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OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

MEMORANDUM **November 12, 2024**

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

THROUGH: Rick Groshong, Compliance and Enforcement Group Manager

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

THROUGH: Alex Johnson, E.I., New Source Permits Section

FROM: Junru Wang, P.E., Existing Source Permits Section

SUBJECT: Evaluation of Permit Application No. **2024-0463-TVR3**
ET Gathering & Processing LLC
Beaver Gas Plant (SIC 1321/NAICS 211130)
Facility ID: 337
Section 18, Township 3N, Range 26E, Beaver County
Latitude: 36.72641° N Longitude: 100.29269° W
From Slapout, Oklahoma, 9 miles west on US 270 to Clear Lake Road, eight miles north, one mile west, then south into the plant.

SECTION I. INTRODUCTION

ET Gathering & Processing LLC (ETGP or the applicant) has submitted an application for renewal of the Part 70 operating permit for their Beaver Gas Plant. The facility is currently operating under Permit No. 2019-0047-TVR2 (M-2), issued on March 22, 2024.

The plant is a PSD major source for NOx and an area source of HAPs.

Since the facility emits more than 100 TPY of a regulated pollutant, it is subject to Title V permitting requirements. Emission units (EUs) have been arranged into Emission Unit Groups (EUGs) in Section V.

SECTION II. REQUESTED CHANGES

Due to the updated DEQ policy, H_2CO emission limits for the engines have been added to the permit. Since the emission reductions from the OC were different for CO and H_2CO in the previous permits for engines (C-1, C-3, C-6, C-7, C-13, C-51, C-52, C-56, and C-57), ETGP has requested to update the CO emission factors for these engines based on a 90% control efficiency plus a safety factor of 17.5% from the OC. Facility-wide CO emissions have decreased as result of this change. In addition, the name of engine C-14 has been corrected to Caterpillar 399 TA since the name was incorrectly stated in the past permits. In addition, working and breathing emissions for the storage tanks (T-21, T-21A, T-22, and T-22A) have been updated in the permit to reflect the calculations

provided by the applicant on November 15, 2021, under Permit No. 2019-0047-TVR2 (M-1). The previous permit listed incorrect working and breathing emissions for each storage tank; the emissions were assumed to be total instead of per tank emissions. VOC emission limits for T-21 and T-22 will increase by 0.12 TPY, and T-21A and T-22A will increase by 0.26 TPY as result of this change.

The requirement to measure gas inlet H_2S content has been removed since there is no specific limit.

No other changes of the current permit have been requested. This permit updates all current rules and regulations and incorporates all updated applicable State of Oklahoma and Federal regulations and requirements.

SECTION III. FACILITY DESCRIPTION

The facility is a natural gas compression station and a natural gas liquids (NGL) recovery plant with a rated capacity of 110 MMSCFD.

INLET GAS COMPRESSION

Gas enters the plant via various pipelines from the field gathering system and other sources. Liquids, primarily water and hydrocarbons, drop out passing through various inlet scrubbers. Gas leaving the scrubbers is sent to inlet compressors to increase the pressure to 800 psig and then the gas is conveyed to the triethylene glycol contactor (Dehy).

INLET GAS DEHYDRATION

Gas streams from all inlet compressors are combined through a common header and then fed to an inlet separator to remove additional liquids (primarily water) and sediment. The gas is then sent to the triethylene glycol contactor, where the glycol absorbs liquids in the gas stream. The dehydration unit is equipped with a flash tank. The flash tank is routed to the suction of the low-pressure units. The rich (wet) glycol is heated to remove liquids that have been absorbed to regenerate the glycol, in a closed loop system. Vapors from the heater still vent are condensed and the condensed liquids are collected and conveyed to the sump system. The condensed liquids are removed by tank truck with other wastewater collected on-site. The non-condensable vapors are routed to the "Evac / combustor" with VOC and HAP control of 98% or greater. The gas then enters one of the three cryogenic plants through the mole sieve dehydrator.

The mole sieve dehydrator's beds are alternately regenerated using heated dry residue gas from the cryogenic plants. The gas is heated by gas fired regeneration heaters. The moisture saturated residue gas used in the regeneration of the mole sieves is then returned to the residue gas sales pipeline after subsequent air cooling, free water removal, and recompression.

CRYOGENIC PLANTS

Gas exiting the mole sieve dehydration unit is filtered to remove dust and then enters a cryogenic plant for removal of the heavier liquid hydrocarbons from the gas stream.

Cryogenic plant feed gas is used to supply heat to the demethanizer bottom reboiler and side

reboilers. The feed gas may first travel through a gas/product exchanger to warm the liquid product. Feed gas not required for the reboilers is sent to gas/gas exchangers, propane refrigerated gas chiller (Plant 1 only), and cold gas/gas exchanger in series, cooling the gas. The inlet gas streams then recombine. All free liquid hydrocarbons are removed in the cold separator with the gas routed to the turbo expander and/or the Joule-Thomson valve. The gas is expanded to approximately 200 psig and cooled to -150°F to -160°F. The cooled gas enters the top of the demethanizer column. The residue gas exits the top of the column and condensed liquid product (Natural gas liquid, NGLs) that falls out from the stream leaves from the bottom of the tower.

Liquids removed in the cold separator enter the demethanizer column at a lower location during normal operation (ethane recovery). Plant 1 can be operated to reject ethane with residue gas (ethane rejection). The cold separator liquid is heated in the side reboiler prior to demethanizer entry.

The natural gas liquids go to product surge tanks before entering the product pipeline. The residue gas from the demethanizer column provides inlets gas cooling through a gas/gas exchanger, partially recompressed through the expander/compressor, before being sent to residue compressors and to the residue gas pipeline.
Fuel gas for gas-fired plant equipment is supplied from the plant residue gas.

Chiller System (Plant 1 only)

The propane refrigeration chiller is a closed loop system that provides inlet gas cooling for cryogenic Plant 1. First propane is evaporated to provide cooling before being recondensed by the propane refrigeration compressor. Refrigerant grade propane is stored in the propane storage tank.

CLOSED DRAIN/VENT SYSTEM

Liquids (primarily condensed water) produced from the previously described scrubber and separator operations in the north section of the plant site and water from the regeneration sections of the dehydration systems go to a flash tank. Enough back pressure is maintained to allow level control of liquids feeding the wastewater tank. Overpressure is vented to the atmosphere. All liquids from gravity drains are also transferred to a wastewater tank. Compressor blowdowns also vent to the atmosphere.

Liquids (primarily condensate) produced from the previously described scrubber and separator operations in the inlet gas section of the plant site go to flash tanks. Back pressure is maintained to allow for liquid control of each flash tank. The flash tanks vent to the condensate storage tanks. The liquids are stored in either the 210-bbl condensate tank or one of the four (4) 500-bbl condensate tanks. The tank vents are routed to the plant flare.

CONDENSATE STABILIZATION

High Reid Vapor Pressure (RVP) condensate is transported to the pressurized condensate storage tanks. Condensate from the pressurized condensate tanks is stabilized by heating, driving off the lighter hydrocarbons and reducing the condensate RVP. Flash vapors from the stabilization process are routed to an existing low pressure system via compressor engines. During compressor downtime, the flash vapors are routed to the flare. The stabilized condensate is stored in 500-bbl

stabilized condensate storage tanks and any remaining high RVP condensate is stored in the 210-bbl high RVP condensate storage tank. All condensate in the storage tanks is removed via tank truck and the vapors from the tanks will be routed to the flare.

SECTION IV. PERMIT HISTORY

Permits	Date Issued	Description
96-324-C (M-8)	3/28/2024	Administrative amendment: change company name
2019-0047-TVR2 (M-2)	3/22/2024	Administrative amendment: change company name
2019-0047-TVR2 (M-1)	10/25/2022	Minor Modification: replace 1 emergency generator and add 1 wastewater tank to the permit
2019-0047-TVR2	12/4/2019	Second Title V renewal
2010-058-TVR (M-4)	12/3/2019	Minor Modification: revert back to 2010-058-TVR (M-2)
2010-058-TVR (M-3)	10/2/2018	Minor Modification: add and remove equipment
2010-058-TVR (M-2)	12/4/2017	Minor Modification: add emergency generator
2010-058-TVR (M-1)	11/29/2016	Significant Modification: add five condensate storage tanks, change throughputs, and revise calculation methodology
2010-058-TVR	8/27/2014	First TV permit renewal
96-324-TV (M-9)	8/26/2014	Minor Modification: add two 500-bbl tanks and condensate stabilization unit
96-324-TV (M-10)	8/26/2014	Administrative amendment: change company name
96-324-TV (M-11)	8/26/2014	Minor Modification: add condensate stabilization unit
96-324-TV (M-8)	8/26/2014	Minor Modification: increase control efficiency of oxidation catalysts and increase HP of new engine
96-324-C (M-7)	10/17/2006	Modification to 96-324-C (M-6): reduce CO and increase HP of new engine
96-324-C (M-6)	11/30/2005	Construction Permit: install oxidation catalysts on 7 engines and modify them from 1,085-hp to 1,265-hp
96-324-TV	7/19/2005	Initial TV operating permit
96-324-C (M-3)	9/29/2000	Construction permit: replace two existing engines with new engines
96-324-C (M-1)	6/27/2000	Construction permit: add two engines, two heaters, and two cryo units
96-324-AD	12/21/1999	Applicability Determination: engine replacement
96-324-C	12/16/1999	Construction permit: add dehydration unit
95-204-C (M-2)	5/28/1997	Construction permit: replace 5 engines with two engines
95-204-C (M-1)	11/14/1996	Construction permit: engine replacement
95-204-O	8/23/1996	Add 7 compressor engines
95-204-C	9/7/1995	Construction permit: add 7 compressor engines
93-008-C	7/4/1993	Construction permit: add 2 compressor engines
90-144-O (M-2)	4/30/1993	Permit issued to correct model and serial numbers for engines

Permits	Date Issued	Description
92-019-O	4/17/1993	Establish throughput and LPG production
90-144-O	3/9/1992	Add compressor

SECTION V. EQUIPMENT

EUG 2 Internal Combustion Engines

EU ID	Point ID	Make/Model	HP	Serial #	Install Date	Manufacture/ Modification Date(3)
C-1(1)	C-1	Caterpillar 3516 TALE HS	1,340	4EK00725	2007	11/1995
C-3(1)	C-3	Caterpillar 3516 TALE-AFI	1,356	4EK04786	2006	11/2005
C-6(1)	C-6	Caterpillar 3516 SITA	1,085	4EK2673	2012	11/1999
C-7(1)	C-7	Caterpillar 3516 TALE	1,085	4EK00955	2007	3/1995
C-9	C-9	Caterpillar 3516 TALE	1,085	4EK00687	2006	6/4/1996
C-13(1)	C-13	Caterpillar 3516 TALE	1,265	4EK03732	2005	10/1995
C-14	C-14	Caterpillar 399 TA	830	049C00291	2007	unknown
C-51(1)	C-51	Caterpillar 3516 TALE	1,265	4EK00640	2006	9/29/1995
C-52(1)	C-52	Caterpillar 3516 TALE	1,340	4EK03615	2010	unknown
C-53(2)	C-53	Waukesha L7042 GSI	1,478	WP1749A	2006	< 4/2006
C-54	C-54	Caterpillar 3516 TALE	1,085	WPW02310	2008	7/28/2008
C-56(1)	C-56	Caterpillar 3516 SITA	1,340	4EK004415	2008	12/2000
C-57(1)	C-57	Caterpillar 3516 TALE-AFI	1,356	4EK03619	2010	9/12/2001
C-REF(4)	C-REF	Waukesha L7042 GU	896	307459	2010	< 7/2007

(1) Equipped with oxidation catalyst.
(2) Equipped with NSCR and AFRC. Subject to 40 CFR Part 64, CAM rule.
(3) As defined in 40 CFR Part 60 Subparts A and JJJJ.
(4) Equipped with NSCR and AFRC.

