DRAFT

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

MEMORANDUM **June 20, 2025**

TO: Lee Warden, P.E., Permits and Engineering Group Manager

THROUGH: Phillip Martin, P.E., Engineering Manager, Existing Source Permits Section

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

FROM: Taylor Maxwell, E.I. Existing Source Permits Section

SUBJECT: Evaluation of Permit Application No. **2024-0504-O**
Enable Oklahoma Intrastate Transmission, LLC
Boiling Springs Compressor Station (SIC 4922, NAICS 486210)
Facility ID No. 486
Latitude: 34.89480°N, Longitude: 95.40966°W
Section 21, Township 5N, Range 18E, Latimer County, Oklahoma
Directions: From the junction of SH-2 and US-270 near Wilburton, OK, travel approximately five (5) miles west on US-270, 1 ¼ miles south, west into facility.

SECTION I. INTRODUCTION

Enable Oklahoma Interstate Transmission, LLC (EOIT or applicant) has requested an individual minor source operating permit for their Boiling Springs Compressor Station in Latimer County, Oklahoma. This facility is currently operating under the General Permit for Oil and Gas Facilities (GP-OGF) Authorization to Operate, Authorization No. 2014-2187-O (M-1), issued on May 7, 2015. EOIT is designating TANK1 as an oily wastewater storage tank to accurately reflect operations at the facility. Additionally, EOIT requests to revise the potential emissions from the process piping fugitives (FUG1) to reflect an updated gas analysis. On issuance, this permit will be a FESOP.

Based on data provided by the applicant, the facility has uncontrolled emissions of 76.47 TPY for NO_X, 76.47 TPY for CO, 29.31 TPY for VOC, and 0.84 TPY for HAPs. This facility, therefore, qualifies for a "minor" permit because the emissions of each of the criteria pollutants are below the major source threshold of 100 TPY and the HAP emissions are below the 10 TPY threshold for a single HAP and below the 25 TPY threshold for any combination of HAPs.

SECTION II. FACILITY DESCRIPTION

The facility is a natural gas gathering compressor station responsible for the compression of natural gas into a pipeline. Storage of oily wastewater occurs on-site as well. Natural gas is transported to the facility via a pipeline gathering system. The natural gas stream enters the facility through an

inlet separator, where oily wastewater, if present, is removed from the inlet stream. The oily wastewater then flows from the inlet separator into one (1) 400-bbl oily wastewater storage tank (TANK1). The oily wastewater is removed from the facility via trucks (LOAD1).

The gas stream is then compressed by three (3) 1,200-hp Solar Saturn 10 natural-gas-fired turbines (COMP1, COMP2, and COMP3). After the inlet gas passes through the compressors, the gas then exits the facility for transmission via pipeline.

SECTION III. EQUIPMENT

The following is a list of current equipment.

Facility-Wide Emission Units

ID#	Equipment Type	Size / Rating	Serial #	Manufacture Date	Subject to an NSPS or NESHAP Subpart
COMP1	Solar Saturn 10	1,200-hp	OHC15-S4664	10/1968	NSPS GG
	Solar C16	23,470 hp	-	Pre-2011	-
COMP2	Solar Saturn 10	1,200-hp	OHJ17-S4593	10/1970	NSPS GG
	Solar C16	23,470 hp	-	Pre-2011	-
COMP3	Solar Saturn 10	1,200-hp	OHJ14-S5119	1969	NSPS GG
	Solar C16	23,470 hp	-	Pre-2011	-
TANK1	Oily Wastewater Tank	400-bbl	-	-	-
LOAD1	Oily Wastewater Truck Loading	-	-	-	
FUG1	Fugitive Emissions	-	-	-	

(1) – Permitted capacity.

SECTION IV. FACILITY-SPECIFIC OR REPRESENTATIVE SAMPLE

TANKS

Flash losses are not expected for the storage tank due to the product being stored consisting of oily wastewater; therefore, no facility-specific or representative sample is needed for these units.

