

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

MEMORANDUM

January 22, 2024

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

THROUGH: Rick Groshong, Environmental Manager, Compliance and Enforcement

THROUGH: Eric L. Milligan, P.E., Engineering Manager, Engineering Section

THROUGH: Ryan Buntyn, P.E., New Source Permits Section

FROM: Jian Yue, P.E., New Source Permits Section

SUBJECT: Evaluation of Permit Application No. **2019-1310-TV R4**
BCE-Mach III Midstream Holdings LLC
Elmore City Gas Plant (SIC 1321/NAICS 211130)
Facility ID: 1376
NW/4 of Section 17, T1N, R2W, Garvin County, Oklahoma
Latitude: 34.56222° N; Longitude: 97.44020° W
Directions: The facility is located 2.5 miles west of Elmore City on SH 29
and 4.2 miles south on N3120 Rd. The facility is located on the east side of
the road.

SECTION I. INTRODUCTION

BCE-Mach III Midstream Holdings LLC, has submitted an application for a renewal of their current Title V operating permit for the Elmore City Gas Plant located near Elmore City in Garvin County, Oklahoma. The Elmore City Gas Plant is currently an existing major source facility operating under Permit No. 2014-1758-TV R3 (M-3), which was issued on June 15, 2023.

The facility emits more than 100 TPY of a regulated pollutant; therefore, it is subject to Title V permitting requirements. Emissions are above 250 TPY; therefore, the facility is an existing PSD source. Emissions of HAPs are below the major source levels (10/25 TPY) for HAPs and the facility is a minor source of HAPs.

SECTION II. FACILITY DESCRIPTION

The Elmore City Gas Plant is engaged in compressing and processing natural gas and producing natural gas liquids. Gas enters the plant by way of a low-pressure gathering system at approximately 20 psig.

Inlet Gas Process

The inlet gas is scrubbed through a series of inlet separators, accumulators, and filters to remove any produced liquids (free water and condensate). The inlet gas is then compressed to approximately 820 psig for processing.

Inlet Gas Compressors

Compressor Engine	Unit No.	Equip. #	Status
White Superior 8GT825	Unit #31	E1	Permitted
White Superior 8GT825	Unit #32	E2	Grandfathered
White Superior 8G825	Unit #34	E4	Grandfathered
Caterpillar 3516 TALE	Unit #102	E38	Permitted
Caterpillar G3606 BLE	Unit #105	C-801	Permitted

Emergency control of the process pressure is accomplished using a vent to flare. Gas passes through an inlet cooling exchanger (E-510) and into a gas scrubber (V-510) where condensed water and hydrocarbons are separated from the gas.

Dehydration

Gas enters the process at approximately 820 psig and 80 °F. Gas enters the pre-filter F-501 where any particles larger than 2 microns are removed. The stream then passes through dehydrator V-501 or V-502 where water is removed down to less than 0.1 ppm. It then enters after-filter F-502, for removal of any dust particles larger than 1 micron.

Cryogenic Gas Process

The gas stream splits into the upper and lower heat exchanger trains. The lower train is cooled in the product exchanger E502-A, in the demethanizer reboiler E502-B, and in the demethanizer side reboiler E502-C. This stream then enters the Cold Separator V-505. The upper train is cooled in the cold gas exchanger E501 and enters the Lift Gas Separator V-504. Liquid from the Lift Gas Separator leaves at 811 psig and -15 °F. It flashes down to -56 °F at 168 psig and enters the demethanizer on Tray 6. Vapor from the lift gas separator passes through E501-A and then combines with the lower train gas in the Cold Separator V-505. Liquid from the Cold Gas Separator leaves at 800 psig and -71 °F. This liquid is flashed to -141 °F at 168 psig and enters the demethanizer on Tray 8 as it passes through Flash Tank V-508. When utilized, excess methane can be flashed and allowed to by-pass the demethanizer from V-508 thereby allowing better pressure control of the demethanizer. Vapor from the cold separator is at 800 psig and -71 °F. The vapor passes through the expander and on to the top tray of the demethanizer at -164 °F and 166 psig as a two phased stream. Residue gas from the top of the demethanizer passes through the cold gas exchanger E501 to emerge at 85 °F and 164 psig. Approximately 1,200 MSCFD is drawn off for fuel gas for plant fuel burning equipment and flare pilot.

Recompression

The remaining gas is recompressed in the expander-compressor to 236 psig at 147 °F. This is cooled to 120 °F at 231 psig in the expander-compressor after cooler AC-502. The gas is then recompressed by the following residue gas compressors:

Residue Gas Compressors

Compressor Engine	Unit No.	Equip. #	Status
Caterpillar G3516B	#104	C-852	Permitted
Cooper Bessemer GMV8T	#43	E10	Grandfathered

The residue gas compressors take the gas to 805 psig and 295 °F. This gas is then cooled to 120 °F at 800 psig in residue after-cooler AC-503 and finally delivered by pipeline to sales and gas lift.

Natural Gas Liquids

The demethanized product from the bottom of the demethanizer at 31 °F and 171 psig is pumped by the demethanized product pumps P-501 or P-502 through the product exchanger E-502-A. It is heated to 87 °F at 385 psig and enters the amine contactor V-507. It passes upward through the 20 sieve trays in countercurrent contact with the monoethanolamine (MEA) solution passing downward. Treated product from the top of the column passes through coalescer F-503 for removal of amine carry-over. The demethanized product then enters the product surge tank V-405. From here, product booster pumps P-411 or P-412 deliver it to the pipeline pumps P-413 and P-414. It is delivered to NGL sales at 1,100 psig and 100 °F.

Regeneration

Gas drying is accomplished by use of a mole sieve absorbent. Gas flows in at the top of the bed and out from the bottom. Two beds are provided. One bed operates in the drying mode while the other bed is being regenerated and cooled. The system utilizes a cycle programmer timer and quick positioning valves. The electric regeneration gas compressor is provided to boost regeneration gas back up to the source pressure after it has passed through the regeneration system. Bed regeneration is accomplished by flow of 4,000 MSCFD of a hot residue gas side stream from the discharge of the residue gas compressors through the regeneration gas heater H-501 at an outlet heater temperature of 550 °F into the bottom of the wet bed. The wet gas from the top of the bed being regenerated passes back through the air cooled regeneration gas cooler AC-501 then through V-503 Scrubber. The regen stream is then boosted through the regeneration gas compressor C-501 back to the residue sales line.

The bed cooling rate is also at 4,000 MSCFD using residue gas. The cooling gas passes through the bed and the rest of the system on through the regeneration gas compressor as before. The main burner of the heater is off during the cooling cycle but the regeneration gas continues through the heater for five minutes to cool the heater coil.

Residue/Regeneration Gas Dehydration

Residue gas is used to regenerate the mole sieve units. The glycol dehydration unit with a 0.25 MMBTUH reboiler is used to dehydrate the residue gas used to regenerate the mole sieve before it is again combined with the residue gas prior to recompression.

MEA Process

The amine unit was manufactured by C.E. Natco Co. designed to circulate 9 gpm of MEA through a continuous cycling process for separating CO₂ from the natural gas liquids. The reboiler heater is direct fired with natural gas and is rated at 0.75 MMBTUH.

The process uses a 15% aqueous solution of MEA as the treating agent. Rich amine product flows from V-507 absorber through a full flow charcoal filter to the amine heat exchanger. It is heated in the exchanger to approximately 215 °F and then passes through a particulate filter into the top of the still V-130 and is further heated by steam rising counter currently to the descending amine. This heat serves to reverse the reaction between the amine and the CO₂ gas breaking the gas loose from the amine. The liberated gas and steam exit overhead from the still and go to the reflux condenser E190 where the steam is condensed and the gases cooled. Condensed steam is returned to the still as reflux. CO₂ gas is removed from the system through the still back pressure valve located in the overhead line from the reflux accumulator V-150. Stripping steam in the still column is furnished by the direct fired reboiler which in turn is fed by the stripped amine from the still column.

The hot regenerated amine flows from the reboiler. It is cooled in the shell side of the heat exchanger E110 by the incoming rich amine stream to about 120 °F. It then flows to the amine surge tank V-170 after being cooled in the lean amine cooler E180. The amine pumps take the lean amine from V-170 surge tank and discharge to the top tray of absorber V-507 to complete the cycle.

Condensate Treating

Condensate and water are piped from the plant inlet scrubbers and compressor interstage scrubbers to Tanks V-BS1 & V-BS2. It is then pumped through a heater treater where the water and hydrocarbons are separated. The water is piped to a storage tank for disposal by truck and the condensate is piped to sale tank V-BS3.

SECTION III. PERMIT HISTORY

The permit history since issuance of the second renewal of the Title V permit is shown.

Permits	Date Issued	Description
2009-354-TV R2	4/19/2010	Requested the renewal of the Part 70 Permit.
2014-1758-TV R3	6/17/2015	Requested the renewal of the Part 70 Permit. This renewal also included several updates to the facility including change in heater burner ratings, and removal or replacement of engines.
2014-1758-TV R3 (M-1)	11/2/2015	Minor modification to replace two engines.
2014-1758-TV R3 (M-2)	5/30/2023	Minor modification to remove 3 engines (E6, E8, and E41) and replace 2 engines (Replace E40 with C-852 and E3 with C-801).
2014-1758-TV R3 (M-3)	6/15/2023	Administrative Amendment to change company name from BCE Mach III, LLC to BCE-Mach III Midstream Holdings, LLC.

