

**DRAFT/PROPOSED**

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

**MEMORANDUM**

**June 7, 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 Permits Section

**THROUGH:** Iftekhar Hossain, P.E., New Source Permits Section

**FROM:** Junru Wang, E.I., Existing Source Permits Section

**SUBJECT:** Evaluation of Permit Renewal Application No. **2021-5260-TVR**  
Enable Gas Gathering, LLC  
Ashland #2 Compressor Station (SIC 4922/NAICS 486210)  
Facility ID: 484  
Latitude 34.73600° N, Longitude 96.10700° W  
Section 13, Township 3N, Range 11E, Coal County, Oklahoma  
From Ashland, 4.25 miles south on Highway 31, then east into station.

**SECTION I. INTRODUCTION**

Enable Gas Gathering, LLC (EGG) has submitted an application for renewal of the Part 70 operating permit for the Ashland #2 Compressor Station. The facility is currently operating under Permit No. 2016-1276-TV, issued on April 27, 2017. There is a natural gas treating plant, Ashland #2 Treating Plant (SIC 1311/NAICS 211130) owned by Kinder Morgan Treating, L.P. (KMT), that is collocated at the same site (Section 13, Township 3N, Range 11E). Ashland #2 Treating Plant is currently operating under Permit No. 2017-2140-TV, issued on September 27, 2018.

AQD considers the two collocated facilities, Ashland #2 Compressor Station and Ashland #2 Treating Plant, a single stationary source for purposes of PSD and Title V permits. The combined emissions are below PSD thresholds, 250 TPY. Upon applicant's request, this permit proceeds through a concurrent public and EPA review.

**SECTION II. REQUESTED CHANGES**

The applicant has requested to update the working and breathing emissions from the condensate tanks (TANK1 through TANK3) and condensate loading (LOAD1) based on the most recent AP-42 (6/20), Section 7.1 equations, which results in a total increase of 0.49 TPY for VOC. The previous emission limits for TANK1 through TANK3 were established in Permit No. 2016-1276-TV. The new emission limits do not require or change a case-by-case determination of an emissions limitation or other standard, or seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement or state-only requirement

which the source has assumed to avoid some other applicable requirement or state-only requirement to which the source would otherwise be subject. No emission limits were changed for the condensate loading (LOAD1) since it is considered an insignificant activity. Additionally, updates to Specific Condition No. 11 include replacing the throughput recordkeeping requirement for specific insignificant storage tanks with a storage tank contents recordkeeping requirement to align with similar recordkeeping requirements in other Title V permits for the same source category. The applicant requests that these updated emission limitations be used in the renewal permit.

In addition, NSPS Subpart OOOO has been removed from the Specific Conditions since the facility and all current equipment are not subject to that subpart. No other changes of the current permit have been requested. This permit updates all current rules and regulations and incorporates all updated applicable State of Oklahoma and Federal regulations and requirements.

### SECTION III. PERMIT HISTORY

| Permits        | Date Issued | Description  |
|----------------|-------------|--|
| 97-126-C       | 5/6/1997    | Initial minor source construction permit for a previously grandfather facility   |
| 97-126-O       | 7/31/1997   | Initial minor source operating permit  |
| 97-126-C (M-1) | 8/22/2001   | Minor source construction permit to replace one compressor engine  |
| 97-126-O (M-1) | 11/20/2001  | Minor source operating permit to incorporate new units whose construction was authorized by Permit No. 97-126-C (M-1)  |
| 97-126-O (M-2) | 11/14/2007  | Minor source operating permit to replace 1 compressor engine and revise tank and dehy still vent emissions   |
| 97-126-C (M-3) | 1/10/2008   | Minor source construction permit to install 2 compressor engines, add a BTEX eliminator to the existing dehy, replace 2 existing condensate storage tanks with 3 new tanks, and revise emissions limits. |
| 97-126-C (M-4) | 5/28/2008   | Minor source construction permit to replace 3 existing compressor engines with 3 new engines and remove existing dehy. The dehy authorized under C(M-3) was not installed.                               |
| 97-126-O (M-4) | 2/23/2009   | Minor source operating permit to incorporate new units whose construction was authorized by Permit Nos. 97-126-C (M-3) and 97-126-C (M-4)  |
| 2016-1276-TV   | 4/27/2017   | Initial Title V operating permit due to the anticipated changes from the KMT facility.   |

### SECTION IV. FACILITY DESCRIPTION

A pipeline gathering system transports field natural gas from wells through an inlet separator where free liquids are removed. Condensate and produced water captured by the inlet separator are stored in tanks. Natural gas then passes through a suction header that feeds the compressors, which boost gas pressure. The natural gas stream enters the compressors at approximately 45-55

psig and leaves the compressors at an approximate gas pressure of 940-960 psig. Compressor discharge gas then flows to equipment owned and operated by KMT for treatment. After treatment, the gas is discharged into EGG’s pipeline before exiting the facility for transmission. Pipeline-grade natural gas is the primary fuel for the engines. Condensate is transported off-site for sale. Produced water is collected from the separator and is periodically transported off-site for disposal. The facility is operated at the maximum capacity of 50 MMSCF/day. Emission units have been arranged into Emission Unit Groups (EUGs) in Section V.

**SECTION V. EQUIPMENT**

**EUG-1. Internal Natural Gas-Fired Combustion Engines**

| <b>EU ID#</b>     | <b>Name/Model</b>   | <b>Serial No.</b> | <b>Installation Date</b> |
|-------------------|---|-------------------|--------------------------|
| COMP1<br>Unit 266 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with oxidation catalyst    | WPW02093          | September 2008           |
| COMP2<br>Unit 267 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with oxidation catalyst    | WPW02090          | September 2008           |
| COMP3<br>Unit 270 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with oxidation catalyst    | WPW02009          | September 2008           |
| COMP4<br>Unit 272 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with oxidation catalyst    | WPW02092          | September 2008           |
| COMP5<br>Unit 271 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn without oxidation catalyst | WPW02011          | September 2008           |

**EUG-2. Condensate Storage Tanks**

| <b>EU ID#</b> | <b>Contents</b>     | <b>Capacity</b> |                | <b>Construction</b> |
|---------------|---------------------|-----------------|----------------|---------------------|
|               |                     | <b>Barrels</b>  | <b>Gallons</b> | <b>Date</b>         |
| TANK1         | Condensate/Slop Oil | 400             | 16,800         | 1997                |
| TANK2         | Condensate/Slop Oil | 400             | 16,800         | 2008                |
| TANK3         | Condensate/Slop Oil | 400             | 16,800         | 2008                |

**EUG-3. Miscellaneous Storage Tanks**

| <b>EU ID#</b> | <b>Contents</b> | <b>Capacity</b> |                | <b>Construction</b> |
|---------------|-----------------|-----------------|----------------|---------------------|
|               |                 | <b>Barrels</b>  | <b>Gallons</b> | <b>Date</b>         |
| TANK4         | Methanol        | 210             | 8,820          | 1997                |
| TANK5         | Lube Oil        | -----           | 500            | N/A                 |
| TANK6         | Lube Oil        | -----           | 500            | N/A                 |
| TANK7         | Compressor Oil  | -----           | 500            | N/A                 |
| TANK8         | Compressor Oil  | -----           | 500            | N/A                 |
| TANK9         | Antifreeze      | -----           | 500            | N/A                 |
| TANK10        | Used Antifreeze | -----           | 500            | N/A                 |
| TANK11        | Used Oil        | -----           | 500            | N/A                 |

**EUG-4. Condensate Truck Loading**

| EU ID # | Emission Unit            | Condensate Throughput (gallons/year) | Construction Date |
|---------|--------------------------|--------------------------------------|-------------------|
| LOAD1   | Condensate Truck Loading | 300,000                              | June 1997         |

**EUG-5. Fugitive VOC Emission Sources**

| EU ID # | Emission Unit            | Number |        |
|---------|--------------------------|--------|--------|
|         |                          | Gas    | Liquid |
| FUG1    | Valves                   | 250    | 25     |
|         | Flanges                  | 275    | 28     |
|         | Compressor Seals         | 100    | 0      |
|         | Relief Valves            | 63     | 13     |
|         | Pump Seals, Light Liquid | 0      | 15     |

**SECTION VI. FACILITY-SPECIFIC OR REPRESENTATIVE SAMPLE**

The applicant did not request any emission changes for the fugitives and flash emissions from the storage tanks from the last operating permit; therefore, no facility-specific or representative sample is needed for these units.