FUGITIVES

Natural Gas Compressor Station (Transmission) Fugitive Considerations	Yes	No
The facility submitted a facility-specific sample of the inlet gas or sales gas.	X	
The facility submitted a representative facility sample of the inlet gas or sales gas from a representative facility that is upstream on the same pipeline from the actual facility.		X
The facility did not submit a liquid sample and assumed 100% VOC content for the liquid service components.	X	

Natural Gas Compressor Station (Transmission) Fugitive Considerations	Yes	No
The facility submitted a facility-specific sample of the VOC containing liquid.		X
The sample was no older than three (3) calendar years at the time of submittal.	X	

SECTION V. EMISSIONS

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

TURBINES

Emissions from turbines COMP1, COMP2, and COMP3 for NO_X, CO, and VOC are based on manufacturer's data. Formaldehyde emissions factors are obtained from EPA AP-42 data. Potential emissions are based on manufacturer emissions factors and maximum horsepower.

Engine Emission Factors

ID#	NO_X	CO	VOC	H_2CO
	g/hp-hr	g/hp-hr	g/hp-hr	lb/MMBtu
COMP1[(1)]	2.20	2.20	0.80	<0.01
COMP2[(1)]	2.20	2.20	0.80	<0.01
COMP3[(1)]	2.20	2.20	0.80	<0.01

[(1)] – Fuel usage 13.20 MMBTUH.

Engine Emissions

ID#	NO_X		CO		VOC		H_2CO	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
COMP1	5.82	25.49	5.82	25.46	2.12	9.27	0.06	0.28
COMP2	5.82	25.49	5.82	25.46	2.12	9.27	0.06	0.28
COMP3	5.82	25.49	5.82	25.46	2.12	9.27	0.06	0.28

TANK

Flash losses are not expected for the storage tank due to the product being stored consisting of oily wastewater. Working and breathing (W/B) emissions calculated from the tank are based on AP-42 (6/20), Section 7.1.

Tank Emissions (per tank)

Parameter	TANK 1 Data
Throughput, gal/yr	840,000
Liquid in Tank(s)	Oily Wastewater
Working/Breathing Method/Tool	AP-42 (6/20), Section 7.1
Working/Breathing Emissions, TPY	0.01
Flashing Emissions, TPY	-
Total VOC Emissions, TPY	0.01

LOADING

Emissions from loading oily wastewater 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 No. 2 fuel oil (Diesel). Loading calculations are calculated assuming 100% diesel content to be conservative.

Loading Parameters and Emissions

Parameter	LOAD1
Liquids Loaded	Oily Wastewater
Throughput, gal/yr	840,000
Saturation Factor	0.6
Temp., °F	63.85
TVP, psia	0.01
MW, lb/lbmol	130
VOC, wt.%	100
Emission Factor, lb/10^3 gal (1)	0.02
VOC Emitted at Truck, TPY	0.01

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

FUGITIVES

Emissions from fugitive equipment leaks (FUG1) are based on EPA's "Protocol for Equipment Leak Emission Estimates" (11/95, EPA-453/R-95-017), an estimated number of components, and the VOC (C_{3+}) and HAP content of the materials handled.

Fugitive Emissions

ID#	VOC, TPY
FUG1	1.48

FACILITY-WIDE EMISSIONS

Facility-Wide Emissions

ID#	Source	NOx	CO	VOC	H_2CO
		TPY	TPY	TPY	TPY
COMP1	1,200-hp Solar Saturn 10	25.49	25.49	9.27(1)	0.28
COMP2	1,200-hp Solar Saturn 10	25.49	25.49	9.27(1)	0.28
COMP3	1,200-hp Solar Saturn 10	25.49	25.49	9.27(1)	0.28
TANK1	400-bbl Oily Wastewater Tank	-	-	0.01	-
LOAD1	Oily Wastewater Loading	-	-	0.01	-
FUG1	Fugitive Emissions	-	-	1.48	-
Total Emissions		**76.47**	**76.47**	**29.31**	**0.84**
Previous Emissions (Authorization No. 2014-2187-O (M-1))		**76.47**	**76.47**	**94.94**	**0.84**
Change in Emissions		**0**	**0**	**-65.63**	**0**

(1) – Includes H_2CO emissions.

SECTION VI. OKLAHOMA AIR POLLUTION CONTROL RULES REVIEW

OAC 252:100-1 (General Provisions) [Applicable]
Subchapter 1 includes definitions but there are no regulatory requirements.
OAC 252:100-2 (Incorporation by Reference) [Applicable]
This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations. These requirements are addressed in the "Federal Regulations" section.