EUG 2a Internal Combustion Engines (NSPS Subpart JJJJ)

EU ID	Point ID	Make/Model	HP	Serial #	Install Date	Manufacture/ Modification Date
E-Gen-1a(1)	E-Gen-1	Generac	25	3008208783	2021	3/23/2021
E-Gen-2(1)	E-Gen-2	Generac	32	3001748440	2017	3/2018

(1) Used as an emergency generator not to exceed 500 hours per year of operation.

EUG 2b Reciprocating Compressors

Point ID	Description	Const. Date
C-1	Ariel JGE/4	1995
C-3	El-Gemini DS504	Before 8/23/2011
C-6	Ariel JGK/4	1992

Point ID	Description	Const. Date
C-7	Ariel JGK/2	1993
C-9	E/I FE565C-4	Before 8/23/2011
C-13	Ariel JGE/4	1995
C-14	Ariel JGH/4	1987
C-51	Ariel JGE/4	1996
C-52	Ariel JGE/4	1996
C-53	Ariel JGE/4	1994
C-54	E/I FE565C-4	Before 8/23/2011
C-56	Ariel JGE/4	1993
C-57	Ariel JGE/4	1993
C-REF	Worthington 0F6 M-4	Before 8/23/2011

EUG 3 Glycol Regenerator Vent

EU ID	Point ID	Equipment	Installed Date
GSV-1	GH-1	Glycol Dehydration Unit Still Vent	2010

The dehydration unit is equipped with a flash tank that is vented to the low pressure inlet.

EUG 4 Glycol Reboiler

EU ID	Point ID	Equipment	MMBTUH	Installed Date
GH-1	GH-1	Glycol Dehydrator Reboiler	1.5	2010

EUG 5 Heaters

EU ID	Point ID	Source	Size MMBTUH	Installed Date
MSH-1	MSH-1	Molecular Sieve Regeneration Heater	6.00	2012
2-HT-14.01	2-HT-14.01	Molecular Sieve Regeneration Heater	1.945	2000
3-HT-14.01	3-HT-14.01	Molecular Sieve Regeneration Heater	0.422	2000
SH-1	SH-1	Condensate Stabilizer Heater	0.5	2013

EUG 6 Tanks

EU ID	Point ID	Contents	Gallons	Install Date
T-8	T-8	Gasoline	300	1990
T-11	T-11	NGL Y Grade	11,500	1993
T-13	T-13	Methanol	1,175	2000
T-14	T-14	Methanol	650	1990
T-21	T-21	Unstabilized Condensate (High RVP = 13)	21,000	1961
T-21A[(1)]	T-21A	Stabilized Condensate (Low RVP = 10)	21,000	2007
T-22	T-22	Unstabilized Condensate (High RVP = 13)	21,000	1961
T-22A[(1)]	T-22A	Stabilized Condensate (Low RVP = 10)	21,000	2007
T-23	T-23	Unstabilized Condensate (High RVP = 13)	8,820	1971
T-24	T-24	Ref. Propane	58,823	2000
T-25	T-25	Methanol (Plt 1)	300	1993
T-26	T-26	Methanol (Plt 2 & 3)	600	2000
T-27	T-27	Methanol (inlet)	570	2004

EU ID	Point ID	Contents	Gallons	Install Date
T-28	T-28	Diesel	230	1990
T-900	T-900	Wastewater	4,200	2010

(1) Subject to NSPS Subpart Kb.

EUG 7 Fugitives - Pre-NSPS

EU ID	Point ID	Type of Equipment	Number	Construction Date
FUG-1	FUG-1	Valves	328	1981
		Flange/Connections	612	1981
		Compressor Seals	0	1981
		Relief Valves	6	1981
		Pump Seals	0	1981
		Open-Ended Lines	3	1981

EUG 7a Fugitives – NSPS Subpart KKK

EU ID	Point ID	Type of Equipment	Number	Construction Date
FUG-1a	FUG-1a	Valves	2,850	2001/2005
		Flange/Connections	5,363	2001/2005
		Compressor Seals	14	2001/2005
		Relief Valves	148	2001/2005
		Pump Seals	17	2001/2005/2012
		Open-Ended Lines	3	2001/2005

EUG 7b Fugitives – NSPS Subpart OOOO

EU ID	Point ID	Type of Equipment	Number	Construction Date
FUG- StabArea	FUG-StabArea	Valves	393	2013
		Flange/Connections	1,569	2013
		Compressor Seals	0	2013
		Relief Valves	12	2013
		Pump Seals	0	2013
		Open-Ended Lines	0	2013

EUG 8 Truck Loading

EU ID	Point ID	Equipment	Volume, bbl/yr	Installation Date
LOAD-1	LOAD-1	Condensate Truck Loading	124,468	1961

Note: This is a grandfathered unit and an emission limit in Specific Conditions is not required.

EUG 9 Flare

EU ID	Point ID	Equipment	Installation Date
FL-1	Fl-1	Flare	2005

SECTION VI. FACILITY-SPECIFIC OR REPRESENTATIVE SAMPLE

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

SECTION VII. AIR EMISSIONS

Emissions were calculated using the following methods:

ENGINES

The potential NOx, CO, VOC and formaldehyde emissions from the engines were calculated using emission factors obtained from manufacturers' data, the rated horsepower, and continuous operation, except for the emergency engine. For the use of an oxidation catalyst, ETC has assumed a 90% control efficiency for CO and formaldehyde plus a safety factor of 17.5%. The VOC factor for C-14 is based on testing and a safety factor. The following table lists the emission factors used for each engine.

Emission Factors

EU ID	Formaldehyde (g/hp-hr)	NOx[5] (g/hp-hr)	CO[5] (g/hp-hr)	VOC[5] (g/hp-hr)
C-1[1]	0.021[3]	2.0	0.235	0.44
C-3[1]	0.021[4]	2.0	0.235	0.44
C-6[1]	0.041[3]	2.0	0.235	0.44
C-7[1]	0.021[3]	2.0	0.235	0.44
C-9	0.165[3]	2.0	2.0	0.44
C-13[1]	0.021[4]	2.0	0.235	0.44
C-14	0.353[3]	2.0	2.0	0.68
C-51[1]	0.021[4]	2.0	0.235	0.44
C-52[1]	0.021[4]	2.0	0.235	0.44
C-53[2]	0.059[5]	2.0	2.0	0.26
C-54	0.106[3]	2.0	2.0	0.44
C-56[1]	0.021[3]	2.0	0.235	0.46
C-57[1]	0.021[3]	2.0	0.235	0.44
C-REF	0.022[5]	2.0	2.0	0.26
E-Gen-1a	0.18	1.0	2.0	0.70
E-Gen-2[6]	0.09 lb/hr	0.15 lb/hr	7.15 lb/hr	0.17 lb/hr

(1) Equipped with an oxidation catalyst.
(2) Equipped with NSCR and AFRC. Subject to 40 CFR Part 64, CAM rule.
(3) Based on unit test data.
(4) Based on average of test data.
(5) Based on manufacturer's data. VOC factors above do not include formaldehyde.
(6) Non-Emergency engine operation not to exceed 500 hr/yr. Emissions of NOx, CO, and VOC based on manufacturer's data and formaldehyde based on AP-42 (7/00), Table 3.2.

Engine Emissions

EU ID	NO_X		CO		VOC		H_2CO	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
C-1	5.91	25.88	0.69	3.04	1.36	5.97	0.06	0.28
C-3	5.98	26.19	0.70	3.08	1.38	6.06	0.06	0.28
C-6	4.78	20.95	0.56	2.46	1.15	5.04	0.10	0.43
C-7	4.78	20.95	0.56	2.46	1.10	4.82	0.05	0.21
C-9	4.78	20.95	4.78	20.95	1.45	6.33	0.39	1.72
C-13	5.58	24.43	0.66	2.87	1.29	5.63	0.06	0.26
C-14	3.66	16.03	3.66	16.03	1.24	5.45	0.65	2.83
C-51	5.58	24.43	0.66	2.87	1.29	5.63	0.06	0.26
C-52	5.91	25.88	0.69	3.04	1.36	5.97	0.06	0.28
C-53	6.52	28.54	6.52	28.54	1.04	4.55	0.19	0.84
C-54	4.78	20.95	4.78	20.95	1.31	5.72	0.25	1.11
C-56	5.91	25.88	0.69	3.04	1.43	6.26	0.07	0.31
C-57	5.98	26.19	0.70	3.08	1.38	6.04	0.06	0.28
C-REF	3.95	17.30	3.95	17.30	0.63	2.76	0.12	0.51
E-Gen-1a	0.06	0.24	0.11	0.48	0.04	0.17	0.01	0.04
E-Gen-2	0.15	0.04	7.15	1.79	0.26	0.06	0.09	0.02

TANKS

Flashing emissions from the condensate and wastewater tanks were calculated using BR&E's ProMax® 4.0, a representative liquid analysis, and the listed throughput. Flash emissions at the condensate and produced water tanks result as liquids under pressure enter the tanks at atmospheric pressure. Working and breathing (W/B) emissions from the condensate and wastewater tanks are calculated based on AP-42 (6/20), Section 7.1. HAP emissions are calculated based on a representative sample of both the liquid and vapor streams that result in the flashing and separation of the inlet stream. Except for wastewater tank T-900, emissions from the storage tanks are routed to the tank flare (FL-1) for control.

Tank Emissions (per tank)

Parameter	T-21 & T-22 Data	T-21A & T-22A Data	T-23 Data	T-900 Data
Throughput, gal/yr	378,000	3,832,500	336,000	630,000
Liquid in Tank(s)	Condensate RVP 13	Stabilized Condensate RVP 10	Condensate RVP 13	Wastewater
Working/Breathing Method/Tool	AP-42 (6/20) Section 7.1	AP-42 (6/20) Section 7.1	AP-42 (6/20) Section 7.1	AP-42 (6/20) Section 7.1
Flash Calculation Method/Tool	ProMax®	ProMax®	ProMax®	N/A
Working/Breathing Emissions, TPY	3.49	6.27	2.49	0.86
Flashing Emissions, TPY	151.55	--	269.42	N/A
Control Type	Flare	Flare	Flare	None
Capture/Control Efficiency, %	98/98	98/98	98/98	--

Parameter	T-21 & T-22 Data	T-21A & T-22A Data	T-23 Data	T-900 Data
Tank VOC Emitted at Tank, TPY	3.10	0.13	5.44	0.86
Tank VOC Emitted at Flare, TPY	3.04	0.12	5.32	--
Total VOC Emissions, TPY	**6.14**	**0.25**	**10.76**	**0.86**

DEHYDRATION UNIT

Emission estimates from the TEG dehydration unit's regenerator vent and flash tank are based on the Gas Research Institute (GRI) program GLYCalc Version 4.0, an inlet gas analysis and continuous operation. The dehydration unit is equipped with a flash tank on the rich glycol stream. Flash tank off-gasses are discharged to the low-pressure inlet. The dehydration unit's regenerator still vent is equipped with an air-cooled condenser, where vapors are captured. The vapors from the dehydration unit's regenerator still vent are routed through the condenser, with the uncondensed vapors from the condenser routed to the "Evac / combustor." The dehydration unit's regenerator still vent emissions were calculated with a 98% overall control efficiency. Emissions from the regenerator vent include a safety factor of 10% to allow for variability in the composition of the natural gas stream.

