

DRAFT

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

MEMORANDUM

June 29, 2016

TO: Phillip Fielder, P.E., Permits and Engineering Group Manager,
Air Quality Division

THROUGH: Rick Groshong, Environmental Manager, Compliance and Enforcement

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

THROUGH: Peer Review

FROM: Kyle Walker, E.I., Engineering Section

SUBJECT: Evaluation of Permit Application No. **2016-0608-TVR** **DRAFT**
Enable Gas Gathering, LLC
Parker Compressor Station
Facility ID: 6848
Section 1, Township 2N, Range 11E; Coalgate, Coal County
Latitude 34.677°N, Longitude 96.109°W
Driving Directions: From the junction of SH-31 and SH-131, northeast of
Coalgate, follow SH-31 approx 6.5 miles north, turn onto county road and
drive 2 miles east and 0.25 miles south. Site is on the east side of road.

SECTION I. INTRODUCTION

Enable Gas Gathering, LLC (Enable) has requested a Title V renewal permit for the Parker Compressor Station. The facility is operating under Permit No. 2011-651-TV (M-2), issued September 10, 2013. The facility consists of four compressor engines, three condensate tanks, one glycol dehydration unit, one glycol reboiler, one amine treater, one flare, one hot oil heater, and various support operations. The Parker Compressor Station is collocated with the Salt Creek Compressor Station and both facilities require Title V permits. The Salt Creek Compressor Station is owned and operated by XTO Energy, Inc. (XTO). The Salt Creek Compressor Station utilizes the glycol dehydrator and amine treater at the Parker Compressor Station. The Salt Creek Compressor Station is currently operating under Permit No. 2012-1221-TV (M-1) issued December 23, 2015. NO_x and CO emissions from the collocated facilities exceed major source thresholds, but do not trigger PSD requirements.

SECTION II. PARKER COMPRESSOR STATION FACILITY DESCRIPTION

The facility is a natural gas gathering compressor station responsible for the compression of natural gas into a pipeline. Natural gas dehydration, amine treatment, and storage of condensate occur on-site as well. Natural gas is transported to the facility via a pipeline gathering system.

The gas stream enters the facility through an inlet separator where water and condensate are removed from the inlet stream. The gas stream is compressed by four Caterpillar 3516TALE natural gas-fired compressor engines (COMP1, COMP2, COMP3, and COMP4) rated at 1,340-hp each. Each compressor engine is equipped with an oxidation catalyst (w/OC). The inlet gas and the gas stream from XTO’s Salt Creek Compressor Station then enter the amine treater.

The amine treater is used to remove carbon dioxide (CO₂) from the gas stream. In the amine gas treating process, gas passes through a contactor vessel where CO₂ is absorbed by the amine solution. The “rich” amine solution is then flashed, filtered, and regenerated in the reboiler. There is a single 16.7 MMBtu/hr gas-fired heater (HEAT2) for regeneration of the hot oil, which is utilized as the heat source in the amine treater. Emissions from the amine treater still vent are combusted in the flare (FLARE1). After the gas passes through the amine treater the gas enters the glycol dehydrator before exiting the facility via pipeline.

The glycol dehydrator is used to remove water from the gas before the gas exits the facility. In the dehydration process gas passes through the contactor vessel where water is absorbed by the glycol. The “rich” glycol containing water goes to the triethylene glycol (TEG) reboiler where heat is used to boil off the water. The heat to the reboiler is supplied by a 2.0 MMBtu/hr burner which exhausts to the atmosphere (HEAT1). The dehydrator still vent (DEHY1) is equipped with a condenser. The off-gasses from the condenser are routed to the reboiler firebox. The reboiler firebox acts as a BTEX eliminator to reduce VOC and hazardous air pollutant (HAP) emissions. The BTEX eliminator is the reboiler with a constant fire or glow plug in the reboiler exhaust vent to control emissions from the glycol unit with 95% efficiency. The glycol unit is equipped with a flash tank. Flash tank off-gases are routed to the station inlet or the reboiler fuel system resulting in 98% control of flash tank emissions. This allows for operational flexibility to reduce fuel costs during operation of the burner. The fuel system is regulated by a thermostat that when it reaches its set point (specific temp) it automatically closes the fuel valve into the reboiler. Therefore, when the burner is not in operation only the continuous pilot is active and the fuel gas is shutoff. During this time the flash tank off-gases are sent to the inlet. At no time are the off-gases vented directly to atmosphere (notwithstanding a malfunction that could result in an excess emissions event). If the reboiler burner is operating and the fuel gas system piping has the least pressure, then the off-gases will be utilized for fuel. If the reboiler burner is off, then the fuel valve will be closed creating backpressure which in turn will cause the off-gases to go into the inlet.

SECTION III. A. PARKER COMPRESSOR STATION EQUIPMENT

EUG-1 Compressor Engines

EU	Point	Description	HP	Serial #	Construction Date
COMP1	COMP1	Caterpillar 3516TALE w/OC	1,340	WPW02145	2/18/2010
COMP2	COMP2	Caterpillar 3516TALE w/OC	1,340	WPW02148	2/18/2010
COMP3	COMP3	Caterpillar 3516TALE w/OC	1,340	WPW02483	3/29/2010
COMP4	COMP4	Caterpillar 3516TALE w/OC	1,340	WPW02486	3/29/2010

EUG-2A Still Vent

EU	Point	Description	Construction Date
DEHY1	DEHY1	Glycol Dehydration Unit Still Vent with condenser and BTEX eliminator	2011

EUG-2B Amine Unit Still Vent and Flare

EU	Point	Description	Construction Date
FLARE1	FLARE1	Amine Unit Still Vent and Facility Flare	2011

EUG-3A Hot Oil Heater

EU	Point	Description	MMBTUH	Construction Date
HEAT2	HEAT2	Hot Oil Heater	16.7	2011

EUG-3B Regeneration Heater

EU	Point	Description	MMBTUH	Construction Date
HEAT1	HEAT1	Glycol Dehydrator Reboiler	2.0	2011

EUG-4 Insignificant Storage Tanks

EU	Point	Description	Capacity (gallons)	Construction Date
TANK1	TANK1	Condensate Tank	16,800	2010
TANK2	TANK2	Condensate Tank	16,800	2010
TANK3	TANK3	Condensate Tank	16,800	2010
TANK4	TANK4	Distilled Water	8,820	2011
TANK5	TANK5	Distilled Water	8,820	2011
TANK6	TANK6	Amine Tank	2,100	2011
TANK7	TANK7	Amine Run-Down Tank	2,100	2011
TANK8	TANK8	TEG Glycol Tank	500	2011
TANK9	TANK9	Amine Relief Valve Tank	500	2011
TANK10	TANK10	Lube Oil Tank	500	2010
TANK11	TANK11	Lube Oil Tank	500	2010
TANK12	TANK12	Used Oil Tank	500	2010
TANK13	TANK13	Antifreeze Tank	500	2010
TANK14	TANK14	Used Antifreeze Tank	500	2010