SECTION IV. REQUESTED CHANGES

The facility is requesting the following changes to the permit:

- Removal of the grandfathered 1,000-hp White Superior 8GT825 engine (E5) from the plant.
- Removal of HAP major source requirements (i.e., NESHAP Subparts ZZZZ and DDDDD).

With the removal of E5 the facility becomes a synthetic minor source of HAP. Along with these changes, AQD also updated the standardized engine testing requirements.

SECTION V. EQUIPMENT

Emission units (EUs) have been arranged into Emission Unit Groups (EUGs).

EUG 1 Internal Combustion Engines

EU	Point	Make/Model	hp	Serial #	Construction Date
E1	31	White Superior 8GT825 ⁽¹⁾	1,000	19098	1967/2007 ⁽¹⁾
E2	32	White Superior 8GT825	1,000	19163	1967
E4	34	White Superior 8G825	800	19161	1967
E38	102	Caterpillar 3516 TALE W/OC	1,085	4EK00456	1995
E10	43	Cooper GMV8T	880	42082	1972
C-801	105	Caterpillar G3606 BLE W/OC	1,775	4ZS02174	2015
C-852	104	Caterpillar G3516 B W/OC	1,380	N6E00337	2015

⁽¹⁾ - Retrofitted with a clean-burn package

EUG 2 Heaters/Regenerators

EU	Point	Make/Model	MMBTUH	Construction Date
E13	H-501	Regen Gas Heater	1.70	2015
E14	H2	Amine Reboiler	0.75	2011
E15	H3	Heater Treater	0.50	2005
E34A	H4	Glycol Dehydration Unit Reboiler	0.25	1981

EUG 3 Process Flare

EU	Point	Name	MMBTUH	Construction Date
E33	FL1	Process Flare	0.25	1950s

EUG 4 Tanks

EU	Point	Contents	Barrels	Gallons	Construction Date
Tanks	V-BS1	Condensate	300	12,600	1956
	V-BS2	Condensate	300	12,600	1956
	V-BS3	Condensate	300	12,600	1956
	V-BS4	Empty	110	4,620	1950s

EU	Point	Contents	Barrels	Gallons	Construction Date
	V-BS5	Produced Water	300	12,600	1950s
	V-MS-1	Methanol	36	1,531	1950s
	V-221B	Empty	714	29,988	1950s
	V-221C	Empty	714	29,988	1950s
	V-21	Empty	600	25,200	1950s
	V-20	Empty	600	25,200	1950s
	V-20A	Empty	600	25,200	1950s
	V-22	Empty	366	15,372	1950s
	V-23	Empty	366	15,372	1950s
	V-24	Empty	366	15,372	1950s
	V-25	Empty	366	15,372	1950s
	V-OS-1	Lube Oil	300	12,600	1950s
	V-OS-2	Empty	300	12,600	1950s
	V-OS-3	Lube Oil	210	8,820	1950s

EUG 5 Fugitives

EU	Number of Items/Type of Equipment
Fugitives	550 Valves (Gas)
	200 Valves (Liquid)
	6 Open Ended Lines(Gas)
	2 Open Ended Lines(Liquid)
	1,650 Connectors(Gas)
	600 Connectors(Liquid)
	24 Other(Gas)
	4 Other(Liquid)
	550 Flanges(Gas)
	200 Flanges(Liquid)
	4 Pump Seals(Liquid)

EUG 6 Glycol Dehydration Unit Still Vent

EU	Point	Name	Construction Date
E34B	DEHY-1	Glycol Dehydration Unit's Still Vent	1981

EUG 7 Amine Unit

EU	Point	Name	Construction Date
E14A	AMINE1	Amine Unit	Grandfathered unit

EUG 8 Compressors

EU #	Description	hp	Date Manufactured
E38	Compressor	1,085	11/1/1993

EU #	Description	hp	Date Manufactured
C-801	Compressor	1,775	11/1/2015
C-852	Compressor	1,380	12/1/2015

EUG 9 Loading

EU	Point	Name	Construction Date
Loading	Loading	Condensate Truck Loading	1956

SECTION VI. EMISSIONS

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

ENGINES

Emission estimates for the engines are based on continuous operation and the emission factors below.

Engine Emission Factors

EU	Name/Model	NO _x (g/hp-hr)	CO (g/hp-hr)	VOC ⁵ (g/hp-hr)
E1	1,000-hp White Superior 8GT825 ¹	2.64	1.464	1.00
E2	1,000-hp White Superior 8GT825 ²	16.70	12.300	2.58
E4	800-hp White Superior 8G825 ³	12.60	7.170	0.47
E38	1,085-hp Caterpillar G3516 TALE W/OC ³	2.00	0.192	0.40
C-801	1,775-hp Caterpillar G3606 BLE W/OC ³	0.50	0.19	0.47
C-852	1,380-hp Caterpillar G3516 B W/OC ³	0.50	0.17	0.36
		(lb/MMBTU)		
E10	880-hp Cooper GMV8T ⁴	3.17 ⁴	0.386 ⁴	0.120 ⁴

¹ - Retrofitted w/clean-burn package. CO and NO_x emission factors are based on stack test data of similar engine and includes a 20% safety factor. VOC emission factor is based on professional engineering knowledge.

² - CO, NO_x, and VOC emission factors are based on manufacturer's specifications. VOC is conservatively assumed to be 33% of total HC emission factor of 7.81 g/hp-hr.

³ - CO, NO_x, and VOC emission factors are based on manufacturer's specifications. CO emission factors before control are 1.8 g/hp-hr for Caterpillar G3516 engines and 2.5 g/hp-hr for Caterpillar G3606 engines, which indicates at least 89% reduction for CO.

⁴ - CO, NO_x, and VOC emission factors in lb/MMBTU are based on AP-42 (7/00), Section 3.2, Table 3.2-1 (Maximum).

⁵ - Includes formaldehyde.

Engine Emissions

EU	Name/Model	NO _x		CO		VOC ²	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
E1	1,000-hp White Superior 8GT825 ¹	5.82	25.49	3.23	14.15	2.20	9.64
E2	1,000-hp White Superior 8GT825	36.82	161.27	27.12	118.79	5.69	24.92

EU	Name/Model	NO _x		CO		VOC ²	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
E4	800-hp White Superior 8G825	22.22	97.32	12.65	55.41	0.83	3.64
E38	1,085-hp Caterpillar 3516 TALE W/OC	4.78	20.94	0.46	2.01	0.96	4.20
C-801	1,775-hp Caterpillar G3606 BLE W/OC	1.96	8.57	0.75	3.30	1.84	8.06
C-852	1,380-hp Caterpillar G3516 B W/OC	1.52	6.66	0.52	2.27	1.10	4.80
E10	880-hp Cooper GMV8T	22.32	97.76	2.72	11.91	0.84	3.68

¹ - Retrofitted w/clean-burn package ²- Includes formaldehyde.

The internal combustion engines have emissions of HAP, the most significant being formaldehyde. Formaldehyde emission estimates are based on the hours of operation, AP-42 (07/2000), Section 3.2, or manufacturer's data. The oxidation catalyst manufacturer's guaranteed reduction of 76% is used for the engines with oxidation catalyst. Based on manufacturer's pre-control CO emission factor, CO reduction is at least 89%. Formaldehyde emission test was performed on C-801 on June 15, 2021, by EcoTest. Results showed 84% reduction.

Potential Formaldehyde Emissions from the Engines

EU	Type	HP	MMBTUH	lb/MMBTU	g/hp-hr	Est. Emissions	
						lb/hr	TPY
E1 ⁽¹⁾	4SLB	1,000	8.624	---	0.216	0.476	2.08
E2 ⁽²⁾	4SLB	1,000	8.624	0.0528	---	0.455	1.99
E4 ⁽⁴⁾	4SRB	800	6.400	0.0205	---	0.131	0.57
E38 ⁽¹⁾	4SLB	1,085	---	---	0.060	0.144	0.63
E10 ⁽³⁾	2SLB	880	7.040	0.0552	---	0.389	1.70
C-801 ⁽¹⁾	4SLB	1,775	---	---	0.060	0.23	1.03
C-852 ⁽¹⁾	4SLB	1,380	---	---	0.050	0.15	0.67
Totals						1.975	8.67

⁽¹⁾ Manufacturer's data

⁽²⁾ AP-42 (07/2000), Section 3.2, Table 3.2-2

⁽³⁾ AP-42 (07/2000), Section 3.2, Table 3.2-1

⁽⁴⁾ AP-42 (07/2000), Section 3.2, Table 3.2-3

HEATER/BOILER

Emissions from the regeneration burners are based on AP-42 (7/98), Section 1.4-1, 1.4-3 and 1.4-3 for small boilers and a gas heating value of 1,000 BTU/SCF. The ratings shown in the following table.

Heater/Reboiler Emission Factors

EU	NO _x	CO	VOC
	lb/MMSCF	lb/MMSCF	lb/MMSCF
E13	100	84	5.5
E14	100	84	5.5

EU	NO _x	CO	VOC
	lb/MMSCF	lb/MMSCF	lb/MMSCF
E15	100	84	5.5
E34A	100	84	5.5

Heater/Reboiler Emissions

EU	Source	Rating	NO _x		CO		VOC	
		MMBTUH	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
E13	Regen Heater	1.70	0.17	0.74	0.14	0.63	0.02	0.06
E14	Amine Reboiler	0.75	0.07	0.32	0.06	0.27	<0.01	0.02
E15	Heater Treater	0.50	0.05	0.22	0.04	0.18	<0.01	0.02
E34A	Glycol Dehy Reboiler	0.25	0.02	0.11	0.02	0.09	<0.01	0.01

GLYCOL DEHYDRATION UNIT

Emission estimates from the glycol dehydration unit's (E34B) still vent are based on GRI-GLYCalc Version 4.0, a residue gas analysis, a glycol recirculation rate of 3.5 gallons per minute (gpm), and a throughput of 25 MMSCFD. The glycol dehydration unit does not have a flash tank or a still vent condenser.