Dehydration Unit VOC Emissions

Parameter	Data
Type of Glycol	TEG
Dry Gas Flow Rate, MMSCFD	110
Glycol Pump Type	Gas
Lean Glycol Pump Design Capacity, gpm	24.0
Lean Glycol Recirculation Rate Input, gpm	23.8
Regenerator Vent	
Condenser Outlet Temperature, °F	120
Potential VOC Emissions, TPY	211.65
Control Method	Condenser/Combustion
Overall Control Efficiency, %	98
VOC Emissions, TPY (1)	4.66
Flash Tank	
Flash Tank Temperature, °F	120
Flash Tank Pressure, psig	60
Potential VOC Emissions, TPY	567.46
Control Method	Combustion
VOC Control Efficiency, %	98
VOC Emissions, TPY (1)	12.48
Total VOC Emissions, TPY (1)	**17.14**

(1) Includes the 10% safety factor.

Dehydration Regenerator Unit HAPs Emissions

Pollutant	Total Potential Emissions, TPY	Total Actual Emissions, TPY (1)
Benzene	13.60	0.30
Toluene	21.97	0.48
Ethylbenzene	1.97	0.04
Xylene	21.30	0.47
n-Hexane	6.24	0.14
Total HAP	65.06	1.43

(1) Includes the 10% safety factor.

Dehydration Flash Tank HAP Emissions

Pollutant	Total Potential Emissions, TPY	Total Actual Emissions, TPY (1)
Benzene	1.03	0.02
Toluene	1.05	0.02
Ethylbenzene	0.05	<0.01
Xylene	0.40	0.01
n-Hexane	14.26	0.31
Total HAP	16.79	0.37

(1) Includes the 10% safety factor.

Dehydration Unit VOC and HAP Emissions during Uncontrolled Operation

Pollutant	Still Vent Emissions	Flash Tank Emissions	Uncontrolled	Total Uncontrolled Emissions(1)	
	lb/hr	lb/hr	hours/year	lb/hr	TPY
VOC	48.32	129.56	120	101.02	6.06
n-Hexane	1.42	3.26	120	2.70	0.16
Benzene	3.10	0.23	120	2.44	0.15
Toluene	5.02	0.24	120	3.89	0.23
Ethylbenzene	0.45	0.01	120	0.34	0.02
Xylene	4.86	0.09	120	3.69	0.22
Total HAPs	**14.85**	**3.83**	-	**13.05**	**0.78**

(1) Based on 120 hr/yr of operation with EVAC burner out of service (i.e., represents 25% control of still vent and 50% control of flash tank).

The Specific Conditions will allow up to 120 hours per year operation without the condenser.

HEATERS/REBOILERS

Emissions are based on AP-42 (7/98), Section 1.4, a gas heating value of 1,020 BTU/SCF, the ratings shown in the second table, and continuous operation. Flash gas emissions from the heater treater are routed to the condensate tanks with a 100% capture efficiency.

Heater/Reboiler Emission Factors

EU ID	NO_X	CO	VOC
	lb/MMSCF	lb/MMSCF	lb/MMSCF
GH-1	100	84	5.5

EU ID	NO_X	CO	VOC
	lb/MMSCF	lb/MMSCF	lb/MMSCF
MSH-1	100	84	5.5
2-HT-14.01	100	84	5.5
3-HT-14.01	100	84	5.5
SH-1	100	84	5.5

Heater/Reboiler Emissions

EU ID	Rating	NO_X		CO		VOC	
	MMBTUH	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
GH-1	1.5	0.15	0.66	0.13	0.55	0.01	0.03
MSH-1	6.00	0.59	2.58	0.49	2.16	0.03	0.14
2-HT-14.01	1.945	0.15	0.66	0.12	0.53	0.01	0.04
3-HT-14.01	0.422	0.15	0.66	0.12	0.53	0.01	0.04
SH-1	0.5	0.05	0.21	0.04	0.18	0.003	0.01

FUGITIVES

Emissions from fugitive equipment leaks (FUG-1, FUG-1a, and FUG-Stab Area) are based on EPA's "Protocol for Equipment Leak Emission Estimates" (11/95, EPA-453/R-95-017), an estimated number of components, and the VOC (C_{3+}) and HAP content of the materials handled.

Fugitive Emissions

EU ID	VOC, TPY
FUG-1, FUG-1a, and FUG-Stab Area	27.63

LOADING

Emissions from loading condensate and produced water into tank trucks were estimated using AP-42 (6/08), Section 5.2, Equation 1, and the parameters listed in the table below. The vapor pressure, molecular weight, and temperature listed are from AP-42 (11/19), Section 7.1 defaults for Oklahoma City, Oklahoma and Motor Gasoline (RVP 10 and 13). Produced water loading emissions were calculated with inputs adjusted to reflect a 99% water.

Loading Parameters and Emissions

Parameter	LOAD-1				
Liquids Loaded	High RVP Condensate	Low RVP Condensate	Stabilized Condensate	Unstabilized Condensate	Wastewater
Throughput, gal/yr	336,000	756,000	7,665,000	210,000	630,000
Saturation Factor	0.6	0.6	0.6	0.6	0.6
Temp., °F	60	60	60	60	60
TVP, psia	12.0	6.73	4.56	6.73	6.73
MW, lb/lbmol	62	66	66	62	62
VOC, wt.%	100	100	100	100	100
Emission Factor, $lb/10^3$ gal (1)	10.66	6.39	4.33	6.39	0.06
Control Method	None	None	None	None	None

Parameter	LOAD-1				
VOC Emitted at Truck, TPY	1.79	2.42	16.59	0.67	0.02

(1) Final factor considering any VOC reduction stated for methane/ethane.
(2) Emissions routed to the flare are represented at the tank flare.
(3) Emissions routed to the tanks are distributed and represented at the tanks.

FLARE / COMBUSTOR

Emission factors of NO_X and CO are taken from AP-42 (2/18), Section 13.5. VOC emissions from the tank flare (FL-1) are based on the emissions from the storage tanks with a 98% destruction efficiency. VOC emissions from the combustor are based on emissions from the dehydration unit still vent with a 98% destruction efficiency.

Flare/Combustor Combustion Emissions

EU ID	Total Gas Combusted MMBTUH	Emission Factor lb/MMBTU		NO_X TPY	CO TPY
		NOx	CO		
FL-1	1.4	0.068	0.31	0.42	1.90
Evac/Combustor	1.4	0.068	0.31	0.42	1.90

Flare/Combustor Emissions

EU ID	Process Point(s)	Uncontrolled VOC Routed to the flare, TPY	VOC Emissions, TPY
FL-1	Storage Tanks	583.48	11.67
EVAC/COMBUSTOR	Dehydration Unit Still Vent	211.65	4.66 (1)

(1) Includes the 10% safety factor.

FACILITY-WIDE EMISSIONS

Facility Wide Emissions

EU ID	Description	NOx		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
C-1[1]	1,340-HP Caterpillar 3516 TALE HS	5.91	25.88	0.69	3.04	1.36[2]	5.97[2]
C-3[1]	1,356-HP Caterpillar 3516 TALE-AFI	5.98	26.19	0.70	3.08	1.38[2]	6.06[2]
C-6[1]	1,085-HP Caterpillar 3516 SITA	4.78	20.95	0.56	2.46	1.15[2]	5.04[2]
C-7[1]	1,085-HP Caterpillar 3516 TALE	4.78	20.95	0.56	2.46	1.10[2]	4.82[2]
C-9	1,085-HP Caterpillar 3516 TALE	4.78	20.95	4.78	20.95	1.45[2]	6.33[2]
C-13[1]	1,265-HP Caterpillar 3516 TALE	5.58	24.43	0.66	2.87	1.29[2]	5.63[2]
C-14	830-HP Caterpillar 399 TA	3.66	16.03	3.66	16.03	1.24[2]	5.45[2]
C-51[1]	1,265-HP Caterpillar 3516 TALE	5.58	24.43	0.66	2.87	1.29[2]	5.63[2]
C-52[1]	1,340-HP Caterpillar 3516 TALE	5.91	25.88	0.69	3.04	1.36[2]	5.97[2]
C-53[2]	1,478-HP Waukesha L7042 GSI	6.52	28.54	6.52	28.54	1.04[2]	4.55[2]
C-54	1,085-HP Caterpillar 3516 TALE	4.78	20.95	4.78	20.95	1.31[2]	5.72[2]
C-56[1]	1,340-HP Caterpillar 3516 SITA	5.91	25.88	0.69	3.04	1.43[2]	6.26[2]
C-57[1]	1,356-HP Caterpillar 3516 TALE-AFI	5.98	26.19	0.70	3.08	1.38[2]	6.04[2]
C-REF[3]	896-HP Waukesha L7042 GU	3.95	17.30	3.95	17.30	0.63[2]	2.76[2]
E-Gen-1a	25-HP Generac	0.06	0.24	0.11	0.48	0.04[2]	0.17[2]
E-Gen-2[4]	32-HP Generac	0.15	0.04	7.15	1.79	0.26[2]	0.06[2]
GSV-1[5]	110-MMSCFD Glycol Dehydration Unit Still Vent	0.08	0.35	0.43	1.90	101.02	23.20
GH-1	1.5-MMBTUH Glycol Dehydrator Reboiler	0.15	0.66	0.04	0.18	0.00	0.01
MSH-1	6.0-MMBTUH Molecular Sieve Regeneration Heater	0.59	2.58	0.49	2.16	0.03	0.14
SH-1	0.5-MMBTUH Condensate Stabilizer Heater	0.05	0.21	0.04	0.18	0.00	0.01
2-HT-14.01	1.945-MMBTUH Molecular Sieve Regeneration Heater	0.15	0.66	0.12	0.53	0.01	0.04
3-HT-14.01	0.422-MMBTUH Molecular Sieve Regeneration Heater	0.15	0.66	0.12	0.53	0.01	0.04
T-8	300-gal Gasoline	-	-	-	-	-	0.01

EU ID	Description	NOx		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
T-21	500-bbl Unstabilized Condensate (High RVP = 13)	-	-	-	-	2.92	12.78
T-21A	500-bbl Stabilized Condensate (Low RVP = 10)	-	-	-	-		
T-22	500-bbl Unstabilized Condensate (High RVP = 13)	-	-	-	-		
T-22A	500-bbl Stabilized Condensate (Low RVP = 10)	-	-	-	-		
T-23	210-bbl Unstabilized Condensate (High RVP = 13)	-	-	-	-	2.46	10.76
T-24	58,823-gal Ref. Propane	-	-	-	-	-	-
T-25	300-gal Methanol (Plt 1)	-	-	-	-	-	0.01
T-26	600-gal Methanol (Plt 2 & 3)	-	-	-	-	-	0.01
T-27	570-gal Methanol (inlet)	-	-	-	-	-	0.01
T-900	4,200-gal Wastewater	-	-	-	-	-	0.86
FUG-1	Fugitives Pre-NSPS	-	-	-	-	2.31	10.10
FUG-1a	Fugitives Subpart KKK	-	-	-	-	3.47	15.46
FUG-StabArea	Fugitives Subpart OOOO	-	-	-	-	0.47	2.07
LOAD-1	Condensate Truck loading	-	-	-	-	-	21.48
	Wastewater Loading	-	-	-	-	-	0.02
FL-1	1.4-MMBTUH Flare	0.10	0.42	0.43	1.90	-	-
Total Emissions		**75.58**	**330.37**	**38.11**	**137.46**	**130.41**	**173.47**
Previous Emissions (Permit No. 2019-0047-TVR2 (M-2))		**75.58**	**330.37**	**42.72**	**157.60**	**130.60**	**174.35**
Change in Emissions		**-**	**-**	**-4.61**	**-20.14**	**-0.19**	**-0.88**

(1) Equipped with an oxidation catalyst.
(2) Includes formaldehyde.
(3) Equipped with NSCR and AFRC. C-53 is subject to 40 CFR Part 64, CAM rule.
(4) E-Gen-2 emergency generator TPY emissions based on maximum 500 hours per year operation.
(5) Includes Dehydrator Still Vent Uncontrolled Emissions (120 hr/yr).