EUG-5 Condensate Loading and Fugitives

EU	Point	Equipment	Construction Date
LOAD1	LOAD1	Condensate Truck Loading	n/a
FUG1	FUG1	Process Piping Fugitives	n/a

SECTION III. B. SALT CREEK COMPRESSOR STATION EQUIPMENT

EUG-1 Compressor Engines

EU	Point	Description	HP	Serial #	Manufacture Date
C1	C1	Caterpillar 3606 LE w/OC	1,775	4ZS01105	01/05/2009
C2	C2	Caterpillar 3606 LE w/OC	1,775	4ZS01075	11/13/2008
C3	C3	Caterpillar 3606 LE w/OC	1,775	4ZS01082	12/01/2008
C4	C4	Caterpillar 3606 LE w/OC	1,775	4ZS01091	01/06/2009

w/OC = with oxidative catalyst

EUG-2 Condensate Storage Tanks

EU	Point	Description	Capacity (gallons)
T1	T1	Condensate Tank	12,600
T2	T2	Condensate Tank	12,600
T3	T3	Condensate Tank	12,600

EUG-3 Insignificant Activities

EU	Point	Description	Capacity
V1	V1	Glycol Dehydration Unit Still Vent	6 MMSCFD
H1	H1	Glycol Dehydrator Reboiler	0.125 MMBTUH
L1	L1	Condensate Truck Loading	Not Applicable
FUG	FUG	Process Piping Fugitives	Not Applicable

SECTION IV. A. PARKER COMPRESSOR STATION EMISSIONS

Emissions estimates for the compressor engines are based on continuous operation and manufacturer’s data. Oxidation catalysts have control efficiencies of 70% for CO, 50% for VOC, and 70% for formaldehyde.

Engine Emission Factors

Engine Specification	NOx g/hp-hr	CO g/hp-hr	VOC g/hp-hr	HCHO g/hp-hr
Caterpillar 3516TALE w/OC	2.00	0.90	0.25	0.084
Caterpillar 3516TALE w/OC	2.00	0.90	0.25	0.084
Caterpillar 3516TALE w/OC	2.00	0.90	0.25	0.084
Caterpillar 3516TALE w/OC	2.00	0.90	0.25	0.084

Engine Stack Parameters

Point	Height (feet)	Diameter (feet)	Flow (ACFM)	Temperature (°F)
COMP1	20.0	1.0	8,002	877
COMP2	20.0	1.0	8,002	877
COMP3	20.0	1.0	8,002	877
COMP4	20.0	1.0	8,002	877

Hot oil heater and glycol dehydrator reboiler combustion emissions are based on AP-42 (7/98), Section 1.4, Tables 1.4-1 through 1.4-3.

Glycol dehydrator vent emissions are based on the GRI-GLYCalc program using extended gas analysis data, a gas throughput of 60 MMSCFD, a maximum glycol pump recirculation of 18.8 gpm, and 95% destruction efficiency for use of the condenser and BTEX eliminator. Flash tank off-gases are routed to the station inlet or the reboiler fuel system resulting in 98% control of flash tank emissions. Annual emissions were based on continuous operation.

Fugitive VOC emissions are based on EPA’s 1995 Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017) and an estimated number of components and VOC content.

Fugitive Emissions

Equipment	Type of Service	Number of Items	VOC %	Emission Factor, lb/hr/source	VOC Emissions	
					lb/hr	TPY
Valves	Gas/Vapor	200	1.12	0.00992	0.02	0.10
Flanges	Gas/Vapor	220	1.12	0.00086	0.002	0.01
Compressor Seals	Gas/Vapor	80	1.12	0.0194	0.02	0.08
Relief Devices	Gas/Vapor	50	1.12	0.0194	0.01	0.05
Valves	Light Liquid	20	100	0.0055	0.11	0.48
Flanges	Light Liquid	22	100	0.0002	0.01	0.02
Pump Seals	Light Liquid	12	100	0.0287	0.34	1.51
Relief Valves	Light Liquid	10	100	0.0165	0.17	0.72
Total		614			0.68	2.97

Loading emissions are based on AP-42 (6/08), Chapter 5.2, using a condensate throughput of 1,200 bbl/year, molecular weight of 66, and a vapor pressure of 6.02 psia.

Emissions from storage tanks were estimated using the EPA software TANKS4.09 using a total condensate throughput of 1,200 bbl/year, molecular weight of 66, and an average vapor pressure of 5.39 psia. Flash emissions were calculated using the Vazquez-Beggs correlation using a stock tank API gravity of 60 and default parameters.

Amine treater emissions are based on extended gas analysis data, gas throughput of 60 MMSCFD, 4 ppm H₂S concentration, and a control efficiency of 50% for CO₂ and 100% efficiency for H₂S. However, Enable utilized a “worst-case” value of 4ppm H₂S to establish emissions limits. Gas analysis results demonstrate the actual H₂S content is 3ppm. Controlled

emissions for VOC, SO₂, H₂S, and HAP are based on pilot feed rate, emissions routed to the flare from the amine unit, and 8,760 hours of operation. Flare emissions are based on mass balance calculations, extended gas analysis data, maximum natural gas throughput, and a control efficiency of 98% for VOCs and HAPs. NO_x and CO emissions are based on AP-42 emission factors from Table 13.5-1 for industrial flares and a maximum heating value of 12.4 MMBTUH. The emission factor for SO₂ is based on the molecular weight ratio of SO₂ to H₂S and a 98% conversion of H₂S to SO₂. It is conservatively assumed that the remaining 2% is emitted as H₂S.