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

OAC 252:100-5 (Registration, Emissions Inventory and Annual Fees) [Applicable]
The owner or operator of any facility that is a source of air emissions shall submit a complete emission inventory annually on forms obtained from the Air Quality Division. Required annual information (Turn-Around Document) shall be provided to Air Quality.

OAC 252:100-7 (Permits for Minor Facilities) [Applicable]
Subchapter 7 sets forth the permit application fees and the basic substantive requirements of permits for minor facilities. This project meets the conditions for a minor facility operating permit because there is no emission of any regulated pollutant of 100 TPY or more and HAP emissions do not exceed the 10/25 TPY threshold. As such, major source BACT consideration and public review are not required.

OAC 252:100-9 (Excess Emission Reporting Requirements) [Applicable]
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, and 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 turbines are subject to the requirements of this subchapter. 252:100, Appendix C specifies a PM emission limitation of 0.60 lb/MMBTU of all equipment at this facility with a heat input rating of 6.6 E-03 lb/MMBTU for

natural fired turbines. For fuel-burning equipment with a capacity between 10 and 10,000 MMBTUH, this subchapter specifies a PM emission limitation based upon the heat input of the equipment and is calculated according to the following equation:

$E = 1.042808\ X^{-0.238561}$ For Units > 10 MMBTUH but < 1,000 MMBTUH

The applicant has indicated the facility uses natural gas for all fuel-burning equipment to ensure compliance with Subchapter 19.

ID#	Equipment	Maximum Heat Input (MMBTUH)	Emissions (lb/MMBTU)	
			Appendix C	Potential
COMP1	1,200-hp Solar Saturn 10	13.20	0.56	6.6E-03
COMP2	1,200-hp Solar Saturn 10	13.20	0.56	6.6E-03
COMP3	1,200-hp Solar Saturn 10	13.20	0.56	6.6E-03

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

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

OAC 252:100-31 (Sulfur Compounds) [Applicable]
Part 2 limits the ambient air concentration of 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 combusting natural gas with a maximum H_2S content of 162 ppmv and storing condensate or sweet crude oil will be in compliance with the H_2S ambient air concentration limit. Part 5 limits sulfur dioxide emissions from new petroleum or natural gas process equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBTU heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,000 BTU/SCF, this limit corresponds to fuel sulfur content of 1,203 ppmv. Gas produced from oil and gas wells having 162 ppmv or

less total sulfur will ensure compliance with Subchapter 31. The permit requires the use of pipeline-grade natural gas or field gas with a maximum sulfur content of 162 ppmv for all fuel-burning equipment to ensure compliance with Subchapter 31.
Part 5 requires H_2S contained in the waste gas stream from any petroleum or natural gas process equipment (constructed after July 1, 1972) to be reduced by 95% by removal or by being oxidized to SO_2. This requirement does not apply if a facility's emissions of H_2S do not exceed 0.3 lb/hr, two-hour average.

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

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

OAC 252:100-37 (Volatile Organic Compounds) [Applicable]
Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia at maximum storage temperature to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The oily wastewater tank at this facility is 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 used in coating lines or operations. This facility does not normally conduct coating or painting operations except for routine maintenance of the facility and equipment. The VOC emission is less than 100 pound per day and so is exempt.
Part 7 requires fuel-burning and refuse-burning equipment to be operated to minimize emissions of VOC. The equipment at this location is subject to this requirement.
Part 7 requires all effluent water separator openings which receive water containing more than 200 gallons per day of any VOC, to be sealed or the separator to be equipped with an external floating roof or a fixed roof with an internal floating roof or a vapor recovery system. No effluent water separators are located at this facility.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]
This subchapter regulates TAC that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated anywhere in the state, there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]
This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

SECTION VII. FEDERAL REGULATORY REVIEW

NSPS, 40 CFR Part 60 [Subpart GG Applicable]
Subpart Kb, VOL Storage Vessels. This subpart regulates hydrocarbon storage tanks larger than 19,813-gallons capacity and built after July 23, 1984. The tanks at this site have a capacity less than the threshold, 19,813 gallons. Therefore, this subpart is not applicable.