HAP EMISSIONS

The internal combustion engines have emissions of HAP, the most significant being formaldehyde. Emissions of formaldehyde are from testing conducted the week of August 16, 2004. The ten (10) Caterpillar G3516 engines testing averaged 0.181 g/hp-hr for formaldehyde. The Caterpillar G3516 engine emissions were estimated using 0.181 g/hp-hr plus a safety factor of 17.5%. The oxidation catalysts also reduce CO emissions. The CO limits were set using a CO reduction efficiency of 90% which corresponds to the 90% HAP reduction efficiency used. Testing that shows compliance with CO emission limits will be assumed to show compliance with formaldehyde emission limits. The table below lists estimated formaldehyde emissions for the compressor engines.

Formaldehyde Emissions

Source	Uncontrolled Emission Factor (g/hp-hr)	Control Type	Efficiency %	Safety Factor	Emissions	
					lb/hr	TPY
C-1	0.180	Oxidation Catalyst	90	17.5%	0.06	0.28
C-3	0.181	Oxidation Catalyst	90	17.5%	0.06	0.28
C-6	0.35	Oxidation Catalyst	90	17.5%	0.10	0.43
C-7	0.17	Oxidation Catalyst	90	17.5%	0.05	0.21
C-9	0.14	None	0	17.5%	0.39	1.72
C-13	0.181	Oxidation Catalyst	90	17.5%	0.06	0.26
C-14	0.30	None	0	17.5%	0.65	2.83
C-51	0.181	Oxidation Catalyst	90	17.5%	0.06	0.26
C-52	0.181	Oxidation Catalyst	90	17.5%	0.06	0.28
C-53	0.05	Catalytic Converter	0	17.5%	0.19	0.84
C-54	0.09	None	0	17.5%	0.25	1.11
C-56	0.20	Oxidation Catalyst	90	17.5%	0.07	0.31
C-57	0.19	Oxidation Catalyst	90	17.5%	0.06	0.28
C-REF	0.05	Catalytic Converter	0	17.5%	0.12	0.51
E-Gen-1a	0.18	None	0	0	0.01	0.04
E-Gen-2	0.09 lb/hr	None	0	0	0.09	0.02
Totals					**2.28**	**9.66**

The dehydration unit using a glycol desiccant emits benzene, toluene, ethyl benzene, xylene, and n-hexane from the still vent that is piped to the condenser and then to the BTEX and VOC control device (i.e., on-skid burner). These compounds are regulated as HAPs. The applicant has analyzed the inlet gas for concentrations of BTEX and estimated the HAP emissions using the previously listed data. Potential VOC and HAP emissions are based on GRI-GLYCalc, an extended gas analysis, a maximum circulation rate of 23.8 gpm, and the maximum gas throughput of 110 MMSCFD. The glycol dehydrator still vent is equipped with a “Evac / Combustor” resulting in 98% control of vapors. The flash tank vents to the inlet of the station. All emissions of HAPs are below the major source levels.

HAP Emissions from Glycol Dehydration Unit's BTEX Combustor

Pollutant	Estimated Emissions			
	Controlled		Limited Control[(1)]	
	lb/hr	TPY	lb/hr	TPY
Benzene	0.07	0.32	2.45	0.15
Toluene	0.12	0.51	3.88	0.23
Ethyl benzene	0.01	0.04	0.34	0.02
Xylene	0.11	0.48	3.69	0.22
n-Hexane	0.10	0.45	2.70	0.16
Totals	**0.41**	**1.80**	**13.06**	**0.78**

(1) Limit of 120 hr/yr of operation with EVAC burner out of service (i.e., represents 25% control of still vent and 50% control of flash tank).

SECTION VIII. INSIGNIFICANT ACTIVITIES

The insignificant activities identified and justified in the application are duplicated below. Appropriate record keeping of activities indicated below with "*" is specified in the Specific Conditions No. 20.

1. * Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas). The facility currently contains one (1) 1.5 MMBTUH reboiler and three (3) heaters rated at 1.50, 1.50, and 0.5 MMBTUH each.

2. * Emissions from crude oil and condensate storage tanks with a capacity of less than or equal to 420,000 gallons that store crude oil and condensate prior to custody transfer. All five condensate tanks have capacities less than the 420,000 gallon limit, but they store condensate after custody transfer.

3. * Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature. Several small tanks are located on-site that are less than 10,000 gallons and store liquids with a vapor pressure below 1.0 psia.

4. Emissions from crude oil or condensate storage marine and truck loading equipment operations at crude oil and natural gas production sites where the loading rate does not exceed 10,000 gallons per day averaged over a 30-day period.

5. * Activities that have the potential to emit no more than 5 TPY (actual) of any criteria pollutant. The methanol tanks have negligible emissions.

6. * Site restoration and/or bioremediation activities of < 5 years expected duration.

SECTION IX. OKLAHOMA AIR POLLUTION CONTROL RULES

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

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

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

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

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

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

Emissions limitations have been established based on existing permits and information in the permit applications.

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

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

OAC 252:100-19 (Particulate Matter) [Applicable]
Section 19-4 regulates emissions of PM from new and existing fuel-burning equipment, with emission limits based on maximum design heat input rating. Fuel-burning equipment is defined

in OAC 252:100-19 as any internal combustion engine or gas turbine, or other combustion device used to convert the combustion of fuel into usable energy. Thus, the engines and the reboiler are subject to the requirements of this subchapter. OAC 252:100, Appendix C specifies a PM emission limitation of 0.60 lbs/MMBTU for all equipment at this facility with a heat input rating of 10-MMBTUH or less. OAC 252:100, Appendix C specifies a PM emission limitation for all equipment at this facility with a heat input rating of greater than 10-MMBTUH, but less than 1,000-MMBTUH based on the following calculation: $E = 1.0428080X^{-0.238561}$, where E is the allowable emission rate and X is the maximum heat input. Table 3.2-2 of AP-42 (7/00) lists the total PM emissions from 4-stroke, lean-burn, natural gas-fired engines to be 0.01 lbs/MMBTU. This permit requires the use of natural gas for all fuel-burning equipment to ensure compliance with Subchapter 19.

EU ID	Equipment	Maximum Heat Input (MMBTUH	Emissions (lbs/MMBTU)	
			Appendix C	Potential
C-1[(1)]	1,340-HP Caterpillar 3516 TALE HS	10.1	0.59	0.01
C-3[(1)]	1,356-HP Caterpillar 3516 TALE-AFI	10.1	0.59	0.01
C-6[(1)]	1,085-HP Caterpillar 3516 SITA	9.39	0.60	0.01
C-7[(1)]	1,085-HP Caterpillar 3516 TALE	9.39	0.60	0.01
C-9	1,085-HP Caterpillar 3516 TALE	9.39	0.60	0.01
C-13[(1)]	1,265-HP Caterpillar 3516 TALE	9.55	0.60	0.01
C-14	830-HP Caterpillar 399 TA	6.6	0.60	0.02
C-51[(1)]	1,265-HP Caterpillar 3516 TALE	9.55	0.60	0.01
C-52[(1)]	1,340-HP Caterpillar 3516 TALE	10.1	0.59	0.01
C-53[(2)]	1,478-HP Waukesha L7042 GSI	11.58	0.58	0.02
C-54	1,085-HP Caterpillar 3516 TALE	9.39	0.60	0.01
C-56[(1)]	1,340-HP Caterpillar 3516 SITA	10.1	0.59	0.01
C-57[(1)]	1,356-HP Caterpillar 3516 TALE-AFI	10.1	0.59	0.01
C-REF[(2)]	896-HP Waukesha L7042 GU	6.48	0.60	0.02
GH-1	Glycol Dehydrator Reboiler	1.5	0.60	<0.01
MSH-1	Molecular Sieve Regeneration Heater	6.00	0.60	<0.01
2-HT-14.01	Molecular Sieve Regeneration Heater	1.945	0.60	<0.01
3-HT-14.01	Molecular Sieve Regeneration Heater	0.422	0.60	<0.01
SH-1	Condensate Stabilizer Heater	0.5	0.60	<0.01

(1) Equipped with OC.
(2) Equipped with NSCR and AFRC.

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

OAC 252:100-25 (Visible Emissions and Particulate Matter) [Applicable]
No discharge of greater than 20% opacity is allowed except for short-term occurrences, which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. There is very little possibility of exceeding these standards when burning natural gas. This permit requires the use of natural gas for all fuel-burning units to ensure compliance with Subchapter 25.

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

OAC 252:100-31 (Sulfur Compounds) [Applicable]
Part 2 limits the ambient air concentration of 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 modeling conducted for the general permit for oil and gas facilities, 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.
Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBTU heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,000 BTU/SCF, this limit corresponds to fuel sulfur content of 1,203 ppmv. The permit requires the use of gaseous fuel with sulfur content less than 162 ppmv to ensure compliance with Subchapter 31.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]
This subchapter limits NO_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 and methanol tanks with a capacity of 400 gallons or more are subject to this requirement.
Part 3 requires loading facilities with a throughput equal to or less than 40,000 gallons per day to be equipped with a system for submerged filling of tank trucks or trailers if the capacity of the vehicle is greater than 200 gallons. This facility does not have the physical equipment (loading arm and pump) to conduct this type of loading. Therefore, this requirement is not applicable.
Part 5 limits the VOC content of coatings from any coating line or other coating operation. This facility does not normally conduct coating or painting operations except for routine maintenance of the facility and equipment, which is exempt.

Part 7 requires fuel-burning and refuse-burning equipment to be 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 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.

Each emissions unit must be evaluated for periodic testing in accordance with the Periodic Testing Standardization guidance issued December 1, 2011, on a pollutant-by-pollutant basis. The frequency of the periodic testing requirement is based on the quantity of the pollutant emitted. Periodic testing requirements are not required for an emission unit that is subject to an applicable requirement that already requires periodic testing, continuous emission monitoring (CEM), or predictive emission monitoring (PEMS). For this facility, the engines are the main emission units that were evaluated for periodic testing requirements. The following table demonstrates the periodic testing requirements for each engine.