Parker Compressor Station Proposed Criteria Pollutant Emissions

Source	NO _x		CO		VOC		SO ₂	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Caterpillar 3516 TALE (COMP1) w/OC	5.91	25.88	2.66	11.65	0.74	3.23	0.01	0.03
Caterpillar 3516 TALE (COMP2) w/OC	5.91	25.88	2.66	11.65	0.74	3.23	0.01	0.03
Caterpillar 3516 TALE (COMP3) w/OC	5.91	25.88	2.66	11.65	0.74	3.23	0.01	0.03
Caterpillar 3516 TALE (COMP4) w/OC	5.91	25.88	2.66	11.65	0.74	3.23	0.01	0.03
Glycol Dehydrator Vent (DEHY1)	--	--	--	--	0.60	2.62	--	--
2.0 MMBTUH Reboiler (HEAT1)	0.20	0.86	0.16	0.72	0.01	0.05	0.001	0.01
Amine Unit Still Vent and Facility Flare (FLARE1)	0.84	3.68	4.57	20.03	0.13	0.56	1.66	7.24
16.7 MMBTUH Hot Oil Heater (HEAT2)	1.64	7.17	1.38	6.02	0.09	0.39	0.01	0.04
(3) 400-bbl Cond. Tanks (TANKS)*	--	--	--	--	--	4.95	--	--
Condensate Truck Loading (LOAD1)	--	--	--	--	--	0.14	--	--
Process Piping Fugitives (FUG1)	--	--	--	--	0.68	2.97	--	--
Totals	26.32	115.23	16.75	73.37	4.74	24.60	1.71	7.41

* Condensate tank emissions include working, breathing, and flash emissions

Parker Compressor Station Engine Formaldehyde Emissions

EU	Description	Emission Factor g/hp-hr	Formaldehyde	
			lb/hr	TPY
COMP1	Caterpillar 3516TALE with oxidation catalyst	0.084	0.25	1.09
COMP2	Caterpillar 3516TALE with oxidation catalyst	0.084	0.25	1.09
COMP3	Caterpillar 3516TALE with oxidation catalyst	0.084	0.25	1.09
COMP4	Caterpillar 3516TALE with oxidation catalyst	0.084	0.25	1.09
Totals			1.00	4.36

HAP Emissions from Dehydration Unit

The dehydration unit using a glycol desiccant emits benzene, toluene, ethyl benzene, xylenes (BTEX) and n-hexane from the glycol reboiler vapor stack. These compounds are regulated as HAP. The applicant performed a gas analysis for the concentration of BTEX and n-hexane for the TEG glycol dehydrator inlet gas. The glycol unit emissions were calculated using GLYCalc 4.0 based on a maximum gas throughput of 60 MMSCFD, a maximum glycol circulation rate of 18.8 gpm. Emissions from the glycol still vent are routed through a condenser with non-condensables routed the reboiler firebox BTEX eliminator. Flash tank off gases not used as fuel by the reboiler are routed to the facility inlet for compression. HAP emissions from the condenser are controlled with 95% efficiency. HAP emissions from the flash tank are controlled

with 98% efficiency. HAP emissions from the condenser and flash tank include a 100% safety factor. The following table lists estimates of HAP from the condenser and the flash tank.

Parker HAP Emissions from the Facility Flare and TEG Dehydration Unit

HAP	CAS #	Emissions	
		lb/hr	TPY
Benzene	71432	0.03	0.13
Toluene	108883	0.08	0.34
Ethylbenzene	100414	0.00	0.00
Xylenes	1330207	0.07	0.29
n-Hexane	110543	0.02	0.10
Totals		0.20	0.86

Since emissions of each HAP is less than 10 TPY and total HAP are less than 25 TPY the facility is an area source of HAP.

SECTION IV. B. SALT CREEK COMPRESSOR STATION EMISSIONS

Salt Creek Compressor Station Criteria Pollutant Emissions

Source	NOx		CO		VOC	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Caterpillar 3606 LE (C1) w/OC	2.74	12.00	1.96	8.57	1.17	5.14
Caterpillar 3606 LE (C2) w/OC	2.74	12.00	1.96	8.57	1.17	5.14
Caterpillar 3606 LE (C3) w/OC	2.74	12.00	1.96	8.57	1.17	5.14
Caterpillar 3606 LE (C4) w/OC	2.74	12.00	1.96	8.57	1.17	5.14
0.125 MMBTUH Glycol Reboiler (H1)	0.01	0.06	0.01	0.05	<0.01	<0.01
Glycol Dehydrator Vent (V1)	--	--	--	--	0.02	0.09
(3) 300-bbl Cond. Tanks (T1, T2, & T3)*	--	--	--	--	--	15.69
Condensate Truck Loading (L1)	--	--	--	--	--	2.42
Process Piping Fugitives (F1)	--	--	--	--	0.58	2.56
Total	10.97	48.06	7.85	34.33	5.29	41.33

* Condensate tank emissions include working, breathing, and flash emissions

Salt Creek Compressor Station Formaldehyde Emissions

EU	Description	Emission Factor g/hp-hr	Formaldehyde	
			lb/hr	TPY
C1	Caterpillar 3606 LE (C1) with oxidation catalyst	0.04	0.16	0.69
C2	Caterpillar 3606 LE (C2) with oxidation catalyst	0.04	0.16	0.69
C3	Caterpillar 3606 LE (C3) with oxidation catalyst	0.04	0.16	0.69
C4	Caterpillar 3606 LE (C4) with oxidation catalyst	0.04	0.16	0.69
Totals			0.63	2.74

XTO states there is no n-Hexane, Benzene, Toluene, Ethylbenzene, or Xylene in the gas stream at the Salt Creek Compressor Station based on an extended gas analysis.

SECTION IV. C. COMBINED COLLOCATED FACILITIES EMISSIONS

Combined Parker and Salt Creek Compressor Stations Facility-Wide Emissions

Facility	NOx		CO		VOC		HCHO	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Parker Compressor Station	26.32	115.23	16.75	73.37	--	24.60	1.00	4.36
Salt Creek Compressor Station	10.97	48.06	7.85	34.33	--	41.33	0.63	2.74
Totals	37.29	163.29	24.60	107.70	--	65.93	1.63	7.10

SECTION V. PARKER COMPRESSOR STATION INSIGNIFICANT ACTIVITIES

The insignificant activities identified and justified in the application are duplicated below. Records are available to confirm the insignificance of the activities. Appropriate recordkeeping of activities indicated below with “*” is specified in the Specific Conditions.

1. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas). The facility currently contains a 2.00 MMBTUH glycol reboiler.
2. *Activities having the potential to emit no more than 5 TPY of any criteria pollutant. The condensate tanks, piping fugitives, and condensate truck loading operations are in this category.
3. *Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature.
4. *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.
5. *Emissions from fuel storage/dispensing equipment operated solely for facility owned vehicles if fuel throughput is not more than 2,175 gallons per day, averaged over a 30-day period.
6. Emissions from crude oil and condensate marine and truck loading equipment operations at crude oil and natural gas production sites where the loading rate does not exceed 10,000 gallons per day averaged over a 30-day period.
7. Cold degreasing operations utilizing solvents that are denser than air.