Subpart GG, Stationary Gas Turbines. This subpart affects stationary gas turbines with a heat input at peak load equal to or greater than 10 MMBTUH, based on the LHV of the fuel fired which commence construction, modification, or reconstruction after October 3, 1977, but on or before February 18, 2005. The three (3) gas turbines (COMP1 through COMP3) at the facility are subject to Subpart GG. These units are subject to the nitrogen oxide emission limitations of 40 CFR 60.332(a)(2), the sulfur dioxide emission limitations of 40 CFR 60.333(a) or (b), and the fuel monitoring requirements of 40 CFR 60.334(b). However, monitoring of fuel nitrogen content shall not be required while pipeline-quality natural gas is the only fuel fired in the turbines and the owner or operator demonstrates that the gaseous fuel meets the definition of "natural gas" using one of the methods in §60.334(h)(3)(i) or (ii). §60.331 defines natural gas as containing 20 grains or less of total sulfur per 100 standard cubic feet and is either composed of at least 70 percent methane by volume or has a gross caloric value between 950 and 1,100 BTU/scf.

Subpart VV, Equipment Leas of VOC in the Synthetic Organic Chemical Manufacturing Industry (SOCMI). The equipment is not in a SOCMI plant.

Subpart KKK, Equipment Leaks of VOC from Onshore Natural Gas Processing Plants. The facility does not engage in natural gas processing.

Subpart LLL, Standards of Performance for SO_2 Emissions from Onshore Natural Gas Processing for which Construction, Reconstruction, or Modification Commenced after January 20, 1984, and on or before August 23, 2011. There is no relevant processing equipment at this facility.

Subpart IIII, Standards of Performance for Stationary Compression Ignition Combustion Engines. There are no compression ignition engines located at this facility.
Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI-ICE). This subpart promulgates emission standards for all new SI engines ordered after June 12, 2006, and all SI engines modified or reconstructed after June 12, 2006, regardless of size.

There are no SI-ICE located at this facility.

Subpart KKKK, Stationary Combustion Turbines. This subpart was proposed on February 18, 2005, and was promulgated on July 6, 2006. It affects combustion turbines with a power output at peak load of 1 MW that commence construction, modification, or reconstruction after February 18, 2005. The turbines at this facility were not constructed, modified, or reconstructed after that date and are not subject to this subpart.

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

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

(f) The group of all equipment, except compressors, within a process unit located at an onshore natural gas processing plant is an affected facility.
(g) Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.

The reciprocating compressors associated with COMP1, COMP2, and COMP3 were constructed before August 23, 2011, and are not subject to this subpart. The oily wastewater storage tank TANK1 was constructed before August 23, 2011, and is not subject to this subpart.

There are no wells or centrifugal compressors located at this facility, and the facility is not a gas plant. All pneumatic controllers have a bleed rate of less than 6 SCFH and are not subject to this subpart. There are no amine units located at this facility.

Subpart OOOOa, Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After September 18, 2015, and on or Before December 6, 2022. This subpart affects the following onshore affected facilities:

(a) Each well affected facility, which is a single well that conducts a well completion operation following hydraulic fracturing or refracturing.
(b) Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.
(c) Each reciprocating compressor affected facility, which is a single reciprocating compressor. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.
(d) Each pneumatic controller affected facility:
    (1) Each pneumatic controller affected facility not located at a natural gas processing plant, which is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 SCFH.
    (2) Each pneumatic controller affected facility located at a natural gas processing plant, which is a single continuous bleed natural gas-driven pneumatic controller.
(e) Each storage vessel affected facility, which is a single storage vessel with the potential for VOC emissions equal to or greater than 6 TPY as determined according to § 60.5365a(e).
(f) The group of all equipment within a process unit located at an onshore natural gas processing plant is an affected facility. Equipment within a process unit of an affected facility located at onshore natural gas processing plants are exempt from this subpart if they are subject to and controlled according to Subparts VVA, GGG, or GGGa.
(g) Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.
(h) Each pneumatic pump affected facility:
    (1) For natural gas processing plants, each pneumatic pump affected facility, which is a single natural gas-driven diaphragm pump.
    (2) For well sites, each pneumatic pump affected facility, which is a single natural gas-driven diaphragm pump.
(i) The collection of fugitive emissions components at a well site, as defined in § 60.5430a, is an affected facility, except as provided in § 60.5365a(i)(2).