**SECTION VII. AIR EMISSIONS**

ENGINES

The emission factors for compressor engines are based on manufacturer data (including a safety factor for operational flexibility) and are presented in table below. The criteria pollutant emissions from compressor engines are estimated based on 8,760 hours per engine per year operation and 1,000 BTU/SCF average heating value. Formaldehyde emissions from the Caterpillar engines are estimated based on manufacturer’s data of 0.29 g/hp-hr with a 70% reduction for OC which resulted in emission factor of 0.087 g/hp-hr.

**Engine Emissions Factors**

| Source  | NOx (g/hp-hr) | CO (g/hp-hr) | VOC (g/hp-hr) | H <sub>2</sub> CO (g/hp-hr) |
|---|---------------|--------------|---------------|-----------------------------|
| COMP1 to COMP4, 1,340-hp Caterpillar G-3516 TALE, 4-stroke lean-burn with an OC | 2.00          | 0.90         | 0.50          | 0.087                       |
| COMP5, 1,340-hp Caterpillar G-3516 TALE, 4-stroke lean-burn without an OC       | 2.00          | 3.00         | 0.50          | 0.29                        |

**Engine Emissions**

| EU ID#         | NOx   |       | CO    |       | VOC <sup>(1)</sup> |      | H <sub>2</sub> CO |      |
|----------------|-------|-------|-------|-------|--------------------|------|-------------------|------|
|                | lb/hr | TPY   | lb/hr | TPY   | lb/hr              | TPY  | lb/hr             | TPY  |
| COMP1 Unit 266 | 5.91  | 25.88 | 2.66  | 11.65 | 1.48               | 6.47 | 0.26              | 1.13 |
| COMP2 Unit 267 | 5.91  | 25.88 | 2.66  | 11.65 | 1.48               | 6.47 | 0.26              | 1.13 |

| EU ID#            | NO <sub>x</sub> |       | CO    |       | VOC <sup>(1)</sup> |      | H <sub>2</sub> CO |      |
|-------------------|-----------------|-------|-------|-------|--------------------|------|-------------------|------|
|                   | lb/hr           | TPY   | lb/hr | TPY   | lb/hr              | TPY  | lb/hr             | TPY  |
| COMP3<br>Unit 270 | 5.91            | 25.88 | 2.66  | 11.65 | 1.48               | 6.47 | 0.26              | 1.13 |
| COMP4<br>Unit 272 | 5.91            | 25.88 | 2.66  | 11.65 | 1.48               | 6.47 | 0.26              | 1.13 |
| COMP5<br>Unit 271 | 5.91            | 25.88 | 8.86  | 38.82 | 1.48               | 6.47 | 0.86              | 3.75 |

<sup>(1)</sup> Includes H<sub>2</sub>CO.

**TANKS**

Estimated emissions of working and breathing losses for the condensate storage tanks (TANK1 through TANK3) are based on AP-42 (6/20), Section 7.1, assuming the tank contents to be Gasoline (RVP 10). Flash emissions were calculated using the Vasquez-Beggs Solution Gas/Oil Ratio Correlation Method and the listed throughput. Flash emissions at the storage tanks result as liquids under pressure enter the tanks at atmospheric pressure. Estimated emissions of working and breathing losses for the methanol tank (TANK4) are based on AP-42 (6/20), Section 7.1, assuming the tank contents to be methyl alcohol.

**Vasquez-Beggs Inputs**

| Parameter                               | Condensate |
|---|------------|
| API Gravity                             | 70         |
| Separator Pressure, psig                | 75         |
| Separator Temperature, °F               | 60         |
| Stock Tank Barrels of Oil Per Day, BOPD | 19.57      |
| Gas Molecular Weight, lb/lb-mol         | 60         |
| Separator Gas Specific Gravity          | 0.9        |
| Fraction VOC in Tank Gas                | 0.8        |
| Atmospheric Pressure, psia              | 14.7       |

**TANK1 through TANK4 Emissions, per tank**

| Parameter                        | TANK1 - TANK3             | TANK4                     |
|----------------------------------|---------------------------|---------------------------|
| Throughput, gal/yr               | 100,000                   | 100,000                   |
| Flash Calculation Method/Tool    | Vasquez-Beggs             | -                         |
| Working/Breathing Method/Tool    | AP-42 (6/20), Section 7.1 | AP-42 (6/20), Section 7.1 |
| Flash Emissions, TPY             | 12.07                     | -                         |
| Working/Breathing Emissions, TPY | 1.10                      | 0.11                      |
| Control Type                     | None                      | None                      |
| Total VOC Emissions, TPY         | 13.17                     | 0.11                      |

**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.

**Loading Parameters and Emissions**

| Parameter                               | LOAD1      |
|---|------------|
| Liquids Loaded                          | Condensate |
| Throughput, gal/yr                      | 300,000    |
| Saturation Factor                       | 0.6        |
| Temp., °F                               | 62.56      |
| TVP, psia                               | 6.39       |
| MW, lb/lbmol                            | 66         |
| VOC, wt.%                               | 100        |
| Emission Factor, lb/10 <sup>3</sup> gal | 6.032      |
| VOC Emissions, TPY                      | 0.90       |

FUGITIVES

Fugitive emissions are based on Table 2-4 of “1995 Protocol for Equipment Leak Emission Estimates (EPA 453/R-95-017),” Oil and Gas Production Operations Average Emission Factors, an estimated number of components, and the VOC (C<sub>3+</sub>) content of the materials handled.

**Fugitive VOC Emissions**

| Component                | Number of Components | Emission Factor, lb/hr/component | Percent VOC | VOC Leakage |             |
|--------------------------|----------------------|----------------------------------|-------------|-------------|-------------|
|                          |                      |                                  |             | lb/hr       | TPY         |
| Gas/Vapor Valves         | 250                  | 0.00092                          | 3.75%       | 0.09        | 0.41        |
| Gas/Vapor Flanges        | 275                  | 0.00086                          | 3.75%       | 0.01        | 0.04        |
| Compressor Seals         | 100                  | 0.0194                           | 3.75%       | 0.07        | 0.32        |
| Gas/Vapor Relief Valves  | 63                   | 0.0194                           | 3.75%       | 0.05        | 0.20        |
| Light Liquid Valves      | 25                   | 0.0055                           | 100%        | 0.14        | 0.60        |
| Light Liquid Flanges     | 28                   | 0.0002                           | 100%        | 0.01        | 0.03        |
| Light Liquid Pump Seals  | 15                   | 0.0287                           | 100%        | 0.43        | 1.89        |
| Lt. Liquid Relief Valves | 13                   | 0.0165                           | 100%        | 0.21        | 0.90        |
| <b>TOTALS</b>            |                      |                                  |             | <b>1.00</b> | <b>4.39</b> |