Dehydration Unit

Parameter	Data
Type of Glycol	TEG
Dry Gas Flow Rate, MMSCF/DAY	25.0
Glycol Pump Type	Gas
Lean Glycol Pump Design Capacity, gpm	3.5
Lean Glycol Recirculation Rate Input, gpm	3.16
Regenerator Vent	
Control Method	None
VOC Emissions, TPY	2.89
Flash Tank	
Total Emissions, TPY	
VOC	2.89
Benzene	N/D
Toluene	0.3128
Ethylbenzene	N/D
Xylene	0.3280
n-Hexane	0.0036
Total HAP	0.644

(1)- N/D- Not Detected

AMINE UNIT

Emissions estimates from the amine unit (AMINE1) are based on an inlet gas analysis (assuming the methane has already been removed from the stream prior to entering the amine unit and uses that for the NGL composition) and AmineCalc Version 1.0, a flow rate of 60 lb/hr, and a concentration of 16,000 ppmv CO₂. The unit is not equipped with a flash tank but was modeled as such to account for the filter separator. The amine unit uses MEA to strip CO₂ from NGLs. The amine unit vent and filter separator are routed to the process gas flare.

Amine Unit

Parameter	Data
Type of Amine	MEA
Inlet NGL, lb/hr	60
Inlet Gas H ₂ S Concentration, ppmv	0
Outlet Gas H ₂ S Concentration, ppmv	0
Lean Amine Pump Design Capacity, gpm	9.0
Lean Amine Recirculation Rate Input, gpm	9.0
Amine Unit Inlet Gas Temperature, °F	87
Amine Unit Inlet Gas Pressure, psig	400
Amine Solution Concentration, wt. %	15
Regenerator Vent	
Control Method	Flare
VOC/H ₂ S Control Efficiency, %	98%
Total Emissions, TPY	
VOC	0.082
H ₂ S, lb/hr	0
SO ₂	0

FLARE

Emissions factors for NO_x and CO are from AP-42 (2/18), Table 13.5-1. VOC emissions are based on the emissions from the amine unit with a 98% destruction efficiency. VOC emissions from pilot gas is negligible.

Flare Combustion Emissions

EU	Heat Capacity MMBTUH	Emission Factor lb/MMBTU		NO _x		CO	
		NO _x	CO	lb/hr	TPY	lb/hr	TPY
E-33	0.25	0.068	0.31	0.02	0.08	0.08	0.35

Flare VOC Emissions

EU	Process Point(s)	VOC	
		lb/hr	TPY
E-33	Amine Unit Gas Stream	0.02	0.082

TANKS

Flashing emissions from condensate tank V-BS1 were calculated using E&P Tanks program (Version 2.0). Working and breathing losses for condensate tanks V-BS1, V-BS2, and V-BS3 are based on AP-42 Section 7.1 (6/20). Condensate tanks V-BS2 and V-BS3 do not have flash emissions. The water tank (V-BS5) has traditionally been considered an insignificant activity and is a grandfathered piece of equipment.

Tank Emissions (per tank)

Parameter	V-BS1 Data	V-BS2 & V-BS3 Data	V-BS5 Data
Content	Condensate	Condensate	Produced Water
Throughput, gal/yr	1,226,400	1,226,400	189,000
Working/Breathing Method/Tool	AP-42 Sec. 7.1	AP-42 Sec. 7.1	AP-42 Sec. 7.1
Flash Calculation Method/Tool	E&P TANKS	None	None
Working/Breathing/Flashing Emissions, TPY	42.78	2.96	0.59*
Control Type	None	None	None
Tank VOC Emitted at Tank, TPY	42.78	2.96	0.59

*Calculated as condensate

LOADING

Emissions from loading condensate into tank trucks were estimated using AP-42 (7/08), Section 5.2, Equation 1, and the parameters listed in the following table. Emissions from produced water truck loading are negligible.

Loading Parameters and Emissions

Parameter	Loading
Liquids Loaded	Condensate
Throughput, gal/yr	1,226,400
Saturation Factor	0.6
Temp., °F	63.02
TVP, psia	3.47
MW, lb/lbmol	50
VOC, wt. %	100
Emission Factor, lb/10 ³ gal ⁽¹⁾	2.482
VOC Emissions, TPY	1.52

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

FUGITIVES

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

Fugitive VOC Emissions

Equipment	%C₃+	Emission Factor	(lb/hr)	TPY
550 Valves (Gas)	10.27	0.00992	0.560	2.453
200 Valves (Liquid)	84.87	0.00551	0.935	4.095
6 Open Ended Lines(Gas)	10.27	0.00441	0.003	0.013
2 Open Ended Lines(Liquid)	84.87	0.00309	0.005	0.022
1,650 Connectors(Gas)	10.27	0.00044	0.075	0.329
600 Connectors(Liquid)	84.87	0.00046	0.234	1.025
24 Other(Gas)	10.27	0.01940	0.048	0.210
4 Other(Liquid)	84.87	0.01653	0.056	0.245
550 Flanges(Gas)	10.27	0.00086	0.049	0.215
200 Flanges(Liquid)	84.87	0.00024	0.041	0.180
4 Pump Seals(Liquid)	84.87	0.02866	0.097	0.425
Total Fugitive Emissions			2.103	9.212

Facility-Wide Emissions

EU	Description	NO_x		CO		VOC ⁴	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
E1	1,000-hp White Superior 8GT825 ¹	5.82	25.49	3.23	14.15	2.20	9.64
E2	1,000-hp White Superior 8GT825	36.82	161.27	27.12	118.79	5.69	24.92
E4	800-hp White Superior 8G825	22.22	97.32	12.65	55.41	0.83	3.64
E38	1,085-hp Caterpillar 3516 TALE W/OC	4.78	20.94	0.46	2.01	0.96	4.20
C-801	1,775-hp Caterpillar G606 BLE W/OC	1.96	8.57	0.75	3.30	1.84	8.06
C-852	1,380-hp Caterpillar G3516 B W/OC	1.52	6.66	0.52	2.27	1.10	4.80
E10	880-hp Cooper GMV8T	22.32	97.76	2.72	11.91	0.84	3.68
E13	1.7-MMBTUH Regen Heater	0.17	0.74	0.14	0.63	0.02	0.06
E14	0.75-MMBTUH Amine Reboiler	0.07	0.32	0.06	0.27	<0.01	0.02

EU	Description	NO _x		CO		VOC ⁴	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
E15	0.50-MMBTUH Heater Treater	0.05	0.22	0.04	0.18	<0.01	0.02
E14A	Amine Unit ²	---	---	---	---	---	---
E33	Process Flare ³	0.02	0.07	0.07	0.34	0.16	0.80
E34A	Glycol Dehy Reboiler	0.02	0.11	0.02	0.09	<0.01	0.01
E34B	Glycol Dehydration Unit's Still Vent	---	---	---	---	0.65	2.89
V-BS1, V-BS2, V-BS3, V-BS5	Condensate Storage Tanks	---	---	---	---	---	49.29
Loading	Loading	---	---	---	---	---	1.52
Fugitives	Fugitives	---	---	---	---	2.10	9.21
Totals		95.77	419.47	47.78	209.35	16.42	122.76
Totals from Permit No. 2014-1758-TV3 (M-2)		132.59	580.74	74.9	328.14	22.08	147.09
Emission Changes		-36.82	-161.27	-27.12	-118.79	-5.69	-24.33

¹ - Retrofitted w/clean-burn package

² - Emissions reported at flare

³ - Includes Amine unit emissions

⁴ - Includes formaldehyde emissions for engines

HAZARDOUS AIR POLLUTANTS (HAPs)

The following table summarizes HAP emissions from engines and the dehydration unit.

HAP Emissions from the Engines and Glycol Dehydration Unit

Pollutant	lb/hr	TPY
Benzene	N/D	N/D
Toluene	0.0714	0.3128
Ethyl benzene	N/D	N/D
Xylene	0.0749	0.3280
n-Hexane	0.0008	0.0036
Formaldehyde	1.975	8.67
Totals	2.122	9.314

ND - Not Detected

Total HAPs emissions are 9.314 TPY, the facility is a minor source for HAPs.

SECTION VII. 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. Any Activity to which a state or federal applicable requirement applies is not insignificant even if it is included on this list.

1. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas). The regen heater, amine reboiler, heater treater, and the dehy heater are located on-site and are rated less than 5 MMBTUH. Other space heaters, boilers, process heaters, and emergency flares may be used in the future.
2. Point* Emissions from fuel storage/dispensing equipment operated solely for facility owned vehicles if fuel throughput is not more than 2,175 gallons/day, averaged over a 30-day period. None identified but may be used in the future.
3. * Emissions from crude oil and condensate storage tanks with a capacity of less than or equal to 420,000 gallons that store crude oil and condensate prior to custody transfer as defined by NSPS Subpart Kb. The three condensate tanks store condensate prior to custody transfer and have capacities less than 420,000 gallons.
4. * Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature. The glycol, lube oil, antifreeze, diesel, and waste water tanks have capacities less than 39,894 gallons and store products having a vapor pressure less than 1.5 psia.
5. Cold degreasing operations utilizing solvents that are denser than air. A parts washer is located on-site and it uses solvents that are denser than air and others may be used in the future.
6. Site restoration and/or bioremediation activities of <5 years expected duration. No site restoration or bioremediation is currently being performed at the site but may be conducted in the future.
7. Hydrocarbon-contaminated soil aeration pads utilized for soils excavated at the facility only. No hydrocarbon-contaminated soil aeration pads are currently located at the facility but may be used in the future.
8. * Activities that have the potential to emit no more than 5 TPY (actual) of any criteria pollutant. Flare emissions and condensate truck loading emissions are in this category.