(j) The collection of fugitive emissions components at a compressor station, as defined in § 60.5430a, is an affected facility.

There are no gas wells or natural gas-driven pneumatic controllers operating at a natural gas bleed rate greater than 6 SCFH at this facility. The reciprocating compressors associated with COMP1, COMP2, and COMP3 were constructed prior to September 18, 2015, and are not subject to this subpart. Storage vessels constructed, modified or reconstruct after September 18, 2015, with VOC emissions equal to or greater than 6 TPY after enforceable limits must reduce VOC emissions by 95.0% or greater. TANK1 was constructed prior to September 18, 2015, and is not subject. The facility was constructed before September 18, 2015; therefore, it is not subject to the fugitive emissions leak monitoring requirements of this rule.

Subpart OOOOb, Crude Oil and Natural Gas Facilities. NSPS Subpart OOOOb was signed on November 30, 2023, and published in the Federal Register on March 8, 2024. The rule became effective on May 7, 2024. NSPS Subpart OOOOb is applicable to affected facilities in the crude oil and natural gas source category that commenced construction, modification, or reconstruction on or after December 6, 2022. The facility commenced operation prior to December 6, 2022, and with no subsequent modifications or reconstructed after the applicability date. Therefore, the facility is not subject to the subpart.

NESHAP, 40 CFR Part 61 [Not Applicable]
There are no emissions of any of the pollutants subject to 40 CFR 61 (arsenic, asbestos, radionuclides, coke oven emissions, mercury, beryllium, vinyl chloride, and benzene) except for benzene. Subpart J affects process streams, which contain more than 10% benzene by weight. Benzene is present only in trace amounts in any product stream in this facility.

NESHAP, 40 CFR Part 63 [Not Applicable]
Subpart HH, Oil and Natural Gas Production Facilities. This subpart applies to affected sources that are located at facilities which are major and area sources of HAP. This facility is an area source of HAP emissions. There is no relevant equipment at this facility.
Subpart YYYY, Combustion Turbines. This subpart was promulgated on March 5, 2004, and would affect turbines that are a major source for HAP emissions such as formaldehyde, toluene, benzene, and acetaldehyde. The stationary combustion turbine category is divided into eight subcategories, including lean premix gas-fired turbines, diffusion flame gas-fired turbines, diffusion flame oil-fired turbines, emergency turbines, turbines with a rated peak power output of less than 1.0 megawatt (MW), turbines burning landfill or digester gas, and turbines located on the North Slope of Alaska. This facility is not a major source of HAP emissions.
Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart affects any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions. There is no relevant equipment at this facility.
Subpart JJJJJJ, Industrial, Commercial, and Institutional Boilers. This subpart affects new and existing boilers located at area sources of HAP, except for gas-fired boilers. Boiler means an enclosed device using controlled flame combustion in which water is heated to recover thermal energy in the form of steam or hot water. There are no boilers located at this facility.

SECTION VIII. COMPLIANCE

TIER CLASSIFICATION AND PUBLIC REVIEW

This application has been determined to be **Tier I** based on the request for a modification of a minor operating permit that did not undergo the FESOP Enhanced NSR Process.

The draft permit underwent public notice on the DEQ's web site as required in OAC 252:4-7-13(g). The public, tribal governments, and the EPA will have 30 days to comment on the draft permit.

The applicant has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant has a current lease given to accomplish the permitted purpose.

FEES PAID

A fee of $750 for the operating permit has been paid. The fee for the Operating Permit was received on July 12, 2024.

INSPECTION

An inspection was determined to not be necessary as part of this review.

COMPLIANCE

There are no active Air Compliance or enforcement issues concerning this facility.

SECTION IX. SUMMARY

The facility was constructed as described in the permit application. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues that would prevent issuance of the permit. Issuance of the operating permit is recommended.

