

**DRAFT**

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

**MEMORANDUM**

**October 10, 2022**

**TO:** Phillip Fielder, Chief Engineer

**THROUGH:** Rick Groshong, Compliance and Enforcement Group Manager

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

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

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

**SUBJECT:** Evaluation of Permit Application **No. 2021-0456-TVR4**  
DCP Operating Company, LP  
Facility: Chitwood Gas Plant  
Facility ID No.: 1021  
Section 34, Township 5N, Range 6W, Grady County, Oklahoma  
Latitude: 34.85630°N Longitude: 97.82770° W  
Directions: From the intersection on E1450 rd. (H St.) & SR-19 located on the west side of Alex, OK, drive three-tenths (0.3) of a mile west on E1450 Rd., turn south and drive four (4) miles on Chitwood Expressway, turn west and drive one and nine-tenths (1.9) miles on E1490 Rd to the gas plant on the right (at N2900 Rd.)

**SECTION I. INTRODUCTION**

DCP Operating Company, LP (DCP) has requested renewal of their current Part 70 operating permit for their Chitwood Gas Plant (SIC 1321). The facility is currently operating under Permit No. 2016-1248-TVR3 issued April 20, 2017. The facility is a major source for Prevention of Significant Deterioration (PSD) and also a major source of Hazardous Air Pollutants (HAPs).

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

**SECTION II. FACILITY DESCRIPTION**

The Chitwood gas plant has currently nine stationary internal combustion engines in compressor service (seven grandfathered, one exempt, and two permitted), in addition to various process heaters, storage tanks, and equipment for natural gas liquids extraction.

Chitwood Gas Plant was constructed in 1948 and converted to a lean oil absorption plant in 1964. In 1976, the plant replaced the lean oil plant with a cryogenic unit and added a second cryogenic skid in 1983. In 2013, a NGL mole sieve dehydration unit and a TEG dehydration unit was added. The liquid-to-liquid amine unit and the TEG dehydration unit are both controlled with a new thermal oxidizer.

Chitwood Gas Plant receives natural gas from field operations through high pressure inlet separators. The high-pressure gas enters the molecular sieve dehydration columns where entrained water is removed. After passing through the molecular sieve columns the dry gas is sent to the cryogenic unit where natural gas liquids (NGL) are removed from the gas stream. The resulting residue gas is recompressed to the facility discharge and enters three transmission sales lines.

Condensate from the plant inlet separators is stored in pressurized bullet tanks and then combined with the NGL from the cryogenic plants. The liquids are sent to the amine treating unit where any CO<sub>2</sub> or H<sub>2</sub>S is removed. The amine still vent vapors are combusted by the Thermal Oxidizer and the flash tank vapors are sent back to the low pressure gathering. After the amine treating, the liquids are saturated with water and must then be dried in a second set of mole sieve dehydrating columns. The dry NGL/Condensate is routed by pipeline out of the facility.

Hot residue gas is used to dry the molecular sieve for the inlet and the NGL. The inlet molecular sieve on the regeneration cycle routes hot, dry residue gas through the packed column and sends the saturated gas through a set of condensers to remove excess water prior to being recombined with the residue discharge stream. For the NGL molecular sieve regeneration, hot residue gas is used to dry the bed. The saturated residue gas is then routed to a TEG dehydration unit to remove the water prior to being recombined with the residue discharge stream.

In addition to the plant process, condensate from field operations is transported to Chitwood Plant and offloaded to the Slop Oil Tanks (T-1 & T-2). From the slop oil tanks, the liquids are manifolded together and pumped to the heater treater where the lighter end hydrocarbons are driven off and sent to low pressure gathering. The stabilized condensate is then transferred to condensate tank T-4 and sequentially to T-3. Condensate is then removed from T-3. Any water generated by the heater treater is dumped to the water tanks, T-5 and T-6a, and removed by truck.

### SECTION III. PERMIT HISTORY

Permits	Date Issued	Description
2016-1248-TVR3	4/20/2017	Third renewal of TV operating permit
2011-629-TVR2 (M-2)	9/27/2016	Minor modification: add NGL treating system
2011-629-TVR2 (M-1)	4/15/2013	Minor modification: add IC engine for electrical generation
2011-629-TVR2	6/14/2012	Second renewal of TV operating permit
2006-224-TVR (M-3)	6/13/2012	Minor modification: add thermal oxidizer to amine unit vent
2006-224-TVR (M-2)	6/9/2010	Minor modification: add spare engine

Permits	Date Issued	Description
2006-224-TVR (M-1)	4/24/2008	Minor modification: re-classify two engines from rich-burn to lean-burn
2006-224-TVR	2/9/2007	First TV operating permit renewal
97-225-TV (M-1)	4/2/2003	Administrative amendment: add new federal regulations
97-225-TV	1/24/2002	Initial TV operating permit
97-225-AD	8/28/1998	Applicability Determination: vapor extraction and air sparge system
96-266-C	8/19/1996	Construction permit: four added engines
80-075-C	10/31/1980	Construction permit: add compressor engine

**SECTION IV. REQUESTED CHANGES**

- The application is requesting to update the list of tanks, now adding many insignificant tanks that were not previously listed, such as lube oil, amine, antifreeze, etc.
- Emissions from “slop oil” and condensate tanks are being updated. Due to the different calculation methodology (AP-42 (6/20) instead of Tanks4.09d), calculated VOC emissions will decrease. However, no changes have been made in the permitted emissions in the permit.
- Emissions from truck loading and unloading operations are being updated. Wastewater loading, previously not included, will be evaluated. VOC emissions will decrease from the updates.

Estimated emissions are being updated in the memo which results in a decrease but no change is occurring to permitted emissions.

**SECTION V. EQUIPMENT**

**EUG G-1A Grandfathered / Exempted Engines**

EU ID #	Make/Model	HP	Serial #	Installed Date
C-1	Cooper-Bessemer GMV-8	880	42118	1948
C-2	Cooper-Bessemer GMV-8	880	42119	1948
C-3	Cooper-Bessemer GMV-8	880	41938	1947
C-4	Cooper-Bessemer GMV-8	880	41704	1949
C-6	Ingersol-Rand KVS-8	1,320	48FT389	1962
C-7	Ingersol-Rand KVS-8	1,320	48FT387	1962
C-8	Cooper-Bessemer GMV-10	1,100	42222	1979

**EUG G-1B Permitted Engines**

EU ID #	Make/Model	HP	Serial #	Construction Date
C-9	Cooper-Bessemer GMV-10	1,100	42225	1980
C-10A	Waukesha L7042GSI ESM /cc	1,478	C18302/1	8/1/2008

**EUG G-1C Generator**

EU ID #	Make/Model	HP	Serial #	Construction Date
G-1	Generac Generator	55	SDA6153	5/14/07

**EUG G-1D Emergency Use Engine**

EU ID #	Make/Model	HP	Serial #	Construction Date
P-1	Caterpillar 3306 DIT	231	64Z04721	3/14/1986

**EUG G-2A Grandfathered Heaters**

EU ID #	Equipment	MMBTUH	Installed Date
H-1	Hot oil heater	8.5	1948
H-2	Process heater	30	1971
H-5	Heater treater	7.0	1964
H-6	Heater treater	7.0	1964

**EUG G-2B Other Heaters**

EU ID #	Equipment	MMBTUH	Installed Date
H-3	Reboiler	0.75	1986
H-4*	Heater	3.5	1996
H-7	Hot Oil Heater	9.12	2013

\*- Out of service

**EUG G-4 Fugitive VOC Leakage**

EU ID #	Equipment	Number of Items	Installed Date
F-1	Equipment in gas/vapor service	124 Valves	1948 / 1976/ 1983
		25 Relief Valves	
		18 Compressor Seals	
		1,024 Connectors/ Flanges	

EU ID #	Equipment	Number of Items	Installed Date
F-2	Equipment in light liquid service	217 Valves	1948 / 1976 / 1983
		50 Relief Valves	
		20 Pump Seals	
		1,510 Connectors/ Flanges	
F-3	New Non-OOOO Process Piping Fugitives (Stream VOC <10%)	180 Valves	2013
		10 Relief Valves	
		1 Compressor Seal	
		360 Connectors/ Flanges	
F-OOOO	New OOOO Process Piping Fugitives	270 Valves	2013
		540 Flanges	
		5 Pump Seals	
		10 Relief Valves	

**EUG G-5 Tanks**

EU ID #	Contents	Gallons	Installed/ Modified Date
T-1	Slop oil	16,800	2011
T-2	Slop oil	16,800	2011
T-3	Condensate	16,800	2010
T-4	Condensate	16,800	2010

**EUG G-5A Insignificant Tanks**

EU ID #	Contents	Gallons	Installed/ Modified Date
T-5	Slop water	16,800	2010
T-6a*	Slop water	16,800	2013
T-7	Methanol	39,984	1950
T-8	Lube oil	4,200	1979
T-9	Lube oil	8,820	1979
T-10	Lube oil	500	2008
T-11	Therminol	1,000	2015
T-12	TEG	1,000	2015
T-13	Antifreeze	200	2015
T-14	Skid oil E-401	110	2015
T-15	Lube oil	110	2015
T-16	Lube oil	290	2015
T-17	Diesel	350	2015
T-18	Antifreeze	8,820	2015
T-19	Amine	6,320	2015

<b>EU ID #</b>	<b>Contents</b>	<b>Gallons</b>	<b>Installed/ Modified Date</b>
T-20	Amine	715	2015
T-21	Lean oil T-1101B	8,820	2015
T-22	Skimmer pit	5027	Pre-2008
T-23	Unit C-10A sump	1,270	2009
T-24	D-1701 sump	1,270	Pre-2008
<b>PRESSURE TANKS</b>			
D-74174	Methanol	40,000	Pre-1995
D-19720	NGL Raw Mix	40,000	Pre-1995
D-19719	NGL Raw Mix	40,000	Pre-1995
D-19718	Propane	40,000	Pre-1995
D-209	W. Stabilizer	25,000	Pre-1995
D-210	E. Stabilizer	25,000	Pre-1995

\* - Indicates tank replaced in 2013 and renamed.

