughput of 8,820 gallons/year. This recalculation makes the tank a significant source of emissions, and

an emissions limit for the tank was added. Since this change is due to a calculation methodology change and the tank was not modified, this change does not require a construction permit.

- Per the change to SN-09, throughput for the condensate loading was reduced to 8,820 gallons/year. The loading operations are an insignificant source of emissions, and this change does not adjust any limits in the specific conditions.

Additionally, AQD is correcting the following minor errors and typos:

- SN-01 was changed from 7.20 lb/hr of VOC to 7.02 lb/hr of VOC.

SECTION V. EQUIPMENT

Emission units are organized into emission unit groups (EUGs) as shown below.

EUG-1 Compressor Engines

EU	Point	Description	Horsepower	Serial #	Const. Date
SN-01	SN-01	Worthington MLV-20	8,000	G2876	1973
SN-02	SN-02	Cooper Bessemer 16W-330	8,000	49146	1998
SN-03	SN-03	Cooper Bessemer GMWC-12	4,000	45843	1982

STACK PARAMETERS

Description	SN-01	SN-02	SN-03
Stack Diameter (in)	56	59	42
Stack Height (ft)	35.5	66	55
Fuel Consumption (SCFH)	70,200	64,728	34,423
Specific Heat (BTU/hp-hr)	7,312.5	6,975	7,418.75
Exhaust Rate (ACFM)	69,348	73,692	47,808
Exhaust Temperature (°F)	650	540	750
Moisture Content (%)	7	6	6

EUG-2 Emergency Generator

EU	Point	Description	Horsepower	Specific Heat (BTU/hp-hr)	Serial #	Const. Date	Manu. Date
SN-04	SN-04	Caterpillar G342	225	7,550	71B02659	4/21/2011	3/23/1977

EUG-3 Emergency Air Compressor

EU	Point	Description	Horsepower	Specific Heat (BTU/hp-hr)	Serial #	Const. Date
SN-05	SN-05	Caterpillar 3406DITA	360	15,556	90U17980	1973

EUG-4 Storage Tanks

EU	Point	Description	Size (gallons)	Construction Date
SN-06	SN-06	Lube Oil Tank	7,520	1973
SN-07	SN-07	Used Lube Oil Tank	2,538	1973
SN-08	SN-08	Wastewater/Entrained Liquids Tank	8,820	1973
SN-09	SN-09	Condensate Tank	8,820	2004
SN-11	SN-11	Solvent Tank	1,000	1973
SN-12	SN-12	Diesel Tank	1,000	1973

EU	Point	Description	Size (gallons)	Construction Date
SN-13	SN-13	Wastewater Tank	8,820	N/A
SN-14	SN-14	Antifreeze Tank	8,274	N/A
SN-15	SN-15	Antifreeze Tank	5,288	N/A
SN-16	SN-16	Diesel Tank (Not in Service)	550	N/A
SN-17	SN-17	Produced Water Tank	4,200	2017

EUG-5 Fugitive Emission Equipment

Component Type	Valves	Flanges	Compressor Seals	Pressure Relief Valves
Gas/Vapor	150	165	60	38
Light Liquid	15	17	9	8

EUG-6 Condensate Truck Loading

EU	Point	Emission Unit	Condensate Throughput (gallons/year)	Installation Date
LOAD	LOAD	Condensate Truck Loading	8,820	N/A

SECTION VI. FACILITY-SPECIFIC OR REPRESENTATIVE SAMPLE

The applicant did not request any emission changes for the tanks, dehydration units, amine units, and fugitive components from the last operating permit; therefore, no facility-specific or representative sample is needed for these units.

SECTION VII. EMISSIONS

Unless otherwise stated emissions are based on 8,760 hours per year of operation with combustion sources firing field-grade natural gas with a maximum sulfur content of 162 ppmv.

ENGINES (EUG1, EUG2, EUG3)

Emissions of NO_x and CO from SN-02 through SN-05 are calculated based on manufacturer data, and are based on stack test data from 1995 for SN-01. Emissions of VOC from SN-01 through SN-03 are based on AP-42 (7/00) Table 3.2-1 factors for two-stroke lean-burn engines, while VOC emissions from SN-04 and SN-05 are based on manufacturer's data. Emissions from SN-04 and SN-05 are based on 500 hours of operation per year. H₂CO emissions for the engines are calculated based on AP-42 (7/00) Table 3.2-3 for uncontrolled, 4SRB engines, AP-42 (7/00) Table 3.2-1 for uncontrolled, 2SLB engines, and AP-42 (10/96) Table 3.3-2 for uncontrolled diesel engines.

Engine Emission Factors

ID#	Engine Type	NO _x	CO	VOC	H ₂ CO
		g/hp-hr	g/hp-hr	g/hp-hr	lb/MMBTU
SN-01	2SLB	8.40	3.27	0.3981 ⁽¹⁾	0.0552
SN-02	2SLB	2.00	3.00	0.3797 ⁽¹⁾	0.0552
SN-03	2SLB	2.00	3.00	0.404 ⁽¹⁾	0.0552
SN-04	4SRB	14.00	14.00	2.00	0.0205
SN-05	Diesel	11.72	3.53	0.20	0.00118

(1) Converted to units of g/hp-hr from the AP-42 (7/00) Table 3.2-1 lb/MMBTU value.