Periodic Testing Review

EU ID	Pollutant	TPY	Current Monitoring	Periodic Testing
C-1 (1)	NO_X	25.88	Every 5 Years	YES
	CO	3.04	Every 5 Years	YES

EU ID	Pollutant	TPY	Current Monitoring	Periodic Testing
C-3 (1)	NO_X	26.19	Every 5 Years	YES
	CO	3.08	Every 5 Years	YES
C-6 (1)	NO_X	20.95	Every 5 Years	YES
	CO	2.46	Every 5 Years	YES
C-7 (1)	NO_X	20.95	Every 5 Years	YES
	CO	2.46	Every 5 Years	YES
C-9	NO_X	20.95	Every 5 Years	YES
	CO	20.95	Every 5 Years	YES
C-13 (1)	NO_X	24.43	Every 5 Years	YES
	CO	2.87	Every 5 Years	YES
C-14	NO_X	16.03	Every 5 Years	YES
	CO	16.03	Every 5 Years	YES
C-51 (1)	NO_X	24.43	Every 5 Years	YES
	CO	2.87	Every 5 Years	YES
C-52 (1)	NO_X	25.88	Every 5 Years	YES
	CO	3.04	Every 5 Years	YES
C-53 (2)	NO_X	28.54	Every 5 Years	YES
	CO	28.54	Every 5 Years	YES
C-54	NO_X	20.95	Every 5 Years	YES
	CO	20.95	Every 5 Years	YES
C-56 (1)	NO_X	25.88	Every 5 Years	YES
	CO	3.04	Every 5 Years	YES
C-57 (1)	NO_X	26.19	Every 5 Years	YES
	CO	3.08	Every 5 Years	YES
C-REF (2)	NO_X	17.30	Every 5 Years	YES
	CO	17.30	Every 5 Years	YES

(1) Equipped with oxidation catalyst.
(2) Equipped with NSCR and AFRC.

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 X. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Not Applicable]

Total potential emissions for NO_X are greater than the major source threshold of 250 TPY. Any future emission increases must be evaluated for PSD if they exceed a significance level (100 TPY

CO, 40 TPY NO_x, 40 TPY SO_2, 40 TPY VOC, 25 TPY PM, 15 TPY PM_{10}, and 0.6 TPY lead).

NSPS, 40 CFR Part 60 [Subparts Kb, KKK, JJJJ, and OOOO are Applicable]
Subpart Kb, VOL Storage Vessels. This subpart regulates hydrocarbon storage tanks larger than 19,813 gallons capacity and built after July 23, 1984. Since tank T-24 is a pressure vessel designed to operate in excess of 29.73 psi, it is specifically exempt from this subpart. Tanks T-21A and T-22A are located in the natural gas processing plant that is after the point of custody transfer. Therefore, both tanks T-21A and T-22A are subject to the requirements of NSPS Subpart Kb. A VRU captures emissions off Tanks T-21A and T-22A and routes the vapors to the inlet of the station as part of the process. All applicable requirements have been incorporated into the permit.

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 constructed, reconstructed, or modified after January 20, 1984, and prior to August 23, 2011. This subpart sets standards for natural gas processing plants, which are defined as any site engaged in the extraction of natural gas liquids from field gas, fractionation of natural gas liquids, or both. All compressors are affected facilities since they were constructed/modified after January 20, 1984. Subpart KKK specifically exempts reciprocating compressors in wet gas service, and compressors that are not in VOC service, from all but notification and recordkeeping requirements. Compressors C-1, C-3, C-6, C-7, C-9, C-13, and C-14 are in wet gas service and must meet the monitoring, demonstration, and recordkeeping requirements of §60.486(j) and §60.635(a) and (c). These process units: Inlet Gas, Glycol Dehy, Plant 1, Plant 2, Plant 3, and Condensate, are in VOC service and subject to §60.482-3 control requirements. The permittee will be required to maintain a leak detection and repair (LDAR) program for EUG 7a and associated equipment. All applicable requirements have been incorporated into the permit.

Subpart LLL, Onshore Natural Gas Processing: SO_2 Emissions. This subpart affects sweetening units and sweetening units followed by sulfur recovery units. This facility does not have a sweetening unit.

Subpart IIII, Stationary Compression Ignition (CI) Internal Combustion Engines (ICE). This subpart affects CI ICE manufactured after 2007. There are no CI ICE manufactured after 2007 at this facility.

Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI-ICE). This subpart promulgates emission standards for new SI engines ordered after June 12, 2006, that are manufactured after certain dates, and for SI engines modified or reconstructed after June 12, 2006. The specific emission standards (either in g/hp-hr or as a concentration limit) vary based on engine class, engine power rating, lean-burn or rich-burn, fuel type, duty (emergency or non-emergency), and manufacture date. Engine manufacturers are required to certify certain engines to meet the emission standards and may voluntarily certify other engines. An initial notification is required only for owners and operators of engines greater than 500 HP that are non-certified. Emergency

engines will be required to be equipped with a non-resettable hour meter and are limited to 100 hours per year of operation excluding use in an emergency (the length of operation and the reason the engine was in operation must be recorded). The fourteen engines in this permit that were manufactured prior to June 12, 2006, are not subject to this subpart. E-GEN-1a and E-Gen-2 were manufactured after June 12, 2006, and are subject to Subpart JJJJ. 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. The following table outlines the applicability of the subpart.

NSPS Subpart OOOO Applicability

§60.5365 section	Applicable? Y/N	Affected Facility	Comment
(a)	N	Gas well	Not at a well site
(b)	N	Centrifugal compressor using wet seals	None on-site
(c)	N	Reciprocating compressor	Before 8/23/2011
(d)		Pneumatic controller:	
	N	(1) Oil production segment, continuous natural gas bleed rate > 6 SCFH	None on-site
	N	(2) Natural gas production segment, continuous natural gas bleed rate > 6 SCFH	None on-site
	N	(3) located at natural gas processing plant, continuous bleed natural gas	None on-site
(e)	N	Storage vessel with the potential for VOC emissions ≥ 6 TPY	Before 8/23/2011
(f)	**Y**	Group of all equipment in a process unit at a gas plant	The condensate stabilizer and vapor recovery unit are subject
(g)	N	Sweetening unit located at a gas plant	None on-site

Only the affected facilities indicated have been modified or reconstructed.

Subpart OOOOa, Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After September 18, 2015, and on or Before December 6, 2022. The following table outlines the applicability of the subpart.

NSPS Subpart OOOOa Applicability

§60.5365a section	Applicable? Y/N	Affected Facility	Comment
(a)	N	Well	Not at a well site
(b)	N	Centrifugal compressor using wet seals	None on-site
(c)	N	Reciprocating compressor	Before 9/18/2015
(d)		Pneumatic controller:	
	N	(1) not located at a gas plant, continuous natural gas bleed rate > 6 SCFH	None on-site
	N	(2) located at a gas plant, continuous bleed natural gas	None on-site
(e)	N	Storage vessel with the potential for VOC emissions ≥ 6 TPY	Before 9/18/2015
(f)	N	Group of all equipment in a process unit at a gas plant	Before 9/18/2015[(1)]

§60.5365a section	Applicable? Y/N	Affected Facility	Comment
(g)	N	Sweetening units	None on-site
(h)		Pneumatic pump:	
	N	(1) natural gas-driven diaphragm pump at a gas plant	None on-site
	N	(2) gas-driven diaphragm pump at a well site	Not at a well site
(i)	N	Fugitive emissions components at a well site	Not at a well site
(j)	N	Fugitive emissions components at a compressor station	Before 9/18/2015

(1) The condensate stabilizer and vapor recovery unit were existing units that were relocated. These units are subject to Subpart OOOO, rather than new construction subject to Subpart OOOOa.

None of the existing affected facilities have been modified or reconstructed.

Subpart OOOOb, Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After December 6, 2022. The following table outlines the applicability of the subpart.

NSPS Subpart OOOOb Applicability

§60.5365b section	Applicable? Y/N	Affected Facility	Comment
(a)	N	Well	Not at a well site
(b)	N	Centrifugal compressor	None on-site
(c)	N	Reciprocating compressor	Before 9/18/2015
(d)	N	Collection of process controllers	None on-site
(e)	N	Tank Battery with the potential for VOC emissions ≥ 6 TPY and/or methane emissions ≥ 20 TPY	Before 12/6/2022
(f)	N	Group of all equipment in a process unit located at a gas plant	Before 12/6/2022
(g)	N	Sweetening units	Before 12/6/2022
(h)	N	Collection of natural gas driven pumps	None on-site
(i)	N	Collection of fugitive emissions components	Before 12/6/2022

None of the existing affected facilities have been modified or reconstructed.

NESHAP, 40 CFR Part 61 [Not Applicable]
There are no emissions of any of the regulated pollutants: arsenic, asbestos, beryllium, benzene, coke oven emissions, mercury, radionuclides or vinyl chloride except for trace amounts of benzene. Subpart J, Equipment Leaks of Benzene only affects process streams that contain more than 10% benzene by weight. All process streams at this facility are below this threshold.

NESHAP, 40 CFR Part 63 [Subpart HH, ZZZZ, and CCCCCC Applicable]
Subpart HH, Oil and Natural Gas Production Facilities. This subpart applies to affected emission points that are located at facilities which are major sources of HAPs and either process, upgrade, or store hydrocarbons prior to the point of custody transfer or prior to which the natural gas enters the natural gas transmission and storage source category. For purposes of this subpart natural gas enters the natural gas transmission and storage source category after the natural gas processing plant. If no natural gas plant is present, natural gas enters the natural gas transmission and storage source category after the point of custody transfer. Since the facility is a gas plant, HAP emissions from all sources are accumulated to determine if the facility is a major source of HAPs. The facility is currently not a major source of HAPs. The TEG dehydration unit is exempt from the

requirements of this subpart except for recordkeeping based on reducing benzene emissions to less than 0.90 megagrams per year through a combination of control and process modifications. All applicable requirements have been incorporated into the permit.

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

	Construction/Reconstruction Dates	
	Engines >500 hp	**Engines ≤ 500hp**
Existing Unit		
Located at Major HAP Source	Before 12/19/2002	Before 6/12/2006
Located at Area HAP Source	Before 6/12/2006	
New or Reconstructed Unit		
Located at Major HAP Source	On and After 12/19/2002	On and After 6/12/2006
Located at Area HAP Source	On and After 6/12/2006	

All engines fall under existing units located at an area HAP source category and shall comply with applicable emission limitations and operating limitations no later than October 19, 2013. 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 Subpart ZZZZ of Part 63**
Emergency stationary CI RICE and black start stationary CI RICE. Emergency stationary SI RICE and black start stationary SI RICE	a. Change oil and filter, and inspect all hoses and belts every 500 hours of operation or annually, whichever comes first and replace hoses and belts as necessary. b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first and replace as necessary.
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 and replace as necessary.
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 and replace as necessary.

All engines are in compliance with this subpart. All requirements have been incorporated into the permit.

Subpart CCCCCC, Gasoline Dispensing Facilities. This subpart establishes emission limitations and management practices for HAP emitted from the loading of gasoline storage tanks at gasoline dispensing facilities (GDF) located at an area source. GDF means any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank.

If the GDF has a monthly throughput of less than 10,000 gallons of gasoline, the owner/operator must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

1. Minimize gasoline spills;
2. Clean up spills as expeditiously as practicable;
3. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
4. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

This facility dispenses gasoline to company owned vehicles and is subject to this subpart. All applicable requirements have been incorporated into the permit.

CAM, 40 CFR Part 64 [Applicable]

Compliance Assurance Monitoring (CAM) 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:

1. It is subject to an emission limit or standard for an applicable regulated air pollutant.
2. It uses a control device to achieve compliance with the applicable emission limit or standard.
3. It has potential emissions, prior to the control device, of the applicable regulated air pollutant of 100 TPY for a criteria pollutant, 10 TPY for an individual HAP, or 25 TPY for all HAP.

Engine C-53 has pre-control emissions above major source levels and is equipped with non-selective catalytic reduction units (NSCR) to meet permit emission limits. Therefore, engine C-53 and its control components is subject to CAM. The applicant has submitted and AQD has approved CAM plans for this subject engine in Permit No. 2010-058-TVR issued August 27, 2014. All applicable requirements are incorporated into the permit as Appendix A to the Specific Conditions. All other engines do not individually have potential emissions greater than 100 TPY of NOx, CO, or VOC, and are therefore not subject to CAM.