**EUG G-6 Miscellaneous Activities**

<b>EU ID #</b>	<b>Activity</b>	<b>Installed Date</b>
L-1	Truck load-out	1964
L-2	Truck offloading	2013

**EUG G-7A Emergency Relief Vent**

<b>EU ID #</b>	<b>Activity</b>	<b>Installed Date</b>
EV-1	Emergency vent	1964

**EUG G-7B Amine Unit & Dehydration Unit**

<b>EU ID #</b>	<b>Point</b>	<b>Activity</b>	<b>Installed Date</b>
V-1	TO-1 A/D	Amine unit vent	1977
DEHY	TO-1 A/D	TEG Dehydrator unit still vent	2013
TO-1 A/D	TO-1 A/D	Amine and Dehydration unit thermal oxidizer	2011 / 2013

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

Since no emissions limits are being increased from the previous permit, no sampling is required.

**SECTION VII. EMISSIONS**

**EUG G-1:** Emissions estimates for engines C-1 through C-10A are based on continuous operation and the following manufacturers’ emission data except for formaldehyde, which was taken from AP-42 (7/00), Section 3.2. Emission estimates for the generator reflect continuous operations (8,760 hr/yr) using emission factors taken from AP-42 (7/00), Table 3.2-3. Emissions estimates for the emergency use fire pump engine reflect potential operation of 500 hrs/yr using emission factors taken from AP-42 (10/96), Table 3.3-1 for uncontrolled gasoline and diesel industrial engines.

**Engine Emission Factors**

ID#	NO <sub>x</sub>	CO	VOC *	CH <sub>2</sub> O **
	g/hp-hr	g/hp-hr	g/hp-hr	lb/MMBTU
C-1	14.0	5.0	2.0	0.0552
C-2	14.0	5.0	2.0	0.0552
C-3	14.0	5.0	2.0	0.0552
C-4	14.0	5.0	2.0	0.0552
C-6	11.0	1.85	0.6	0.0528
C-7	11.0	1.85	0.6	0.0528
C-8	14.0	5.0	2.0	0.0552
C-9	14.0	5.0	2.0	0.0552
C-10A	2.0	3.0	1.0	0.00492
G-1	2.21 lb/MMBTU	3.72 lb/MMBTU	0.0296 lb/MMBTU	0.02050
P-1	4.41 lb/MMBTU	0.95 lb/MMBTU	0.35 lb/MMBTU	0.00118

\*Above factors do not include formaldehyde.

\*\*Fuel consumption is 8,000-BTU/hp-hr.

**Engine Emissions**

ID#	NO <sub>x</sub>		CO		VOC		H <sub>2</sub> CO	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
C-1	27.16	118.96	9.70	42.49	4.28	18.75	0.40	1.76
C-2	27.16	118.96	9.70	42.49	4.28	18.75	0.40	1.76
C-3	27.16	118.96	9.70	42.49	4.28	18.75	0.40	1.76
C-4	27.16	118.96	9.70	42.49	4.28	18.75	0.40	1.76
C-6	32.01	140.21	5.38	23.58	2.25	9.85	0.50	2.20
C-7	32.01	140.21	5.38	23.58	2.25	9.85	0.50	2.20
C-8	33.95	148.71	12.13	53.11	5.35	23.42	0.50	2.17
C-9	33.95	148.71	12.13	53.11	5.35	23.42	0.50	2.17
C-10A	6.52	28.54	9.78	42.82	3.32	14.52	0.06	0.25
G-1	1.24	5.42	2.08	9.12	0.03	0.12	0.01	0.05
P-1	7.13	1.78	1.54	0.38	0.58	0.15	< 0.01	< 0.01

ID#	NO <sub>x</sub>		CO		VOC		H <sub>2</sub> CO	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
<b>TOTALS</b>	<b>255.45</b>	<b>1,089.4 2</b>	<b>87.22</b>	<b>375.66</b>	<b>36.25</b>	<b>156.33</b>	<b>3.67</b>	<b>16.08</b>

VOC includes formaldehyde.

**EUG G-2A and G-2B:** Emission estimates for the heaters are based on AP-42 (7/98), Table 1.4-2.

**Heater/Reboiler Emission Factors**

ID#	NO <sub>x</sub>	CO	VOC
	lb/MMSCF	lb/MMSCF	lb/MMSCF
H-1	100	84	5.5
H-2*	100	84	5.5
H-3	100	84	5.5
H-4*	100	84	5.5
H-5	100	84	5.5
H-6*	100	84	5.5
H-7	100	84	5.5

\*- Out of Service

**Heater/Reboiler Emissions**

ID#	Rating	NO <sub>x</sub>		CO		VOC	
	MMBTUH	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
H-1	8.5	0.85	3.72	0.75	3.28	0.05	0.22
H-2*	30	3.00	13.14	2.55	11.17	0.16	0.70
H-3	7.0	0.08	0.35	0.06	0.26	0.01	0.04
H-4*	7.0	0.35	1.53	0.30	1.30	0.02	0.09
H-5	0.75	0.70	3.07	0.59	2.58	0.04	0.18
H-6*	3.5	0.70	3.07	0.59	2.58	0.04	0.18
H-7	9.12	0.91	3.99	0.77	3.36	0.05	0.22

\*- Out of Service

**EUG G-4:** Emissions from fugitive equipment leaks (FUG1) are based on EPA’s “Protocol for Equipment Leak Emission Estimates” (11/95, EPA-453/R-95-017), an estimated number of components, and the VOC (C<sub>3+</sub>) and HAP content of the materials handled.



**Fugitive Emissions**

Component Type	Type of Service	Number of Items	Emission Factor lb/hr/source	lb/hr	TPY
F1					
Valves	Gas/ Vapor	124	0.0032	0.401	1.755
Relief Valves	Gas/ Vapor	25	0.0063	0.158	0.692
Compressor Seals	Gas/ Vapor	18	0.0063	0.114	0.498
Connectors/Flanges	Gas/ Vapor	1,024	0.0003	0.287	1.256
F2					
Valves	Light Liquid	217	0.0055	1.183	5.182
Relief Valves	Light Liquid	50	0.0164	0.818	3.582
Pump Seals	Light Liquid	20	0.0164	0.567	2.484
Connectors/Flanges	Light Liquid	1,510	0.0005	0.687	3.010
F-3 <sup>1</sup>					
Valves	Gas/ Vapor	180	0.00992	0.04	0.16
Relief Valves	Gas/ Vapor	10	0.00086	0.006	0.03
Compressor Seals	Gas/ Vapor	1	0.0194	< 0.01	< 0.01
Connectors/Flanges	Gas/ Vapor	360	0.0194	< 0.01	0.02
F-OOOO <sup>2</sup>					
Valves	Light Liquid	270	0.0055	0.04	0.16
Relief Valves	Light Liquid	540	0.0002	0.003	0.014
Pump Seals	Light Liquid	5	0.0287	0.008	0.04
Connectors/Flanges	Light Liquid	10	0.0194	0.005	0.02
<b>TOTALS</b>			<b>F-1 / F-2</b>	<b>4.215</b>	<b>18.46</b>
			<b>F-3</b>	<b>0.046</b>	<b>0.20</b>
			<b>F-OOOO</b>	<b>0.051</b>	<b>0.23</b>

1 – Components in gas service with VOC content less than 10% therefore do not meet definition of VOC service.

2 – Components in VOC service, subject to NSPS Subpart OOOO.

**EUG G-5:** Condensate and produced water are hauled into the facility and offloaded at the slop tanks. No flash is anticipated for these liquids which are hauled in from DCP booster stations. The produced water is assumed to contain 1% condensate. Working and breathing losses are calculated using AP-42 (3/20). Section 7.1.).

**Tank Emissions (per tank)**

<b>Parameter</b>	<b>T-1 &amp; T-2 Data</b>	<b>T-3 Data</b>	<b>T-4 Data</b>	<b>T-5 &amp; T-6a Data</b>
Throughput, gal/yr	3,510,750	3,510,750	3,510,750	1,625,004
Liquid in Tank(s)	Condensate/Water	Stabilized Condensate	Stabilized Condensate	Wastewater
Working/Breathing Method/Tool	AP-42 (6/20) Section 7.1	AP-42 (6/20) Section 7.1	AP-42 (6/20) Section 7.1	AP-42 (6/20) Section 7.1
Flash Calculation Method/Tool	N/A	N/A	N/A	N/A
Working/Breathing Emissions, TPY	5.70	2.89	2.89	0.06
Flashing Emissions, TPY	--	--	--	--
Heater Treater Flash Emissions, TPY	--	--	Routed to inlet	--
Control Type	None	None	None	None
Tank VOC Emitted at Tank, TPY	5.70	2.89	2.89	0.06
Flash Gas VOC Emitted at Tank, TPY	--	--	--	--

**Tank Emissions**

<b>EU</b>	<b>Contents</b>	<b>Throughput (gal/yr)</b>	<b>VOC TPY</b>
T-1	Condensate/Water	3,510,750	5.70
T-2	Condensate/Water	3,510,750	5.70
T-3	Stabilized Condensate	3,510,750	2.89
T-4	Stabilized Condensate	3,510,750	2.89
T-5	Wastewater	1,625,004	0.06
T-6a	Wastewater	1,625,004	0.06
<b>TOTALS</b>			<b>17.29</b>
Existing Totals			42.24

**EUG G-6:** Emissions from loading condensate and produced water into tank trucks were estimated using AP-42 (6/08), Section 5.2, Equation 1, and the parameters listed in the table following. The vapor pressure, molecular weight, and temperature listed are from AP-42 (11/19), Section 7.1 defaults for Oklahoma City and Motor Gasoline (RVP 9). Produced water loading emissions were calculated with inputs adjusted to reflect a 99% water and 1% condensate mixture.