FACILITY-WIDE EMISSIONS

| EU ID #           | Source   | NOx   |       | CO    |       | VOC                 |                     |
|-------------------|--|-------|-------|-------|-------|---------------------|---------------------|
|                   |  | lb/hr | TPY   | lb/hr | TPY   | lb/hr               | TPY                 |
| COMP1<br>Unit 266 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with an OC    | 5.91  | 25.88 | 2.66  | 11.65 | 1.48 <sup>(1)</sup> | 6.47 <sup>(1)</sup> |
| COMP2<br>Unit 267 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with an OC    | 5.91  | 25.88 | 2.66  | 11.65 | 1.48 <sup>(1)</sup> | 6.47 <sup>(1)</sup> |
| COMP3<br>Unit 270 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with an OC    | 5.91  | 25.88 | 2.66  | 11.65 | 1.48 <sup>(1)</sup> | 6.47 <sup>(1)</sup> |
| COMP4<br>Unit 272 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with an OC    | 5.91  | 25.88 | 2.66  | 11.65 | 1.48 <sup>(1)</sup> | 6.47 <sup>(1)</sup> |
| COMP5<br>Unit 271 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn without an OC | 5.91  | 25.88 | 8.86  | 38.82 | 1.48 <sup>(1)</sup> | 6.47 <sup>(1)</sup> |
| TANK1             | 400-bbl Condensate/Slop Oil Tank                                     |       |       |       |       |                     |                     |
| TANK2             | 400-bbl Condensate/Slop Oil Tank                                     |       |       |       |       |                     |                     |

| EU ID #  | Source                           | NOx          |               | CO           |              | VOC          |                      |
|--|----------------------------------|--------------|---------------|--------------|--------------|--------------|----------------------|
|  |                                  | lb/hr        | TPY           | lb/hr        | TPY          | lb/hr        | TPY                  |
| TANK3  | 400-bbl Condensate/Slop Oil Tank | -----        | -----         | -----        | -----        | -----        | 39.51 <sup>(2)</sup> |
| TANK4  | 210-bbl Methanol Tank            | -----        | -----         | -----        | -----        | -----        | 0.11                 |
| LOAD1  | Condensate Truck Loading         | -----        | -----         | -----        | -----        | -----        | 0.90                 |
| FUG1   | Fugitive VOC Emissions           | -----        | -----         | -----        | -----        | 1.00         | 4.39                 |
| <b>Total Emissions</b>   |                                  | <b>29.55</b> | <b>129.40</b> | <b>19.50</b> | <b>85.42</b> | <b>8.40</b>  | <b>77.26</b>         |
| <b>Emissions from Collocated Facility<br/>(From Permit No. 2017-2140-TV)</b> |                                  | <b>1.20</b>  | <b>5.26</b>   | <b>2.34</b>  | <b>10.29</b> | <b>5.59</b>  | <b>24.45</b>         |
| <b>Collocated Total Emissions</b>  |                                  | <b>30.75</b> | <b>134.66</b> | <b>21.84</b> | <b>95.71</b> | <b>13.99</b> | <b>101.71</b>        |
| <b>Previous Emissions<br/>(From Permit No. 2016-1276-TV)</b>                 |                                  | <b>29.55</b> | <b>129.40</b> | <b>19.50</b> | <b>85.42</b> | <b>8.40</b>  | <b>76.76</b>         |
| <b>Change in Emissions</b>   |                                  | -----        | -----         | -----        | -----        | -----        | <b>0.50</b>          |

(1) Includes H<sub>2</sub>CO.

(2) Combined emissions from working, breathing losses, and flash emissions

**HAP EMISSIONS**

The primary HAP emission from the engines is H<sub>2</sub>CO. Formaldehyde emissions from the Caterpillar engines are estimated based on manufacturer’s data of 0.29 g/hp-hr with a 70% reduction for OC which resulted in emission factor of 0.087 g/hp-hr. The table below lists formaldehyde emissions based on continuous operation. The facility-wide formaldehyde emissions do not exceed the major source threshold, 10 TPY. The total facility-wide HAP emissions, including formaldehyde, do not exceed 25 TPY. The facility is, therefore, an area source of HAP.

**Formaldehyde Emissions**

| Emissions Source   | Formaldehyde |             |
|--|--------------|-------------|
|  | lb/hr        | TPY         |
| COMP1, 1,340-hp Caterpillar G-3516 TALE with an Oxid. Cata.    | 0.26         | 1.13        |
| COMP2, 1,340-hp Caterpillar G-3516 TALE with an Oxid. Cata.    | 0.26         | 1.13        |
| COMP3, 1,340-hp Caterpillar G-3516 TALE with an Oxid. Cata.    | 0.26         | 1.13        |
| COMP4, 1,340-hp Caterpillar G-3516 TALE with an Oxid. Cata.    | 0.26         | 1.13        |
| COMP5, 1,340-hp Caterpillar G-3516 TALE without an Oxid. Cata. | 0.86         | 3.75        |
| <b>Total Emissions</b>   | <b>1.90</b>  | <b>8.27</b> |

**SECTION VIII. INSIGNIFICANT ACTIVITIES**

The insignificant activities identified and justified in the application are duplicated below. Records are available to confirm the insignificance of the activities. Appropriate recordkeeping of activities indicated below with “\*” are 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. Emissions from condensate tanks with a design capacity of 400 gallons or less in ozone attainment areas. None identified but may be used in the future.

2. Emissions from crude oil and condensate storage tanks with a capacity of less than or equal to 420,000 gallons that store crude oil and condensate prior to custody transfer as defined by Subpart Kb. None identified but may be conducted in the future.
3. \* 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 psi at maximum storage temperature. All tanks have a capacity less than 10,000 gallons and store liquids with vapor pressure less than 1.0 psi.
4. \* 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. The lube oil tanks, compressor oil tanks, used oil tank, and antifreeze tanks have capacities less than 39,894 gallon with a vapor pressure less than 1.5 psia at maximum storage temperature.
5. Cold degreasing operations utilizing solvents that are denser than air.
6. Hand wiping and spraying of solvents from containers with less than 1 liter capacity used for spot cleaning and/or degreasing in ozone attainment areas. Routine maintenance on compressor engines might require use of a degreasing solvent sprayed from containers with less than a 1 liter capacity.
7. \* Activities that have the potential to emit no more than 5 TPY (actual) of any criteria pollutant. VOC emissions from methanol tank (EUG 3), fugitive VOC emissions (EUG 4), and VOC emissions from condensate loading (EUG 5) are below 5 TPY.
8. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTU/hr heat input (commercial natural gas). None identified but may be in the future.
9. Welding and soldering operations utilizing less than 100 pounds of solder and 53 tons per year of electrodes. Welding is conducted as a part of routine maintenance and is considered a trivial activity and recordkeeping will not be required in the Specific Conditions.
10. Surface coating operations which do not exceed a combined total usage of more than 60 gallons/month of coatings, thinners, and clean-up solvents at any one emissions unit. Surface coating is conducted as a part of routine maintenance and is considered trivial activities and recordkeeping will not be required in the Specific Conditions.
11. 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. The facility performs small amounts of hand wiping and spraying of solvents.
12. Emissions from stationary internal combustion engines rated less than 50 hp output. None identified but may be used in the future.



13. Gasoline and aircraft fuel handling facilities, equipment, and storage tanks except those subject to new source performance standards and standards in OAC 252:100-37-15, 39-30, 39-41, and 39-48. None identified but may be used in the future.
14. Additions or upgrades of instrumentation or control systems that result in emission increases less than the pollutant quantities specified in OAC 252:100-8-3(e)(1). None identified but may be conducted in the future.
15. Site restoration and/or bioremediation activities of <5 years expected duration. None identified but may be conducted in the future.
16. Hydrocarbon-contaminated soil aeration pads utilized for soils excavated at the facility only. None identified but may be used in the future.
17. Emissions from groundwater remediation wells including but not limited to emissions from venting, pumping, and collecting activities subject to de minimis limits for toxics (OAC 252:100-41-43) and HAP's (112(b) of CAAA90). None identified but may be used in the future.