SECTION VIII. OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions)

[Applicable]

Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference)

[Applicable]

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, Emissions Inventory and Annual Operating Fees) [Applicable]
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Emission inventories were submitted and fees paid for previous years as required.

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

- 5 TPY of any one criteria pollutant
- 2 TPY of any one hazardous air pollutant (HAP) or 5 TPY of multiple HAPs or 20% of any threshold less than 10 TPY for 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, previous issued permits, or are developed from the applicable requirement. Emissions limitations (lb/hr and TPY) for EU E1, E6, E34B, E37 and E38 were incorporated from Permit No. 2009-354-TV R2.

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

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

OAC 252:100-19 (Particulate Matter) [Applicable]
This subchapter specifies a particulate matter (PM) emissions limitation of 0.6 lb/MMBTU from indirect fired fuel-burning units with a rated heat input of 10 MMBTUH or less. Fuel-burning equipment with a rated heat input between 10 and 100 MMBTUH is limited to between 0.599 and

0.349 lb/MMBTU, as specified in Appendix C. AP-42 (7/98), Table 1.4-1 lists natural gas PM emissions from external combustion sources to be 7.6 lb/MMSCF or about 0.0076 lb/MMBTU. For 4-cycle engines burning natural gas, AP-42 (7/00), Tables 3.2-2 and 3.2-3 lists the total PM emissions as 0.01 lb/MMBTU for lean-burn engine and 0.02 lb/MMBTU for rich-burn engines, respectively. The permit requires the use of natural gas for all fuel-burning equipment to ensure compliance with Subchapter 19.

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

OAC 252:100-25 (Visible Emissions and Particulate Matter)

[Applicable]

No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. When burning natural gas there is little possibility of exceeding the opacity standards.

OAC 252:100-29 (Fugitive Dust)

[Applicable]

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

OAC 252:100-31 (Sulfur Compounds)

[Applicable]

Part 2, Section 31.7 limits the ambient air concentration of hydrogen sulfide (H_2S) emissions from any facility to 0.2 ppmv (24-hour average) at standard conditions which is equivalent to $283 \mu g/m^3$ (based on EPA standard conditions). Based on modeling conducted for the General Permit for Oil and Gas Facilities (GP-OGF), the ambient impacts of H_2S from oil and gas facilities handling, treating, and combusting sweet natural gas and storing sweet crude oil or condensate will be in compliance with the ambient air concentration limit.

The facility has accepted a facility inlet gas concentration limit of 4 ppmv H_2S to ensure compliance with the ambient standards.

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

Part 5 also limits hydrogen sulfide emissions from new petroleum or natural gas process equipment (constructed after December 31, 1974). Removal of hydrogen sulfide in the exhaust stream, or oxidation to sulfur dioxide, is required unless hydrogen sulfide emissions would be less than 0.3 lb/hr for a two-hour average. Emissions from the amine unit are vented to the flare.

OAC 252:100-33 (Nitrogen Oxides)

[Not Applicable]

This subchapter limits NO_x emissions from new fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH. None of the engines exceed the 50 MMBTUH threshold.

OAC 252:100-35 (Carbon Monoxide)

[Not Applicable]

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

OAC 252:100-37 (Volatile Organic Compounds)

[Applicable]

Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The condensate tanks are “grandfathered” and are not subject to this requirement.

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

Part 5 limits the VOC content of coatings from any coating line or other coating operation. This facility does not normally conduct coating or painting operations except for routine maintenance of the facility and equipment. Any painting operation will involve maintenance coating of buildings and equipment and emit less than 100 pounds per day of VOCs and is exempt.

Part 7 requires fuel-burning and refuse-burning equipment to be cleaned, operated, and maintained so as to minimize VOC emissions. Based on manufacturer's data and good engineering practice, the equipment must not be overloaded and temperature and available air must be sufficient to provide essentially complete combustion.

Part 7 requires all effluent water separators openings or floating roofs to be sealed or equipped with an organic vapor recovery system. There are no effluent water separators located at this facility.

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

[Applicable]

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

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

[Applicable]

This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions

and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

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

OAC 252:100-11	Alternative Emissions Reduction	Not requested
OAC 252:100-17	Incinerators	Not type of emission unit
OAC 252:100-23	Cotton Gins	Not type of emission unit
OAC 252:100-24	Grain Elevators	Not in source category
OAC 252:100-39	Nonattainment Areas	Not in area category
OAC 252:100-47	Municipal Solid Waste Landfills	Not in source category

SECTION IX. FEDERAL REGULATIONS

PSD, 40 CFR Part 52

[Not Applicable]

Total potential emissions for NO_x and CO are greater than the major source threshold of 250 TPY. Any future increases of emissions must be evaluated for PSD if they exceed a significance level (40 TPY NO_x, 100 TPY CO, 40 TPY VOC, 40 TPY SO₂, 25 TPY TSP, 15 TPY PM₁₀, 10 TPY PM_{2.5}).

NSPS, 40 CFR Part 60

[Subparts KKK, JJJJ, OOOO, and OOOOa are Applicable]

Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units. This subpart affects steam generating units constructed after June 9, 1989, and with capacity between 10 and 100 MMBTUH. Subpart Dc excludes “process heaters,” and the regeneration heater does not meet the definition of “steam generating unit” in Subpart Dc.

Subpart K, Ka, Kb, Petroleum and Volatile Organic Liquid (VOL) Storage Vessels. The three 12,600 gallon condensate tanks at the site are not subject because they were constructed prior to the effective dates of these standards and they are below the de minimis sizes of 19,813 gallons for Subpart Kb and 40,000 gallons for Subparts K and Ka.

Subpart GG, Stationary Gas Turbines. There are none at this facility.

Subpart VV, Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry (SOCMI). The equipment is not in a SOCMI plant but the facility is applicable to Subpart KKK which references some of the standards of Subpart VV.

Subpart KKK, Equipment Leaks of VOC from Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011. This subpart applies to natural gas processing plants that commence construction, reconstruction, or modification after January 20, 1984 and prior to August 23, 2011. Although most of the plant is exempt from this subpart based on construction prior to January 24, 1984, the compressors and associated affected facilities attached to the 1,085-hp Caterpillar 3516 TALE engine (E38) are subject to the requirements of this subpart. The glycol dehydration unit and associated affected equipment are also subject to this subpart. The gas treated by the glycol

dehydration unit contains approximately 2% VOC and the other streams processed in the glycol dehydration unit are expected to contain even less VOC. Therefore, the glycol dehydration unit is also not subject to the monitoring requirements of this subpart. For the equipment that contact streams that contain less than 10% VOC, the facility will need to comply with paragraph 60.486(j), which requires the facility to record information and data that demonstrates that the unit is not in VOC service in a log that is kept in a readily accessible location. All applicable requirements have been incorporated into the permit.

Subpart LLL, SO₂ Emissions From Onshore Natural Gas Processing for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011. This subpart affects sweetening units and sweetening units followed by a sulfur recover unit which commence construction or modification after January 20, 1984 and prior to August 23, 2011. This subpart requires facilities with a design capacity less than 2 LT/D of H₂S in the acid gas (expressed as sulfur) to keep, for the life of the facility, a record demonstrating that the facility's design capacity is less than 2 LT/D of H₂S expressed as sulfur. The amine unit was installed in the 1950s and is not applicable to this subpart because it was constructed prior to the effective date of this standard (January 20, 1984). However, this facility has records documenting that its potential for sulfur production is less than the de minimis amount.

Subpart KKKK, Gas Turbines. Subpart KKKK affects gas turbines constructed after February 18, 2005. There are none at this facility.

Subpart IIII, Stationary Compression Ignition (CI) Internal Combustion Engines (ICE). There are no CI-ICE at this facility.

Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI-ICE). This subpart promulgates emission standards for all new SI engines ordered after June 12, 2006 and all SI engines modified or reconstructed after June 12, 2006, regardless of size. The specific emission standards (either in g/hp-hr or as a concentration limit) vary based on engine class, engine power rating, lean-burn or rich-burn, fuel type, duty (emergency or non-emergency), and numerous manufacture dates. Engine manufacturers are required to certify certain engines to meet the emission standards and may voluntarily certify other engines. An initial notification is required only for owners and operators of engines greater than 500-hp that are non-certified. Emergency engines will be required to be equipped with a non-resettable hour meter and are limited to 100 hours per year of operation excluding use in an emergency (the length of operation and the reason the engine was in operation must be recorded).

There are only two engines that were installed after June 12, 2006. The 1,775-hp Caterpillar G606 BLE W/OC engine (C-801) was manufactured in 2015. The 1,380-hp Caterpillar G3516 B W/OC engine (C-852) was manufactured in 2015. Engines C-801 and C-852 are subject to this subpart. The remaining engines at the facility are not subject since they were manufactured prior to the applicability date and have not been modified or reconstructed.

The owner/operator of SI-ICE with a maximum engine power greater than or equal to 100-hp must comply with the emission standards in Table 1 of Subpart JJJJ.