**Loading Parameters and Emissions**

Parameter	L-1	L-2
Liquids Loaded	Condensate/Oil	Wastewater
Throughput, gal/yr	3,510,750	1,625,004
Saturation Factor	0.6	0.6
Temp., °F	63	63
TVP, psia	3.98	3.98
MW, lb/lbmol	68	68
VOC, wt.%	100	1
Emission Factor, lb/10 <sup>3</sup> gal <sup>(1)</sup>	3.87	3.87
Control Method	None	None
VOC Emitted at Truck, TPY	6.79	0.03

<sup>(1)</sup> Final factor; no VOC reduction stated for methane/ethane.

**EUG G-7A:** Emissions for the emergency vent were taken from the previous owner’s emissions inventory, no calculations were provided, but the vent is considered “grandfathered.”

**Maintenance, Startup, and Shutdown Emissions**

ID#	VOC, TPY
EV-1	443.00

**EUG G-7B:** Combustion emissions from the thermal oxidizer were based on AP-42 (7/98), Table 1.4-2. SO<sub>2</sub> and H<sub>2</sub>S emissions were modeled using Aspen HYSYS Version 2006 (20.0.0.6728) with the following results:

- H<sub>2</sub>S Inlet (lb/hr) = 1.69 (Inlet mass flow based on 90 MMSCFD with a concentration of 5.0-ppm H<sub>2</sub>S.)
- H<sub>2</sub>S Sales (lb/hr) = 0.0681 (Piped out with residue sales.)

**AMINE UNIT**

Emission estimates from the amine, methyldiethanolamine (MDEA), unit’s regenerator vent and flash tank are based on the API program AMINECalc Version 1.0, an inlet gas analysis, and continuous operation. Note that the unit is a liquid-liquid extraction operation. Emissions from the amine unit regenerator still vent and flash tank are routed to a thermal oxidizer. Controlled emissions are represented at the amine unit TO in the facility-wide emission summary and are shown in the following table are for informational purposes.

**Amine Unit**

Parameter	Data
Type of Amine	DGA
Inlet Gas Flow Rate, MMSCFD	90
Inlet Gas H <sub>2</sub> S Concentration, ppmv	5.0
Outlet Liquid H <sub>2</sub> S Concentration, ppmv	0.0553
Lean Amine Pump Design Capacity, gpm	56
Lean Amine Recirculation Rate Input, gpm	28
Amine Unit Inlet Liquid Temperature, °F	75 - 120

<b>Parameter</b>	<b>Data</b>
Amine Unit Inlet Gas Pressure, psig	750 – 1,000
Amine Solution Concentration, wt. %	50 - 55
<b>Regenerator Vent</b>	
Control Method	Thermal Oxidizer
VOC/H <sub>2</sub> S Control Efficiency, %	95
<b>Flash Tank</b>	
Flash Tank Temperature, °F	120
Flash Tank Pressure, psig	100
Control Method	Recycle
VOC/H <sub>2</sub> S Control Efficiency, %	100%
<b>Total Emissions, TPY (controlled)</b>	
VOC	0.22
H <sub>2</sub> S, lb/hr	0.08
SO <sub>2</sub> , lb/hr	3.16

DEHYDRATION UNIT

VOC and HAP emissions from the glycol dehydration unit that dries the NGL mole sieve regen gas were estimated using the GRI software, “GLYCalc 4.0” using an extended gas analysis, and maximum glycol circulation capacity. A gas flow of 7.5 MMSCFD and a glycol circulation rate of 4.0 GPM were entered into the program for the dehydration unit. While the unit will be equipped with a condenser and the overheads routed to the thermal oxidizer, the calculations were done with the assumption of no controls to show that the facility modification will not be subject to PSD. The flash tank is routed either to the gathering system or the inlet to be processed.

**Dehydration Unit**

<b>Parameter</b>	<b>Data</b>
Type of Glycol	TEG
Dry Gas Flow Rate, MMSCFD	7.5
Glycol Pump Type	Electric
Lean Glycol Pump Design Capacity, gpm	4.0
Lean Glycol Recirculation Rate Input, gpm	4.0
<b>Regenerator Vent</b>	
Condenser Outlet Temperature, °F	N/A
Control Method	Condenser/Combustion
Overall Control Efficiency, %	95
VOC Emissions, TPY (Pre-control)	5.94
<b>Flash Tank</b>	
Flash Tank Temperature, °F	147
Flash Tank Pressure, psig	84
Control Method	Recycled/Recompressed
VOC Control Efficiency, %	100
VOC Emissions, TPY	0
<b>Total Emissions, TPY</b>	

Parameter	Data
VOC	0.30
Total HAP	0.05

**FLARES/COMBUSTORS**

Emission factors of NO<sub>x</sub> and CO are taken from AP-42, Chapter 1, Table 1.4-1 for Natural Gas Combustion.. VOC emissions from the amine unit / dehydration unit oxidizer (TO-1 A/D) are based on the calculated flow rate and composition of the gas from the dehy and amine regenerator still vents, with a 95 % destruction efficiency. SO<sub>2</sub> emissions were based on an inlet concentration of 5 ppmv and 100% conversion of H<sub>2</sub>S to SO<sub>2</sub>.

**Flare/Combustor Combustion Emissions**

ID#	Total Gas Combusted MMBTUH	Emission Factor lb/MMBTU <sup>1</sup>		NO <sub>x</sub> TPY	CO TPY
		NO <sub>x</sub>	CO		
TO-1 A/D	4.0	0.098	0.082	1.76	1.48

<sup>1</sup> lb/MMBTU derived from AP-42 Table 1.4-1 and divided by 1020 btu/scf to convert to lb/MMBTU

**Flare/Combustor Emissions**

ID#	Process Point(s)	VOC Emissions, TPY	SO <sub>2</sub> Emissions, TPY
TO-1 A/D	Amine Unit	0.22	13.82
	Dehydration Unit	0.30	-

**Total Potential Emissions**

EU ID #	Source	NO <sub>x</sub>		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
C-1	Cooper Bessemer GMV-8	27.16	118.96	9.70	42.49	4.28	18.75
C-2	Cooper Bessemer GMV-8	27.16	118.96	9.70	42.49	4.28	18.75
C-3	Cooper Bessemer GMV-8	27.16	118.96	9.70	42.49	4.28	18.75
C-4	Cooper Bessemer GMV-8	27.16	118.96	9.70	42.49	4.28	18.75
C-6	Ingersol-Rand KVS-8	32.01	140.21	5.38	23.58	2.25	9.85
C-7	Ingersol-Rand KVS-8	32.01	140.21	5.38	23.58	2.25	9.85
C-8	Cooper Bessemer GMV-10	33.95	148.71	12.13	53.11	5.35	23.42
C-9	Cooper Bessemer GMV-8	33.95	148.71	12.13	53.11	5.35	23.42
C-10A	Waukesha L7042GSI <sup>CC</sup>	6.52	28.54	9.78	42.82	3.32	14.52
G-1	Generac Generator	1.24	5.42	2.08	9.12	0.03	0.12
P-1	Caterpillar 3306 DIT	7.13	1.78	1.54	0.38	0.58	0.15
H-1	Hot Oil Heater	0.85	3.72	0.75	3.29	0.05	0.22
H-2	Process Heater	3.00	13.14	2.55	11.17	0.16	0.70
H-3	Reboiler	0.08	0.35	0.06	0.26	0.01	0.04
H-4	Heater*	0.35	1.53	0.30	1.31	0.02	0.09
H-5	Heater Treater	0.70	3.07	0.59	2.58	0.04	0.18

EU ID #	Source	NO <sub>x</sub>		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
H-6	Heater Treater	0.70	3.07	0.59	2.58	0.04	0.18
H-7	Hot Oil Heater	0.91	3.99	0.77	3.36	0.05	0.22
T-1	400-bbl Slop Oil Tank	--	--	--	--	--	5.70
T-2	400-bbl Slop Oil Tank	--	--	--	--	--	5.70
T-3	400-bbl Condensate Tank	--	--	--	--	--	2.89
T-4	400-bbl Condensate Tank	--	--	--	--	--	2.89
T-5	400-bbl Slop Oil Tank	--	--	--	--	--	0.06
T-6a <sup>1</sup>	400-bbl Slop Oil Tank	--	--	--	--	--	0.06
T-7	1,000-bbl Methanol Tank	--	--	--	--	--	0.35
T-8	100-bbl Lube Oil Tank	--	--	--	--	--	0.01
T-9	210-bbl Lube Oil Tank	--	--	--	--	--	0.01
T-10	500 gallon Lube Oil Tank	--	--	--	--	--	0.01
L-1	Truck Loading	--	--	--	--	--	6.79
L-2	Waste Water Loading	--	--	--	--	--	0.03
EV-1	Emergency Vent	--	--	--	--	--	443.0
TO-1A/D	Amine and Dehy Unit TO	0.40	1.76	0.34	1.48	0.14	0.62
F-1/F-2	Process Piping Fugitive	--	--	--	--	4.22	18.46
F-3	New Non-OOOO Process Piping Fugitive	--	--	--	--	0.05	0.20
F-OOOO	New OOOO Process Piping Fugitives	--	--	--	--	0.05	0.23
B-1	Blowdowns	--	--	--	--	--	0.49
<b>Total Emissions</b>		<b>262.44</b>	<b>1,120.05</b>	<b>93.17</b>	<b>401.69</b>	<b>41.08</b>	<b>645.46</b>
<b>Current Permit</b>		<b>289.60</b>	<b>1,239.0</b>	<b>102.87</b>	<b>444.18</b>	<b>41.28</b>	<b>679.18</b>
<b>CHANGES</b>		<b>-27.16</b>	<b>-118.95</b>	<b>-9.70</b>	<b>-42.49</b>	<b>-0.20</b>	<b>-33.72</b>

<sup>CC</sup> - w/ catalytic converter \* - out of service <sup>1</sup>-Tank replaced in 2013 with T-6a

**FACILITY WIDE HAP EMISSIONS**

Formaldehyde emissions from the engines were based on AP-42 (7/00), Section 3.2 except for the emergency fire pump which was based on AP-42 (10/96) Table 3.3-2. The facility is a major source of HAP.