## 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 of Air Contaminant Sources) [Applicable]  
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Emission inventories have been submitted and fees paid for the past years 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 HAP or 5 TPY of multiple HAPs or 20% of any threshold less than 10 TPY for a HAP that EPA may establish by rule

Emission limitations and operational requirements necessary to assure compliance with all applicable requirements for all sources are taken from the operating permit application and previous permits.

OAC 252:100-9 (Excess Emissions Reporting Requirements) [Applicable]  
 Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

OAC 252:100-13 (Open Burning) [Applicable]  
 Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter) [Applicable]  
Section 19-4 regulates emissions of PM from new and existing fuel-burning equipment, with emission limits based on maximum design heat input rating. Fuel-burning equipment is defined in OAC 252:100-19 as any internal combustion engine or gas turbine, or other combustion device used to convert the combustion of fuel into usable energy. Thus the engines are subject to the requirements of this subchapter. OAC 252:100, Appendix C specifies a PM emission limitation for all equipment at this facility with a heat input rating of greater than 10 MMBTUH but less than 1,000 MMBTUH based on the following calculation:  $E = 1.0428080X^{-0.238561}$ , where E is the allowable emission rate and X is the maximum heat input. Table 3.2-3 of AP-42 (7/00) lists the total PM emissions from 4-stroke, rich-burn, natural gas-fired engines to be 0.02 lbs/MMBTU. This permit requires the use of natural gas for all fuel-burning equipment to ensure compliance with Subchapter 19.

| EU ID #           | Source  | Maximum Heat Input (MMBTUH) | Emissions (lbs/MMBTU) |           |
|-------------------|---|-----------------------------|-----------------------|-----------|
|                   |   |                             | Appendix C            | Potential |
| COMP1<br>Unit 266 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with an OC | 11.38                       | 0.58                  | 0.02      |
| COMP2<br>Unit 267 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with an OC | 11.38                       | 0.58                  | 0.02      |
| COMP3<br>Unit 270 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with an OC | 11.38                       | 0.58                  | 0.02      |

| EU ID #           | Source   | Maximum Heat Input (MMBTUH) | Emissions (lbs/MMBTU) |           |
|-------------------|--|-----------------------------|-----------------------|-----------|
|                   |  |                             | Appendix C            | Potential |
| COMP4<br>Unit 272 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with an OC    | 11.38                       | 0.58                  | 0.02      |
| COMP5<br>Unit 271 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn without an OC | 11.38                       | 0.58                  | 0.02      |

Section 19-12 limits emissions of particulate matter from industrial processes and direct-fired fuel-burning equipment based on their process weight rates. Since there are no significant particulate emissions from the nonfuel-burning processes at the facility compliance with the standard is assured without any special monitoring provisions.

OAC 252:100-25 (Visible Emissions and Particulate Matter) [Applicable]  
 No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. When burning natural gas, there is little possibility of exceeding the opacity standards.

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

OAC 252:100-31 (Sulfur Compounds) [Applicable]  
Part 2 limits the ambient air concentration of hydrogen sulfide (H<sub>2</sub>S) emissions from any facility to 0.2 ppmv (24-hour average) at standard conditions, which is equivalent to 283 µg/m<sup>3</sup>. Based on modeling conducted for the general permit for oil and gas facilities, the ambient impacts of H<sub>2</sub>S from oil and gas facilities combusting natural gas with a maximum H<sub>2</sub>S content of 162 ppmv and storing condensate or sweet crude oil will be in compliance with the H<sub>2</sub>S ambient air concentration limit.

Part 5 limits sulfur dioxide emissions from new petroleum or natural gas process equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBTU heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,000 BTU/SCF, this limit corresponds to fuel sulfur content of 1,203 ppmv. Gas produced from oil and gas wells having 162 ppmv or less total sulfur will ensure compliance with Subchapter 31. The permit requires the use of pipeline-grade natural gas or field gas with a maximum sulfur content of 162 ppmv for all fuel-burning equipment to ensure compliance with Subchapter 31.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]  
 This subchapter limits NO<sub>x</sub> emissions from new fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.2 lb of NO<sub>x</sub> per MMBTU. There are no equipment items that exceed the 50 MMBTUH threshold.

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

OAC 252:100-37 (Volatile Organic Compounds) [Applicable]  
Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia at maximum storage temperature to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. All three (3) condensate tanks and the methanol tank are subject to this requirement.

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

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

Part 7 requires fuel-burning equipment to be operated and maintained so as to minimize VOC emissions. Temperature and available air must be sufficient to provide essentially complete combustion. The engines are designed to provide essentially complete combustion of organic materials.

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 anywhere in the state, 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 Emissions Reduction | Not requested             |
| OAC 252:100-15 | Mobile Sources                  | Not in source category    |
| OAC 252:100-17 | Incinerators                    | Not type of emission unit |
| OAC 252:100-23 | Cotton Gins                     | Not type of emission unit |
| OAC 252:100-24 | Grain Elevators                 | Not in source category    |
| OAC 252:100-39 | Nonattainment Areas             | Not in area category      |
| OAC 252:100-47 | Municipal Solid Waste Landfills | Not in source category    |

**SECTION X. FEDERAL REGULATIONS**

PSD, 40 CFR Part 52 [Not Applicable]  
 The total emissions are less than the threshold level of 250 TPY of any single regulated pollutant and the facility is not one of the 26 specific industries with a threshold of 100 TPY for criteria pollutants. This facility is not subject to 40 CFR Part 52.

NSPS, 40 CFR Part 60 [Subpart JJJJ is Applicable]  
Subparts K, Ka, Kb, VOL Storage Vessels. The condensate tanks are below the de minimis of 19,813-gallons for Subpart Kb.  
Subpart GG, Stationary Gas Turbines. There are no turbines at this facility. The compressors here are powered by reciprocating engines.  
Subpart VV, Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (SOCMI). This facility is not a SOCMI plant.  
Subpart KKK, Equipment Leaks of VOC from Onshore Natural Gas Processing Plants. This subpart applies to natural gas processing plants that commence construction, reconstruction, or modification after January 20, 1984, and include the following facilities located at on-shore natural gas processing plants: a compressor station, dehydration unit, underground storage tank, field gas gathering system, or liquefied natural gas unit located at an on-shore natural gas processing plant. "Natural gas processing plant" is defined as any site engaged in the extraction of natural gas liquids from field gas, fractionation of natural gas liquids, or both; "Natural gas liquids" are further defined as hydrocarbons such as ethane, propane, butane, and pentane. This site does not engage in this type of activity at this time. Therefore, this facility is not subject to Subpart KKK.  
Subpart LLL, Onshore Natural Gas Processing: SO<sub>2</sub> Emissions. There is no natural gas sweetening operation at this site at this time. Therefore, this facility is not subject to Subpart LLL.  
Subpart IIII, Stationary Compression Ignition (CI) Internal Combustion Engines (ICE). This subpart affects CI ICE manufactured after 2007. There are no CI-ICE at this facility.  
Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI-ICE). This subpart promulgates emission standards for all new SI engines ordered after June 12, 2006 and all SI engines modified or reconstructed after June 12, 2006, regardless of size. The specific emission standards (either in g/hp-hr or as a concentration limit) vary based on engine class, engine power rating, lean-burn or rich-burn, fuel type, duty (emergency or non-emergency), and manufacture

date. Engine manufacturers are required to certify certain engines to meet the emission standards and may voluntarily certify other engines. An initial notification is required only for owners and operators of engines greater than 500 HP that are non-certified. Emergency engines will be required to be equipped with a non-resettable hour meter and are limited to 100 hours per year of operation excluding use in an emergency (the length of operation and the reason the engine was in operation must be recorded). The five (5) Caterpillar 3516 TALE engines (COMP1 to COMP5) were manufactured after January 1, 2008; therefore, all five engines are subject to this subpart. All applicable requirements have been incorporated into the permit.