Enable may install and operate other insignificant activities as authorized under OAC 252:100 Appendix I.

SECTION VI. OKLAHOMA AIR POLLUTION CONTROL RULES

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

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

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

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

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 refer to those individual emission units either listed in Appendix I or whose actual calendar year emissions do not exceed the following limits.

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

Emission limitations for all the sources are taken from the permit application and previous permit.

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 affirmative defense, 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 (PM)) [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. Appendix C specifies a PM emission limitation for fuel-burning equipment based on heat input rating. The following table compares the applicable limits to expected PM emissions. The equipment at this facility is in compliance with the requirements of this subchapter.

Fuel Burning Equipment PM Emissions

Unit	Heat Input Capacity	PM Emission Limit	PM Emission Rate
COMP1	11.4 MMBTUH	0.58 lb/MMBTU	0.0099 lb/MMBTU
COMP2	11.4 MMBTUH	0.58 lb/MMBTU	0.0099 lb/MMBTU
COMP3	11.4 MMBTUH	0.58 lb/MMBTU	0.0099 lb/MMBTU
COMP4	11.4 MMBTUH	0.58 lb/MMBTU	0.0099 lb/MMBTU
HEAT2	2.0 MMBTUH	0.60 lb/MMBTU	0.0076 lb/MMBTU
HEAT1	16.7 MMBTUH	0.53 lb/MMBTU	0.0076 lb/MMBTU

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 very little possibility of exceeding these standards.

OAC 252:100-29 (Fugitive Dust) [Applicable]
 No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originated 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 to interfere with the maintenance of air quality standards. Under normal operating conditions, this facility has negligible potential to violate this requirement; 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 impact of hydrogen sulfide (H₂S) emissions from any new or existing source. Amine units processing natural gas or natural gas liquids from inlet gases containing less than 4 ppmv H₂S have been shown to have impacts below the ambient standards in OAC 252:100-31-7. When emissions are controlled using a flare with 95% control efficiency or greater, no additional specific requirements to limit H₂S or SO₂ emissions from amine units at a facility which process natural gas containing less than 4 ppmv H₂S are necessary. The amine unit is required to oxidize the amine unit emissions with at least 98% efficiency. SO₂ emissions for reciprocating internal combustion engines and heaters have been modeled to develop sulfur fuel content limitations that are compliant with OAC 252:100-31-7 requirements. Modeling results demonstrate reciprocating internal combustion engines and heaters combusting fuel with a sulfur content less than 162 ppmv are in compliance with the ambient air concentration limit. The permit requires the facility to use natural gas fuel with a sulfur content less than 162 ppmv in fuel burning equipment.
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 343 ppmv to ensure compliance with Subchapter 31.
Part 5 requires removal or oxidation of H₂S from the exhaust gas of any new petroleum or natural gas process equipment. This part allows direct oxidation of H₂S to SO₂, without sulfur recovery,

when the exhaust gas will contain no more than 100 lbs/hr SO₂ (2-hour average). Compliance with the 100 lb/hr can be demonstrated by establishing that the acid gas stream contains 0.54 long tons per day (LTD) of sulfur or less. The facility emits 0.02 LTD of sulfur based on 60 MMSCFD gas throughput with 4 ppm sulfur compound concentration. Oxidation of the H₂S must be conducted in a system that assures at least a 95% reduction of the H₂S in the exhaust gases and that is equipped with an alarm system to signal non-combustion of the exhaust gases. These requirements do not apply if H₂S emissions do not exceed 0.3 lb/hr. All emissions from the amine unit's still vent are vented to the acid gas flare for conversion of H₂S to SO₂ at an estimated efficiency of 98%. The permit limits the amine unit to 4 ppmv with a maximum throughput of 60 MMSCFD. All applicable requirements have been incorporated into the permit.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]

This subchapter limits new gas-fired fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.20 lbs of NO_x per MMBTU, three-hour average. 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) [Part 3 and 7 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. This affects condensate storage. The vapor pressure of glycol and lube oil less than 1.5 psia, therefore, Part 3 does not apply to those tanks. Any tanks, with a capacity of 400 gallons or more, storing a VOC with a vapor pressure greater than 1.5 psia shall have a submerged fill pipe to comply with Part 3. Part 5 limits the VOC content of coating used in coating lines or operations. This facility will not normally conduct coating or painting operations except for routine maintenance of the facility and equipment, which is exempt.

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

Part 7 also regulates effluent water separators that receive water containing more than 200 gallons per day of VOC. All access hatches and other openings are required to be closed and sealed. There is no oil-water separator on location.

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

This subchapter regulates toxic air contaminants (TAC) that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a

modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

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

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

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

OAC 252:100-11	Alternative Reduction	not eligible
OAC 252:100-15	Mobile Sources	not in source category
OAC 252:100-17	Incinerators	not type of emission unit
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Feed & Grain Facility	not in source category
OAC 252:100-39	Nonattainment Areas	not in a subject area
OAC 252:100-47	Landfills	not type of source category

SECTION VII. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Not Applicable]

Total potential emissions of NO_x and CO are less than the significance level of 250 TPY, and the facility is not among the 26 specific industries defined as major sources at an emission level of 100 TPY.

NSPS, 40 CFR Part 60 [Subpart JJJJ Applicable]

Subpart Kb, VOL Storage Vessels. This subpart regulates hydrocarbon storage tanks larger than 19,813 gallons capacity and built after July 23, 1984. There are no tanks larger than the threshold of applicability.

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

Subpart VV, Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry. The equipment is not in a SOCOMI plant.

Subpart KKK, Equipment Leaks of VOC from Onshore Natural Gas Processing Plants. This site does not engage in extraction of natural gas liquids or fractionation of natural gas liquids.

Subpart LLL, Onshore Natural Gas Processing: SO₂ Emissions. This subpart affects sweetening units and sweetening units followed by a sulfur recovery unit which commence construction or modification after January 20, 1984. Acid/Sour gas is defined as gas with an H₂S content greater than 4 ppmv. An extended gas analysis showed that the inlet gas contains less than 4 ppmv H₂S content. This facility only treats sweet natural gas. The permit establishes an H₂S limit of 4 ppmv. Therefore, this facility is not subject to Subpart LLL.

Subpart IIII, Stationary Compression Ignition Internal Combustion Engines. This subpart affects stationary compression ignition (CI) internal combustion engines (ICE) based on power and displacement ratings, depending on date of construction, beginning with those constructed after July 11, 2005. There are no compression ignition engines at this facility.

Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI-ICE), promulgates emission standards for all new SI engines ordered after June 12, 2006, and all SI engines modified or reconstructed after June 12, 2006, regardless of size. The specific emission standards (either in g/hp-hr or as a concentration limit) vary based on engine class, engine power rating, lean-burn or rich-burn, fuel type, duty (emergency or non-emergency), and numerous manufacture dates. Engine manufacturers are required to certify certain engines to meet the emission standards and may voluntarily certify other engines. An initial notification is required only for owners and operators of engines greater than 500 HP that are non-certified. Emergency engines will be required to be equipped with a non-resettable hour meter and are limited to 100 hours per year of operation excluding use in an emergency (the length of operation and the reason the engine was in operation must be recorded). Any proposed engine ordered after June 12, 2006 and manufactured after July 1, 2007 (for an engine more than 1,350-hp) or after January 1, 2008 (for an engine less than 1,350 HP) will be subject to this subpart. The four 1,340-hp Caterpillar 3516TALE engines in this permit were manufactured after January 1, 2008 and are subject to this subpart.

Subpart OOOO, Crude Oil and Natural Gas Production, Transmission, and Distribution. This subpart was promulgated on August 16, 2012, and per §60.5365 affects the following onshore affected facilities that commence construction, reconstruction, or modification after August 23, 2011:

1. Each gas well affected facility, which is a single natural gas well.
2. 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.
3. 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.
4. Each pneumatic controller affected facility, which is:
 - a. For the oil production segment (between the wellhead and the point of custody transfer to an oil pipeline): a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 SCFH.
 - b. 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.
- c. For natural gas processing plants: a single continuous bleed natural gas-driven pneumatic controller.
5. 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. On April 12, 2013, EPA proposed revisions to NSPS, Subpart OOOO revising the affected facilities to only those storage vessels that emit more than 6 TPY and revising the definition to only include those storage vessels that contain crude oil, condensate, intermediate hydrocarbon liquids, or produced water.
 6. The group of all equipment, except compressors, within a process unit is an affected facility.
 - a. Addition or replacement of equipment for the purpose of process improvement that is accomplished without a capital expenditure shall not by itself be considered a modification under this subpart.
 - b. Equipment associated with a compressor station, dehydration unit, sweetening unit, underground storage vessel, field gas gathering system, or liquefied natural gas unit is covered by §§ 60.5400, 60.5401, 60.5402, 60.5421, and 60.5422 if it is located at an onshore natural gas processing plant.
 7. Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.
 - a. Each sweetening unit that processes natural gas is an affected facility; and
 - b. Each sweetening unit that processes natural gas followed by a sulfur recovery unit is an affected facility.
 - c. Facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H₂S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423(c) but are not required to comply with §§60.5405 through 60.5407 and §§60.5410(g) and 60.5415(g) of this subpart.

All of the equipment in this permit was constructed prior to August 23, 2011. The permit will require the facility to comply with all applicable requirements of NSPS, Subpart OOOO for new or modified affected facilities.

NESHAP, 40 CFR Part 61

[Not Applicable]

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

NESHAP, 40 CFR Part 63

[Subparts HH and ZZZZ Applicable]

Subpart HH, Oil and Natural Gas Production Facilities. This subpart applies to affected emission points that are located at facilities that are major and area sources of 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. The facility is an “area” source of HAPs. TEG dehydration units with an actual annual average flowrate of less than 3 MMSCFD or less than 1 TPY of benzene emissions are exempt from control standards, but are subject to recordkeeping. GRI-GLYCalc Version 3.0 or higher may be used to show that benzene emissions are less than 1 TPY, or a direct measurement can be made. Even though the TEG dehydration unit at this facility is considered an affected source it is exempt from the requirements of § 63.764(c)(1) and (d) since the criteria § 63.764(e)(1)(i) or (ii) are met. However, the facility must maintain records of the de minimis determination as required in § 63.774(d)(1). The applicable recordkeeping requirements have been incorporated into the permit.

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart previously affected only RICE with a site-rating greater than 500 brake horsepower that are located at a major source of HAP emissions. On January 18, 2008, the EPA published a final rule that promulgates standards for new and reconstructed engines (after June 12, 2006) with a site-rating less than or equal to 500 HP located at major sources, and new and reconstructed engines (after June 12, 2006) located at area sources. Owners and operators of new or reconstructed engines at area sources, and new or reconstructed engines with a site-rating equal to or less than 500 HP located at a major source (except new or reconstructed 4-stroke lean-burn engines with a site-rating greater than or equal to 250 HP and less than or equal to 500 HP located at a major source) must meet the requirements of Subpart ZZZZ by complying with either 40 CFR Part 60 Subpart III (for CI engines), or 40 CFR Subpart JJJJ (for SI engines). Owners and operators of new or reconstructed 4SLB engines with a site-rating greater than or equal to 250 HP and less than or equal to 500 HP located at a major source are subject to the same MACT standards previously established for 4SLB engines above 500 HP at a major source, and must also meet the requirements of 40 CFR Part 60 Subpart JJJJ, except for the emission standards for CO. The four 1,340-hp Caterpillar 3516TALE engines at this site were manufactured after July 12, 2006 and are subject to the area source standards of this subpart.

CAM, 40 CFR Part 64

[Not Applicable]

Compliance Assurance Monitoring (CAM), as published in the Federal Register on October 22, 1997, applies to any pollutant specific emission unit at a major source, that is required to obtain a Title V permit, if it meets all of the following criteria:

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

Chemical Accident Prevention Provisions, 40 CFR Part 68

[Not Applicable]

This facility will not process or store more than the threshold quantity of any regulated substance (Section 112r of the Clean Air Act 1990 Amendments). More information on this federal program is available on the web page: www.epa.gov/ceppo.

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.

SECTION VIII. COMPLIANCE

Tier Classification and Public Review

This application has been determined to be **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” on June 8, 2016, in the *The Coalgate Record Register*, a daily newspaper in Coal County. The notice stated that the application was available for review at the Coal County Public Library, 115 West Ohio Avenue, Coalgate, Oklahoma 74538, or at the Air Quality Division’s Main Office in Oklahoma City, Oklahoma. The applicant will publish a “Notice of Tier II Draft Permit” in a newspaper local to the facility. The draft permit will be available for public review for a period of 30 days. After public review the “proposed” permit will be submitted to EPA for a 45-day review period.

This facility is not located within 50 miles of the border of Oklahoma and any other state.

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

Information on all permit actions is available for review by the public in the Air Quality section of the DEQ Web Page: <http://www.deq.state.ok.us>.