EU ID #	Engine Model	Hp	Emission Factor lb/MMBTU	Formaldehyde	
				lb/hr	TPY
C-1	Cooper-Bessemer GMV-8	880	0.0552	0.40	1.76
C-2	Cooper-Bessemer GMV-8	880	0.0552	0.40	1.76
C-3	Cooper-Bessemer GMV-8	880	0.0552	0.40	1.76
C-4	Cooper-Bessemer GMV-8	880	0.0552	0.40	1.76
C-6	Ingersol-Rand KVS-8	1,320	0.0528	0.50	2.20
C-7	Ingersol-Rand KVS-8	1,320	0.0528	0.50	2.20

EU ID #	Engine Model	Hp	Emission Factor lb/MMBTU	Formaldehyde	
				lb/hr	TPY
C-8	Cooper-Bessemer GMV-10	1,100	0.0552	0.50	2.17
C-9	Cooper-Bessemer GMV-10	1,100	0.0552	0.50	2.17
C-10A	Waukesha L7024GSI w/cc	1,478	0.00492	0.06	0.25
G-1	Generac Generator	55	0.02050	0.01	0.05
P-1	Caterpillar 3306 DIT	231	0.00118	0.01	0.01
<b>TOTAL</b>				<b>3.67</b>	<b>16.08</b>

**Dehydration Unit HAP Emissions**

Pollutant	Uncontrolled Emissions		Controlled Emissions	
	lb/hr	TPY	lb/hr	TPY
Benzene	0.03	0.11	<0.01	<0.01
Toluene	0.03	0.12	<0.01	<0.01
Ethyl Benzene	< 0.01	< 0.01	<0.01	<0.01
Xylene	0.01	0.03	<0.01	<0.01
n-Hexane	0.16	0.70	<0.01	0.035
<b>TOTALS</b>	<b>0.22</b>	<b>0.96</b>	<b>0.05</b>	<b>0.06</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 “\*” is specified in the Specific Conditions.

1. Space heaters, boilers, process heaters and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas). Heater H-3 meets this criterion.
2. Emissions from crude oil or condensate marine and truck loading equipment operations at crude oil and natural gas production sites where the loading rate does not exceed 10,000 gallons per day averaged over a 30-day period. The truck loading operation is in this category. However, since the operation is also grandfathered, no recordkeeping will be required for it.
3. \* Activities that have the potential to emit no more than 5.0 TPY (actual) of any criteria pollutant. Lubricating oil storage tanks and amine storage are in this category.

**SECTION IX. OKLAHOMA AIR POLLUTION CONTROL RULES**

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

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

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

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

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

- 5 TPY of any one criteria pollutant
- 2 TPY of any one hazardous air pollutant (HAP) or 5 TPY of multiple HAPs or 20% of any threshold less than 10 TPY for a HAP that the 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, or developed from the applicable requirement.

OAC 252:100-9 (Excess Emission Reporting Requirements) [Applicable]  
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible, but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emissions 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 event describing the extent of the event and the actions taken by the owner or operator in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emissions 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]  
This subchapter specifies a particulate matter (PM) emissions limitation of 0.6 lb/MMBTU from fuel-burning equipment with a rated heat input of 10 MMBTUH or less. AP-42, Table 1.4-2 (7/98) lists the total PM emissions for natural gas to be 7.6 lb/MMft<sup>3</sup> or about 0.0076 lb/MMBTU. AP-42 (7/00), Table 3.2, list the total PM emissions for natural gas to be 0.00991 lb/MMBTU for four-cycle rich burn engines, 0.00991 lb/MMBTU for four-cycle lean-burn engines, and 0.0384 lb/MMBTU for two-cycle lean burn engines. The permit requires the use of natural gas for all fuel-burning equipment to ensure compliance with Subchapter 19.

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

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

OAC 252:100-31 (Sulfur Compounds) [Applicable]  
Part 2, Section 31.7 limits the ambient air concentration of hydrogen sulfide (H<sub>2</sub>S) emissions from any facility to 0.2 ppmv (24-hour average) at standard conditions which is equivalent to 283 ug/m<sup>3</sup> (based on EPA standard conditions).  
Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBTU heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,000 BTU/SCF, this limit corresponds to fuel sulfur content of 1,203-ppmv. The permit requires the use of gaseous fuel with sulfur content less than 162-ppmv 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. All of the emission units that exceed the 50 MMBTUH threshold are considered existing emission units.

OAC 252:100-37 (Volatile Organic Compounds)

[Applicable]

Part 3 requires new storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and containing 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. The methanol tank, installed in 1954 or before, pre-dates this rule. The lube oil tanks contain organic liquids with vapor pressures below 1.5-psia. Tanks 1 – 4 for condensate and slop oil are subject to this requirement.

Part 3 requires 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. The loading operation, installed in 1964, predates this rule.

Part 5 limits the VOC content of coatings used in coating operations. 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 all effluent water separators openings or floating roofs to be sealed or equipped with an organic vapor recovery system. No effluent water separators are located at this facility.

Part 7 also requires fuel-burning equipment to be operated and maintained so as to minimize emissions. Temperature and available air must be sufficient to provide essentially complete combustion.

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

[Applicable]

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

OAC 252:100-43 (Sampling and Testing Methods)

[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. Since no stack exceeds 100 TPY, only quarterly testing on the permitted engines will be required.

**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 252:100-35	Carbon Monoxide	not in source category
OAC 252:100-39	Nonattainment Areas	not in area category
OAC 252:100-47	Landfills	not in source category

**SECTION X. FEDERAL REGULATIONS**

PSD, 40 CFR Part 52 [Not Applicable]  
 Total potential emissions of NO<sub>x</sub>, CO, and VOC are greater than the significance level of 250 TPY. Any future emission increases must be evaluated for PSD if they exceed a significance level (100 TPY CO, 40 TPY NO<sub>x</sub>, 40 TPY SO<sub>2</sub>, 40 TPY VOC, 25 TPY PM, 15 TPY PM<sub>10</sub>, 0.6 TPY lead).

NSPS, 40 CFR Part 60 [Subpart JJJJ and OOOO Applicable]  
Subparts K and Ka, Petroleum Liquids Storage Vessels. None of the tanks are subject to any of the subparts because they were either installed prior to an applicable date or are too small.  
Subpart Kb, VOL Storage Vessels. This subpart regulates hydrocarbon storage tanks larger than 19,813 gallons (472-bbl) capacity and built after July 23, 1984. The tanks at this facility are below the threshold and are therefore not subject.  
Subpart GG, Stationary Gas Turbines. There are none at this facility.  
Subpart VV, Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry. The equipment is not in a SOCOMI plant.  
Subpart KKK, Equipment Leaks of VOC from Onshore Natural Gas Processing Plants. This Subpart applies to compressors in VOC service or in wet gas service, equipment except compressors within a process unit, dehydration units, sweetening units, underground tanks, gathering systems, or liquefied natural gas units located at onshore natural gas processing plants if constructed, reconstructed, or modified after January 20, 1984, and on or before August 23, 2011. All natural gas liquids extraction equipment was installed prior to January 20, 1984, the effective date of Subpart KKK. All of the compressors are either considered “grandfathered” or not “in VOC service.”  
Subpart LLL, Onshore Natural Gas Processing: SO<sub>2</sub> Emissions, sets standards for natural gas sweetening units. The sweetening operation at this site was installed in 1977, prior to the effective date of Subpart LLL (January 20, 1984).

Subpart JJJJ, Standards of Performance for 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). With the exception of Engine C-10A and Generator G-1, all the compressor engines at this facility as well as the emergency use fire pump engine were constructed prior to June 6, 2006, and are exempt from this subpart. Engine C-10A and Generator G-1 were manufactured after June 6, 2006, and are subject to this subpart.

Subpart OOOO, Crude Oil and Natural Gas Production, Transmission, and Distribution. This subpart regulates equipment at crude oil and natural gas production, transmission and distribution facilities that commenced construction, reconstruction, or modification after August 23, 2011, and on or before September 18, 2015. This subpart regulates single well heads, centrifugal and reciprocating compressors, single continuous bleed natural gas driven pneumatic controllers with a natural gas bleed rate greater than 6 standard cubic feet per hour (SCFH), storage vessels with the potential for VOC emissions greater than 6 TPY after federally enforceable conditions, onshore natural gas processing plants and sweetening units. With the exemption of Tank T-6a, all applicable equipment at the facility was constructed prior to August 23, 2011, and is not subject to this subpart. Tank T-6a was constructed in 2013, however the emissions are below the 6.0 TPY limit and therefore not subject to this subpart. Since this is a gas plant, all equipment leaks associated with the new equipment constructed, modified, or reconstructed after August 23, 2011 are subject to this subpart; therefore, all fugitive components identified as F-0000 will comply with all applicable requirements of NSPS, 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.