Engine Emissions

ID#	NO _x		CO		VOC ⁽¹⁾		H ₂ CO	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
SN-01	148.15	648.89	57.67	252.60	7.02	30.75	3.23	14.14
SN-02	35.27	154.50	52.91	231.75	6.70	29.33	3.08	13.49
SN-03	17.64	77.25	26.46	115.87	3.56	15.60	1.64	7.17
SN-04	6.94	1.74	6.94	1.74	0.99	0.25	0.03	0.01
SN-05	9.30	2.33	2.80	0.70	0.16	0.04	0.01	0.002

(1) Includes Formaldehyde

TANKS

Working, breathing, and flashing emissions from the condensate tank was calculated using E&P Tanks, a representative liquid analysis, and the listed throughput. Flash emissions at the condensate and produced water tanks result as liquids under pressure enter the tanks at atmospheric pressure.

Tank Emissions

Parameter	SN-09 Data
Throughput, gal/yr	8,820
Liquid in Tank	Condensate
Working/Breathing Method/Tool	AP-42 (06/20) Section 7.1
Flash Calculation Method/Tool	VBE
Control Type	None
Tank VOC Emitted at Tank, TPY	12.08

LOADING

Emissions from loading condensate into tank trucks were estimated using AP-42 (6/08), Section 5.2, Equation 1, and the parameters listed in the table below. The vapor pressure, molecular weight, and temperature listed are from AP-42 (11/06), Section 7.1 defaults for Oklahoma City, Oklahoma and Motor Gasoline (RVP 10).

Loading Parameters and Emissions

Parameter	LOAD1
Liquids Loaded	Condensate
Throughput, gal/yr	8,820
Saturation Factor	0.6
Temp., °F	63.85
TVP, psia	6.89
MW, lb/lbmol	66
VOC, wt. %	100
Emission Factor, lb/10 ³ gal ⁽¹⁾	6.493
VOC Emitted at Truck, TPY	0.03

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

FUGITIVES

Emissions from fugitive equipment leaks (FUG1) are based on EPA's "Protocol for Equipment Leak Emission Estimates" (11/95, EPA-453/R-95-017), an estimated number of components, and the VOC (C₃₊) and HAP content of the materials handled.

Fugitive Emissions

ID#	VOC, TPY
FUG1	2.16

FACILITY-WIDE EMISSIONS**Facility-Wide Emissions**

EUG	EU	Description	NO _x		CO		VOC	
			lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
EUG-1	SN-01	8,000-hp Worthington MLV-20	148.15	648.89	57.67	252.60	7.02	30.75
	SN-02	8,000-hp Cooper Bessemer 16W-330	35.27	154.50	52.91	231.75	6.70	29.33
	SN-03	4,000-hp Cooper Bessemer GMWC-12	17.64	77.25	26.46	115.87	3.56	15.60
EUG-2	SN-04	225-hp Caterpillar G342	6.94	1.74	6.94	1.74	0.99	0.25
EUG-3	SN-05	360-hp Caterpillar 3406DITA	9.30	2.33	2.80	0.70	0.16	0.04
EUG-4	SN-09	210-bbl Condensate Tank	-	-	-	-	-	12.08
EUG-5	FUG	Fugitives	-	-	-	-	0.49	2.16
EUG-6	LOAD	Condensate Truck Loading	-	-	-	-	-	0.03
	Totals (Permit No. 2021-5034-TV4)		217.30	884.71	146.78	602.66	18.92	90.24
	Totals (Permit No. 2016-0555-TV3)		217.30	884.72	146.78	602.66	18.92	80.91
	Change in Emissions		0.00	(0.01)	0.00	0.00	0.00	9.33

HAZARDOUS AIR POLLUTANTS

Emissions from the engines SN-01 through SN-05 are the primary source of HAPs for this facility.

Total HAP Emissions

HAP	Emissions	
	lb/hr	TPY
Formaldehyde	7.99	34.82
Total HAP (2021-5034-TV4)	7.99	34.82
Total HAP (2016-0555-TV3)	7.98	34.81
Change in Emissions	+0.01	+0.01

Formaldehyde emissions exceed 10 TPY and total HAP emissions exceed 25 TPY. Therefore, this facility is a major source of HAPs.

SECTION VIII. INSIGNIFICANT ACTIVITIES

The insignificant activities identified and justified for the facility are duplicated below. Records are available to confirm the insignificance of the activities. Appropriate recordkeeping on activities indicated below with “*” is specified in the Specific Conditions. Any Activity to which a state or federal applicable requirement applies is not insignificant even if it is included on this list.

(1)* Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature. There are 7 tanks on-site in this category.

(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.

(3) Hand wiping and spraying of solvents from containers with less than 1 liter capacity used

for spot cleaning and/or degreasing in ozone attainment areas.

(4)* Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant.