GSV-1 does not meet §64.2(a)(2). GSV-1 does not use a control device, as defined in §64.1. Flash gases from the flash tank are routed to inlet of the facility. Emissions from the glycol dehydrator still vent are routed to a condenser for liquids recovery (i.e., liquids from the condenser are pumped to the condensate tanks and sold). Non-condensable vapors from the condenser are routed to the "Evac / combustor" for destruction (these non-condensable vapors are <100 TPY). Facility provided purchasing quote for the existing condenser (JATCO BTEX Eliminator), which showed the condenser cost $67,899.00. Based on 2023 records, the actual volume of recovered oil from condenser was 0.0124 gal/min, which equates to 6,517.44 gal/yr or 155.18 bbl/yr. Based on the market rate for West Texas Intermediate (WTI) Crude Oil of $82 per barrel, this volume of recovered condensate is worth $12,726.4. At this rate, the condenser would pay for itself in a little over five years. Therefore, facility has proved that the main purpose for this condenser is to recover condensate for sale instead of using it as a control device. Since the condenser and flash tank are inherent process equipment, which is specifically excluded in the definition of control device as

defined in §64.1, CAM is not applicable because uncontrolled emissions after the condenser are less than major source thresholds.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Applicable]
The definition of a stationary source does not apply to transportation, including storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the provisions of this part. The definition of a stationary source also does not include naturally occurring hydrocarbon reservoirs. Naturally occurring hydrocarbon mixtures, prior to entry into a natural gas processing plant or a petroleum refining process unit, including: condensate, crude oil, field gas, and produced water, are exempt for the purpose of determining whether more than a threshold quantity of a regulated substance is present at the stationary source. This part is applicable due to storage of NGL exceeding the threshold. More information on this federal program is available on the web page: *www.epa.gov/rmp*.

Stratospheric Ozone Protection, 40 CFR Part 82 [Subpart A and F Applicable]
These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).
Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030.
This facility does not utilize any Class I & II substances.
Subpart F requires that any persons servicing, maintaining, or repairing appliances except for motor vehicle air conditioners; persons disposing of appliances, including motor vehicle air conditioners; refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment comply with the standards for recycling and emissions reduction.
The standard conditions of the permit address the requirements specified at § 82.156 for persons opening appliances for maintenance, service, repair, or disposal; § 82.158 for equipment used during the maintenance, service, repair, or disposal of appliances; § 82.161 for certification by an approved technician certification program of persons performing maintenance, service, repair, or disposal of appliances; § 82.166 for recordkeeping; § 82.158 for leak repair requirements; and § 82.166 for refrigerant purchase records for appliances normally containing 50 or more pounds of refrigerant.

SECTION XI. COMPLIANCE

INSPECTION

A full compliance evaluation (FCE) was conducted at the facility on May 17, 2023. The compliance evaluation was conducted by Oba Hughes, Environmental Programs Specialist, for the Department of Environmental Quality ("Department"), Air Quality Division. Richard Felts, Sr. Environmental Specialist, represented ETGP. Based on the information provided or obtained during this evaluation, no compliance issues were discovered.

SECTION XII. TIER CLASSIFICATION, PUBLIC AND EPA REVIEW

TIER CLASSIFICATION AND PUBLIC REVIEW

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

The applicant published the "Notice of Filing a Tier II Application" in The Herald-Democrat, a weekly publication in Beaver County, on August 1, 2024. The notice stated that the application was available for public review in the Beaver Public Library at 201 Douglas Ave, Beaver, OK 73932 or at the Air Quality Division's main office in Oklahoma City. Information on all permit actions is available for review by the public in the Air Quality section of the DEQ Web page: https://www.deq.ok.gov.

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

TRIBAL REVIEW

Tribal nations will be notified of the draft permit.

STATE REVIEW

This facility is located within 50 miles of the Oklahoma - Kansas border and the Oklahoma – Texas border. Those states will be notified of the draft permit.

LANDOWNER AFFIDAVIT

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

FEE PAID

Major source operating permit renewal fee of $7,500 was paid on June 4, 2024.

EPA REVIEW

The applicant requested and was granted concurrent public and EPA review periods. The draft/proposed permit will undergo a 30-day public comment period and the draft/proposed permit will be sent to EPA for a 45-day review period. If no comments are received from the public the draft/proposed permit will be deemed the proposed permit.

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(j) 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(j), 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(j), 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 XIII. 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 EPA, tribal, and public review.

PERMIT TO OPERATE
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS

ET Gathering & Processing LLC **Permit Number 2024-0463-TVR3**
Beaver Gas Plant

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on May 30, 2024. The Evaluation Memorandum dated November 12, 2024, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operation 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 2. Internal Combustion Engines

EU ID	HP	Source	NOx		CO		VOC		H_2CO
			lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	TPY
C-1[(1)]	1,340	Caterpillar 3516 TALE HS	5.91	25.88	0.69	3.04	1.36	5.97	0.28
C-3[(1)]	1,356	Caterpillar 3516 TALE-AFI	5.98	26.19	0.70	3.08	1.38	6.04	0.28
C-6[(1)]	1,085	Caterpillar 3516 SITA	4.78	20.95	0.56	2.46	1.15	5.04	0.43
C-7[(1)]	1,085	Caterpillar 3516 TALE	4.78	20.95	0.56	2.46	1.10	4.82	0.21
C-9	1,085	Caterpillar 3516 TALE	4.78	20.95	4.78	20.95	1.45	6.33	1.72
C-13[(1)]	1,265	Caterpillar 3516 TALE	5.58	24.43	0.66	2.87	1.29	5.63	0.26
C-14	830	Caterpillar 399 TA	3.66	16.03	3.66	16.03	1.24	5.45	2.83
C-51[(1)]	1,265	Caterpillar 3516 TALE	5.58	24.43	0.66	2.87	1.29	5.63	0.26
C-52[(1)]	1,340	Caterpillar 3516 TALE	5.91	25.88	0.69	3.04	1.36	5.97	0.28
C-53[(2)]	1,478	Waukesha L7042 GSI	6.52	28.54	6.52	28.54	1.04	4.55	0.84
C-54	1,085	Caterpillar 3516 TALE	4.78	20.95	4.78	20.95	1.31	5.72	1.11
C-56[(1)]	1,340	Caterpillar 3516 SITA	5.91	25.88	0.69	3.04	1.43	6.26	0.31
C-57[(1)]	1,356	Caterpillar 3516 TALE-AFI	5.98	26.19	0.70	3.08	1.38	6.04	0.28
C-REF[(3)]	896	Waukesha L7042 GU	3.95	17.30	3.95	17.30	0.63	2.76	0.51

(1) Equipped with an oxidation catalyst.
(2) Equipped with NSCR and AFRC. Subject to 40 CFR Part 64, CAM rule.
(3) C-REF is not subject to CAM.

a. Compliance with the CO emission limits for the engines in this permit is deemed compliance with the formaldehyde emission limits. This permit requires periodic testing of CO emissions from the engines to demonstrate compliance with the formaldehyde limits.

EUG 2a. Internal Combustion Engines (NSPS Subpart JJJJ)

EU ID	HP	Description	NOx		CO		VOC	
			lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
E-Gen-1a	25	Generac	0.06	0.24	0.11	0.48	0.04	0.17

EU ID	HP	Description	NOx		CO		VOC	
			lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
E-Gen-2[(1)]	32	Generac	0.15	0.04	7.15	1.79	0.26	0.06

(1) E-Gen-2 emergency engine emissions are based on a maximum of 500 hr/yr operation for non-emergency run hours only.

a. The permittee shall comply with all applicable requirements in NSPS, 40 CFR Part 60, Subpart JJJJ, for the above engines including, but not limited to, the following.

[40 CFR §§ 60.4230 through 60.4248]

(1) § 60.4230 Am I subject to this subpart?
(2) § 60.4233 What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?
(3) § 60.4234 How long must I meet the emission standards if I am an owner or operator of a stationary SI internal combustion engine?
(4) § 60.4235 What fuel requirements must I meet if I am an owner or operator of a stationary SI gasoline fired internal combustion engine subject to this subpart?
(5) § 60.4236 What is the deadline for importing or installing stationary SI ICE produced in the previous model year?
(6) § 60.4237 What are the monitoring requirements if I am an owner or operator of an emergency stationary SI internal combustion engine?
(7) § 60.4243 What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?
(8) § 60.4244 What test methods and other procedures must I use if I am an owner or operator of a stationary SI internal combustion engine?
(9) § 60.4245 What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?
(10) § 60.4246 What parts of the General Provisions apply to me?
(11) § 60.4248 What definitions apply to this subpart?

EUG 2b. Reciprocating Compressors: Emissions limits have not been established for this EUG.

EUG 2b Reciprocating Compressors

Point ID	Description
C-1	Ariel JGE/4
C-3	El-Gemini DS504
C-6	Ariel JGK/4
C-7	Ariel JGK/2
C-9	E/I FE565C-4
C-13	Ariel JGE/4
C-14	Ariel JGH/4
C-51	Ariel JGE/4
C-52	Ariel JGE/4
C-53	Ariel JGE/4
C-54	E/I FE565C-4

Point ID	Description
C-56	Ariel JGE/4
C-57	Ariel JGE/4
C-REF	Worthington 0F6 M-4

EUG 3. Glycol Regenerator Vent

EU ID	Point ID	VOC [1]	
		lb/hr	TPY
GSV-1	GH-1	101.02	23.20

[1] Includes Dehydrator Still Vent Uncontrolled Emissions of 120 hr/yr of operation with EVAC burner out of service (i.e., uncontrolled represents 25% control of still vent and 50% control of flash tank).

EUG 4. Regenerator Heater Emissions from the equipment listed below are estimated based on existing equipment items and are insignificant.

EU ID	Point ID	Description	MMBTUH
GH-1	GH-1	Glycol Dehydrator Reboiler	1.5

EUG 5. Regenerator Heaters: Emissions from the equipment listed below are estimated based on existing equipment items and are insignificant.

EU ID	Point ID	Description	MMBTUH
H-802C	H-802C	Molecular Sieve Regeneration Heater	6.0
2-HT-14.01	2-HT-14.01	Molecular Sieve Regeneration Heater	1.945
3-HT-14.01	3-HT-14.01	Molecular Sieve Regeneration Heater	0.422
SH-1	SH-1	Condensate Stabilizer Heater	0.5

EUG 6. Tanks: Emissions from the equipment listed below are estimated based on existing equipment items and are insignificant.

EU ID	Point ID	Contents	Gallons
T-8	T-8	Gasoline	300
T-11	T-11	NGL Y Grade[1]	11,500
T-13	T-13	Methanol	1,175
T-14	T-14	Methanol	650
T-24	T-24	Refrig. Propane[1]*	58,823
T-25	T-25	Methanol (Plt 1)	300
T-26	T-26	Methanol (Plt 2 & 3)	600
T-27	T-27	Methanol (inlet)	570
T-28	T-28	Diesel	230
T-900	T-900	Wastewater	4,200

Tanks With Emission Limits:

EU ID	Point ID	Material Stored	Capacity	Throughput	VOC Emissions
			Gallons	Gallons	TPY
T-21	T-21	Unstabilized Condensate (High RVP =13)	21,000	756,000(1)	12.28
T-22	T-22		21,000		
T-21A	T-21A	Stabilized Condensate (Low RVP =10)	21,000	7,665,000(1)	0.50
T-22A	T-22A		21,000		
T-23	T-23	Unstabilized Condensate (High RVP = 13)	8,820	336,000	10.76

(1) Combined total.

a. Tanks T-21, T-21A, T-22, T-22A and T-23 are controlled by a flare.

b. Tanks T-21A and T-22A are subject 40 CFR Part 60 Subpart Kb and shall comply with all applicable standards, including but not limited to the following.