All equipment was constructed prior to the effective date of Subpart OOOOa.

NESHAP, 40 CFR Part 61

[Not Applicable]

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

NESHAP, 40 CFR Part 63

[Subparts HH, ZZZZ and DDDDD Applicable]

Subpart HH, Oil and Natural Gas Production Facilities. This subpart applies to affected emission points that are located at facilities which are major or area sources of HAPs and either process, upgrade, or store hydrocarbons prior to the point of custody transfer or prior to which the natural gas enters the natural gas transmission and storage source category. Subpart HH affects glycol dehydration units (unless benzene emissions are less than 1 TPY), unit process vents, storage vessels with potential for flash emissions (which are defined to include only those vessels with a daily throughput of 21,000 gallons or more), and compressors and ancillary equipment (valves, flanges, etc.) in VHAP service (i.e., more than 10% by weight VHAP) which are located at gas plants. Subpart HH requires keeping records of analyses showing non-applicability of emissions control standards. The permit will require compliance with the applicable requirements of this subpart, including analyzing HAP concentrations in storage tanks, which are open to the atmosphere, and conducting fugitive leakage monitoring for ancillary equipment.

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE), affects existing, new, and reconstructed spark ignition 4 stroke rich burn (4SRB) RICE with a site rating greater than 500 brake horsepower that are located at a major or area source of HAP emissions. Owners and operators of the following new or reconstructed RICE must meet the requirements of Subpart ZZZZ by complying with either 40 CFR Part 60 Subpart IIII (for CI engines) or 40 CFR Part 60 Subpart JJJJ (for SI engines):

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

Based on emission calculations, this facility is a major source of HAP. Engines C-1 through C-9 were constructed prior to December 12, 2002, and are therefore existing. However since the engines are all 4SLB & 2SLB engines with a site rating of more than 500 HP, the engines have no applicable requirements. Engine C-10A was constructed after December 12, 2002, and is therefore considered a “new” 4 stroke rich burn (4SRB) RICE with a site rating greater than 500 brake horsepower located at a major source of HAP emissions. Engine C-10A is required to comply with the specified monitoring, testing, and reporting requirements applicable to a 4SRB engine located at a major source of HAPs including parametric monitoring of temperature on the inlet and outlet of the catalyst, pressure drop across the catalyst, and monthly HP. A new baseline performance test is required anytime the catalyst is replaced. Emergency generator (G-1) is a “new” unit that will comply with Subpart ZZZZ by complying with NSPS Subpart JJJJ. Engine G-1 is an emergency generator, anticipated to operate less than 100 hours per year and must be equipped with a non-resettable hour meter. The emergency pump engine (P-1) is subject to Subpart ZZZZ and will comply with all appropriate requirements.

Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters at major sources of HAPs. The seven (7) existing and new heaters (H-1 – H-7) are all “units designed to burn gas-1 fuels” (natural gas and process off-gases not containing measurable sulfur compounds” and are subject to this subpart. None of the heaters have “continuous oxygen trim.”

If your unit is . . .	You must meet the following . . .
1. A new or existing boiler or process heater with a continuous oxygen trim system that maintains an optimum air to fuel ratio, or a heat input capacity of less than or equal to 5 million BTU per hour in any of the following subcategories: unit designed to burn gas 1; unit designed to burn gas 2 (other); or unit designed to burn light liquid, or a limited use boiler or process heater	Conduct a tune-up of the boiler or process heater every 5 years as specified in <a href="#">§ 63.7540</a> .
2. A new or existing boiler or process heater without a continuous oxygen trim system and with heat input capacity of less than 10 million BTU per hour in the unit designed to burn heavy liquid or unit designed to burn solid fuel subcategories; or a new or existing boiler or process heater with heat input capacity of less than 10 million BTU per hour, but greater than 5 million BTU per hour, in any of the following subcategories: unit designed to burn gas 1; unit designed to burn gas 2 (other); or unit designed to burn light liquid	Conduct a tune-up of the boiler or process heater biennially as specified in <a href="#">§ 63.7540</a>

Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers at area sources of HAPs. EPA has published various actions regarding implementation of this rule with the latest version on February 2, 2013. This facility is a major source of HAPs and therefore the heaters are not subject to this subpart.

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

- It is subject to an emission limit or standard for an applicable regulated air pollutant
- It uses a control device to achieve compliance with the applicable emission limit or standard
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant of 100 TPY

Emission units C-1 through C-8 do not use control devices and are not subject to emissions limits. Emission unit C-9 has emission limits but does not use a control device to achieve compliance with these limits and is therefore not subject. C-10A is subject to NSPS Subpart JJJJ limits for NO<sub>x</sub>, CO, and VOC (NO<sub>x</sub> of 38 TPY, VOC of 57 TPY, and 19 TPY) , and does not have uncontrolled emissions greater than 10 TPY of formaldehyde. Therefore C-10A is not subject to the requirements of this subpart.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Applicable]  
Flammable chemicals subject to this regulation are present at the facility in quantities greater than the threshold quantities; therefore, Part 68 is applicable. A Risk Management Plan was submitted on June 21, 1999, and determined to be complete by EPA. More information on this federal program is available on the web page: [www.epa.gov/rmp](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. This facility does not utilize any Class I & II substances.

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

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.

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

**SECTION XI. COMPLIANCE**

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

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

<b>Inspection Type</b>	<b>Date</b>	<b>Summary/Results</b>
Full Inspection	10/4/19	Two violations and one “item of concern”
Full Inspection	5/30/18	In Compliance

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

**SECTION XII. TIER CLASSIFICATION, PUBLIC AND EPA REVIEW**

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

On November 11, 2021, the applicant published a “Notice of Filing of Tier II Application” in the *Express-Star*, a daily publication printed in Chickasha, Grady County, Oklahoma. The notice stated that the application was available for review at the Chickasha Public Library or at the DEQ



office in Oklahoma City. The applicant will also publish the “Notice of Draft Tier II Permit”. Tribal Nations will be notified of the permit.

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

The applicant has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the real property.

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

If the Administrator does not object in writing during the 45-day EPA review period, any person that meets the requirements of OAC 252:100-8-8 may petition the Administrator within 60 days after the expiration of the Administrator's 45-day review period to make such objection. Any such petition shall be based only on objections to the permit that the petitioner raised with reasonable specificity during the public comment period provided for in 27A O.S. § 2-14-302.A.2., unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period. If the Administrator objects to the permit as a result of a petition filed under OAC 252:100-8-8, the DEQ shall not issue the permit until EPA's objection has been resolved, except that a petition for review does not stay the effectiveness of a permit or its requirements if the permit was issued after the end of the 45-day review period and prior to an EPA objection. If the DEQ has issued a permit prior to receipt of an EPA objection under OAC 252:100-8-8, the DEQ will modify, terminate, or revoke such permit, and shall do so consistent with the procedures in 40 CFR §§ 70.7(g)(4) or (5)(i) and (ii) except in unusual circumstances. If the DEQ revokes the permit, it may thereafter issue only a revised permit that satisfies EPA's objection. In any case, the source will not be in violation of the requirement to have submitted a timely and complete application.

### **Fee Paid**

Title V operating permit renewal application fee of \$7,500.

### **SECTION XIII. SUMMARY**

The facility was constructed as described in the permit application. There are no active Air Quality compliance and enforcement issues concerning this facility that would prohibit issuance of this modified operating permit. Issuance of the operating permit is recommended, contingent on public and EPA review.

DRAFT

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

**DCP Operating Company, LP  
Chitwood Gas Plant**

**Permit Number 2021-0456-TVR4**

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on October 15, 2021. The Evaluation Memorandum, dated October 10, 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 G-1A: “Grandfathered”/Exempted Engines:** The following emissions units are “grandfathered” and are limited to the existing equipment as it is.

<b>EU ID #</b>	<b>Make/Model</b>	<b>HP</b>	<b>Serial #</b>
C-1	Cooper-Bessemer GMV-8	880	42118
C-2	Cooper-Bessemer GMV-8	880	42119
C-3	Cooper-Bessemer GMV-8	880	41938
C-4	Cooper-Bessemer GMV-8	880	41704
C-6	Ingersol-Rand KVS-8	1,320	48FT389
C-7	Ingersol-Rand KVS-8	1,320	48FT387
C-8	Cooper-Bessemer GMV-10	1,100	42222

**EUG G-1B: Permitted Engines**

<b>EU ID #</b>	<b>Make/Model</b>	<b>NO<sub>x</sub></b>		<b>CO</b>		<b>VOC*</b>	
		<b>lb/hr</b>	<b>TPY</b>	<b>lb/hr</b>	<b>TPY</b>	<b>lb/hr</b>	<b>TPY</b>
C-9	Cooper-Bessemer GMV-10	33.95	148.71	12.13	53.11	5.35	23.42
C-10A	Waukesha L7042GSI ESM /cc	6.52	28.54	9.78	42.82	3.32	14.52

\* VOC includes formaldehyde

**EUG G-1C: Permitted Generator**

<b>EU ID #</b>	<b>Make/Model</b>	<b>NO<sub>x</sub></b>		<b>CO</b>		<b>VOC*</b>	
		<b>lb/hr</b>	<b>TPY</b>	<b>lb/hr</b>	<b>TPY</b>	<b>lb/hr</b>	<b>TPY</b>
G-1	Generac Generator	1.24	5.42	2.08	9.12	0.03	0.12

\* VOC includes formaldehyde

**EUG G-1D: Permitted Emergency Use Engine**

EU ID #	Make/Model	NO <sub>x</sub>		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
P-1	Caterpillar 3306 DIT	7.13	1.78	1.54	0.38	0.57	0.03

\* VOC includes formaldehyde

**EUG G-2A: Grandfathered Heaters:** The following emissions units are “grandfathered” and are limited to the existing equipment as it is.