Emission Standards from Table 1, Subpart JJJJ, g/hp-hr (ppmvd @ 15%O₂)

Engine Type & Fuel	Max Power (hp)	Mfg. Date	NO _x	CO	VOC
Non-Emergency SI Lean Burn Natural Gas	500 ≤ hp < 1,350	1/1/2008	2.0 (160)	4.0 (540)	1.0 (86)
		7/1/2010	1.0 (80)	2.0 (270)	0.7 (60)

For engines greater than 500-hp, the owner/operator must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the owner/operator must conduct an initial performance test and subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.

All applicable requirements have been incorporated into the permit.

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

- (a) Each gas well affected facility, which is a single natural gas well.
- (b) Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals.
- (c) Each reciprocating compressor affected facility, which is a single reciprocating compressor.
- (d) Each pneumatic controller affected facility, which is:
 - (1) For the oil and natural gas production segment: a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 SCFH.
 - (2) For natural gas processing plants: a single continuous bleed natural gas-driven pneumatic controller.
- (e) Each storage vessel affected facility, which is a single storage vessel, that emits more than 6 TPY and contain crude oil, condensate, intermediate hydrocarbon liquids, or produced water.
- (f) The group of all equipment, except compressors, within a process unit located at an onshore natural gas processing plant is an affected facility.
- (g) Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.

All equipment located at this facility commenced construction prior to the NSPS, Subpart OOOO applicability date of August 23, 2011, and has not been modified or reconstructed, except for the regen gas heater (E-13), two engines (C-801 and C-852), and the compressors associated with engines C-801 and C-852. The regen gas heater and engines are not affected facilities. The two compressors associated with C-801 and C-852 were manufactured after 9/18/2015 and are subject to Subpart OOOOa. All applicable requirements have been incorporated into the permit.

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.
- (c) Each reciprocating compressor affected facility, which is a single reciprocating compressor.
- (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.
 - (g) Sweetening units that process natural gas produced from either onshore or offshore wells.
 - (h) 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 located at this facility commenced construction prior to the NSPS, Subpart OOOOa applicability date of September 18, 2015, and have not been modified or reconstructed, except for the compressors associated with the engines C-801 and C-852. These two compressors are subject to this subpart as new units, but do not constitute a modification under this subpart. All applicable requirements have been incorporated into the permit.

NESHAP, 40 CFR Part 61

[Not Applicable]

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

NESHAP, 40 CFR Part 63

[Subparts HH and ZZZZ are Applicable]

Subpart HH, Oil and Natural Gas Production Facilities. This subpart affects major and area sources of HAP that process, upgrade, or store natural gas prior to the point at which it enters the natural gas transmission and storage source category or is delivered to a final end user. The affected source at area sources is triethylene glycol (TEG) dehydration units. This facility is an area source of HAP. TEG dehydration units with either an annual average natural gas flow rate less than 3 MMSCF/D or benzene emissions less than 1.0 TPY are exempt from control requirements. The TEG dehydration unit at this facility does not have any benzene emissions and is only required to keep records of the determination of these criteria as required in § 63.774(d)(1).

Subpart YYYY, Stationary Combustion Turbines. Subpart YYYY affects combustion turbines located at major sources of HAPs. There are none at this facility.

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart affects any existing, new, or reconstructed stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand. Engines C-801 and C-852 are new sources and are required to meet NSPS Subpart JJJJ requirements. No further requirements for these two engines apply under this subpart. All other engines are existing units located at an area source of HAP emissions and shall comply with applicable emission limitations, operating limitations, and/or maintenance requirements. Initial performance test or other initial compliance demonstration according to Tables 4 and 5 to this subpart shall be conducted within

180 days after the compliance date. Specific requirements in §63.6603 are listed in the following table.

Engine Category	Requirements From Table 2d to Subpart ZZZZ of Part 63
Existing Non-Emergency, Non-Black Start, 4SLB > 500-hp, Remote Stationary RICE	Change oil and filter, inspect spark plugs, and inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first.
Existing Non-Emergency, Non-Black Start, 4SLB ≤ 500-hp	Change oil and filter, inspect spark plugs, and inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first.
Existing Non-Emergency, Non-Black Start, 2SLB	Change oil and filter, inspect spark plugs, and inspect all hoses and belts every 4,320 hours of operation or annually, whichever comes first.
Existing Non-Emergency, Non-Black Start, 4SRB > 500-hp, Remote Stationary RICE	Change oil and filter, inspect spark plugs, and inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first.
Existing Non-Emergency, Non-Black Start, 4SRB ≤ 500-hp	Change oil and filter, inspect spark plugs, and inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first.

Based on information submitted by the applicant, this facility and the existing engines within the facility are considered remote. Onshore remote stationary RICE means stationary RICE meeting any of the following criteria:

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

Subpart DDDDD, Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. This facility is an area source of HAP emissions and is not subject to this subpart.

Subpart JJJJJ, Area Sources: Industrial, Commercial, and Institutional Boilers. There are no boilers at this facility.

Compliance Assurance Monitoring, 40 CFR Part 64

[Not Applicable]

Compliance Assurance Monitoring applies to any pollutant specific emission unit at a major source, that is required to obtain a Title V permit, if it meets all of the following criteria:

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

Emission units E1, E34B, E38, C-801, and C-852 have emission limits but only EU E38, C-801, and C-852 use control devices to achieve compliance with the applicable emission limits. Since there are no emission units that have the potential to emit prior to control greater than major source levels, the EUs are not subject to CAM.

Chemical Accident Prevention Provisions, 40 CFR Part 68

[Applicable]

This facility handles naturally occurring hydrocarbon mixtures at a natural gas processing plant and the Accidental Release Prevention Provisions are applicable to this facility. The facility was required to submit the appropriate accidental release emergency response program plan prior to June 21, 1999. This facility has submitted their plan to EPA. More information on this federal program is available on the web page: www.epa.gov/rmp.

Stratospheric Ozone Protection, 40 CFR Part 82

[Subparts A and F are Applicable]

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

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

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

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

SECTION X. COMPLIANCE

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

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

Inspection Type	Date	Summary/Results
Full Inspectopm (On-Site FCE)	10/21/2022	Eleven violations and two areas of concern
Partial Inspection (On-Site PCE)	4/25/22	Evaluated NSPS KKK report 02/01/21 to 07/31/21
Full Inspection (On-Site FCE)	4/8/2021	Off Site evaluation conducted and the facility was in Compliance
Full Inspection (On-Site FCE)	2/26/2018	In Compliance
Full Inspection (On-Site FCE)	3/23/2017	One Violation and One Area of concern

SECTION XI. TIER CLASSIFICATION, PUBLIC AND EPA REVIEW

Tier Classification

This application has been determined to be **Tier II** based on the request for renewal of a Part 70 operating permit. Part 70 operating permit renewal fee of \$7,500 has been received.

Landowner Notification

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

Public Review

The applicant published the “Notice of Filing a Tier II Application” in the *Pauls Valley Democrat* newspaper, a local newspaper in Garvin County on December 29, 2019. The notice stated that the application was available for review at the Pauls Valley Public Library, 210 N. Willow St., Pauls

Valley, OK 73075 in Garvin County, and also at the Air Quality Division's main office in Oklahoma City. The information on all permit actions is available for review by the public in the Air Quality section of the DEQ web page at <https://www.deq.ok.gov>.

The applicant will publish the "Notice of Tier II Draft Permit" as a legal notice in a newspaper of general circulation in the area where the source is located. The notice of draft permit will state that the draft permit will be available for public review at a location in the county where the facility is located, and that the draft permit will also be available for public review at the Air Quality Division main office. The draft permit will be available for a 30-day public review period.

Bordering State Review

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

Tribal Review

Tribal Nations will be notified of the draft permit.

EPA Review

The applicant requested and was granted concurrent public and EPA review periods. The draft/proposed permit will be sent to EPA for a 45-day review period. If no comments are received, the draft/proposed permit will be deemed the proposed permit.

Public Petition

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.

SECTION XII. SUMMARY

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

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

**BCE-Mach III Midstream Holdings LLC
Elmore City Gas Plant**

**Permit Number: 2019-1310-TVR4
Facility ID: 1376**

The permittee is authorized to operate the facility in conformity with the specifications submitted to Air Quality on December 23, 2019, and all supplemental materials. The Evaluation Memorandum dated January 22, 2024, 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)(1)]

EUG 1:

Emission Units (EU) E1, E38, C-801, & C-852: Emission Limits for EU E1, E38, C-801, & C-852:

Emission Unit		Units	NO_x	CO	VOC
E1	1,000-hp White Superior 8GT825 W/CBR	lb/hr	5.82	3.23	2.20
		TPY	25.49	14.14	9.65
E38	1,085-hp Caterpillar 3516 TALE W/OC	lb/hr	4.78	0.46	0.96
		TPY	20.95	2.01	4.19
C-801	1,775-hp Caterpillar G606 BLE W/OC	lb/hr	1.96	0.75	1.84
		TPY	8.57	3.30	8.06
C-852	1,380-hp Caterpillar G3516 B W/OC	lb/hr	1.52	0.52	1.10
		TPY	6.66	2.27	4.80

- a. Engine E1 shall be equipped with a clean burn conversion package.
- b. Engine E38, C-801, and C-852 shall be set to operate with the exhaust gases passing through properly operating oxidation catalysts.
- c. VOC emissions include formaldehyde.

EU E2, E4, & E10: EU E2, E4, and E10 are “grandfathered/exempt” engines. These EU are limited to the existing equipment as it is and do not have federally enforceable emission limitations:

EU	Make/Model	hp	Serial #
E2	White Superior 8GT825	1,000	19163
E4	White Superior 8G825	800	19161
E10	Cooper GMV8T	880	42082

- a. Engine E2 shall be operated as a lean-burn engine as defined by NESHAP, Subpart ZZZZ.
- b. Engine E4 is an existing 4SRB engine as defined by NESHAP, Subpart ZZZZ and shall comply with all applicable requirements of NESHAP, Subpart ZZZZ.