SECTION IX. OKLAHOMA AIR POLLUTION CONTROL RULES

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

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

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

OAC 252:100-5 (Registration, Emission Inventory, and Annual Operating Fees) [Applicable]
The owner or operator of any facility that is a source of air emissions shall submit a complete emission inventory annually on forms obtained from the Air Quality Division. An emission inventory was submitted and fees paid for previous years as required.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]
Part 5 includes the general administrative requirements for Part 70 permits. Any planned changes in the operation of the facility which result in emissions not authorized in the permit and which exceed the “Insignificant Activities” or “Trivial Activities” thresholds require prior notification to AQD and may require a permit modification. Insignificant activities 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 single HAP that the EPA may establish by rule

Emission limitations for the facility are based on the previous Title V permit [Permit No. 2016-0555-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 and a limit of 0.10 lb/MMBTU for units with a rated heat input of 10,000 MMBTUH or greater. For fuel-burning equipment with a capacity between 10 and 10,000 MMBTUH, this subchapter specifies a PM emission limitation based upon the heat input of the equipment and is calculated according to the following equations:

$$E = 1.042808 X^{-0.238561}$$

$$E = 1.6 X^{-0.30103}$$

For Units > 10 MMBTUH but < 1,000 MMBTUH
For Units > 1,000 MMBTUH but < 10,000 MMBTUH

Where: E = allowable total particulate matter emissions in pounds per MMBTU and
X = the maximum heat input in MMBTU per hour.

The combustion units located at the facility are subject to this subchapter and will be in compliance as indicated below.

Point ID	Equipment	Heat Input, (MMBTUH)	Appendix C Emission Limit, (lbs/MMBTU)	PM Emission Rate, (lbs/MMBTU)
SN-01	Worthington MLV-20	58.5	0.40	0.0483
SN-02	Cooper Bessemer 16W-330	55.8	0.40	0.0483
SN-03	Cooper Bessemer GMWC-12	29.68	0.46	0.0483

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 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 162 ppmv and storing condensate or sweet crude oil will be in compliance with the H₂S ambient air concentration limit. There are no significant emissions of H₂S from this facility as the inlet gas contains approximately 4 ppm H₂S.

Part 5 limits sulfur dioxide emissions from new equipment (constructed after July 1, 1972). For gaseous fuels, the limit is 0.2 lb/MMBtu heat input. For liquid fuels, the limit is 0.8 lb/MMBtu heat input. 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 162 ppmv to ensure compliance with Subchapter 31.

OAC 252:100-33 (Nitrogen Oxides)

[Not Applicable]

This subchapter limits NO_x emissions from new gas-fired fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH. The 8,000-hp Worthington engine has a potential heat input of 58.5 MMBTU/hr and the 8,000-hp Cooper engine has a potential heat input of 55.8 MMBTU/hr. However, the limitation in Subchapter 33 of 0.2 lb/MMBtu of NO_x is equivalent to 0.56 g/hp-hr NO_x. By current standards, BACT is acceptable as 1.0 g/hp-hr and until the late 1980s, 11.0 g/hp-hr was sufficient. It is doubtful that 0.56 g/hp-hr could be attained with current technology and when the rule was promulgated in 1971 was certainly unattainable, therefore, it is clear that the rule was not intended to affect engines.

OAC 252:100-35 (Carbon Monoxide)

[Not Applicable]

None of the following affected processes are located at this facility: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic cracking unit, or petroleum catalytic reforming unit.

OAC 252:100-37 (Volatile Organic Compounds)

[Parts 3 and 7 Applicable]

Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more 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 applies to the 210-barrel condensate tank. The other tanks at this facility are exempt based on vapor pressures below the 1.5 psia level.

Part 3 requires VOC loading facilities with a throughput equal to or less than 40,000 gallons per day to be equipped with a system for submerged filling of tank trucks or trailers if the capacity of the vehicle is greater than 200 gallons. This facility does not have the physical equipment (loading arm and pump) to conduct this type of loading and is not subject to this requirement.

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

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

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

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

[Applicable]

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

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

[Applicable]

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

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

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

SECTION X. FEDERAL REGULATIONS

PSD, 40 CFR Part 52

[Applicable]

Total potential emissions of NO_x and CO are greater than the level of significance of 250 TPY. Any future increases will be evaluated in comparison to the significance levels: CO 100 TPY, NO_x 40 TPY, SO₂ 40 TPY, PM 25 TPY, PM₁₀ 15 TPY, and VOC 40 TPY.

NSPS, 40 CFR Part 60

[Not Applicable]

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

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

Subpart VV, Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry. This facility is not a SOCM 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 IIII, Stationary Compression Ignition Internal Combustion Engines. This subpart affects stationary compression ignition (CI) internal combustion engines (ICE) based on power and displacement ratings, depending on date of construction, beginning with those constructed after July 11, 2005. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. The emergency air compressor engine was manufactured before July 11, 2005, and is not subject to this subpart.

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

Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015:

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

There are no gas wells at this facility, there are no natural gas-driven pneumatic controllers operating at a natural gas bleed rate greater than 6 SCFH at this facility, this facility is not a gas plant, and there are no sweetening units at this facility. All storage tanks at this facility other than

SN-17 were installed prior to the affected date of August 23, 2011. SN-17 was constructed after September 18, 2015 and is not subject to this subpart. Therefore, the tanks are not subject to NSPS Subpart OOOO. The reciprocating compressors associated with engines SN-01 through SN-05 commenced construction prior to August 23, 2011 and are therefore not subject to this subpart.