[40 CFR Part 60 Subpart Kb]

(1) §60.110b Applicability and designation of affected facility.
(2) §60.111b Definitions.
(3) §60.112b Standard for volatile organic compounds.
(4) §60.113b Testing and procedures.
(5) §60.114b Alternative means of emission limitation.
(6) §60.115b Reporting and recordkeeping requirements.
(7) §60.116b Monitoring of operations.

EUG 7. Piping Components: Fugitive VOC emissions are estimated based on existing equipment items but do not have a specific limitation.

EUG 7 Fugitives – Pre-NSPS

EU ID	Point ID	Equipment	Number(1)
FUG-1	FUG-1	Valves	328
		Flange/Connections	612
		Compressor Seals	0
		Relief Valves	6
		Pump Seals	0
		Open-Ended Lines	3

(1) Estimate only, not a permit limit.

EUG 7a Fugitives – NSPS Subpart KKK

EU ID	Point ID	Equipment	Number[(1)]
FUG-1a	FUG-1a	Valves	2850
		Flange/Connections	5363
		Compressor Seals	14
		Relief Valves	148
		Pump Seals	9
		Open-Ended Lines	3

(1) Estimate only, not a permit limit.

EUG 7b Fugitives – NSPS Subpart OOOO

EU ID	Point ID	Type of Equipment	Number[(1)]
FUG- StabArea	FUG-StabArea	Valves	393
		Flange/Connections	1569
		Compressor Seals	0
		Relief Valves	12
		Pump Seals	0
		Open-Ended Lines	0

(1) Estimate only, not a permit limit.

EUG 8. Truck Loading: Emissions from the equipment listed below are estimated based on existing equipment items.

EU ID	Point ID	Type of Equipment
FUG-02	FUG-02	Condensate Truck Loading

Note: EUG 8. Truck Loading - This is a grandfathered operation (1961) and has not previously had a limit for loading, so a limit is not needed here.

EUG 9. Flare

EU ID	Point ID	VOC
		TPY
FL-1	FL-1	13.14

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

3. The permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year). [OAC 252:100-8-6(a)(1)]

4. Engines shall have a permanent identification plate attached that shows the make, model, and serial number. [OAC 252:100-43]

5. Engines C-1, C- 3, C-6, C-7, C-13, C-51, C-52, C-56, and C-57 shall each be set to operate with exhaust gases passing through properly functioning oxidation catalysts. C-REF shall be set to operate with exhaust gases passing through a properly functioning catalytic converter. [OAC 252:100-8-6(a)]

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 (1) an Emergency Use Engine (i.e., any engine that drives a generator, firewater pump, or other emergency use equipment, and operates no more than 500 hours per year), or (2) 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.

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 & 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.

At least once every 5 years (during the permit term), the permittee shall conduct tests of NOx and CO emissions from any uncontrolled 4SLB engines 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 or concentration limits in Specific Condition No. 1, the permittee shall comply with the provisions of OAC 252:100-9. [OAC 252:100-9]

8. Engine C-53 is subject to Compliance Assurance Monitoring (CAM) and shall comply with all applicable requirements and shall perform monitoring as approved in Appendix A of this permit. Engine C-53 shall be set to operate with properly functioning automatic air/fuel ratio controllers and with exhaust gases passing through properly functioning non-selective catalytic reduction units. [40 CFR §§ 64.1 to 64.9]

a. § 64.1 Definitions.
b. § 64.2 Applicability.
c. § 64.3 Monitoring design criteria.

d. § 64.6 Approval of monitoring.
e. § 64.7 Operation of approved monitoring.
f. § 64.8 Quality improvement plan (QIP) requirements.
g. § 64.9 Reporting and recordkeeping requirements.

9. Replacement of any equipment with emission 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.

10. The permittee shall maintain, and update annually, an inventory record of fugitive emission sources at the facility. The record shall include the following: [OAC 252:100-8-6 (a)(3)]

a. Type of service (gas, heavy oil, light oil, and water/light oil).
b. Component type and count.
c. VOC content of stream handled.

11. Total HAP emissions shall not exceed 9.99 TPY for any single HAP or 24.9 TPY for any combination of HAPs. Facility wide formaldehyde emissions shall not exceed 9.99 TPY. Compliance with the CO emission limits in Specific Condition 1 shall be assumed to show compliance with the formaldehyde emission limit of 9.99 TPY. [OAC 252:100-8-6(a)(1)]

12. The condensate tanks T-21, T-21A, T-22, T-22A, and T-23 shall be limited to the 12-month rolling total throughputs as listed in Specific Condition 1. Emissions from the five (5) condensate tanks shall be vented to the vapor recovery unit or flare with a 98% control efficiency.
[OAC 252:100-8-6(a)(1)]

13. The glycol dehydration unit shall be maintained and operated in accordance with applicable state and federal rules, including but not limited to the following requirements:
[OAC 252:100-8-6(a)(1)]

a. The natural gas throughput shall not exceed 110 MMSCFD (averaged monthly).
b. The lean glycol circulation rate shall not exceed 23.8 gallons per minute (GPM).
c. The glycol dehydration unit shall be equipped with a flash tank on the rich glycol stream. The gases from the flash tank shall be directed to the inlet of the facility, plant fuel system, or the EVAC burner when the reboiler is operating.
d. The glycol dehydrator shall be equipped with a condenser. All of the emissions from the glycol dehydration unit’s still vent shall be routed to the condenser, then to the BTEX and VOC control system burner, or to an equally-effective (overall 98% or more) VOC/HAP emissions control system. Except for up to 120 hours per year where the dehydration unit can operate without the BTEX eliminator or an equally-effective emissions control system.
e. The permittee shall monitor and record the lean glycol circulation rate at least once a

month. When three consecutive months show no exceedance of the limit, the frequency may be reduced to quarterly. Upon any showing of non-compliance, the monitoring and recordkeeping frequency shall revert to monthly. With each inspection the lean glycol circulation rate shall be recorded as follows:

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

The requirement to monitor and record the glycol circulation rate shall not apply if the pump capacity does not exceed 23.8 GPM. If so, the manufacturer's rating or the performance data for the model of pump that verifies the maximum pump rate at any operational conditions shall be maintained and available for inspection.

14. The permittee shall comply with the Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants, NSPS Subpart KKK, for each affected facility located on-site. [40 CFR §§ 60.630 to 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, identified below:
[§ 60.632(a)]

(1) The owner/operator shall demonstrate compliance with applicable sections of NSPS KKK for applicable process units within 180 days of initial start-up 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)]

15. The permittee shall comply with NSPS, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015, for all affected facilities located at this site. [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, reciprocating compressors and 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, reciprocating compressors and 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?

16. The permittee shall comply with all applicable requirements of the NESHAP for Oil and Natural Gas Production, Subpart HH, for each affected dehydration unit including but not limited to the following: [40 CFR § 60.764]

a. An owner or operator of a glycol dehydration unit that meets the exemption criteria in § 63.764(e)(1) shall maintain the records specified in §§ 63.774(d)(1), as appropriate, for that glycol dehydration unit.

17. The owner/operator shall comply with all applicable requirements of the NESHAP: Reciprocating Internal Combustion Engines (RICE), Subpart ZZZZ, for each affected facility including but not limited to: [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. § 63.6603 What emission limitations, operating limitations and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?
f. § 63.6605 What are my general requirements for complying with this subpart?
g. § 63.6612 By what date must I conduct the initial performance tests or other initial compliance demonstrations?
h. § 63.6615 When must I conduct subsequent performance tests?
i. § 63.6620 What performance tests and other procedures must I use?
j. § 63.6625 What are my monitoring, installation, operation, and maintenance requirements?
k. § 63.6630 How do I demonstrate initial compliance with the emission limitations, operating limitations and other requirements?
l. § 63.6635 How do I monitor and collect data to demonstrate continuous compliance?
m. § 63.6640 How do I demonstrate continuous compliance with the emission limitations, operating limitations and other requirements?
n. § 63.6650 What reports must I submit and when?
o. § 63.6655 What records must I keep?
p. § 63.6660 In what form and how long must I keep my records?
q. § 63.6665 What parts of the General Provisions apply to me?
r. § 63.6670 Who implements and enforces this subpart?
s. § 63.6675 What definitions apply to this subpart?

18. The owner/operator shall comply with all applicable requirements of the NESHAP: Gasoline Dispensing Facilities, Subpart CCCCCC, by the initial compliance date January 10, 2011, for each affected facility including, but not limited to, the following: [40 CFR §§ 63.11110 - 63.11132]

a. § 63.11110 What is the purpose of this subpart?
b. § 63.11111 Am I subject to the requirements in this subpart?
c. § 63.11112 What parts of my affected source does this subpart cover?
d. § 63.11113 When do I have to comply with this subpart?

e. § 63.11116 Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline.
f. § 63.11130 What parts of the General Provisions apply to me?
g. § 63.11132 What definitions apply to this subpart?

19. 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. Periodic emission testing for each engine and each replacement engine/turbine or hours of operation.
b. Operating hours for any engine or replacement engine(s)/turbine(s) if operated less than 440 hours per semi-annual period and not tested.
c. For fuel(s) burned, the appropriate document(s) as described in Specific Condition No. 2.
d. Condensate throughput for tanks T-21, T-21-A, T-22, T-22A, and T-23 (monthly and 12-month rolling total).
e. Uncontrolled operating hours for the glycol dehydration unit, if operated without emissions controls (monthly and 12-month rolling total).
f. Glycol pump circulation rate (monthly / quarterly) if applicable, based on Specific Condition No. 13(e).
g. Records required by 40 CFR Part 60 (NSPS), Subparts A, Kb, KKK, JJJJ, and OOOO.
h. Records required by 40 CFR Part 63 (NESHAP), Subparts HH, ZZZZ, and CCCCCC.
i. Records as required by 40 CFR Part 64 (CAM).

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

a. 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.
b. 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).

21. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit (July 19, 2005), the permittee shall submit to the Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit. [OAC 252:100-8-6 (c)(5)(A) & (D)]

22. The Permit Shield (Standard Conditions, Section VI) is extended to the following requirements that have been determined to be inapplicable to this facility [OAC 252:100-8-6(d)(2)]

a. OAC 252:100-8, Part 9, Major Sources Affecting Nonattainment Areas
b. OAC 252:100-23, Control of Emissions from Cotton Gins

c. OAC 252:100-24, Control of Emissions from Grain Elevators
d. OAC 252:100-31-13, Sulfuric Acid Mist
e. OAC 252:100-31-15, Total Reduced Sulfur
f. OAC 252:100-33, Control of Emissions of Nitrogen Oxides
g. OAC 252:100-35, Control of Emissions of Carbon Monoxide
h. OAC 252:100-39 Control of VOCs in Nonattainment and Former Nonattainment Areas
i. 40 CFR Part 61, NESHAP
j. 40 CFR Parts 55, 56, 57, 58, 65, 67, 69, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 86, 88, 93, 95
k. OAC 252:100-39-43 Graphic Arts

23. 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)]

24. Upon issuance, Permit No. 2024-0463-TVR3 supersedes all previous Air Quality operating permits and/or authorizations for this facility which are now cancelled.