DRAFT

PERMIT TO OPERATE
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS

Enable Oklahoma Intrastate Transmission, LLC **FESOP No. 2024-0504-O**
Boiling Springs Compressor Station

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on June 12, 2024. The Evaluation Memorandum dated June 20, 2025 explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein:

1. Points of emissions and emission limitations for each point:

ID#	Source	NOx		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
COMP1	1,200-hp Solar Saturn 10	5.82	25.49	5.82	25.49	2.12	9.27(1)
COMP2	1,200-hp Solar Saturn 10	5.82	25.49	5.82	25.49	2.12	9.27(1)
COMP3	1,200-hp Solar Saturn 10	5.82	25.49	5.82	25.49	2.12	9.27(1)
TANK1	400-bbl Oily Wastewater Tank	-	-	-	-	-	0.01
LOAD1	Oily Wastewater Loading		-		-	-	0.01

(1) – Includes H_2CO emissions.

2. The fuel-burning equipment shall be fired with pipeline grade natural gas or other gaseous fuel with 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, etc. Compliance shall be demonstrated at least once every calendar year.

3. The permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year, 8,760 hours).

4. The turbines at the facility shall have permanent identification plates attached, which show the make, model number, and serial numbers.

5. The permittee shall conduct an initial test of NO_X and CO emissions from any engine listed in S.C. #1 or any replacement engine; other than (1) an Emergency Use Engine (i.e., any engine that drives an emergency power generator, peaking power 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.

6. At least twice per calendar year, the permittee shall conduct tests of NOX and CO emissions from any controlled engine greater than 250 hp. 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 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.

7. Replacement of any equipment with emissions specified in this permit are authorized under OAC 252:100-7-15(a)(2)(C), provided the replacement unit does not require a change in any emission limit and the owner or operator notifies the DEQ in writing within fifteen (15) days of the startup of the replacement unit. The replacement unit shall meet the definition under OAC 252:100-7-1.1. 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.

8. The storage tank shall be bottom filled or operated with submerged fill pipes.

9. The permittee shall comply with all applicable requirements of the NPSP for Standards of Performance for Stationary Gas Turbines, Subpart GG, for each affected turbine including but not limited to the following:

   a. 60.330 – Applicability and designation of affected facility.
   b. 60.332 – Standard for nitrogen oxides.
   c. 60.333 – Standard for sulfur dioxide.
   d. 60.334 – Monitoring of operations.
   e. 60.335 – Test methods and procedures.

10. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site or at a local field office for at least five years after the date of recording and shall be provided to regulatory personnel upon request.

    a. Periodic testing for NOx and CO emissions for each turbine.
    b. For the fuel(s) burned, maintain the appropriate document(s) as specified in Specific Condition No. 2.
    c. Records required under NSPS 40 CFR Part 60, Subpart GG.

11. Upon issuance, FESOP No. 2024-0504-O replaces and supersedes all previous Air Quality authorizations and/or permits issued to this facility, which are now cancelled

DRAFT

PERMIT

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

FESOP No. 2024-0504-O

Enable Oklahoma Interstate Transmission LLC,

having complied with the requirements of the law, is hereby granted permission to operate the Boiling Springs Compressor Station located in Section 21, Township 5N, Range 18E, Grady County, Oklahoma, and subject to the standard conditions dated February 13, 2020, and specific conditions, both attached.

DRAFT

Lee Warden, P.E.
Permits and Engineering Group Manager

Issuance Date

Robert Singletary
Executive Director

OKLAHOMA Environmental Quality

Kevin Stitt
Governor

Enable Oklahoma Intrastate Transmission, LLC
Attn.: Brian De Luca
P.O. Box 24300, MC LS700
Oklahoma City, OK 73124

SUBJECT: FESOP No. **2024-0504-O**
Boiling Springs Compressor Station
Facility ID No. 486
Section 21, Township 5N, Range 18E, Latimer County, Oklahoma

Dear Mr. De Luca:

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

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

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me at Taylor.Maxwell@deq.ok.gov, or (405) 702-4209.