EUG 2: These units have insignificant emissions and are limited to the existing equipment as it is.

EU	Make/Model	MMBTUH
E13	Regen Gas Heater	1.70
E14	Amine Reboiler	0.75
E15	Heater Treater	0.50
E34A	Glycol Dehydrator Reboiler	0.25

EUG 3: EU E33 is “grandfathered” (constructed prior to any applicable rule). This EU is limited to the existing equipment as it is.

EU	Name	MMBTU/hr
E33	Process Flare	0.25

- a. The hydrogen sulfide (H₂S) concentration of the facility inlet gas shall not exceed 4 ppmv. [OAC 252:100-31]
- b. At least annually, the permittee shall test the H₂S concentration of the inlet gas using a “stain tube” analysis or similar method to determine the H₂S concentration to be within 0.1 ppmv. [OAC 252:100-8-6(a)(3)(A)]

EUG 4: The storage tanks are “grandfathered” (constructed prior to any applicable rule). These EU are limited to the existing equipment as it is.

EU	Point	Contents	Barrels	Gallons
Tanks	V-BS1	Condensate	300	12,600
	V-BS2	Condensate	300	12,600
	V-BS3	Condensate	300	12,600
	V-BS4	Empty	110	4,620
	V-BS5	Produced Water	300	12,600
	V-MS-1	Methanol	36	1,531
	V-221B	Empty	714	29,988
	V-221C	Empty	714	29,988
	V-21	Empty	600	25,200
	V-20	Empty	600	25,200
	V-20A	Empty	600	25,200
	V-22	Empty	366	15,372
	V-23	Empty	366	15,372
	V-24	Empty	366	15,372
	V-25	Empty	366	15,372

EU	Point	Contents	Barrels	Gallons
	V-OS-1	Lube Oil	300	12,600
	V-OS-2	Empty	300	12,600
	V-OS-3	Lube Oil	210	8,820

EUG 5: Fugitive VOC emissions are estimated based on existing equipment items but do not have a specific limitation.

EU	Number of Items/Type of Equipment
Fugitives	550 Valves (Gas)
	200 Valves (Liquid)
	6 Open Ended Lines (Gas)
	2 Open Ended Lines (Liquid)
	1,650 Connectors (Gas)
	600 Connectors (Liquid)
	24 Other (Gas)
	4 Other (Liquid)
	550 Flanges (Gas)
	200 Flanges (Liquid)
	4 Pump Seals (Liquid)

EUG 6: Emission limitations for EU E34B. Emissions from the glycol dehydration unit's still vent are based on GRI-GLYCalc Version 4.0, a recent inlet gas analysis, a glycol recirculation rate of 3.5 gallons per minute (gpm), and an estimated throughput of 25 MMSCFD.

Emission Unit		Units	VOC	HAP
E34B	Glycol Dehydration	lb/hr	0.65	--
	Unit's Still Vent	TPY	2.89	0.64

- The glycol dehydration unit shall be operated with a Kimray 9015 PV or similar pump with a lean glycol recirculation rate that shall not exceed 3.5 gallons per minute (gpm). Compliance shall be demonstrated by documenting the pump make and model and maximum glycol recirculation rate.
- The natural gas throughput of the glycol dehydration unit shall not exceed 25 million standard cubic feet per day (MMSCD) based on a monthly average.
- The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Oil and Natural Gas Production, Subpart HH, for each affected dehydration unit by the dates specified in §63.760(f).

EUG 7: EU E14A is “grandfathered” (constructed prior to any applicable rule). This EU is limited to the existing equipment as it is.

EU	Point	Name	Const. Date
E14A	AMINE1	Amine Unit	Grandfathered unit

- a. The natural gas throughput of E14A shall not exceed 60 gal/hr based on a monthly average.
- b. The hydrogen sulfide (H₂S) concentration of the facility inlet gas shall not exceed 4 ppmv.
- c. Exhaust gas stream from the regenerator still vent shall be routed to the process flare (E33) or equivalent control device with 98% control efficiency for VOC and H₂S.

[OAC 252:100-31]

EUG 8: Compressors

EU #	Description	hp	Date Manufactured
E38	Compressor	1,085	11/1/1993
C-801	Compressor	1,775	11/1/2015
C-852	Compressor	1,380	12/1/2015

2. The fuel-burning equipment shall be fired with pipeline natural gas or other gaseous fuel with a sulfur content of less than 162 ppmv. Compliance can be shown by the following methods: for pipeline natural gas, a current gas company bill; for other gaseous fuel, a current lab analysis, stain-tube analysis, gas contract, tariff sheet, or other approved methods. Compliance shall be demonstrated at least per calendar year. [OAC 252:100-31]

3. The permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year) except as limited in Specific Condition No. 1. [OAC 252:100-8-6(a)]

4. Each engine/turbine at the facility shall have a permanent identification plate attached that shows the make, model number, and serial number. [OAC 252:100-43]

5. The permittee shall keep operation and maintenance (O&M) records for those “grandfathered” emission units identified in EUG 1, which have not been modified, and for those replacement engines/turbines which do not conduct semi-annual testing. Such records shall at a minimum include the dates of operation, and maintenance, type of work performed, and the increase, if any, in emissions as a result. [OAC 252:100-8-6 (a)(3)(B)]

6. The permittee shall conduct an initial test of NO_x and CO emissions from any engine with emission limits, or any replacement engine; other than a grandfathered engine or an Emergency Use Engine (i.e., any engine that drives a generator or firewater pump, or other emergency use equipment and operates no more than 500 hours per year), or any engine equal to or less than 250 horsepower (hp). The initial test must be performed within 180 days of engine startup. Testing

shall be conducted using EPA reference methods, if applicable, or 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 AQD. [OAC 252:100-43]

At least twice per calendar year, the permittee shall conduct tests of NO_x and CO emissions from any controlled engine greater than 250 hp with emission limits and any uncontrolled 4SRB engine greater than 500-hp with emission limits. Testing shall be conducted using EPA reference methods, if applicable, or 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 AQD. Testing is required for any controlled engine greater than 250-hp with emission limits and any uncontrolled 4SRB engine greater than 500-hp with emission limits that runs for more than 440 hours during a semi-annual period. A semi-annual period is defined as a calendar semi-annual period (i.e., January through June and July through December). Each semi-annual test shall be separated by at least 120 days. In the first year of operation, any engine started after March 31st only requires one test regardless of hours operated. The initial test may be counted as the first semi-annual test of an engine. [OAC 252:100-43]

At least once every 5 years (during the permit term), the permittee shall conduct tests of NO_x and CO emissions from any uncontrolled lean-burn engine greater than 500-hp with emission limits. Testing shall be conducted using EPA reference methods, if applicable, or 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 AQD. [OAC 252:100-43]

7. When periodic compliance testing shows engine exhaust emissions in excess of the lb/hr limits in Specific Condition Number 1, the permittee shall comply with the provisions of OAC 252:100-9. [OAC 252:100-9]

8. Replacement of any equipment with emissions limits specified in this permit is allowed under OAC 252:100-8-6 (f)(2), provided the owner or operator notifies the DEQ in writing at least seven (7) days in advance of the proposed change. Installation of an “affected facility”, “affected source”, or “new source” as those terms are defined in 40 CFR Section 60.2, 40 CFR Section 63.2, and 40 CFR Section 61.02, respectively, that is subject to an emission standard, equipment standard, work practice standard or recordkeeping requirement in a federal NSPS (40 CFR Part 60) or a federal NESHAP (40 CFR Parts 61 and 63) shall comply with all applicable requirements.

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

9. The permittee shall comply with NSPS, Subpart KKK, Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants, for the compressors attached to EU E38, the glycol dehydration unit and all affected equipment associated with each of these EU, including but not limited to the following: [40 CFR §§ 60.630-60.636]

- a. The owner/operator shall comply with the requirements of §§ 60.482-1(a), (b), and (d) and § 60.482-2 through § 60.482-10 except as provided in § 60.633. [§ 60.632(a)]
 - (1) The owner/operator shall demonstrate compliance with §§ 60.482-1 to 60.482-10 for all affected equipment within 180 days of initial startup which shall be determined by review of records, reports, performance test results, and inspection

using methods and procedures specified in § 60.485 unless the equipment is in vacuum service and is identified as required by § 60.486(e)(5).