EU ID #	Equipment	MMBTUH
H-1	Hot oil heater	8.5
H-2	Process heater	30
H-5	Heater treater	7.0
H-6	Heater treater	7.0

**EUG G-2B: Heaters:** The following emissions units are “Insignificant Activities” since emissions are less than 5.0 TPY.

EU ID #	Equipment	MMBTUH
H-3	Reboiler	0.75
H-4*	Heater	3.5
H-7	Hot Oil Heater	9.12

\* - out of service

**EUG G-4: Fugitives:** Emissions are based on existing equipment, and have been separated into NSPS Subpart OOOO piping fugitives and non-OOOO fugitives, but there are no specific emissions limitations.

Equipment	Type of Service	Number of Items	
		Non-OOOO	OOOO
Gas Valves	Gas/Vapor	304	0
Relief Valves	Gas/Vapor	35	0
Compressor Seals	Gas/Vapor	19	0
Connectors/Flanges	Gas/Vapor	1,384	0
Light Liquid Valves	Light Liquid	217	270
Relief Valves	Light Liquid	50	540
Pump Seals	Light Liquid	20	5
Connectors/Flanges	Light Liquid	1,510	10

**EUG G-5a: Tanks:**

EU ID #	Contents	Gallons	VOC Emissions, TPY
T-1	Slop oil	16,800	5.70
T-2	Slop oil	16,800	5.70
T-3	Condensate	16,800	2.89
T-4	Condensate	16,800	2.89

**EUG G-5A Insignificant Tanks**

EU ID #	Contents	Gallons	Installed/ Modified Date
T-5	Slop water	16,800	2010
T-6a*	Slop water	16,800	2013
T-7	Methanol	39,984	1950
T-8	Lube oil	4,200	1979
T-9	Lube oil	8,820	1979
T-10	Lube oil	500	2008
T-11	Therminol	1,000	2015
T-12	TEG	1,000	2015
T-13	Antifreeze	200	2015
T-14	Skid oil E-401	110	2015
T-15	Lube oil	110	2015
T-16	Lube oil	290	2015
T-17	Diesel	350	2015
T-18	Antifreeze	8,820	2015
T-19	Amine	6,320	2015
T-20	Amine	715	2015
T-21	Lean oil T-1101B	8,820	2015
T-22	Skimmer pit	5027	Pre-2008
T-23	Unit C-10A sump	1,270	2009
T-24	D-1701 sump	1,270	Pre-2008
<b>PRESSURE TANKS</b>			
D-74174	Methanol	40,000	Pre-1995
D-19720	NGL Raw Mix	40,000	Pre-1995
D-19719	NGL Raw Mix	40,000	Pre-1995
D-19718	Propane	40,000	Pre-1995
D-209	W. Stabilizer	25,000	Pre-1995
D-210	E. Stabilizer	25,000	Pre-1995

\* - Indicates tank replaced in 2013 and renamed.

**EUG G-6: Truck Loading/Offloading** The following emission unit is “grandfathered” and is limited to the existing equipment as it is.

EU ID #	Point	Equipment	Annual Throughput
L-1	L-1	Condensate Truck Load-Out	83,589 bbl
L-2	L-2	Water Truck Load-Out	38,691 bbl

**EUG G-7A: Emergency Vent:** The following emission unit is “grandfathered” and is limited to the existing equipment as it is.

EU ID #	Point	Activity	Installed Date
EV-1	EV-1	Emergency Vent	1964

**EUG G-7B: Amine and Dehydration Unit**

Source	EU ID #	NO <sub>x</sub>		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Thermal oxidizer for the Amine and Dehydration Units	TO-1A/D	0.40	1.79	0.34	1.48	0.14	0.62

The glycol dehydration unit shall be operated as follows:

- a. Flow through the dehydration shall not exceed 7.5 MMSCFD (monthly average).
- b. Glycol pump recirculation rate shall not exceed 4.0 gpm (monthly average).
- c. The glycol dehydration unit shall be equipped with a condenser with the condenser overheads being routed to a thermal oxidizer.
- d. The Permittee shall monitor and record the lean glycol circulation rate at least once a month. When three consecutive months show no exceedance of the limit, the frequency may be reduced to quarterly. Upon any showing of non-compliance, the monitoring and recordkeeping frequency shall revert to monthly. With each inspection the lean glycol circulation rate shall be recorded as follows:

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

This recordkeeping requirement is waived if the dehydration unit is equipped with a glycol recirculation pump whose rated capacity does not exceed 4.0 gallons per minute.

2. All fuel-burning equipment shall be fueled only with pipeline-grade natural gas or with field gas containing 162-ppmv or less sulfur. Compliance can be shown for pipeline grade natural gas by a current gas company bill, and for other gaseous fuel, by 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. H<sub>2</sub>S in inlet gas shall not exceed 5.0 ppm. The inlet gas shall be tested for H<sub>2</sub>S concentration at least annually. If the facility processes natural gas containing H<sub>2</sub>S that results in H<sub>2</sub>S emissions greater than 0.3 lb/hr from the amine vent, then the amine unit off-gas shall be routed to the thermal oxidizer or other acceptable combustion device. The facility shall monitor thermal oxidizer downtime and document spot average gas flow rate to the facility vent during thermal oxidizer downtime. [OAC 252:100-31]
  4. The permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year). [OAC 252:100-8-6(a)]
  5. 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]
  6. Engine C-10A shall be operated with exhaust gases passing through a functioning catalytic converter. [40 CFR 60.4230-4248]
  7. The emergency use water pump (P-1) shall operate as an emergency engine as defined in 40 CFR Part 63 Subpart ZZZZ and shall be equipped with a non-resettable hour meter.
  8. At least once per calendar quarter, the permittee shall conduct tests of NO<sub>x</sub> and CO emissions from the engines in EUG G-1B and from each replacement engine/turbine when operating under representative conditions for that period. Testing is required for any engine/turbine that runs for more than 220 hours during that calendar quarter. A quarterly test may be conducted no sooner than 20 calendar days after the most recent test. Testing shall be conducted using a portable analyzer in accordance with a protocol meeting the requirements of the latest AQD Portable Analyzer Guidance document, or an equivalent method approved by Air Quality. When four consecutive quarterly tests show the engine/turbine to be in compliance with the emissions limitations shown in the permit, then the testing frequency may be reduced to semi-annual testing. A semi-annual test may be conducted no sooner than 60 calendar days nor later than 180 calendar days after the most recent test. Likewise, when the following two consecutive semi-annual tests show compliance, the testing frequency may be reduced to annual testing. An annual test may be conducted no sooner than 120 calendar days nor later than 365 calendar days after the most recent test. Upon any showing of non-compliance with emissions limitations or testing that indicates that emissions are within 10% of the emission limitations, the testing frequency shall revert to quarterly. Reduced testing frequency does not apply to engines with catalytic converters. [OAC 252:100-8-6 (a)(3)(A)]
  9. When periodic testing shows emissions in excess of the established emission limits in the Specific Conditions (lbs/hr), the owner or operator shall comply with the provisions for reporting excess emissions in Subchapter 9. [OAC 252:100-9]
  10. Replacement (including temporary periods of 6 months or less for maintenance purposes), of internal combustion engines/turbines with emissions limitations specified in this permit with

engines of lesser or equal emissions of each pollutant (in lbs/hr and TPY) are authorized under the following conditions. [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, lbs/hr, and TPY) at maximum rated horsepower for the altitude/location.
  - e. Replacement equipment and emissions are limited to equipment and emissions which are not a modification under NSPS or NESHAP.
  - f. Replacement equipment and emissions are limited to equipment and emissions which are not a modification or a significant modification under PSD. For existing PSD facilities, the permittee shall calculate the PTE or the net emissions increase resulting from the replacement to document that it does not exceed significance levels and submit the results with the notice required by paragraph (c) of this Specific Condition. The permittee shall attach each such notice to their copy of the relevant permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield described in OAC 252:100-8-6(d) does not apply to any change made pursuant to this paragraph.
  - g. Engines whose installation and operation are authorized under this Specific Condition which are subject to 40 CFR Part 63, Subpart ZZZZ and/or 40 CFR Part 60, Subpart JJJJ shall comply with all applicable requirements.
  - h. Turbines whose installation and operation are authorized under this Specific Condition which are subject to 40 CFR Part 60, Subpart KKKK shall comply with all applicable requirements.
11. The permittee shall comply with all applicable requirements in 40 CFR Part 60, Subpart JJJJ, for all stationary spark ignition (SI) internal combustion engines (ICE) that commenced construction, modification, or reconstruction after June 12, 2006, including, but not limited to: [40 CFR §§60.4230 – 4248]
- a. § 60.4230: Am I subject to this subpart?