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

- (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, centrifugal compressors, or sweetening units located at this facility and this facility is not a gas plant.

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

the compressor (excluding relocation) at the facility. All existing compressors at the facility were constructed prior to August 23, 2011, and have not been modified or reconstructed. Therefore, this facility is not subject to Subpart OOOO.

Pneumatic controllers at a natural gas processing plant must have a bleed rate of zero. All existing pneumatic controllers at this facility were either constructed prior to August 23, 2011, and have not been modified or reconstructed or are not continuous bleed. Therefore, this facility is not subject to Subpart OOOO.

Storage vessels constructed, modified or reconstructed after August 23, 2011, with VOC emissions equal to or greater than 6 TPY must reduce VOC emissions by 95.0 % or greater. All existing storage vessels at this facility were constructed prior to August 23, 2011, and have not been modified or reconstructed. Therefore, this facility is not subject to Subpart OOOO.

Subpart OOOOa, 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.

The applicability date for Subpart OOOOa is September 18, 2015. None of the equipment at the facility was constructed, modified, or reconstructed after September 18, 2015. Therefore, the facility is not subject to this subpart.

NESHAP, 40 CFR Part 61 [Not Applicable]

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

NESHAP, 40 CFR Part 63 [Subpart ZZZZ is Applicable]

Subpart HH, Oil and Natural Gas Production Facilities. This subpart applies to affected emission points that are located at facilities that are major and area sources of HAP and either process, upgrade, or store hydrocarbons prior to the point of custody transfer or prior to which the natural gas enters the natural gas transmission and storage source category. For purposes of this subpart natural gas enters the natural gas transmission and storage source category after the natural gas processing plant, if present. There is no dehydration unit at the facility and the potential HAP emissions are below the 10/25 TPY threshold, so this subpart is not applicable.

Subpart HHH, Natural Gas Transmission and Storage Facilities. Since this facility is a production facility, this subpart does not apply.

Subpart YYYY, Stationary Combustion Turbines. This subpart affects stationary gas turbines located at a major source of HAP emissions. There are no combustion turbines at this facility.

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart affects any existing, new, or reconstructed stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand. The following table differentiates existing, new, or reconstructed units based on their construction dates.

|                                  | Construction/Reconstruction Dates |                      |
|----------------------------------|-----------------------------------|----------------------|
|                                  | Engines >500 hp                   | Engines ≤ 500hp      |
| <b>Existing Unit</b>             |                                   |                      |
| Located at Major HAP Source      | Before 12/19/02                   | Before 6/12/06       |
| Located at Area HAP Source       | Before 6/12/06                    |                      |
| <b>New or Reconstructed Unit</b> |                                   |                      |
| Located at Major HAP Source      | On and After 12/19/02             | On and After 6/12/06 |
| Located at Area HAP Source       | On and After 6/12/06              |                      |

The following table lists the status of each engine at this facility:

| EU ID# | Make/Model                       | Construction Date | Status |
|--------|----------------------------------|-------------------|--------|
| COMP1  | 1,340-hp Caterpillar G-3516 TALE | September 2008    | New    |



|                   |   |                |     |
|-------------------|---|----------------|-----|
| Unit 266          | 4-stroke lean-burn with oxidation catalyst  |                |     |
| COMP2<br>Unit 267 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with oxidation catalyst    | September 2008 | New |
| COMP3<br>Unit 270 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with oxidation catalyst    | September 2008 | New |
| COMP4<br>Unit 272 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with oxidation catalyst    | September 2008 | New |
| COMP5<br>Unit 271 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn without oxidation catalyst | September 2008 | New |

All five compressor engines are new SI-ICE located at an area HAP source and shall meet the requirements of this Subpart through NSPS Subpart JJJJ, as addressed above. No further requirements apply under this part.

Compliance Assurance Monitoring, 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 criteria air pollutant of 100 TPY or of the HAP of 10 TPY.

All engines use clean burn technology to meet low NO<sub>x</sub> emission rates and do not individually have potential emissions greater than 100 TPY of NO<sub>x</sub> or CO. All engines do not individually have potential emissions greater than 10 TPY of H<sub>2</sub>CO or other HAP. The facility is not subject to this part.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]  
This facility will not process or store more than the threshold quantity of any regulated substance (Section 112r of the Clean Air Act 1990 Amendments). More information on this federal program is available on the web page: <http://www.epa.gov/rmp>.

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

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

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

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

**SECTION 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.

INSPECTION

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

| <b>Inspection Type</b> | <b>Date</b> | <b>Summary/Results</b> |
|------------------------|-------------|------------------------|
| Full Inspection        | 5/16/2019   | In compliance          |
| Full Inspection        | 6/10/2021   | In compliance          |

One area of concern was identified during the Full Compliance Inspection (FCE) conducted on June 10, 2021. The area of concern states that no blowdown emissions have been reported in the emissions inventories since the previous inspection. If future blowdown emissions are above the 0.1 TPY reporting threshold, they should be reported in the emissions inventories. There have been no other enforcement actions since issuance of the last Title V permit.

TIER CLASSIFICATION AND PUBLIC REVIEW

This application has been determined to be a **Tier II** based on the request for renewal of a Part 70 operating 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 has a current easement which is given to accomplish the permitted purpose.

The applicant published the “Notice of Filing a Tier II Application” in the *Coalgate Record-Register*, a weekly newspaper printed and published in the City of Coalgate, Coal County, on October 20, 2021. The notice stated that the application was available for public review at the Coal County Public Library, located at 115 West Ohio Avenue in Coalgate, Oklahoma 74538 or at the Air Quality Division’s Main Office in Oklahoma City, Oklahoma 73101.

The applicant will also publish a “Notice of Tier II Draft Permit” in a local newspaper in Coal County where the facility is located. The notice will state that the draft permit will be available for a 30-day public review at the facility or the DEQ office in Oklahoma City. The notice will also state that the draft permit will be available for public review in Coal County, Oklahoma. 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>.

The applicant requested and was granted concurrent public and EPA review periods. The draft permit will undergo a 30-day public comment period and the proposed permit will be sent to EPA for a 45-day review period.

The facility is located in the Coal County; therefore, the tribal nations will be notified of the draft permit.

This facility is not located within 50 miles of the border of Oklahoma so no notice to other states is required.

If the Administrator does not object in writing during the 45-day EPA review period, any person that meets the requirements of this subsection may petition the Administrator within 60 days after the expiration of the Administrator's 45-day review period to make such objection. Any such petition shall be based only on objections to the permit that the petitioner raised with reasonable specificity during the public comment period provided for in 27A O.S. § 2-14-302.A.2., unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period. If the Administrator objects to the permit as a result of a petition filed under this subsection, the DEQ shall not issue the permit until EPA's objection has been resolved, except that a petition for review does not stay the effectiveness of a permit or its requirements if the permit was issued after the end of the 45-day review period and prior to an EPA objection. If the DEQ has issued a permit prior to receipt of an EPA objection under this subsection, the DEQ will modify, terminate, or revoke such permit, and shall do so consistent with the procedures in 40 CFR §§ 70.7(g)(4) or (5)(i) and (ii) except in unusual circumstances. If the DEQ revokes the permit, it may thereafter issue only a revised permit that satisfies EPA's objection. In any case, the source will not be in violation of the requirement to have submitted a timely and complete application.