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

- (a) Each well affected facility, which is a single well that conducts a well completion operation following hydraulic fracturing or refracturing.
- (b) 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.
- (c) 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.
- (d) Each pneumatic controller affected facility:
 - (1) 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.
 - (2) Each pneumatic controller affected facility located at a natural gas processing plant, which is a single continuous bleed natural gas-driven pneumatic controller.
- (e) 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).
- (f) 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.
- (g) Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.
- (h) Each pneumatic pump affected facility:
 - (1) For natural gas processing plants, each pneumatic pump affected facility, which is a single natural gas-driven diaphragm pump.
 - (2) For well sites, each pneumatic pump affected facility, which is a single natural gas-driven diaphragm pump.
- (i) 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).
- (j) The collection of fugitive emissions components at a compressor station, as defined in § 60.5430a, is an affected facility.

There are no gas wells at this facility, there are no natural gas-driven pneumatic controllers operating at a natural gas bleed rate greater than 6 SCFH at this facility, this facility is not a gas plant, and there are no sweetening units at this facility. All storage tanks other than SN-17 at this facility were installed prior to the affected date of September 18, 2015. SN-17 was constructed after the affected date of September 18, 2015 but has potential emissions less than 6.0 TPY. Therefore, the tanks are not subject to NSPS Subpart OOOOa. The reciprocating compressors

associated with SN-01 through SN-05 were manufactured before September 18, 2015 and are not subject to NSPS Subpart OOOOa.

NESHAP, 40 CFR Part 61

[Not Applicable]

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

NESHAP, 40 CFR Part 63

[Subpart ZZZZ Applicable]

Subpart HH, Oil and Natural Gas Production Facilities. This subpart applies to affected emission points that are located at facilities which are major sources of HAPs and either process, upgrade, or store hydrocarbons prior to the point of custody transfer or prior to which the natural gas enters the natural gas transmission and storage source category. For the purposes of Subpart HH, a “major” source of HAPs is determined from the sum of HAPs from any glycol dehydration units plus one other unit. The facility is a major source of formaldehyde but the formaldehyde is generated as a combustion product from the compressor engines. There are no dehydration units at this facility. This facility is a Natural Gas Transmission Facility so it is not subject.

Subpart HHH, Natural Gas Transmission and Storage Facilities. There are no dehydration units at the facility. Therefore, this subpart does not apply.

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart previously affected only RICE with a site rating greater than 500 brake horsepower that were located at a major source of HAP emissions. On January 18, 2008, the EPA published a final rule that promulgates standards for new and reconstructed engines (after June 12, 2006) with a site-rating less than or equal to 500 HP located at major sources, and new and reconstructed engines (after June 12, 2006) located at area sources. Owners and operators of new or reconstructed engines (after June 12, 2006) at area sources, and new or reconstructed engines with a site-rating equal to or less than 500 HP located at a major source (except new or reconstructed 4-stroke lean-burn engines with a site-rating greater than or equal to 250 HP and less than or equal to 500 HP located at a major source) must meet the requirements of Subpart ZZZZ by complying with either 40 CFR Part 60 Subpart IIII (for CI engines), or 40 CFR Part 60 Subpart JJJJ (for SI engines). Owners and operators of new or reconstructed 4SLB engines with a site-rating greater than or equal to 250 HP and less than or equal to 500 HP located at a major source are subject to the same MACT standards previously established for 4SLB engines above 500 HP at a major source, and must also meet the requirements of 40 CFR Part 60 Subpart JJJJ, except for the emission standards for CO. The facility is a major source of HAP emissions.

March 3, 2010, a final rule of Subpart ZZZZ was published affecting existing stationary emergency and non-emergency (CI) RICE located at major sources and at area sources of hazardous air pollutants. The effective date of this final rule was May 3, 2010. SN-05 is an existing emergency 360-hp compression ignition air compressor engine and is subject to this Subpart.

August 20, 2010, a final rule of Subpart ZZZZ was published affecting existing stationary emergency and non-emergency (SI) RICE located at major sources and at area sources of hazardous air pollutants. The effective date of this final rule was October 19, 2013. SN-04 is an existing 225-hp four stroke rich burn emergency generator engine and is subject to this subpart. SN-01, SN-02, SN-03 are existing two stroke lean burn engines at a major source of HAPs. There



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Enable Gas Transmission, LLC
Attn: Mr. Sean Walker
P.O. Box 24300 MC LS700
Oklahoma City, OK 73124

Subject: Operating Permit No. **2021-5034-TV4**
Chandler Compressor Station
AQD Facility ID: 1133
Section 21, Township 5N, Range 18E, Latimer County, Oklahoma.

Dear Mr. Walker:

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

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

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

Sincerely,

DRAFT/PROPOSED

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

Enclosure





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. 2021-5034-TVR4

Enable Gas Transmission, LLC,

having complied with the requirements of the law, is hereby granted permission to operate the Chandler Compressor Station, located in Section 21, Township 5N, Range 18E of the Indian Meridian, in Latimer County, Oklahoma, subject to the Standard Conditions dated June 21, 2016, and Specific Conditions, both of which are attached.

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

DRAFT/PROPOSED

Kendal Stegman, Division Director

Date

are no requirements under Subpart ZZZZ for two stroke lean burn engines at a major source of HAPs.