Sincerely,

Taylor Maxwell

Taylor Maxwell, E.I.
Existing Source Permits Section
AIR QUALITY DIVISION

Robert Singletary
Executive Director

OKLAHOMA Environmental Quality

Kevin Stitt
Governor

Date: June 16, 2025

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

Re: Permit Application No. 2024-0504-O
Enable Oklahoma Intrastate Transmission, LLC, Boiling Springs Compressor Station,
Facility ID No. 486
Latitude: 34.89480°N, Longitude: 95.40966°W
Section 21, Township 5N, Range 18E, Latimer County, Oklahoma
Latimer County
Date Received: June 12, 2024

Dear Chief Batton:

The Oklahoma Department of Environmental Quality (ODEQ), Air Quality Division (AQD), has received the Tier I application referenced above. A Tier I application requires AQD to provide a 30-day public comment period on the draft Tier I permit on the ODEQ website. Since the proposed project falls within your Tribal jurisdiction, AQD is providing this direct notice. This letter notification is in addition to email notifications provided to tribal contacts on record.

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

https://www.deq.ok.gov/permits-for-public-review/

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

Department of Environmental Quality, Air Quality Division
Attn: Phillip Fielder, Chief Engineer
P.O. Box 1677
Oklahoma City, OK, 73101-1677

Thank you for your cooperation. If you have any questions, I can be contacted at (405) 702-4237 and Mr. Fielder may be reached at (405) 702-4185.

Sincerely,

Lee Warden, P.E.
Permits and Engineering Group Manager
AIR QUALITY DIVISION

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
11-21-2024

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
AVO	Audio, Visual, or Olfactory
BACT	Best Available Control Technology
BAE	Baseline Actual Emissions
BBL	Barrel(s)
BHP	Brake Horsepower (bhp)
BTEX	Benzene, Toluene, Ethylbenzene, Xylene
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
FEL	Federally Enforceable Limit(s)
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)
LPE	Legally and Practicably Enforceable
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
OGI	Optical Gas Imaging
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

MINOR SOURCE PERMIT TO OPERATE / CONSTRUCT
AIR POLLUTION CONTROL FACILITY
STANDARD CONDITIONS
(February 13, 2020)

A. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ) in accordance with and under the authority of the Oklahoma Clean Air Act. The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. This specifically includes compliance with the rules of the other Divisions of DEQ: Land Protection Division and Water Quality Division.

B. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-7-15(g)) 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 252:100-7-15(f)]

C. 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 252:100-7-18(a)]

D. Unless specified otherwise, the term of an operating permit shall be unlimited.

E. Notification to the Air Quality Division of DEQ of the sale or transfer of ownership of this facility is required and shall be made in writing by the transferor within 30 days after such date. A new permit is not required. [OAC 252:100-7-2(f)]

F. The following limitations apply to the facility unless covered in the Specific Conditions:

1. No person shall cause or permit the discharge of emissions such that National Ambient Air Quality Standards (NAAQS) are exceeded on land outside the permitted facility. [OAC 252:100-3]
2. All facilities that emit air contaminants are required to file an emission inventory and pay annual operating fees based on the inventory. Instructions are available on the Air Quality section of the DEQ web page. www.deq.ok.gov [OAC 252:100-5]
3. 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 252:100-9]
4. 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]
5. No particulate emissions from new fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lbs/MMBTU. [OAC 252:100-19]
6. 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. [OAC 252:100-25]
7. 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]

8. No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lbs/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
9. 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 an organic material vapor-recovery system. [OAC 252:100-37-15(b)]
10. 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]

G. Any owner or operator subject to provisions of NSPS shall provide written notification as follows: [40 CFR 60.7 (a)]

1. A notification of the date construction (or reconstruction as defined under §60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.
2. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in §60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.
3. A notification of the actual date of initial start-up of an affected facility postmarked within 15 days after such date.
4. If a continuous emission monitoring system is included in the construction, a notification of the date upon which the test demonstrating the system performance will commence, along with a pretest plan, postmarked no less than 30 days prior to such a date.

H. Any owner or operator subject to provisions of NSPS shall maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility or any malfunction of the air pollution control equipment. [40 CFR 60.7 (b)]

I. Any owner or operator subject to the provisions of NSPS shall maintain a file of all measurements and other information required by this subpart recorded in a permanent file suitable for inspection. This file shall be retained for at least five years following the date of such measurements, maintenance, and records. [40 CFR 60.7 (f)]

J. Any owner or operator subject to the provisions of NSPS shall conduct performance test(s) and furnish to AQD a written report of the results of such test(s). Test(s) shall be conducted within 60 days after achieving the maximum production rate at which the facility will be operated, but not later than 180 days after initial start-up. [40 CFR 60.8]