TESTING

Engine emission testing was conducted in the first quarter of 2022. The results of the tests conducted on February 1, 2022, and March 18, 2022, are presented below. The results show compliance with the applicable permit conditions.

| EU ID #           | Source  | Permit Limitations |             | Test Results |             |
|-------------------|---|--------------------|-------------|--------------|-------------|
|                   |   | NOx<br>lb/hr       | CO<br>lb/hr | NOx<br>lb/hr | CO<br>lb/hr |
| COMP1<br>Unit 266 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with OC    | 5.91               | 2.66        | 3.70         | 0.18        |
| COMP2<br>Unit 267 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with OC    | 5.91               | 2.66        | 2.87         | 0.19        |
| COMP3<br>Unit 270 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with OC    | 5.91               | 2.66        | 2.39         | 0.36        |
| COMP4<br>Unit 272 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with OC    | 5.91               | 2.66        | 2.48         | 0.04        |
| COMP5<br>Unit 271 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn without OC | 5.91               | 8.86        | 2.54         | 2.98        |

FEE PAID

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

**SECTION XII. SUMMARY**

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

**DRAFT/PROPOSED**

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

**Enable Gas Gathering, LLC  
Ashland #2 Compressor Station**

**Permit No. 2021-5260-TVR**

The permittee is authorized to operate in conformity with the specifications received by Air Quality (AQD) on October 15, 2021. The Evaluation Memorandum dated June 7, 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:** Emission limits for all permitted engines.

| EU ID#            | EU Name/Model  | NO <sub>x</sub> |       | CO    |       | VOC <sup>(1)</sup> |      |
|-------------------|--|-----------------|-------|-------|-------|--------------------|------|
|                   |  | lb/hr           | TPY   | lb/hr | TPY   | lb/hr              | TPY  |
| COMP1<br>Unit 266 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with an OC    | 5.91            | 25.88 | 2.66  | 11.65 | 1.48               | 6.47 |
| COMP2<br>Unit 267 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with an OC    | 5.91            | 25.88 | 2.66  | 11.65 | 1.48               | 6.47 |
| COMP3<br>Unit 270 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with an OC    | 5.91            | 25.88 | 2.66  | 11.65 | 1.48               | 6.47 |
| COMP4<br>Unit 272 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn with an OC    | 5.91            | 25.88 | 2.66  | 11.65 | 1.48               | 6.47 |
| COMP5<br>Unit 271 | 1,340-hp Caterpillar G-3516 TALE<br>4-stroke lean-burn without an OC | 5.91            | 25.88 | 8.86  | 38.82 | 1.48               | 6.47 |

<sup>(1)</sup> Includes H<sub>2</sub>CO.

- a. The four engines, COMP1 to COMP4, shall each be set to operate with exhaust gases passing through a properly functioning oxidation catalyst. [OAC 252:100-8-6 (a)(1)]

**EUG 2:** Condensate storage tanks.

| EU ID# | Capacity, gallons | Contents   | VOC   |
|--------|-------------------|------------|-------|
|        |                   |            | TPY   |
| TANK1  | 16,800            | Condensate | 39.51 |
| TANK2  | 16,800            | Condensate |       |
| TANK3  | 16,800            | Condensate |       |

- a. All condensate storage tanks shall each be operated with a submerged fill pipe. [OAC 252:100-37-15 (b)]
- b. VOC emissions shall combine all emissions from working and breathing losses and flash emissions.
- c. For the facility-wide operation, the total condensate throughput is limited to 300,000 gallons per year based on a 12-month rolling total.

**EUG 3:** Miscellaneous storage tanks VOC emissions are estimated based on existing equipment items but do not have a specific limitation and are considered insignificant.

| EU ID# | Contents        | Capacity |         |
|--------|-----------------|----------|---------|
|        |                 | Barrels  | Gallons |
| TANK4  | Methanol        | 210      | 8,820   |
| TANK5  | Lube Oil        | -----    | 500     |
| TANK6  | Lube Oil        | -----    | 500     |
| TANK7  | Compressor Oil  | -----    | 500     |
| TANK8  | Compressor Oil  | -----    | 500     |
| TANK9  | Antifreeze      | -----    | 500     |
| TANK10 | Used Antifreeze | -----    | 500     |
| TANK11 | Used Oil        | -----    | 500     |

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

| EU ID# | Emission Unit            | Number |        |
|--------|--------------------------|--------|--------|
|        |                          | Gas    | Liquid |
| FUG1   | Valves                   | 250    | 25     |
|        | Flanges                  | 275    | 28     |
|        | Compressor Seals         | 100    | 0      |
|        | Relief Valves            | 63     | 13     |
|        | Pump Seals, Light Liquid | 0      | 15     |

**EUG 5:** Condensate truck loading emissions are estimated based on existing equipment items but do not have a specific limitation and are considered insignificant.

| EU ID # | Emission                 |
|---------|--------------------------|
| LOAD1   | Condensate Truck Loading |

2. The fuel-burning equipment shall be fired with pipeline grade natural gas or other gaseous fuel with a sulfur content less than 162 ppmv. Compliance can be shown by the following methods: for pipeline grade natural gas, a current gas company bill; for other gaseous fuel, a current lab analysis, stain-tube analysis, gas contract, tariff sheet, or other approved methods. Compliance shall be demonstrated at least once every calendar year. [OAC 252:100-31]
3. The permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year). [OAC 252:100-8-6 (a)]
4. Each engine at the facility shall have a permanent identification plate attached, which shows the make, model number, and serial number. [OAC 252:100-43]
5. At least once per calendar quarter, the permittee shall conduct tests of NOx and CO emissions in exhaust gases from each engine in EUG-1 and each replacement engine when operating under representative conditions for that period. Testing is required for any engine or replacement

engine, which runs for more than 220 hours during that calendar quarter. Engines shall be tested no sooner than 20 days after the last test. Testing shall be conducted using a portable engine analyzer in accordance with a protocol meeting the requirements of the “AQD Portable Analyzer Guidance” document or an equivalent method approved by Air Quality. When four consecutive quarterly tests show an engine to be in compliance with the emissions limitations shown in the permit, then the testing frequency may be reduced to semi-annual testing. A semi-annual test may be conducted no sooner than 60 calendar days nor later than 180 calendar days after the most recent test. Likewise, when the following two consecutive semi-annual tests show compliance, the testing frequency may be reduced to annual testing. An annual test may be conducted no sooner than 120 calendar days nor later than 365 calendar days after the most recent test. Upon any showing of non-compliance with emissions limitations or testing that indicate that emissions are within 10% of the emission limitation, the testing frequency shall revert to quarterly. Reduced engine testing does not apply to engines with catalytic converters/oxidation catalysts. [OAC 252:100-8-6 (a)(3)(A)]

6. 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. [OAC 252:100-9]
7. The permittee is authorized to replace any internal combustion engine or turbine with emissions limitations specified in this permit with an engine or turbine that meets the following requirements: [OAC 252:100-8-6(f)(2)]
  - a. The replacement engine or turbine shall comply with the same emissions limits as the engine or turbine that it replaced. This applies to lb/hr and TPY limits specified in this permit.
  - b. The authorization of replacement of an engine or turbine includes temporary periods of 6 months or less for maintenance purposes.
  - c. The permittee shall notify AQD in writing not later than 7 days prior to start-up of the replacement engine or turbine. Said notice shall identify the old engine/turbine and shall include the new engine/turbine make and model, serial number, horsepower rating, and pollutant emission rates (g/hp-hr, lb/hr, and TPY) at maximum horsepower for the altitude/location.
  - d. Quarterly emissions tests for the replacement engine(s)/turbine(s) shall be conducted to confirm continued compliance with NO<sub>x</sub> and CO emission limitations. A copy of the first quarter testing shall be provided to AQD within 60 days of start-up of each replacement engine/turbine. The test report shall include the engine/turbine fuel usage, stack flow (ACFM), stack temperature (°F), and pollutant emission rates (g/hp-hr, lb/hr, and TPY) at maximum rated horsepower for the altitude/location.
  - e. Replacement equipment and emissions are limited to equipment and emissions which are not a modification under NSPS or NESHAP.
  - f. Replacement equipment and emissions are limited to equipment and emissions which are not a modification or a significant modification under PSD. For existing PSD facilities, the permittee shall calculate the PTE or the net emissions increase resulting from the replacement to document that it does not exceed significance levels and submit the results with the notice required by paragraph (c) of this Specific Condition. The permittee shall attach each such notice to their copy of the relevant permit. For each such change, the written notification required above shall include a brief description of the change within

the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield described in OAC 252:100-8-6(d) does not apply to any change made pursuant to this paragraph.