A summary of the requirements for the emergency RICE located at this facility are shown below.

Engine Category	Normal Operation¹
Emergency Stationary CI and Black Start CI at a major source	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
Existing Emergency Stationary SI and Black Start SI HP ≤ 500-hp at a major source	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

During Startup - 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.

The standards of Subpart ZZZZ have been incorporated into the permit.

CAM, 40 CFR Part 64

[Not Applicable]

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

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

Unit SN-01 does not use any control device. Units SN-02 and SN-03 are lean burn engines and do not use add-on control devices to achieve compliance with the applicable emission limit or standard. Therefore, none of them are subject to CAM.

Chemical Accident Prevention Provisions, 40 CFR Part 68

[Not Applicable]

The definition of a stationary source does not apply to transportation, including storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the provisions of this part. The definition of a stationary source also does not include naturally occurring hydrocarbon reservoirs. Naturally occurring hydrocarbon mixtures, prior to entry into a natural gas processing plant or a petroleum refining process unit, including: condensate, crude oil, field gas, and

produced water, are exempt for the purpose of determining whether more than a threshold quantity of a regulated substance is present at the stationary source. This facility does not store any regulated substance above the applicable threshold limits. More information on this federal program is available on the web page: www.epa.gov/ceppo.

Stratospheric Ozone Protection, 40 CFR Part 82

[Subparts A and F Applicable]

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

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

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

This facility does not produce, consume, recycle, import, or export any controlled substances or controlled products as defined in this part, nor does this facility perform service on motor (fleet) vehicles which involves ozone-depleting substances. Therefore, as currently operated, this facility is not subject to these requirements. To the extent that the facility has air-conditioning units that apply, the permit requires compliance with Part 82.

SECTION XI. COMPLIANCE

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

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

Inspection Type	Date	Summary/Results
Full Inspection	3/14/2017	In Compliance
Full Inspection	5/23/2019	In Compliance
Full Inspection	4/26/2021	In Compliance

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

SECTION XII. TIER CLASSIFICATION, PUBLIC AND EPA REVIEW

Tier Classification

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

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 owns the real property. 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>.

Public Review

The applicant published the “Notice of Filing a Tier II Application” in the *Latimer County News-Tribune*, a weekly local newspaper in Latimer County on March 18, 2021. The notice stated that the application was available for review at the Latimer County Public Library in Latimer County, 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” as a legal notice in a newspaper of general circulation in the area where the source is located. The notice of draft permit will state that the draft permit will be available for public review at a location in the county where the facility is located, and that the draft permit will also be available for public review at the Air Quality Division main office in Oklahoma City, Oklahoma, and on the Air Quality section of the DEQ web page at <https://www.deq.ok.gov>. The draft permit will be available for a 30-day public review period.

EPA Review

The applicant requested and was granted concurrent public and EPA review periods. The proposed permit will be sent concurrently to EPA for a 45-day review period.

If the Administrator does not object in writing during the 45-day EPA review period, any person that meets the requirements of OAC 252:100-8-8 may petition the Administrator within 60 days after the expiration of the Administrator's 45-day review period to make such objection. Any such petition shall be based only on objections to the permit that the petitioner raised with reasonable specificity during the public comment period provided for in 27A O.S. § 2-14-302.A.2., unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or

unless the grounds for such objection arose after such period. If the Administrator objects to the permit as a result of a petition filed under OAC 252:100-8-8, the DEQ shall not issue the permit until EPA's objection has been resolved, except that a petition for review does not stay the effectiveness of a permit or its requirements if the permit was issued after the end of the 45-day review period and prior to an EPA objection. If the DEQ has issued a permit prior to receipt of an EPA objection under OAC 252:100-8-8, the DEQ will modify, terminate, or revoke such permit, and shall do so consistent with the procedures in 40 CFR §§ 70.7(g)(4) or (5)(i) and (ii) except in unusual circumstances. If the DEQ revokes the permit, it may thereafter issue only a revised permit that satisfies EPA's objection. In any case, the source will not be in violation of the requirement to have submitted a timely and complete application.

Bordering State Review

This facility is not located within 50 miles of the Oklahoma state border with another state. Therefore, notice of the proposed permit was not required to be provided to any state bordering the state of Oklahoma.

Tribal Review

Tribal Nations will be notified of the draft permit.

Testing

The most recent tests were conducted on December 4, 2020. Testing results as summarized in the following table indicated compliance with permit limitations.

EU	Source/Engine	Test Date	Test Results		Permit Limitations	
			NO _x	CO	NO _x	CO
			lb/hr	lb/hr	lb/hr	lb/hr
SN-01	8,000-hp Worthington MLV-20	12/4/2020	73.53	36.81	148.15	57.67
SN-02	8,000-hp Cooper Bessemer 16W-330	12/4/2020	25.57	12.63	35.27	52.91
SN-03	4,000-hp Cooper Bessemer GMWC-12	12/4/2020	12.28	11.29	17.64	26.46

Fees Paid

A Part 70 permit renewal fee of \$7,500 has been paid.

SECTION XIII. SUMMARY

The facility was constructed as described in the permit application and supplemental materials. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues concerning this facility. Issuance of the permit is recommended, contingent on public, tribal, and EPA Review.