- b. § 60.4231: What emission standards must I meet if I am a manufacturer of stationary SI internal combustion engines?
  - c. § 60.4232: How long must my engines meet the emissions standards if I am a manufacturer of stationary SI internal combustion engines?
  - 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 emissions standards if I am an owner or operator of a stationary SI internal combustion engine?
  - f. § 60.4235: What fuel requirements must I meet if I am an owner or operator of a stationary SI internal combustion engine?
  - g. § 60.4236: What is the deadline for importing or installing stationary SI ICE produced in the previous model year?
  - h. § 60.4237: What are the monitoring requirements if I am an owner or operator of a stationary SI internal combustion engine?
  - i. § 60.4238: What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines < 19 KW (25 HP).
  - 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?
  - k. § 60.4240: What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines > 19 KW (25 HP) that use LPG?
  - 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?
  - m. § 60.4242: What other requirement must I meet if I am a manufacturer of stationary SI internal combustion engines?
  - n. § 60.4243: What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?
  - 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?
  - 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?
  - q. § 60.4246: What parts of the General Provisions apply to me?
  - r. § 60.4247: What parts of the mobile source provisions apply to me if I am a manufacturer of stationary SI internal combustion engines?
  - s. § 60.4248: What definitions apply to this subpart?
12. The permittee shall comply with NSPS, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transportation, and Distribution, for all affected facilities located at this site, including, but not limited to;[40 CFR §§60.536 through 60.543]
- a. § 60.5360 What is the purpose of this subpart?
  - b. § 60.5365 Am I subject to this subpart?
  - c. § 60.5370 When must I comply with this subpart?
  - d. § 60.5375 What standards apply to gas well affected facilities?
  - e. § 60.5380 What standards apply to centrifugal compressor affected facilities?
  - f. § 60.5385 What standards apply to reciprocating compressor affected facilities?
  - g. § 60.5390 What standards apply to pneumatic controller affected facilities?



- h. § 60.5395 What standards apply to storage vessel affected facilities?
- i. § 60.5400 What equipment leak standards apply to affected facilities at an onshore natural gas processing plant?
- j. § 60.5401 What are the exceptions to the equipment leak standards for affected facilities at onshore natural gas processing plants?
- k. § 60.5402 What are the alternative emission limitations for equipment leaks from onshore natural gas processing plants?
- l. § 60.5405 What standards apply to sweetening units at onshore natural gas processing plants?
- m. § 60.5406 What test methods and procedures must I use for my sweetening units affected facilities at onshore natural gas processing plants?
- n. § 60.5407 What are the requirements for monitoring of emissions and operations from my sweetening unit affected facilities at onshore natural gas processing plants?
- o. § 60.5408 What is an optional procedure for measuring hydrogen sulfide in acid gas-Tutwiler Procedure?
- p. § 60.5410 How do I demonstrate initial compliance with the standards for my gas well affected facility, my centrifugal compressor affected facility, my reciprocating compressor affected facility, my pneumatic controller affected facility, my storage vessel affected facility, and my equipment leaks and sweetening unit affected facilities at onshore natural gas processing plants?
- q. § 60.5411 What additional requirements must I meet to determine initial compliance for my closed vent systems routing emissions from storage vessels or centrifugal compressor wet seal fluid degassing systems?
- r. § 60.5412 What additional requirements must I meet for determining initial compliance with control devices used to comply with the emission standards for my storage vessel or centrifugal compressor affected facility?
- s. § 60.5413 What are the performance testing procedures for control devices used to demonstrate compliance at my storage vessel or centrifugal compressor affected facility?
- t. § 60.5415 How do I demonstrate continuous compliance with the standards for my gas well affected facility, my centrifugal compressor affected facility, my stationary reciprocating compressor affected facility, my pneumatic controller affected facility, my storage vessel affected facility, and my affected facilities at onshore natural gas processing plants?
- u. § 60.5416 What are the initial and continuous cover and closed vent system inspection and monitoring requirements for my storage vessel or centrifugal compressor affected facility?
- v. § 60.5417 What are the continuous control device monitoring requirements for my storage vessel or centrifugal compressor affected facility?
- w. § 60.5420 What are my notification, reporting, and recordkeeping requirements?
- x. § 60.5421 What are my additional recordkeeping requirements for my affected facility subject to VOC requirements for onshore natural gas processing plants?
- y. § 60.5422 What are my additional reporting requirements for my affected facility subject to VOC requirements for onshore natural gas processing plants?
- z. § 60.5423 What additional recordkeeping and reporting requirements apply to my sweetening unit affected facilities at onshore natural gas processing plants?
- aa. § 60.5425 What parts of the General Provisions apply to me?

- bb. § 60.5430 What definitions apply to this subpart?
13. The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Oil and Natural Gas Production, Subpart HH, for all affected facilities located at this site, including, but not limited to:
- a. § 63.760: Applicability and designation of affected sources
  - b. § 63.761: Definitions
  - c. § 63.762: Affirmative defense for violations of emission standards during malfunction
  - d. § 63.764: General Standards
  - e. § 63.765: Glycol dehydration unit process vent standards
  - f. § 63.766: Storage vessel standards
  - g. § 63.769: Equipment leak standards
  - h. § 63.771: Control equipment requirements
  - i. § 63.772: Test methods, compliance procedures, and compliance demonstrations
  - j. § 63.773: Inspection and monitoring requirements
  - k. § 63.774: Recordkeeping requirements
  - l. § 63.775: Reporting requirements
  - m. § 63.776: Implementation and enforcement
  - n. § 63.777: Alternate means of emission limitations
14. The permittee shall comply with all applicable requirements of the NESHAP (40 CFR Part 63) for Stationary Reciprocating Internal Combustion Engines (RICE), Subpart ZZZZ, for each affected engine including but not limited to: [40 CFR §§63.6580 through 63.6675]
- a. § 63.6580 What is the purpose of subpart ZZZZ?
  - b. § 63.6585 Am I subject to this subpart?
  - c. § 63.6590 What parts of my plant does this subpart cover?
  - d. § 63.6595 When do I have to comply with this subpart?
  - e. § 63.6603 What emission limitations and operating limitations must I meet if I own or operate an existing stationary CI RICE located at an area source of HAP emissions?
  - f. § 63.6605 What are my general requirements for complying with this subpart?
  - g. § 63.6625 What are my monitoring, installation, operation, and maintenance requirements?
  - h. § 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?
  - i. § 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?
  - j. § 63.6650 What reports must I submit and when?
  - k. § 63.6655 What records must I keep?
  - l. § 63.6660 In what form and how long must I keep my records?
  - m. § 63.6665 What parts of the General Provisions apply to me?
  - n. § 63.6670 Who implements and enforces this subpart
  - o. § 63.6675 What definitions apply to this subpart?

15. The permittee shall comply with all applicable requirements of the NESHAP (40 CFR Part 63) for Industrial, Commercial, and Institutional Boilers and Process Heaters at Major Sources for HAPS, Subpart DDDDD, for each affected heaters including but not limited to:  
[40 CFR §§63.7480 through 63.7575]
- a. § 63.7480 What is the purpose of this subpart?
  - b. § 63.7485 Am I subject to this subpart?
  - c. § 63.7490 What is the affected source of this subpart?
  - d. § 63.7491 Are any boiler or process heaters not subject to this subpart?
  - e. § 63.7495 When do I have to comply with this subpart?
  - f. § 63.7499 What are the subcategories of boilers and process heaters?
  - g. § 63.7500 What emission limits, work practice standards, and operating limits must I meet?
  - h. § 63.7505 What are my general requirements for complying with this subpart?
  - i. § 63.7510 What are my initial compliance requirements and by what date must I conduct them?
  - j. § 63.7515 When must I conduct subsequent performance tests or fuel analyses?
  - k. § 63.7520 What performance test and procedures must I use?
  - l. § 63.7521 What fuel analyses and procedures must I use?
  - m. § 63.7522 Can I use emission averaging to comply with this subpart?
  - n. § 63.7525 What are my monitoring, installation, operation and maintenance requirements?
  - o. § 63.7530 How do I demonstrate initial compliance with the emissions limits and work practice standards?
  - p. § 63.7535 How do I monitor and collect data to demonstrate continuous compliance?
  - q. § 64.7540 How do I demonstrate continuous compliance with the emission limits and work practice standards?
  - r. § 63.7541 How do I demonstrate continuous compliance under the emission averaging provisions?
  - s. § 63.7545 What notifications must I submit and when?
  - t. § 63.7550 What reports must I submit and when?
  - u. § 63.7555 What records must I keep?
  - v. § 63.7560 In what form and how long must I keep my records?
  - w. § 63.7565 What parts of the General Provisions apply to me?
  - x. § 63.7570 Who implements and enforces this subpart?
  - y. § 63.7575 What definitions apply to this subpart?
16. 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 252:100-43]
- a. Condensate throughput (monthly and 12-month rolling total).
  - b. Periodic testing for engine C-9 and C-10 and each engine/turbine replacement.
  - c. Operating hours for engine C-9 and C-10 if less than 220 hours/quarter and not tested.
  - d. For the fuel(s) burned, the appropriate document(s) as described in Specific Condition #2.
  - e. Annually H<sub>2</sub>S records as described in Specific Condition #3.