- g. Engines whose installation and operation are authorized under this Specific Condition which are subject to 40 CFR Part 63, Subpart ZZZZ and/or 40 CFR Part 60, Subpart JJJJ shall comply with all applicable requirements.
  - h. Turbines whose installation and operation are authorized under this Specific Condition which are subject to 40 CFR Part 60, Subpart KKKK shall comply with all applicable requirements.
8. The permittee, or the owner/operator (O/O), shall comply with the Standards of Performance for Stationary Spark Ignition Internal Combustion Engine (SI-ICE), 40 CFR Part 60, NSPS, Subpart JJJJ, for all affected emission units, including but not limited to the following:

[40 CFR §§ 60.4230-60.4248]

#### **What This Subpart Covers**

- a. § 60.4230 Am I subject to this subpart?

#### **Emission Standards for Manufacturers**

- b. § 60.4231 What emission standards must I meet if I am a manufacturer of stationary SI internal combustion engines or equipment containing such engines?
- c. § 60.4232 How long must my engines meet the emission standards if I am a manufacturer of stationary SI internal combustion engines?

#### **Emission Standards for Owners and Operators**

- d. § 60.4233 What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?
- e. § 60.4234 How long must I meet the emission standards if I am an owner or operator of a stationary SI internal combustion engine?

#### **Other Requirements for Owners and Operators**

- f. § 60.4235 What fuel requirements must I meet if I am an owner or operator of a stationary SI gasoline fired internal combustion engine subject to this subpart?
- g. § 60.4236 What is the deadline for importing or installing stationary SI ICE produced in previous model years?
- h. § 60.4237 What are the monitoring requirements if I am an owner or operator of an emergency stationary SI internal combustion engine?

#### **Compliance Requirements for Manufacturers**

- i. § 60.4238 What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines  $\leq$ 19 KW (25 HP) or a manufacturer of equipment containing such engines?
- j. § 60.4239 What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines  $>$ 19 KW (25 HP) that use gasoline or a manufacturer of equipment containing such engines?
- k. § 60.4240 What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines  $>$ 19 KW (25 HP) that are rich burn engines that use LPG or a manufacturer of equipment containing such engines?



- l. § 60.4241 What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines participating in the voluntary certification program or a manufacturer of equipment containing such engines?
- m. § 60.4242 What other requirements must I meet if I am a manufacturer of stationary SI internal combustion engines or equipment containing stationary SI internal combustion engines or a manufacturer of equipment containing such engines?

**Compliance Requirements for Owners and Operators**

- n. § 60.4243 What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?

**Testing Requirements for Owners and Operators**

- o. § 60.4244 What test methods and other procedures must I use if I am an owner or operator of a stationary SI internal combustion engine?

**Notification, Reports, and Records for Owners and Operators**

- p. § 60.4245 What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?

**General Provisions**

- q. § 60.4246 What parts of the General Provisions apply to me?

**Mobile Source Provisions**

- r. § 60.4247 What parts of the mobile source provisions apply to me if I am a manufacturer of stationary SI internal combustion engines or a manufacturer of equipment containing such engines?

**Definitions**

- s. § 60.4248 What definitions apply to this subpart?

9. The permittee, or the owner/operator (O/O), shall comply with all applicable requirements in 40 CFR Part 63, NESHAP, Subpart ZZZZ, for any existing, new, or reconstructed reciprocating internal combustion engines (RICE) including, but not limited to, the following.

[40 CFR §§ 63.6580 to 63.6675]

**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. § 63.6600 What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?
- f. § 63.6601 What emission limitations must I meet if I own or operate a new or reconstructed 4SLB stationary RICE with a site rating of greater than or equal to 250 brake HP and less than or equal to 500 brake HP located at a major source of HAP emissions?
- g. § 63.6602 What emission limitations and other requirements must I meet if I own or operate an existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?

h. § 63.6603 What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

i. § 63.6604 What fuel requirements must I meet if I own or operate a stationary CI RICE?

**General Compliance Requirements**

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

**Testing and Initial Compliance Requirements**

k. § 63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?

l. § 63.6611 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a new or reconstructed 4SLB SI stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions?

m. § 63.6612 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?

n. § 63.6615 When must I conduct subsequent performance tests?

o. § 63.6620 What performance tests and other procedures must I use?

p. § 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?

q. § 63.6630 How do I demonstrate initial compliance with the emission limitations, operating limitations, and other requirements?

**Continuous Compliance Requirements**

r. § 63.6635 How do I monitor and collect data to demonstrate continuous compliance?

s. § 63.6640 How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?

**Notifications, Reports, and Records**

t. § 63.6645 What notifications must I submit and when?

u. § 63.6650 What reports must I submit and when?

v. § 63.6655 What records must I keep?

w. § 63.6660 In what form and how long must I keep my records?

**Other Requirements and Information**

x. § 63.6665 What parts of the General Provisions apply to me?

y. § 63.6670 Who implements and enforces this subpart?

z. § 63.6675 What definitions apply to this subpart?

10. The following records shall be maintained on-site to verify Insignificant Activities. No recordkeeping is required for those operations which qualify as Trivial Activities.

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

a. For storage tanks with a capacity of less than or equal to 10,000 gallons which store VOLs 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 activity and the amount of emissions from that activity (annual).
11. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site or at a local field office for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-8-6 (a)(3)(B)]
- a. Operating hours for each engine/turbine and replacement engine/turbine if less than 220 hours per calendar quarter and not tested.
  - b. Periodic testing for each engine and replacement engines.
  - c. For the fuel(s) burned, the appropriate document(s) as described in Specific Condition No. 2.
  - d. Summary of O&M records for any engine/turbine not tested in each calendar quarter.
  - e. Condensate throughput for the facility (monthly and 12-month rolling total records).
  - f. Records as required by 40 CFR Part 60, NSPS, Subpart JJJJ.
  - g. Records as required by 40 CFR Part 63, NESHAP, Subpart ZZZZ.
12. No later than 30 days after each anniversary date of the issuance of this Title V permit, 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. This permit supersedes all previous Air Quality operating permits for this facility, which are now cancelled. [OAC 252:100-8-6(a)(2)]

**TITLE V (PART 70) PERMIT TO OPERATE / CONSTRUCT  
STANDARD CONDITIONS  
(June 21, 2016)**

**SECTION I. DUTY TO COMPLY**

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

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

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

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

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

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

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

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

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

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

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

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

B. Records of required monitoring shall include:

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

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

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

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

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

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

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

[OAC 252:100-43]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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:

- (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).

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

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:

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

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:
  - (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. [OAC 252:100-25]

- (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:

- (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. [40 CFR 82, Subpart A]

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:

- (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.
- [40 CFR 82, Subpart F]

## 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.

Chickasaw Nation  
Attn: Bill Anoatubby, Governor  
P.O. Box 1548  
Ada, OK 74821

Re: Permit Application No. 2021-5260-TVR  
Enable Gas Gathering, LLC, Ashland #2 Compressor Station (FAC ID 484)  
Coal County  
Date Received: October 15, 2021

Dear Mr. Anoatubby:

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](mailto: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, P.E.  
Chief Engineer  
**AIR QUALITY DIVISION**



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

Re: Permit Application No. 2021-5260-TVR  
Enable Gas Gathering, LLC, Ashland #2 Compressor Station (FAC ID 484)  
Coal County  
Date Received: October 15, 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](mailto: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, P.E.  
Chief Engineer  
**AIR QUALITY DIVISION**



Enable Gas Gathering, LLC  
Attn: Mr. Sean Walker, Senior Specialist - Environmental  
P.O. Box 24300, MC LS700  
Oklahoma City, OK 73124

SUBJECT: Title V Operation Permit No. **2021-5260-TVR**  
Ashland #2 Compressor Station (Facility ID: 484)  
Section 13, Township 3N, Range 11E  
Ashland, Coal 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 in this matter. If we may be of further service, please contact Junru Wang at [Junru.Wang@deq.ok.gov](mailto:Junru.Wang@deq.ok.gov) or (405) 702-4197.