DRAFT/PROPOSED

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

**Enable Gas Transmission, LLC
Chandler Compressor Station**

Permit Number 2021-5034-TV4

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on March 12, 2021. The Evaluation Memorandum, dated February 16, 2022, 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, EUG-2, and EUG-3

EU	Description	NO _x		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
SN-01	8,000-hp Worthington MLV-20	148.15	648.89	57.67	252.60	7.02	30.75
SN-02	8,000-hp Cooper Bessemer 16W-330	35.27	154.50	52.91	231.75	6.70	29.33
SN-03	4,000-hp Cooper Bessemer GMWC-12	17.64	77.25	26.46	115.87	3.56	15.60
SN-04	225-hp Caterpillar G342	6.94	1.74	6.94	1.74	0.99	0.25
SN-05	360-hp Caterpillar 3406DITA	9.30	2.33	2.80	0.70	0.16	0.04

EUG-4 Storage Tanks

Storage tank VOC emissions are estimated based on existing equipment items.

Condensate Storage Tank

<u>EU</u>	Description	Throughput Limit	Emissions Limit
SN-09	8,820-gal Condensate Tank	8,820 gal/yr	12.08 TPY

Other storage tank VOC emissions are insignificant based on existing equipment items but do not have a specific limitation.

Insignificant Storage Tanks

EU	Point	Description	Size (gallons)
SN-06	SN-06	Lube Oil Tank	7,520
SN-07	SN-07	Used Lube Oil Tank	2,538
SN-08	SN-08	Wastewater/Entrained Liquids Tank	8,820
SN-11	SN-11	Solvent Tank	1,000
SN-12	SN-12	Diesel Tank	1,000
SN-13	SN-13	Wastewater Tank	8,820
SN-14	SN-14	Antifreeze Tank	8,274
SN-15	SN-15	Antifreeze Tank	5,288
SN-16	SN-16	Diesel Tank (Not in Service)	550
SN-17	SN-17	Produced Water Tank	4,200

EUG-5: Fugitive VOC emissions are insignificant based on existing equipment items and do not have a specific limitation.

EUG-6: Condensate Truck Loading VOC emissions are insignificant based on existing equipment items and do not have a specific limitation.

2. The fuel-burning equipment, other than SN-05, shall be fired with pipeline grade natural gas or other gaseous fuel with a sulfur content less than 162 ppmv. SN-05 shall use fuel that meets the requirements of NESHAP Subpart ZZZZ. 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; for liquid fuel, a fuel delivery ticket or other approved methods. Compliance shall be demonstrated at least once every calendar year. [OAC 252:100-31]
3. Engines shall have a permanent identification plate attached that shows the make, model, and serial number. [OAC 252:100-43]
4. The permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year). [OAC 252:100-8-6(a)(1)]
5. The emergency generator engine (SN-04) and emergency air compressor engine (SN-05) shall operate as emergency engines as defined in 40 CFR 63 NESHAP Subpart ZZZZ § 63.6675. Engine SN-04 and engine SN-05 shall each be equipped with a non-resettable hour meter.
6. At least once per calendar quarter, the permittee shall conduct tests of NO_x and CO emissions in exhaust gases from each engine in Specific Condition No. 1 and each replacement engine/turbine when operating under representative conditions for that period. Testing is required for any engine/turbine that runs for more than 220 hours during that calendar quarter. Engines/turbines shall be tested no sooner than 20 calendar days after the last test. Testing shall be conducted using a portable analyzer in accordance with a protocol meeting the requirements of the "AQD Portable Analyzer Guidance" document or an equivalent method approved by Air Quality. When four consecutive quarterly tests show the engine/turbine to be in compliance with the emissions limitations shown in the permit, then the testing frequency may be reduced to semi-annual testing. Likewise, when the following two consecutive semi-annual tests show compliance, the testing frequency may be reduced to annual testing. Upon any showing of non-compliance with emissions limitations or testing that indicates that emissions are within 10% of the emission limitations, the testing frequency shall revert to quarterly. Reduced testing frequency does not apply to engines with catalytic converters. Any reduction in the testing frequency shall be noted in the next required semiannual monitoring and deviation report. [OAC 252:100-8-6 (a)(3)(A)]
7. When periodic compliance testing shows engine exhaust emissions in excess of the lb/hr limits in Specific Condition Number 1, the permittee shall comply with the provisions of OAC 252:100-9 for excess emissions. [OAC 252:100-9]