- f. O&M records for any engine not tested in each 6 month period.
  - g. Operating hours for P-1 (emergency use engine).
  - h. Thermal oxidizer down time and spot average gas flow rate to the facility vent during thermal oxidizer downtime.
  - i. Natural gas throughput of the facility, MMSCFD (monthly).
  - j. Throughput for the glycol dehydrator (monthly average) and Glycol pump recirculation rate (monthly average) as required in Specific Condition #11.
  - j. Produced water throughput (monthly and 12-month rolling total).
  - k. Records as required by 40 CFR Part 60, Subpart JJJJ.
  - l. Records as required by 40 CFR Part 60, Subpart OOOO.
  - m. Records as required by 40 CFR Part 63, Subpart HH.
  - n. Records as required by 40 CFR Part 63, Subpart ZZZZ.
  - o. Records as required by 40 CFR Part 63, Subpart DDDDD.
17. The following records shall be maintained on-site to verify insignificant activities. No records are required for trivial activities. [OAC 252:100-43]
- a. Vapor pressures of contents of lube oil tanks and slop oil tanks.
  - b. Calculations of emissions of any other insignificant activity.
18. No later than 30 days after each anniversary date of the issuance of the initial Title V operating permit (January 24, 2002), 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)]
19. The Permit Shield (Standard Conditions, Section VI) is extended to the following requirements that have been determined to be inapplicable to this facility. [OAC 252:100-8-6(d)(2)]
- a. OAC 252:100-11 Alternative Emissions Reduction
  - b. OAC 252:100-15 Mobile Sources
  - c. OAC 252:100-23 Cotton Gins
  - d. OAC 252:100-24 Grain Elevators
  - e. OAC 252:100-39 Nonattainment Areas
  - f. OAC 252:100-47 Landfills
20. This permit supersedes all previous Air Quality operating permits for this facility, which are now canceled.

DCP Operating Company, LP  
Attn: Ms. Lynn Holt  
3201 Quail Springs Parkway, Suite 100  
Oklahoma City, OK 73134

Re: Permit Application No. **2021-0456-TV R4**  
Chitwood Gas Plant  
Facility ID No.: 1021  
Location: Section 34, T5N, R6W, Grady County, Oklahoma

Dear Ms. Holt:

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

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

Sincerely,

DRAFT

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





# PART 70 PERMIT

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

Permit No. 2021-0456-TVR4

DCP Operating Company, LP,

having complied with the requirements of the law, is hereby granted permission to operate the Chitwood Gas Plant located in Section 34, T5N, R6W, Grady County, Oklahoma, subject to Specific Conditions and Standard Conditions dated June 21, 2016, 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

\_\_\_\_\_  
Director, Air Quality Division

\_\_\_\_\_  
Date





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

**SECTION I. DUTY TO COMPLY**

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

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

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

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

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

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

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

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

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

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.

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

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

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

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

B. Records of required monitoring shall include:

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

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

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

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

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

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

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

[OAC 252:100-43]

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM**

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

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

**SECTION VI. PERMIT SHIELD**

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit. [OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit. [OAC 252:100-8-6(d)(2)]

**SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT**

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

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

**SECTION VIII. TERM OF PERMIT**

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

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

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

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

**SECTION IX. SEVERABILITY**

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

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

**SECTION X. PROPERTY RIGHTS**

A. This permit does not convey any property rights of any sort, or any exclusive privilege.

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

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

## **SECTION XI. DUTY TO PROVIDE INFORMATION**

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing, terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit.

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

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

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

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

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

## **SECTION XII. REOPENING, MODIFICATION & REVOCATION**

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

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

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances: [OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

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

- (4) DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

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

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

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

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

### **SECTION XIII. INSPECTION & ENTRY**

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(18) for confidential information submitted to or obtained by the DEQ under this section):

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

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

### **SECTION XIV. EMERGENCIES**

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

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

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

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

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

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

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

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

## **SECTION XV. RISK MANAGEMENT PLAN**

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

## **SECTION XVI. INSIGNIFICANT ACTIVITIES**

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



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

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

## **SECTION XVII. TRIVIAL ACTIVITIES**

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

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

## **SECTION XVIII. OPERATIONAL FLEXIBILITY**

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating.

[OAC 252:100-8-6(a)(10) and (f)(1)]

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

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

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

## **SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS**

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

- (1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter.

[OAC 252:100-13]

- (2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]
- (3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for: [OAC 252:100-25]
- (a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
  - (b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
  - (c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
  - (d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.
- (4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]
- (5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
- (6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]
- (7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

## SECTION XX. STRATOSPHERIC OZONE PROTECTION

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

- (1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
- (2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and

- (3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

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

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

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

## **SECTION XXI. TITLE V APPROVAL LANGUAGE**

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

- (1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA

objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.

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

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

## **SECTION XXII. CREDIBLE EVIDENCE**

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

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

<b>ACFM</b>	Actual Cubic Feet per Minute	<b>GR</b>	Grain(s) (gr)
<b>AD</b>	Applicability Determination	<b>H<sub>2</sub>CO</b>	Formaldehyde
<b>AFRC</b>	Air-to-Fuel Ratio Controller	<b>H<sub>2</sub>S</b>	Hydrogen Sulfide
<b>API</b>	American Petroleum Institute	<b>HAP</b>	Hazardous Air Pollutants
<b>ASTM</b>	American Society for Testing and Materials	<b>HC</b>	Hydrocarbon
<b>BACT</b>	Best Available Control Technology	<b>HCFC</b>	Hydrochlorofluorocarbon
<b>BAE</b>	Baseline Actual Emissions	<b>HFR</b>	Horizontal Fixed Roof
<b>BBL</b>	Barrel(s)	<b>HON</b>	Hazardous Organic NESHAP
<b>BHP</b>	Brake Horsepower (bhp)	<b>HP</b>	Horsepower (hp)
<b>BTU</b>	British thermal unit (BTU)	<b>HR</b>	Hour (hr)
<b>C&amp;E</b>	Compliance and Enforcement	<b>I&amp;M</b>	Inspection and Maintenance
<b>CAA</b>	Clean Air Act	<b>IBR</b>	Incorporation by Reference
<b>CAM</b>	Compliance Assurance Monitoring	<b>ICE</b>	Internal Combustion Engine
<b>CAS</b>	Chemical Abstract Service	<b>LAER</b>	Lowest Achievable Emission Rate
<b>CAAA</b>	Clean Air Act Amendments	<b>LB</b>	Pound(s) [Mass] (lb, lbs, lbm)
<b>CC</b>	Catalytic Converter	<b>LB/HR</b>	Pound(s) per Hour (lb/hr)
<b>CCR</b>	Continuous Catalyst Regeneration	<b>LDAR</b>	Leak Detection and Repair
<b>CD</b>	Consent Decree	<b>LNG</b>	Liquefied Natural Gas
<b>CEM</b>	Continuous Emission Monitor	<b>LT</b>	Long Ton(s) (metric)
<b>CFC</b>	Chlorofluorocarbon	<b>M</b>	Thousand (Roman Numeral)
<b>CFR</b>	Code of Federal Regulations	<b>MAAC</b>	Maximum Acceptable Ambient Concentration
<b>CI</b>	Compression Ignition	<b>MACT</b>	Maximum Achievable Control Technology
<b>CNG</b>	Compressed Natural Gas	<b>MM</b>	Prefix used for Million (Thousand-Thousand)
<b>CO</b>	Carbon Monoxide or Consent Order	<b>MMBTU</b>	Million British Thermal Units (MMBTU)
<b>COA</b>	Capable of Accommodating	<b>MMBTUH</b>	Million British Thermal Units per Hour (MMBTU/hr)
<b>COM</b>	Continuous Opacity Monitor	<b>MMSCF</b>	Million Standard Cubic Feet (MMscf)
<b>D</b>	Day	<b>MMSCFD</b>	Million Standard Cubic Feet per Day
<b>DEF</b>	Diesel Exhaust Fluid	<b>MSDS</b>	Material Safety Data Sheet
<b>DG</b>	Demand Growth	<b>MWC</b>	Municipal Waste Combustor
<b>DSCF</b>	Dry Standard (At Standard Conditions) Cubic Foot (Feet)	<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>FIP</b>	Federal Implementation Plan	<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>FR</b>	Federal Register	<b>NOI</b>	Notice of Intent
<b>GACT</b>	Generally Achievable Control Technology	<b>NSCR</b>	Non-Selective Catalytic Reduction
<b>GAL</b>	Gallon (gal)	<b>NSPS</b>	New Source Performance Standards
<b>GDF</b>	Gasoline Dispensing Facility	<b>NSR</b>	New Source Review
<b>GEP</b>	Good Engineering Practice		
<b>GHG</b>	Greenhouse Gases		

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

DCP Operating Company, LP  
Attn: Ms. Lynn Holt  
3201 Quail Springs Parkway, Suite 100  
Oklahoma City, Oklahoma 73134

Permit Number: 2021-0456-TVR4  
Permit Writer: David Schutz  
Date: October 10, 2022  
FAC ID 1021

**SUBJECT: Permit Application No. 2021-0456-TVR4**  
DCP Operating Company, LP  
Facility: Chitwood Gas Plant  
Facility ID No.: 1021  
Section 34, Township 5N, Range 6W, Grady County, Oklahoma

Dear Ms. Holt:

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

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located (Instructions enclosed);
2. Submit sample notice and provide date of publication to **AQD 5 days prior to notice publishing;**
3. Provide for public review, for a period of 30 days following the date of the newspaper announcement, a copy of the application and draft permit at a convenient location (preferentially at a public location) within the county of the facility;
4. Send AQD a signed affidavit of publication for the notice(s) from Item #1 above within 20 days of publication of the draft permit. Any additional comments or requested changes you have for the draft permit or the application should be submitted within 30 days of publication.

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

Sincerely,



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







**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: <http://www.deq.ok.gov/>.**

**For additional information, contact ...names, addresses and telephone numbers of contact persons for the applicant, or contact DEQ at: Chief Engineer, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677. Phone No. (405) 702-4100.**

October 10, 2022

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

Re: **Permit Application No. 2021-0456-TVR4**  
DCP Operating Company, LP  
Facility: Chitwood Gas Plant  
Facility ID No.: 1021  
Section 34, Township 5N, Range 6W, Grady County, Oklahoma  
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**