Inspection

The facility was inspected on February 5, 2016 by Jenn McCutcheon, Environmental Programs Specialist of DEQ along with Danny Hulsey, Emission Analyst of Enable. Based on the information provided or obtained during this evaluation, no violations were identified at Parker.

Testing

Test results demonstrating compliance with the applicable permit conditions are shown in the following table.

Unit ID	Description	Date	Limits (lb/hr)		Results (lb/hr)	
			NO _x	CO	NO _x	CO
1	Caterpillar G3516 TALE	5/16/16	5.91	2.66	4.63	0.54
2	Caterpillar G3516 TALE	5/16/16	5.91	2.66	4.68	0.41
3	Caterpillar G3516 TALE	2/25/16	5.91	2.66	3.67	0.36
4	Caterpillar G3516 TALE	2/25/16	5.91	2.66	2.83	0.28

Fees Paid

Part 70 operating permit renewal application fee of \$7,500.

SECTION IX. SUMMARY

The applicant has demonstrated the ability to comply with the requirements of the applicable Air Quality rules and regulations. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance and enforcement issues concerning this facility. Issuance of the operating permit is recommended, contingent on public and EPA review.

DRAFT

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

**Enable Gas Gathering, LLC
Parker Compressor Station**

Permit No. 2016-0608-TVR

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on June 3, 2016. The Evaluation Memorandum dated June 29, 2016, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein:

1. Points of emissions and emissions limitations for each point. [OAC 252:100-8-6(a)]

EUG-1 Compressor Engines

EU	Point	Description	HP
COMP1	COMP1	Caterpillar 3516TALE w/OC	1,340
COMP2	COMP2	Caterpillar 3516TALE w/OC	1,340
COMP3	COMP3	Caterpillar 3516TALE w/OC	1,340
COMP4	COMP4	Caterpillar 3516TALE w/OC	1,340

w/OC = with oxidation catalyst

Emission Limits	NOx		CO		VOC	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
COMP1	5.91	25.88	2.66	11.65	0.74	3.23
COMP2	5.91	25.88	2.66	11.65	0.74	3.23
COMP3	5.91	25.88	2.66	11.65	0.74	3.23
COMP4	5.91	25.88	2.66	11.65	0.74	3.23

EUG-2A Still Vent

EU	Point	Description	Construction Date
DEHY1	DEHY1	Glycol Dehydration Unit Still Vent with condenser and BTEX eliminator	2011

Source	VOC	
	lb/hr	TPY
Glycol Dehydrator Vent (DEHY1)	0.60	2.62

EUG-2B Amine Unit Still Vent and Flare

EU	Point	Description	Construction Date
FLARE1	FLARE1	Amine Unit Still Vent and Facility Flare	2011

Source	NO _x		CO		VOC		SO ₂	
	lb/hr	TPY	lb/hr	lb/hr	TPY	TPY	TPY	TPY
Facility Flare (FLARE1)	0.84	3.68	4.57	20.03	0.13	0.56	1.66	7.24

EUG-3A Heater

EU	Point	Description	MMBTUH	Construction Date
HEAT2	HEAT2	Hot Oil Heater	16.7	2011

Emission Limits	NO _x		CO		VOC	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
HEAT2	1.64	7.17	1.38	6.02	0.09	0.39

2. Insignificant activities. The equipment listed following do not have a specific limitation and the emissions are insignificant. [OAC 252:100-8-6(a)]

EUG-3B Heater

EU	Point	Description	MMBTUH	Construction Date
HEAT1	HEAT1	Glycol Dehydrator Reboiler	2.0	2011

EUG-4 Insignificant Storage Tanks

EU	Point	Description	Capacity (gallons)	Construction Date
TANK1	TANK1	Condensate Tank	16,800	2010
TANK2	TANK2	Condensate Tank	16,800	2010
TANK3	TANK3	Condensate Tank	16,800	2010
TANK4	TANK4	Distilled Water	8,820	2011
TANK5	TANK5	Distilled Water	8,820	2011
TANK6	TANK6	Amine Tank	2,100	2011
TANK7	TANK7	Amine Run-Down Tank	2,100	2011
TANK8	TANK8	TEG Glycol Tank	500	2011
TANK9	TANK9	Amine Relief Valve Tank	500	2011
TANK10	TANK10	Lube Oil Tank	500	2010
TANK11	TANK11	Lube Oil Tank	500	2010
TANK12	TANK12	Used Oil Tank	500	2010
TANK13	TANK13	Antifreeze Tank	500	2010
TANK14	TANK14	Used Antifreeze Tank	500	2010

EUG-5 Condensate Loading and Fugitives

EU	Point	Description
LOAD1	LOAD1	Truck Loading

EU	Equipment	Type of Service	Number of Items*
FUG1	Valves	Gas/Vapor	200
	Flanges	Gas/Vapor	220
	Compressor Seals	Gas/Vapor	80
	Relief Devices	Gas/Vapor	50
	Valves	Light Liquid	20
	Flanges	Light Liquid	22
	Pump Seals	Light Liquid	12
	Relief Valves	Light Liquid	10
Total			614

*Estimate only, not a permit limit.

3. The fuel-burning equipment shall be fired with pipeline grade natural gas or other gaseous fuel with a sulfur content less than 343 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 per calendar year. [OAC 252:100-31]

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

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

6. At least once per calendar quarter, the permittee shall conduct tests of NO_x and CO emissions in exhaust gases from each engine in EUG-1 and each replacement engine when operating under representative conditions for that period. Testing is required for any engine or replacement engine, which runs for more than 220 hours during that calendar quarter. Engines shall be tested no sooner than 20 days after the last test. Testing shall be conducted using a portable engine analyzer in accordance with a protocol meeting the requirements of the "AQD Portable Analyzer Guidance" document or an equivalent method approved by Air Quality. When four consecutive quarterly tests show an engine to be in compliance with the emissions limitations shown in the permit, then the testing frequency may be reduced to semi-annual testing. A semi-annual test may be conducted no sooner than 60 calendar days nor later than 180 calendar days after the most recent test. Likewise, when the following two consecutive semi-annual tests show compliance, the testing frequency may be reduced to annual testing. An annual test may be conducted no sooner than 120 calendar days nor later than 365 calendar days after the most recent test. Upon any showing of non-compliance with emissions limitations or testing that indicate that emissions are within 10% of the emission limitation, the testing frequency shall revert to quarterly. Reduced engine testing does not apply to engines with catalytic converter/oxidation catalyst. [OAC 252:100-8-6 (a)(3)(A)]