8. The permittee is authorized to replace any internal combustion engine or turbine with emissions limitations specified in this permit with an engine or turbine that meets the following requirements: [OAC 252:100-8-6(f)(2)]
- (a) The replacement engine or turbine shall comply with the same emissions limits as the engine or turbine that it replaced. This applies to lb/hr and TPY limits specified in this permit.
 - (b) The authorization of replacement of an engine or turbine includes temporary periods of 6 months or less for maintenance purposes.
 - (c) The permittee shall notify AQD in writing not later than 7 days prior to start-up of the replacement engine or turbine. Said notice shall identify the old engine/turbine and shall include the new engine/turbine make and model, serial number, horsepower rating, and pollutant emission rates (g/hp-hr, lb/hr, and TPY) at maximum horsepower for the altitude/location.
 - (d) Quarterly emissions tests for the replacement engine(s)/turbine(s) shall be conducted to confirm continued compliance with NO_x and CO emission limitations. A copy of the first quarter testing shall be provided to AQD within 60 days of start-up of each replacement engine/turbine. The test report shall include the engine/turbine fuel usage, stack flow (ACFM), stack temperature (°F), and pollutant emission rates (g/hp-hr, lbs/hr, and TPY) at maximum rated horsepower for the altitude/location.
 - (e) Replacement equipment and emissions are limited to equipment and emissions which are not a modification under NSPS or NESHAP.
 - (f) Replacement equipment and emissions are limited to equipment and emissions which are not a modification or a significant modification under PSD. For existing PSD facilities, the permittee shall calculate the PTE or the net emissions increase resulting from the replacement to document that it does not exceed significance levels and submit the results with the notice required by paragraph (c) of this Specific Condition. The permittee shall attach each such notice to their copy of the relevant permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield described in OAC 252:100-8-6(d) does not apply to any change made pursuant to this paragraph.
 - (g) Engines whose installation and operation are authorized under this Specific Condition which are subject to 40 CFR Part 63, Subpart ZZZZ and/or 40 CFR Part 60, Subpart JJJJ shall comply with all applicable requirements.
9. The owner/operator shall comply with all applicable requirements of the NESHAP: Reciprocating Internal Combustion Engines, Subpart ZZZZ, for each affected facility including but not limited to:

What This Subpart Covers

- a. § 63.6580 What is the purpose of subpart ZZZZ?
- b. § 63.6585 Am I subject to this subpart?
- c. § 63.6590 What parts of my plant does this subpart cover?
- d. § 63.6595 When do I have to comply with this subpart?

Emission and Operating Limitations

- e. § 63.6603 What emission limitations and operating limitations must I meet if I own or

operate an existing stationary RICE located at an area source of HAP emissions?

General Compliance Requirements

- f. § 63.6605 What are my general requirements for complying with this subpart?

Testing and Initial Compliance Requirements

- g. § 63.6625 What are my monitoring, installation, operation, and maintenance requirements?
- h. § 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?

Continuous Compliance Requirements

- i. § 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?

Notifications, Reports, and Records

- j. § 63.6650 What reports must I submit and when?
- k. § 63.6655 What records must I keep?
- l. § 63.6660 In what form and how long must I keep my records?

Other Requirements and Information

- m. § 63.6665 What parts of the General Provisions apply to me?
- n. § 63.6670 Who implements and enforces this subpart?
- o. § 63.6675 What definitions apply to this subpart?

10. 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. These records may be kept in computerized format. [OAC 252:100-8-6 (a)(3)(B)]

- a. O&M log for any engine/turbine not tested in each 6 month period.
- b. Periodic emission testing for each engine and each replacement engine/turbine.
- c. Condensate throughput, monthly and 12-month rolling total for tank SN-09 to demonstrate compliance with Specific Condition No. 1.
- d. For the fuel(s) burned, the appropriate document(s) as described in Specific Condition No. 2.
- e. Records as required by 40 CFR Part 63, Subpart ZZZZ.
- f. Records as required by Specific Condition No. 5.

11. The following records shall be maintained on-site to verify Insignificant Activities. No recordkeeping is required for those operations that qualify as Trivial Activities. [OAC 252:100-8-6 (a)(3)(B)]

- a. For storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature; records of capacity of the tanks and contents.
- b. For fluid storage tanks with a capacity of less than 39,894 gallons and a true vapor pressure less than 1.5 psia; records of capacity of the tanks and contents.
- c. For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant; the type of activities, the amount of emissions (cumulative annual), and Operation and Maintenance records that demonstrate no increase of emissions.

12. No later than 30 days after each anniversary date of the issuance of the original Title V operating permit (August 23, 2001), the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit.
[OAC 252:100-8-6 (c)(5)(A) & (D)]
13. The Permit Shield (Standard Conditions, Section VI) is extended to the following requirements that have been determined to be inapplicable to this facility.
[OAC 252:100-8-6(d)(2)]
 - a. OAC 252:100-11 Alternative Emissions Reduction
 - b. OAC 252:100-15 Mobile Sources
 - c. OAC 252:100-23 Cotton Gins
 - d. OAC 252:100-24 Grain Elevators
 - e. OAC 252:100-39 Nonattainment Areas
14. This facility is considered a Prevention of Significant Deterioration (PSD) facility. As such, the facility is subject to the provisions of OAC 252:100-8-36.2(c) for any project as defined therein.
[OAC 252:100-8-36.2(c)]
15. This permit supersedes all existing Air Quality operating permits for this facility, which are now cancelled.