[§ 60.482-1(a), (b), & (d)]

- (2) The owner/operator shall comply with the monitoring, inspection, and repair requirements, for pumps in light liquid service, of §§ 60.482-2(a), (b), and (c) except as provided in §§ 60.482-2(d), (e), (f), and 60.633(d).
 - (3) Information and data used to demonstrate that a reciprocating compressor is in wet gas service or is not in VOC service shall be recorded in a log that is kept in a readily accessible location. [§§ 60.633(f), 60.635(c), & § 60.486(j)]
 - (4) The owner/operator shall comply with the operation and monitoring requirements, for pressure relief devices in gas/vapor service, of §§ 60.482-4(a) and (b) except as provided in § 60.482-4(c) and § 60.633(b).
 - (5) Sampling and connection systems are exempt from the requirements of § 60.482-5. [§ 60.633(c)]
 - (6) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in § 60.632(c). The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall be closed at all other times. [§ 60.482-6]
 - (7) The owner/operator shall comply with the monitoring, inspection, and repair requirements, for valves in gas/vapor service and light liquid service, of §§ 60.482-7(b) through (e), except as provided in §§ 60.633(d), 60.482-7(f), (g), and (h), §§ 60.483-1, 60.483-2, and 60.482-1(c). [§ 60.482-7(a)]
 - (8) The owner/operator shall comply with the monitoring and repair requirements, for pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors, of §§ 60.482-8(a) through (d). [§ 60.482-8]
 - (9) Delay of repair of equipment is allowed if it meets one of the requirements of §§ 60.482-9(a) through (e).
 - (10) The owner/operators using a closed vent system and control device to comply with these provisions shall comply with the design, operation, monitoring and other requirements of 60.482-10(b) through (g). [§ 60.482-10(a)]
- b. An owner/operator may elect to comply with the alternative requirements for valves of §§ 60.483-1 and 60.483-2. [§ 60.632(b) & § 60.482-1(b)]
 - c. An owner/operator may apply to the Administrator for permission to use an alternative means of emission limitation that achieves a reduction in emissions of VOC at least equivalent to that achieved by the controls required in NSPS Subpart KKK. In doing so, the owner or operator shall comply with requirements of § 60.634. [§ 60.632(c)]
 - d. The owner/operator shall comply with the test method and procedures of § 60.485 except as provided in §§ 60.632(f) and 60.633(h). [§ 60.632(d)]

- e. The owner/operator shall comply with the record-keeping requirements of § 60.486 and the reporting requirements of § 60.487 except as provided in §§ 60.633, 60.635, and 60.636. [§ 60.632(e)]
- f. The owner/operator shall comply with the record-keeping requirements of §§ 60.635(b) and (c) in addition to the requirements of § 60.486. [§ 60.635(a)]
- g. The owner/operator shall comply with the reporting requirements of §§ 60.636(b) and (c) in addition to the requirements of § 60.487. [§ 60.636(a)]

10. The permittee shall comply with applicable requirements of NESHAP Subpart HH, National Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities, for each affected TEG dehydration unit, including but not limited to the following.

[40 CFR §§63.760 – 63.775]

- a. Each owner or operator of a glycol dehydration unit that meets the exemption criteria in §63.764(e)(1) shall maintain the records specified in §63.777(d)(1) for that glycol dehydration unit.

11. The permittee shall comply with all applicable requirements of the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), Subpart ZZZZ, for each affected engine including but not limited to the following:

[40 CFR §§ 63.6580-63.6675]

- 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. § 63.6600 What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?
- f. § 63.6601 What emission limitations must I meet if I own or operate a 4SLB stationary RICE with a site rating of greater than or equal to 250 brake HP and less than 500 brake HP located at a major source of HAP emissions?
- g. § 63.6602 What emission limitations and other requirements must I meet if I own or operate an existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?
- h. § 63.6604 What fuel requirements must I meet if I own or operate a stationary CI RICE?
- i. § 63.6605 What are my general requirements for complying with this subpart?
- j. § 63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?
- k. § 63.6611 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a 4SLB SI stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions?
- l. § 63.6615 When must I conduct subsequent performance tests?
- m. § 63.6620 What performance tests and other procedures must I use?

- n. § 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?
- o. § 63.6630 How do I demonstrate initial compliance with the emission limitations, operating limitations, and other requirements?
- p. § 63.6635 How do I monitor and collect data to demonstrate continuous compliance?
- q. § 63.6640 How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?
- r. § 63.6645 What notifications must I submit and when?
- s. § 63.6650 What reports must I submit and when?
- t. § 63.6655 What records must I keep?
- u. § 63.6660 In what form and how long must I keep my records?
- v. § 63.6665 What parts of the General Provisions apply to me?
- w. § 63.6670 Who implements and enforces this subpart?
- x. § 63.6675 What definitions apply to this subpart?

12. The owner/operator (O/O) shall comply with the Standards of Performance for Stationary Spark Ignition Internal Combustion Engine (SI-ICE), NSPS, Subpart JJJJ, for all affected emission units, including but not limited to the following: [40 CFR §§ 60.4230-60.4248]

- a. § 60.4233 What emission standards must I meet if I am an O/O of a stationary SI-ICE?
- b. § 60.4234 How long must I meet the emission standards if I am an O/O of a stationary SI-ICE?
- c. § 60.4235 What fuel requirements must I meet if I am an O/O of a stationary SI gasoline fired ICE subject to this subpart?
- d. § 60.4236 What is the deadline for importing or installing stationary SI ICE produced in the previous model year?
- e. § 60.4237 What are the monitoring requirements if I am an O/O of an emergency stationary SI-ICE?
- f. § 60.4243 What are my compliance requirements if I am an O/O of a stationary SI-ICE?
- g. § 60.4244 What test methods and other procedures must I use if I am an O/O of a stationary SI-ICE?
- h. § 60.4245 What are my notification, reporting, and recordkeeping requirements if I am an O/O of a stationary SI-ICE?
- i. § 60.4246 What parts of the General Provisions apply to me?

13. The permittee shall comply with 40 CFR Part 60, NSPS, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Facilities, for all affected equipment located at this facility. [40 CFR §§ 60.5360-60.5430]

- 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?
14. The permittee shall comply with NSPS, Subpart OOOOa, Standards of Performance for Crude Oil and Natural Gas Facilities, for all affected facilities located at this site.
[40 CFR §§ 60.5360a-60.5432a]
- a. §60.5360a What is the purpose of this subpart?
 - b. §60.5365a Am I subject to this subpart?
 - c. §60.5370a When must I comply with this subpart?
 - d. §60.5375a What VOC standards apply to well affected facilities?
 - e. §60.5380a What VOC standards apply to centrifugal compressor affected facilities?
 - f. §60.5385a What VOC standards apply to reciprocating compressor affected facilities?
 - g. §60.5390a What VOC standards apply to pneumatic controller affected facilities?
 - h. §60.5393a What VOC standards apply to pneumatic pump affected facilities?
 - i. §60.5395a What VOC standards apply to storage vessel affected facilities?
 - j. §60.5397a What fugitive emissions VOC standards apply to the affected facility which is the collection of fugitive emissions components at a well site and the affected facility which is the collection of fugitive emissions components at a compressor station?
 - k. §60.5398a What are the alternative means of emission limitations for VOC from well completions, reciprocating compressors, the collection of fugitive emissions components at a well site and the collection of fugitive emissions components at a compressor station?
 - l. §60.5400a What equipment leak VOC standards apply to affected facilities at an onshore natural gas processing plant?
 - m. §60.5401a What are the exceptions to the equipment leak VOC standards for affected facilities at onshore natural gas processing plants?
 - n. §60.5402a What are the alternative means of emission limitations for VOC equipment leaks from onshore natural gas processing plants?
 - o. §60.5405a What standards apply to sweetening unit affected facilities ?
 - p. §60.5406a What test methods and procedures must I use for my sweetening unit affected facilities?
 - q. §60.5407a What are the requirements for monitoring of emissions and operations from my sweetening unit affected facilities?
 - r. §60.5408a What is an optional procedure for measuring hydrogen sulfide in acid gas—Tutwiler Procedure?
 - s. §60.5410a How do I demonstrate initial compliance with the standards for my well, centrifugal compressor, reciprocating compressor, pneumatic controller, pneumatic pump, storage vessel, collection of fugitive emissions components at a well site, collection of fugitive emissions components at a compressor station, and equipment leaks at onshore natural gas processing plants and sweetening unit affected facilities?

- t. §60.5411a What additional requirements must I meet to determine initial compliance for my covers and closed vent systems routing emissions from centrifugal compressor wet seal fluid degassing systems, reciprocating compressors, pneumatic pumps and storage vessels?
- u. §60.5412a What additional requirements must I meet for determining initial compliance with control devices used to comply with the emission standards for my centrifugal compressor, and storage vessel affected facilities?
- v. §60.5413a What are the performance testing procedures for control devices used to demonstrate compliance at my centrifugal compressor and storage vessel affected facilities?
- w. §60.5415a How do I demonstrate continuous compliance with the standards for my well, centrifugal compressor, reciprocating compressor, pneumatic controller, pneumatic pump, storage vessel, collection of fugitive emissions components at a well site, and collection of fugitive emissions components at a compressor station affected facilities, and affected facilities?
- x. §60.5416a What are the initial and continuous cover and closed vent system inspection and monitoring requirements for my centrifugal compressor, reciprocating compressor, pneumatic pump, and storage vessel affected facilities?
- y. §60.5417a What are the continuous control device monitoring requirements for my centrifugal compressor and storage vessel affected facilities?
- z. §60.5420a What are my notification, reporting, and recordkeeping requirements?
- aa. §60.5421a What are my additional recordkeeping requirements for my affected facility subject to VOC requirements for onshore natural gas processing plants?
- bb. §60.5422a What are my additional reporting requirements for my affected facility subject to VOC requirements for onshore natural gas processing plants?
- cc. §60.5423a What additional recordkeeping and reporting requirements apply to my sweetening unit affected facilities?
- dd. §60.5425a What parts of the General Provisions apply to me?
- ee. §60.5430a What definitions apply to this subpart?
- ff. §60.5432a How do I determine whether a well is a low pressure well using the low pressure well equation?

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

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

- a. For fuel storage/dispensing equipment operated solely for facility owned vehicles if fuel throughput is not more than 2,175 gallons/day, averaged over a 30-day period: Records of the type and amount of fuel dispensed (annual).
- b. For crude oil and condensate storage tanks with a capacity of less than or equal to 420,000 gallons that store crude oil and condensate prior to custody transfer: Records of capacity of the tanks and the amount of throughput (annual).
- c. For fluid storage tanks with a capacity of less than 39,894 gallons and a true vapor pressure less than 1.5 psia: Records of capacity of the tanks and contents.