Appendix A.
ET GATHERING BEAVER GAS PLANT COMPLIANCE ASSURANCE MONITORING (CAM) FOR ENGINE C-53 WITH CATALYTIC CONVERTER

	Indicator No. 1	Indicator No. 2	Indicator No. 3
I. Indicator	Temperature of exhaust gas into catalyst.	Temperature of exhaust gas out of catalyst.	Pressure Differential Across Catalyst
A. Measurement Approach	Exhaust gas temperature is measured continuously using an inline thermocouple and translated by a temp. scanner or other end device.	Exhaust gas temperature is measured continuously using an inline thermocouple and translated by a temp. scanner or other end device.	Pressure differential across the catalyst element is measured monthly using a differential pressure gauge.
II. Indicator Range	The indicator range is above 750ºF, but lower than 1,250ºF. Excursions trigger corrective action, logging, and reporting in semiannual report.	The indicator range is above 800ºF, but lower than 1,300ºF. Excursions trigger corrective action, logging and reporting in semiannual report	The indicator range is a pressure differential deviation of 2 inches water column from the benchmark. Excursions trigger corrective action, logging and reporting in the semiannual report.
III. Performance Criteria A. Data Representativeness	Temperature is measured at the inlet to the catalyst by a thermocouple with a minimum accuracy of +/-5ºF.	Temperature is measured at the outlet to the catalyst by a thermocouple. The minimum accuracy is ±5ºF.	Pressure differential across the catalyst is measured at the catalyst inlet and exhaust. The minimum increments of the measurement is 0.25 inches of water column.
B. Verification of Operational Status	Guarantee from thermocouple manufacturer.	Guarantee from thermocouple manufacturer.	System will be initially tested with a new catalyst to develop a baseline pressure differential across the catalyst.
C. QA/QC Practices and Criteria	Thermocouple scanner or other end device is calibrated annually.	Thermocouple scanner or other end device is calibrated annually.	Pressure gauge is calibrated quarterly. Pressure taps checked monthly for plugging.
D. Monitoring Frequency	Temperature measured continuously and recorded on log sheets once daily. Compliance assumed daily if no corrective action events occur.	Temperature measured continuously and recorded on log sheets once daily. Compliance assumed daily if no corrective action events occur.	Pressure differential is measured monthly.
E. Data Collection Procedures	Temperature data recorded on log sheet once daily. Otherwise, excursions trigger corrective action, logging, and reporting in semiannual report.	Temperature data recorded on log sheet once daily. Otherwise, excursions trigger corrective action, logging, and reporting in semiannual report.	Records are maintained to document monthly readings and any required maintenance. compliance is assumed on a 45-day basis.
F. Averaging period	None, not to exceed minimums and maximums.	None, not to exceed maximum.	NA

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

SECTION I. DUTY TO COMPLY

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

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

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.
[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

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

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

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

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

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

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

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

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

B. Records of required monitoring shall include:

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

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

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report. [OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions. [OAC 252:100-8-6(a)(3)(C)(iii)]

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

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

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

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

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

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

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

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

Robert Singletary
Executive Director

OKLAHOMA Environmental Quality

Kevin Stitt
Governor

Mr. Richard Felts
Sr. Specialist - Environmental
ET Gathering & Processing, LLC
8111 Westchester Dr., Suite 600
Dallas, TX 75225

Permit Number: 2024-0463-TVR3
Permit Writer: Junru Wang

SUBJECT: Title V Operating Permit Renewal Application **No. 2024-0463-TVR3**
Beaver Gas Plant (Fac ID: 337)
Section 18, Township 3N, Range 26E
Beaver County, Oklahoma

Dear Mr. Felts:

Enclosed is the permit authorizing operation of the referenced facility. 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 the permit writer at (405) 702-4197.

Sincerely,

Draft/Proposed

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

Enclosure

PART 70 PERMIT

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

Permit No. 2024-0463-TVR3

ET Gathering & Processing LLC,

having complied with the requirements of the law, is hereby granted permission to operate the Beaver Gas Plant located in Section 18, Township 3N, Range 26E, near Beaver in Beaver County, Oklahoma, subject to the Standard Conditions dated July 21, 2016, and Specific Conditions, both of which are attached.

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

DRAFT/PROPOSED

Kendal Stegmann, Division Director **Date**

Air Quality Division

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

ACFM	Actual Cubic Feet per Minute
AD	Applicability Determination
AFRC	Air-to-Fuel Ratio Controller
API	American Petroleum Institute
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BAE	Baseline Actual Emissions
BBL	Barrel(s)
BHP	Brake Horsepower (bhp)
BTU	British thermal unit (Btu)
C&E	Compliance and Enforcement
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS	Chemical Abstract Service
CAAA	Clean Air Act Amendments
CC	Catalytic Converter
CCR	Continuous Catalyst Regeneration
CD	Consent Decree
CEM	Continuous Emission Monitor
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CI	Compression Ignition
CNG	Compressed Natural Gas
CO	Carbon Monoxide or Consent Order
COA	Capable of Accommodating
COM	Continuous Opacity Monitor
D	Day
DEF	Diesel Exhaust Fluid
DG	Demand Growth
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)
EGU	Electric Generating Unit
EI	Emissions Inventory
EPA	Environmental Protection Agency
ESP	Electrostatic Precipitator
EUG	Emissions Unit Group
EUSGU	Electric Utility Steam Generating Unit
FCE	Full Compliance Evaluation
FCCU	Fluid Catalytic Cracking Unit
FIP	Federal Implementation Plan
FR	Federal Register
GACT	Generally Achievable Control Technology
GAL	Gallon (gal)
GDF	Gasoline Dispensing Facility
GEP	Good Engineering Practice
GHG	Greenhouse Gases
GR	Grain(s) (gr)
H_2CO	Formaldehyde
H_2S	Hydrogen Sulfide
HAP	Hazardous Air Pollutants
HC	Hydrocarbon
HCFC	Hydrochlorofluorocarbon
HFR	Horizontal Fixed Roof
HON	Hazardous Organic NESHAP
HP	Horsepower (hp)
HR	Hour (hr)
I&M	Inspection and Maintenance
IBR	Incorporation by Reference
ICE	Internal Combustion Engine
LAER	Lowest Achievable Emission Rate
LB	Pound(s) [Mass] (lb, lbs, lbm)
LB/HR	Pound(s) per Hour (lb/hr)
LDAR	Leak Detection and Repair
LNG	Liquefied Natural Gas
LT	Long Ton(s) (metric)
M	Thousand (Roman Numeral)
MAAC	Maximum Acceptable Ambient Concentration
MACT	Maximum Achievable Control Technology
MM	Prefix used for Million (Thousand-Thousand)
MMBTU	Million British Thermal Units (MMBtu)
MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
MMSCF	Million Standard Cubic Feet (MMscf)
MMSCFD	Million Standard Cubic Feet per Day
MSDS	Material Safety Data Sheet
MWC	Municipal Waste Combustor
MWe	Megawatt Electrical
NA	Nonattainment
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NH_3	Ammonia
NMHC	Non-methane Hydrocarbon
NGL	Natural Gas Liquids
NO_2	Nitrogen Dioxide
NOx	Nitrogen Oxides

NOI	Notice of Intent
NSCR	Non-Selective Catalytic Reduction
NSPS	New Source Performance Standards
NSR	New Source Review
O_3	Ozone
O&G	Oil and Gas
O&M	Operation and Maintenance
O&NG	Oil and Natural Gas
OAC	Oklahoma Administrative Code
OC	Oxidation Catalyst
PAH	Polycyclic Aromatic Hydrocarbons
PAE	Projected Actual Emissions
PAL	Plant-wide Applicability Limit
Pb	Lead
PBR	Permit by Rule
PCB	Polychlorinated Biphenyls
PCE	Partial Compliance Evaluation
PEA	Portable Emissions Analyzer
PFAS	Per- and Polyfluoroalkyl Substance
PM	Particulate Matter
$PM_{2.5}$	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers
PM_{10}	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers
POM	Particulate Organic Matter or Polycyclic Organic Matter
ppb	Parts per Billion
ppm	Parts per Million
ppmv	Parts per Million Volume
ppmvd	Parts per Million Dry Volume
PSD	Prevention of Significant Deterioration
psi	Pounds per Square Inch
psia	Pounds per Square Inch Absolute
psig	Pounds per Square Inch Gage
RACT	Reasonably Available Control Technology
RATA	Relative Accuracy Test Audit
RAP	Regulated Air Pollutant or Reclaimed Asphalt Pavement
RFG	Refinery Fuel Gas
RICE	Reciprocating Internal Combustion Engine
RO	Responsible Official
ROAT	Regional Office at Tulsa
RVP	Reid Vapor Pressure
SCC	Source Classification Code
SCF	Standard Cubic Foot
SCFD	Standard Cubic Feet per Day
SCFM	Standard Cubic Feet per Minute
SCR	Selective Catalytic Reduction
SER	Significant Emission Rate
SI	Spark Ignition
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SNCR	Selective Non-Catalytic Reduction
SO_2	Sulfur Dioxide
SOx	Sulfur Oxides
SOP	Standard Operating Procedure
SRU	Sulfur Recovery Unit
T	Tons
TAC	Toxic Air Contaminant
TEG	Triethylene Glycol
THC	Total Hydrocarbons
TPY	Tons per Year
TRS	Total Reduced Sulfur
TSP	Total Suspended Particulates
TV	Title V of the Federal Clean Air Act
$\mu g/m^3$	Micrograms per Cubic Meter
US EPA	U. S. Environmental Protection Agency
VFR	Vertical Fixed Roof
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VOL	Volatile Organic Liquid
VRT	Vapor Recovery Tower
VRU	Vapor Recovery Unit
YR	Year
2SLB	2-Stroke Lean Burn
4SLB	4-Stroke Lean Burn
4SRB	4-Stroke Rich Burn

Robert Singletary
Executive Director

OKLAHOMA Environmental Quality

Kevin Stitt
Governor

Mr. Richard Felts
Sr. Specialist - Environmental
ET Gathering & Processing, LLC
8111 Westchester Dr., Suite 600
Dallas, TX 75225

SUBJECT: Title V Operating Permit Renewal Application **No. 2024-0463-TVR3**
Beaver Gas Plant (Fac ID: 337)
Section 18, Township 3N, Range 26E
Beaver County, Oklahoma

Dear Mr. Felts:

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.

The permit will be placed into pending facility action until the notice of draft permit is published. Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (405) 702-4100.

Sincerely,

Phillip Fielder

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

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

APPLICANT RESPONSIBILITIES

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

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

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

Robert Singletary
Executive Director

OKLAHOMA Environmental Quality

Kevin Stitt
Governor

Texas Commission on Environmental Quality
Operating Permits Division (MC 163)
P.O. Box 13087
Austin, TX 78711-3087

SUBJECT: Title V Operating Permit Renewal Application **No. 2024-0463-TVR3**
Beaver Gas Plant (Fac ID: 337)
Section 18, Township 3N, Range 26E
Beaver County, Oklahoma

Dear Sir / Madam:

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

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

Sincerely,

Phillip Fielder

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

Robert Singletary
Executive Director

OKLAHOMA Environmental Quality

Kevin Stitt
Governor

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

SUBJECT: Title V Operating Permit Renewal Application **No. 2024-0463-TVR3**
Beaver Gas Plant (Fac ID: 337)
Section 18, Township 3N, Range 26E
Beaver County, Oklahoma

Dear Sir / Madam:

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

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

Sincerely,

Phillip Fielder

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