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

SECTION I. DUTY TO COMPLY

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

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

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

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

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

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

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

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

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

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

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

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

B. Records of required monitoring shall include:

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

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

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

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

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

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

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

[OAC 252:100-43]

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

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

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

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

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

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

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

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
9-10-21

ACFM	Actual Cubic Feet per Minute	GR	Grain(s) (gr)
AD	Applicability Determination	H₂CO	Formaldehyde
AFRC	Air-to-Fuel Ratio Controller	H₂S	Hydrogen Sulfide
API	American Petroleum Institute	HAP	Hazardous Air Pollutants
ASTM	American Society for Testing and Materials	HC	Hydrocarbon
		HCFC	Hydrochlorofluorocarbon
BACT	Best Available Control Technology	HFR	Horizontal Fixed Roof
BAE	Baseline Actual Emissions	HON	Hazardous Organic NESHAP
BBL	Barrel(s)	HP	Horsepower (hp)
BHP	Brake Horsepower (bhp)	HR	Hour (hr)
BTU	British thermal unit (Btu)		
		I&M	Inspection and Maintenance
C&E	Compliance and Enforcement	IBR	Incorporation by Reference
CAA	Clean Air Act	ICE	Internal Combustion Engine
CAM	Compliance Assurance Monitoring		
CAS	Chemical Abstract Service	LAER	Lowest Achievable Emission Rate
CAAA	Clean Air Act Amendments	LB	Pound(s) [Mass] (lb, lbs, lbm)
CC	Catalytic Converter	LB/HR	Pound(s) per Hour (lb/hr)
CCR	Continuous Catalyst Regeneration	LDAR	Leak Detection and Repair
CD	Consent Decree	LNG	Liquefied Natural Gas
CEM	Continuous Emission Monitor	LT	Long Ton(s) (metric)
CFC	Chlorofluorocarbon		
CFR	Code of Federal Regulations	M	Thousand (Roman Numeral)
CI	Compression Ignition	MAAC	Maximum Acceptable Ambient Concentration
CNG	Compressed Natural Gas		
CO	Carbon Monoxide or Consent Order	MACT	Maximum Achievable Control Technology
COA	Capable of Accommodating	MM	Prefix used for Million (Thousand-Thousand)
COM	Continuous Opacity Monitor	MMBTU	Million British Thermal Units (MMBtu)
D	Day	MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
DEF	Diesel Exhaust Fluid		
DG	Demand Growth	MMSCF	Million Standard Cubic Feet (MMscf)
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)	MMSCFD	Million Standard Cubic Feet per Day
		MSDS	Material Safety Data Sheet
EGU	Electric Generating Unit	MWC	Municipal Waste Combustor
EI	Emissions Inventory	MWe	Megawatt Electrical
EPA	Environmental Protection Agency	NA	Nonattainment
ESP	Electrostatic Precipitator	NAAQS	National Ambient Air Quality Standards
EUG	Emissions Unit Group	NAICS	North American Industry Classification System
EUSGU	Electric Utility Steam Generating Unit	NESHAP	National Emission Standards for Hazardous Air Pollutants
FCE	Full Compliance Evaluation		
FCCU	Fluid Catalytic Cracking Unit	NH₃	Ammonia
FIP	Federal Implementation Plan	NMHC	Non-methane Hydrocarbon
FR	Federal Register	NGL	Natural Gas Liquids
		NO₂	Nitrogen Dioxide
GACT	Generally Achievable Control Technology	NO_x	Nitrogen Oxides
GAL	Gallon (gal)	NOI	Notice of Intent
GDF	Gasoline Dispensing Facility	NSCR	Non-Selective Catalytic Reduction
GEP	Good Engineering Practice	NSPS	New Source Performance Standards
GHG	Greenhouse Gases	NSR	New Source Review

O₃	Ozone	SOP	Standard Operating Procedure
O&G	Oil and Gas	SRU	Sulfur Recovery Unit
O&M	Operation and Maintenance		
O&NG	Oil and Natural Gas	T	Tons
OAC	Oklahoma Administrative Code	TAC	Toxic Air Contaminant
OC	Oxidation Catalyst	TEG	Triethylene Glycol
		THC	Total Hydrocarbons
PAH	Polycyclic Aromatic Hydrocarbons	TPY	Tons per Year
PAE	Projected Actual Emissions	TRS	Total Reduced Sulfur
PAL	Plant-wide Applicability Limit	TSP	Total Suspended Particulates
Pb	Lead	TV	Title V of the Federal Clean Air Act
PBR	Permit by Rule		
PCB	Polychlorinated Biphenyls	µg/m³	Micrograms per Cubic Meter
PCE	Partial Compliance Evaluation	US EPA	U. S. Environmental Protection Agency
PEA	Portable Emissions Analyzer		
PFAS	Per- and Polyfluoroalkyl Substance	VFR	Vertical Fixed Roof
PM	Particulate Matter	VMT	Vehicle Miles Traveled
PM_{2.5}	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers	VOC	Volatile Organic Compound
PM₁₀	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers	VOL	Volatile Organic Liquid
POM	Particulate Organic Matter or Polycyclic Organic Matter	VRT	Vapor Recovery Tower
ppb	Parts per Billion	VRU	Vapor Recovery Unit
ppm	Parts per Million	YR	Year
ppmv	Parts per Million Volume	2SLB	2-Stroke Lean Burn
ppmvd	Parts per Million Dry Volume	4SLB	4-Stroke Lean Burn
PSD	Prevention of Significant Deterioration	4SRB	4-Stroke Rich Burn
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		
RAP	Regulated Air Pollutant or Reclaimed Asphalt Pavement		
RFG	Refinery Fuel Gas		
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		