- d. For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant: The type of activity and the amount of emissions from that activity (annual).

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

- a. Operation, maintenance, and inspection log for the “grandfathered” engines and for engines E1, E38, C-801, & C-852, and any replacement engine/turbine not tested in each 6-month period.
- b. Periodic emission testing for engines E1, E38, C-801, & C-852 and each replacement engine/turbine.
- c. Operating hours for engines E1, E38, C-801, & C-852 if less than 440 hours in a semi-annual period and not tested.
- d. For fuel(s) burned, the appropriate document(s) as described in Specific Condition No. 2.
- e. Records required by 40 CFR Part 60, NSPS, Subparts KKK, JJJ, OOOO, and OOOOa.
- f. The glycol dehydration unit’s average natural gas throughput (monthly).
- g. The glycol dehydration unit’s lean glycol pump make, model, and maximum flow rate.
- h. Records required by 40 CFR Part 63, NESHAP, Subparts HH, and ZZZZ.
- i. Records required by Specific Condition No. 18.

17. No later than 30 days after each anniversary date of the issuance of the original Title V operating permit (February 3, 2000), 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 the operating permit. [OAC 252:100-8-6 (c)(5)(A) & (D)]

18. This facility is considered an existing Prevention of Significant Deterioration (PSD) facility. As such, the facility is subject to the provisions of OAC 252:100-8-36.2(c) for any project as defined therein. [OAC 252:100-8-36.2(c)]

19. This permit supersedes all other Air Quality operating permits for this facility, which are now cancelled.

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

SECTION I. DUTY TO COMPLY

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

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

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

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

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

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

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

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

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

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

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

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

B. Records of required monitoring shall include:

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

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

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

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

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

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

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

[OAC 252:100-43]

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

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

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

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

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

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

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

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

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

SECTION IV. COMPLIANCE CERTIFICATIONS

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

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

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

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

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

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

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

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

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

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

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

SECTION VI. PERMIT SHIELD

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

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

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

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

SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

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

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

SECTION VIII. TERM OF PERMIT

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

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

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

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

SECTION IX. SEVERABILITY

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

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

SECTION X. PROPERTY RIGHTS

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

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

SECTION XI. DUTY TO PROVIDE INFORMATION

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

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

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

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

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

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

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

SECTION XII. REOPENING, MODIFICATION & REVOCATION

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

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

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

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

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

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

[OAC 100-8-7.3(d)]

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

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

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

SECTION XIII. INSPECTION & ENTRY

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

- (1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
 - (2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
 - (3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - (4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.
- [OAC 252:100-8-6(c)(2)]

SECTION XIV. EMERGENCIES

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

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

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

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

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

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

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

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

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

SECTION XV. RISK MANAGEMENT PLAN

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

SECTION XVI. INSIGNIFICANT ACTIVITIES

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

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

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

SECTION XVII. TRIVIAL ACTIVITIES

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

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

SECTION XVIII. OPERATIONAL FLEXIBILITY

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

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

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

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

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

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

- (1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter.
[OAC 252:100-13]
- (2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU.
[OAC 252:100-19]
- (3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for:
[OAC 252:100-25]
 - (a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
 - (b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
 - (c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
 - (d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.
- (4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards.
[OAC 252:100-29]

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

SECTION XX. STRATOSPHERIC OZONE PROTECTION

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

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

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

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

- (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
- (2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
- (3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161;
- (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;

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

SECTION XXI. TITLE V APPROVAL LANGUAGE

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

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

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

SECTION XXII. CREDIBLE EVIDENCE

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



PART 70 PERMIT

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

Permit No. 2019-1310-TVR4

BCE-Mach III Midstream Holdings LLC

having complied with the requirements of the law, is hereby granted permission to operate the Elmore City Gas Plant located in the NW/4 of Section 17, T1N, R2W, Garvin County, Oklahoma, subject to Standard Conditions dated June 21 2016, and Specific Conditions, both of which are attached.

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

DRAFT/PROPOSED

Director

Air Quality Division

Date

BCE-Mach III Midstream Holdings LLC
Attn: Mr. Justin Flanagan
14201 Wireless Way, Suite 300
Oklahoma City, OK 73134

SUBJECT: Permit No. 2019-1310-TVR4
Facility: Elmore City Gas Plant
Facility ID: 1376
NW/4 of Section 17, T1N, R2W
Garvin County, Oklahoma

Dear Mr. Flanagan:

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) 702-4205.

Sincerely,



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

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

APPLICANT RESPONSIBILITIES

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

1. Complete the public notice using the samples provided by AQD below. Please use the version applicable to the requested permit action;
Version 1 – Traditional NSR process for a construction permit
Version 2 – Enhanced NSR process for a construction permit
Version 3 – initial Title V (Part 70 Source) operating permit, Title V operating permit renewal, Significant Modification to a Title V operating permit, and any Title V operating permit modification incorporating a construction permit that followed Traditional NSR process
2. Determine appropriate newspaper local to facility for publishing;
3. Submit sample notice and provide date of publication to AQD 5 days prior to notice publishing;
4. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD within 20 days of publication.

REQUIRED CONTENT (27A O.S. § 2-14-302 and OAC 252:4-7-13(c))

1. A statement that a Tier II or Tier III draft permit has been prepared by DEQ;
2. Name and address of the applicant;
3. Name, address, driving directions, legal description and county of the site or facility;
4. The type of permit or permit action being sought;
5. A description of activities to be regulated, including an estimate of emissions from the facility;
6. Location(s) where the application and draft permit may be reviewed (a location in the county where the site/facility is located must be included);
7. Name, address, and telephone number of the applicant and DEQ contacts;
8. Any additional information required by DEQ rules or deemed relevant by applicant;
9. A 30-day opportunity to request a formal public meeting on the draft permit.

SAMPLE NOTICE:

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.

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

Re: Title V Renewal Permit No. 2019-1310-TVR4
BCE-Mach III Midstream Holdings LLC
Elmore City Gas Plant (Facility ID: 1376)
NW/4 of Section 17, T1N, R2W
Garvin County, Oklahoma

Dear Mr. Anoatubby:

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

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

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

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

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

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

Sincerely,



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

BCE-Mach III Midstream Holdings LLCA
Attn: Mr. Justin Flanagan
14201 Wireless Way, Suite 300
Oklahoma City, OK 73134

SUBJECT: Permit No. 2019-1310-TVR4
Facility: Elmore City Gas Plant
Facility ID: 1376
NW/4 of Section 17, T1N, R2W
Garvin County, Oklahoma

Dear Mr. Flanagan:

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

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

Thank you for your cooperation in this matter. If we may be of further service, please contact our office at (405) 702-4100.

Sincerely,

PROPOSED

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

Enclosures

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

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

NSCR	Non-Selective Catalytic Reduction	SIP	State Implementation Plan
NSPS	New Source Performance Standards	SNCR	Selective Non-Catalytic Reduction
NSR	New Source Review	SO₂	Sulfur Dioxide
		SO_x	Sulfur Oxides
O₃	Ozone	SOP	Standard Operating Procedure
O&G	Oil and Gas	SRU	Sulfur Recovery Unit
O&M	Operation and Maintenance		
O&NG	Oil and Natural Gas	T	Tons
OAC	Oklahoma Administrative Code	TAC	Toxic Air Contaminant
OC	Oxidation Catalyst	TEG	Triethylene Glycol
		THC	Total Hydrocarbons
PAH	Polycyclic Aromatic Hydrocarbons	TPY	Tons per Year
PAE	Projected Actual Emissions	TRS	Total Reduced Sulfur
PAL	Plant-wide Applicability Limit	TSP	Total Suspended Particulates
Pb	Lead	TV	Title V of the Federal Clean Air Act
PBR	Permit by Rule		
PCB	Polychlorinated Biphenyls	µg/m³	Micrograms per Cubic Meter
PCE	Partial Compliance Evaluation	US EPA	U. S. Environmental Protection Agency
PEA	Portable Emissions Analyzer		
PFAS	Per- and Polyfluoroalkyl Substance	VFR	Vertical Fixed Roof
PM	Particulate Matter	VMT	Vehicle Miles Traveled
PM_{2.5}	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers	VOC	Volatile Organic Compound
PM₁₀	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers	VOL	Volatile Organic Liquid
POM	Particulate Organic Matter or Polycyclic Organic Matter	VRT	Vapor Recovery Tower
ppb	Parts per Billion	VRU	Vapor Recovery Unit
ppm	Parts per Million		
ppmv	Parts per Million Volume	YR	Year
ppmvd	Parts per Million Dry Volume		
PSD	Prevention of Significant Deterioration	2SLB	2-Stroke Lean Burn
psi	Pounds per Square Inch	4SLB	4-Stroke Lean Burn
psia	Pounds per Square Inch Absolute	4SRB	4-Stroke Rich Burn
psig	Pounds per Square Inch Gage		
RACT	Reasonably Available Control Technology		
RATA	Relative Accuracy Test Audit		
RAP	Regulated Air Pollutant or Reclaimed Asphalt Pavement		
RFG	Refinery Fuel Gas		
RICE	Reciprocating Internal Combustion Engine		
RO	Responsible Official		
ROAT	Regional Office at Tulsa		
RVP	Reid Vapor Pressure		
SCC	Source Classification Code		
SCF	Standard Cubic Foot		
SCFD	Standard Cubic Feet per Day		
SCFM	Standard Cubic Feet per Minute		
SCR	Selective Catalytic Reduction		
SER	Significant Emission Rate		
SI	Spark Ignition		
SIC	Standard Industrial Classification		