Sincerely,



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

Enclosures

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

## **APPLICANT RESPONSIBILITIES**

Permit applicants are required to give public notice that a Tier II or Tier III draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. 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 NOTICES:**

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

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

**A Tier ...II or III... application for an air quality ...type of permit or permit action being sought (e.g., 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: <https://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.**

Enable Gas Gathering, LLC  
Attn: Mr. Sean Walker, Senior Specialist - Environmental  
P.O. Box 24300, MC LS700  
Oklahoma City, OK 73124

SUBJECT: Title V Operation Permit **No. 2021-5260-TVR**  
Ashland #2 Compressor Station (Facility ID: 484)  
Section 13, Township 3N, Range 11E  
Ashland, Coal County, Oklahoma

Dear Mr. Walker:

Enclosed is the Part 70 permit renewal authorizing operation of the referenced facility. Please note that this permit is issued subject to certain standard and specific conditions, which are attached. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections.

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

Thank you for your cooperation in this matter. If we may be of further service, please contact the permit writer at (405) 702-4197.

Sincerely,

**DRAFT/PROPOSED**

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

Enclosures



# 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. 2021-5260-TVR

Enable Gas Gathering, LLC

having complied with the requirements of the law, is hereby granted permission to operate their Ashland #2 Compressor Station in Section 13, Township 3N, Range 11E, near Ashland, Coal County, Oklahoma, subject to the Standard Conditions dated June 21, 2016, and Specific Conditions, both of which are attached.

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

DRAFT/PROPOSED

\_\_\_\_\_  
Division Director

Air Quality Division

\_\_\_\_\_  
Date

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

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



|                         |  |                         |                                       |
|-------------------------|--|-------------------------|---------------------------------------|
| <b>NOI</b>              | Notice of Intent   | <b>SIP</b>              | State Implementation Plan             |
| <b>NSCR</b>             | Non-Selective Catalytic Reduction                                  | <b>SNCR</b>             | Selective Non-Catalytic Reduction     |
| <b>NSPS</b>             | New Source Performance Standards                                   | <b>SO<sub>2</sub></b>   | Sulfur Dioxide                        |
| <b>NSR</b>              | New Source Review  | <b>SO<sub>x</sub></b>   | Sulfur Oxides                         |
|                         |  | <b>SOP</b>              | Standard Operating Procedure          |
| <b>O<sub>3</sub></b>    | Ozone  | <b>SRU</b>              | Sulfur Recovery Unit                  |
| <b>O&amp;G</b>          | Oil and Gas  |                         |                                       |
| <b>O&amp;M</b>          | Operation and Maintenance  | <b>T</b>                | Tons                                  |
| <b>O&amp;NG</b>         | Oil and Natural Gas  | <b>TAC</b>              | Toxic Air Contaminant                 |
| <b>OAC</b>              | Oklahoma Administrative Code                                       | <b>TEG</b>              | Triethylene Glycol                    |
| <b>OC</b>               | Oxidation Catalyst   | <b>THC</b>              | Total Hydrocarbons                    |
|                         |  | <b>TPY</b>              | Tons per Year                         |
| <b>PAH</b>              | Polycyclic Aromatic Hydrocarbons                                   | <b>TRS</b>              | Total Reduced Sulfur                  |
| <b>PAE</b>              | Projected Actual Emissions   | <b>TSP</b>              | Total Suspended Particulates          |
| <b>PAL</b>              | Plant-wide Applicability Limit                                     | <b>TV</b>               | Title V of the Federal Clean Air Act  |
| <b>Pb</b>               | Lead   |                         |                                       |
| <b>PBR</b>              | Permit by Rule   | <b>µg/m<sup>3</sup></b> | Micrograms per Cubic Meter            |
| <b>PCB</b>              | Polychlorinated Biphenyls  | <b>US EPA</b>           | U. S. Environmental Protection Agency |
| <b>PCE</b>              | Partial Compliance Evaluation                                      |                         |                                       |
| <b>PEA</b>              | Portable Emissions Analyzer  | <b>VFR</b>              | Vertical Fixed Roof                   |
| <b>PFAS</b>             | Per- and Polyfluoroalkyl Substance                                 | <b>VMT</b>              | Vehicle Miles Traveled                |
| <b>PM</b>               | Particulate Matter   | <b>VOC</b>              | Volatile Organic Compound             |
| <b>PM<sub>2.5</sub></b> | Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers | <b>VOL</b>              | Volatile Organic Liquid               |
|                         |  | <b>VRT</b>              | Vapor Recovery Tower                  |
| <b>PM<sub>10</sub></b>  | Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers  | <b>VRU</b>              | Vapor Recovery Unit                   |
|                         |  |                         |                                       |
| <b>POM</b>              | Particulate Organic Matter or Polycyclic Organic Matter            | <b>YR</b>               | Year                                  |
|                         |  |                         |                                       |
| <b>ppb</b>              | Parts per Billion  | <b>2SLB</b>             | 2-Stroke Lean Burn                    |
| <b>ppm</b>              | Parts per Million  | <b>4SLB</b>             | 4-Stroke Lean Burn                    |
| <b>ppmv</b>             | Parts per Million Volume   | <b>4SRB</b>             | 4-Stroke Rich Burn                    |
| <b>ppmvd</b>            | Parts per Million Dry Volume                                       |                         |                                       |
| <b>PSD</b>              | Prevention of Significant Deterioration                            |                         |                                       |
| <b>psi</b>              | Pounds per Square Inch   |                         |                                       |
| <b>psia</b>             | Pounds per Square Inch Absolute                                    |                         |                                       |
| <b>psig</b>             | Pounds per Square Inch Gage  |                         |                                       |
|                         |  |                         |                                       |
| <b>RACT</b>             | Reasonably Available Control Technology                            |                         |                                       |
| <b>RATA</b>             | Relative Accuracy Test Audit                                       |                         |                                       |
| <b>RAP</b>              | Regulated Air Pollutant or Reclaimed Asphalt Pavement              |                         |                                       |
| <b>RFG</b>              | Refinery Fuel Gas  |                         |                                       |
| <b>RICE</b>             | Reciprocating Internal Combustion Engine                           |                         |                                       |
| <b>RO</b>               | Responsible Official   |                         |                                       |
| <b>ROAT</b>             | Regional Office at Tulsa   |                         |                                       |
| <b>RVP</b>              | Reid Vapor Pressure  |                         |                                       |
|                         |  |                         |                                       |
| <b>SCC</b>              | Source Classification Code   |                         |                                       |
| <b>SCF</b>              | Standard Cubic Foot  |                         |                                       |
| <b>SCFD</b>             | Standard Cubic Feet per Day  |                         |                                       |
| <b>SCFM</b>             | Standard Cubic Feet per Minute                                     |                         |                                       |
| <b>SCR</b>              | Selective Catalytic Reduction                                      |                         |                                       |
| <b>SER</b>              | Significant Emission Rate  |                         |                                       |
| <b>SI</b>               | Spark Ignition   |                         |                                       |
| <b>SIC</b>              | Standard Industrial Classification                                 |                         |                                       |