7. Each engine shall be operated with exhaust gases passing through a properly functioning oxidative catalyst. [OAC 252:100-8-6(a)(1)]

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

9. Replacement (including temporary periods of 6 months or less for maintenance purposes), of internal combustion engines/turbines with emissions limitations specified in this permit with engines of lesser or equal emissions of each pollutant (in lbs/hr and TPY) are authorized under the following conditions. [OAC 252:100-8-6 (f)(2)]

- a. The permittee shall notify AQD in writing not later than 7 days prior to start-up of the replacement engine(s)/turbine(s). Said notice shall identify the old engine/turbine and shall include the new engine/turbine make and model, serial number, horsepower rating, and pollutant emission rates (lb/hr and TPY) at maximum horsepower for the altitude/location.
- b. Quarterly emissions tests for the replacement engine(s)/turbine(s) shall be conducted to confirm continued compliance with NO_x and CO emission limitations. A copy of the first quarter testing shall be provided to AQD within 60 days of start-up of each replacement engine/turbine. The test report shall include the engine/turbine fuel usage, stack flow (ACFM), stack temperature (°F), and pollutant emission rates (lbs/hr and TPY) at maximum rated horsepower for the altitude/location.
- c. Replacement equipment and emissions are limited to equipment and emissions which are not a modification under NSPS or NESHAP, or a significant modification under PSD. For existing PSD facilities, the permittee shall calculate the PTE or the net emissions increase resulting from the replacement to document that it does not exceed significance levels and submit the results with the notice required by a. of this Specific Condition.
- d. Engines installed as allowed under the replacement allowances in this Specific Condition that are subject to 40 CFR Part 63, Subpart ZZZZ and/or 40 CFR Part 60, Subpart JJJJ shall comply with all applicable requirements.

10. The glycol dehydration units shall be maintained and operated in accordance with applicable state and federal rules, including but not limited to the following requirements:

- a. The glycol dehydration unit shall be equipped with a condenser. All off-gases from the dehydration unit still vent shall be routed through the condenser.
- b. All off-gases from the condenser shall be routed to the glycol reboiler firebox BTEX eliminator or to an equally-effective (overall 95% or more) VOC/HAP emissions control system.
- c. The glycol dehydrator shall be equipped with a flash tank on the rich glycol stream. Flash tank emissions shall be routed to the reboiler for fuel or to the station inlet, whichever has lower pressure, or to an equally-effective (overall 98%) VOC/HAP emissions control system.
- d. The natural gas throughput of the glycol dehydration unit shall not exceed 60 MMSCFD, monthly average.
- e. The lean glycol circulation rate shall not exceed 18.8 gallons per minute. 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.

11. The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Oil and Natural Gas Production, Subpart HH, for each affected dehydration unit including but not limited to the following:

- 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

12. The amine unit shall be maintained and operated in accordance with applicable state and federal rules, including but not limited to the following requirements:

- a. The amine unit shall be equipped with an acid gas flare with at least 98% oxidation efficiency. [OAC 252:100-31]
- c. The flare shall be equipped with an alarm system to signal non-combustion of exhaust gases. [OAC 252:100-31]
- d. All emissions from the amine unit's still vent shall be vented to the acid gas flare. [OAC 252:100-31]
- e. The natural gas throughput of the amine unit shall not exceed 60 MMSCFD, monthly average.
- f. The concentration of H₂S in the amine unit inlet gas shall not exceed 4ppm. [OAC 252:100-31]
- g. At least once per calendar year, the permittee shall analyze the natural gas being processed for H₂S and other sulfur compounds. The measurement method shall be accurate to at least ±0.5 ppm H₂S. [OAC 252:100-43]

13. The engines at the facility are subject to 40 CFR Part 60, Subpart JJJJ, and shall comply with all applicable standards for owners or operators of stationary spark ignition internal combustion engines: [40 CFR 60.4230 to 60.4248]

- a. §60.4230: Am I subject to this subpart?
- b. §60.4231: What emission standards must I meet if I am a manufacturer of stationary SI internal combustion engines or equipment containing such engines?
- c. §60.4232: How long must my engines meet the emissions standards if I am a manufacturer of stationary SI internal combustion engines?
- d. §60.4233: What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?
- e. §60.4234: How long must I meet the emissions standards if I am an owner or operator of a stationary SI internal combustion engine?
- f. §60.4235: What fuel requirements must I meet if I am an owner or operator of a stationary SI internal combustion engine subject to this subpart?
- g. §60.4236: What is the deadline for importing or installing stationary SI ICE produced in previous model years?
- h. §60.4237: What are the monitoring requirements if I am an owner or operator of an emergency stationary SI internal combustion engine?

- i. §60.4238: What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines \leq 19 KW (25 HP) or a manufacturer of equipment containing such engines.
 - j. §60.4239: What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines \geq 19 KW (25 HP) that use gasoline or a manufacturer of equipment containing such engines?
 - k. §60.4240: What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines \geq 19 KW (25 HP) that use LPG or a manufacturer of equipment containing such engines?
 - l. §60.4241: What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines participating in the voluntary certification program or a manufacturer of equipment containing such engines?
 - m. §60.4242: What other requirement must I meet if I am a manufacturer of stationary SI internal combustion engines or equipment containing stationary SI internal combustion engines or a manufacturer of equipment containing such engines?
 - n. §60.4243: What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?
 - o. §60.4244: What test methods and other procedures must I use if I am an owner or operator of a stationary SI internal combustion engine?
 - p. §60.4245: What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?
 - q. §60.4246: What parts of the General Provisions apply to me?
 - r. §60.4247: What parts of the mobile source provisions apply to me if I am a manufacturer of stationary SI internal combustion engines or a manufacturer of equipment containing such engines?
 - s. §60.4248: What definitions apply to this subpart?
14. The owner/operator shall comply with all applicable requirements of the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), Subpart ZZZZ, for any engine at the facility subject to Subpart ZZZZ, including but not limited to: [40 CFR 60.630 to 60.636]
- a. §63.6580 What is the purpose of subpart ZZZZ?
 - b. §63.6585 Am I subject to this subpart?
 - c. §63.6590 What parts of my plant does this subpart cover?
 - d. §63.6595 When do I have to comply with this subpart?
 - e. §63.6600 What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?
 - f. §63.6601 What emission limitations must I meet if I own or operate a new or reconstructed 4SLB stationary RICE with a site rating of greater than or equal to 250 brake HP and less than or equal to 500 brake HP located at a major source of HAP emissions?
 - g. §63.6602 What emission limitations and other requirements must I meet if I own or operate an existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?
 - h. §63.6603 What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

- i. §63.6604 What fuel requirements must I meet if I own or operate a stationary CI RICE?
 - j. §63.6605 What are my general requirements for complying with this subpart?
 - k. §63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?
 - l. §63.6611 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a new or reconstructed 4SLB SI stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions?
 - m. §63.6612 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?
 - n. §63.6615 When must I conduct subsequent performance tests?
 - o. §63.6620 What performance tests and other procedures must I use?
 - p. §63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?
 - q. §63.6630 How do I demonstrate initial compliance with the emission limitations, operating limitations, and other requirements?
 - r. §63.6635 How do I monitor and collect data to demonstrate continuous compliance?
 - s. §63.6640 How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?
 - t. §63.6645 What notifications must I submit and when?
 - u. §63.6650 What reports must I submit and when?
 - v. §63.6655 What records must I keep?
 - w. §63.6660 In what form and how long must I keep my records?
 - x. §63.6665 What parts of the General Provisions apply to me?
 - y. §63.6670 Who implements and enforces this subpart?
 - z. §63.6675 What definitions apply to this subpart?
15. The permittee shall comply with NSPS, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transportation, and Distribution, for all affected units located at this facility. [40 CFR 60.5360 to 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 covers and closed vent systems routing emissions from storage vessels, reciprocating compressors and centrifugal compressor wet seal 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, centrifugal compressor and reciprocating 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 maintain records of operations as listed below. These records shall be maintained on-site for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-43]

- a. Operating hours for each engine, if operated less than 220 hours per quarter and not tested.
- b. Periodic emissions testing results (NO_x and CO) for each engine and each replacement engine.
- c. For the fuel(s) burned, the appropriate document(s) as described in Specific Condition No. 3.
- d. Records required by 40 CFR Part 60, Subpart JJJJ.
- e. Records required by 40 CFR Part 60, Subpart OOOO.
- f. Records as required by 40 CFR Part 63, Subpart HH.
- g. Records required by 40 CFR Part 63, Subpart ZZZZ.
- h. Facility natural gas throughput, MMSCFD (monthly average).
- i. The amine unit inlet gas H₂S concentration (at least once per calendar year).

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

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

- a. For 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).
- c. For fluid 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: records of capacity of the tanks and contents.
- d. Emissions from fuel storage/dispensing equipment operated solely for facility owned vehicles if fuel throughput is not more than 2,175 gallons per day, averaged over a 30-day period.

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

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

SECTION I. DUTY TO COMPLY

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

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

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

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

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

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

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

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

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

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

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

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

B. Records of required monitoring shall include:

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

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

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

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

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

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

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

[OAC 252:100-43]

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

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

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

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

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

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

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

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

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

SECTION IV. COMPLIANCE CERTIFICATIONS

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

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

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

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

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

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

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

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

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

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

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

SECTION VI. PERMIT SHIELD

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

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

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

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

SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

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

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

SECTION VIII. TERM OF PERMIT

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

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

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

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

SECTION IX. SEVERABILITY

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

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

SECTION X. PROPERTY RIGHTS

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

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

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

SECTION XI. DUTY TO PROVIDE INFORMATION

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

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

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

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

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

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

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

SECTION XII. REOPENING, MODIFICATION & REVOCATION

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

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

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

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

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

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

[OAC 100-8-7.3(d)]

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

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

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

SECTION XIII. INSPECTION & ENTRY

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

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

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

SECTION XIV. EMERGENCIES

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

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

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

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

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

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

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

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

SECTION XV. RISK MANAGEMENT PLAN

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

SECTION XVI. INSIGNIFICANT ACTIVITIES

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

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

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

SECTION XVII. TRIVIAL ACTIVITIES

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

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

SECTION XVIII. OPERATIONAL FLEXIBILITY

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the

permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

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

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

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

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

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

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

- (4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]
- (5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
- (6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]
- (7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

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

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

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

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

- (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
- (2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;

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

SECTION XXI. TITLE V APPROVAL LANGUAGE

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

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

- (10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

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

SECTION XXII. CREDIBLE EVIDENCE

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

[OAC 252:100-43-6]



PART 70 PERMIT

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

DRAFT

Permit No. 2016-0608-TVR

Enable Gas Gathering, LLC

having complied with the requirements of the law, is hereby granted permission to operate the Parker Compressor Station located in Sections 1, Township 2N, Range 11E, Coalgate, Coal County, Oklahoma, subject to Major Source Standard Conditions dated June 21, 2016, and Specific Conditions, both attached.

DRAFT

Division Director, Air Quality

Date

Mr. Sean Walker, Sr. Environmental Specialist
Enable Gas Gathering, LLC
P.O. Box 24300, M/C LS700
Oklahoma City, OK 73124

Permit Writer: Kyle Walker
Date: Month XX, 2016

SUBJECT: Major Source Operating Permit No. **2016-0608-TVR**
Enable Gas Gathering, LLC
Parker Compressor Station (Facility ID: 6848)
Section 1, Township 2N, Range 11E
Coalgate, Coal County, Oklahoma.

Dear Mr. Walker:

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 on approved AQD forms and submitted (hardcopy or electronically) by April 1st of every year. Any questions concerning the form or 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, or you have any questions about this permit, please contact me at (405) 702-4193.

Sincerely,

DRAFT

Kyle Walker, E.I.
Engineering Section
AIR QUALITY DIVISION

Enclosure

Mr. Sean Walker, Sr. Environmental Specialist
Enable Gas Gathering, LLC
P.O. Box 24300, M/C LS700
Oklahoma City, OK 73124

Re: Permit Application **No. 2016-0608-TVR**
Parker Compressor Station (Facility ID: 6848)
Section 1, Township 2N, Range 11E; Coal County, Oklahoma

Dear Mr. Walker:

Air Quality Division has completed the initial review of your construction permit application referenced above. This application has been determined to be a **Tier II**. In accordance with 27A O.S. §2-14-302 and OAC 252:002-31 the enclosed draft permit is now ready for public review. The requirements for public review 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. (Instruction enclosed)
2. Provide for public review (for a period of 30 days following the date of the newspaper announcement) a copy of this draft permit and a copy of the application at a convenient location within the county of the facility.
3. Send to AQD a copy of the proof of publication notice from Item #1 above together with any additional comments or requested changes, which you may have on the draft permit.

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

Sincerely,

Phillip Fielder, P.E.
Permits and Engineering Group Manager
AIR QUALITY DIVISION

Enclosure