

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

MEMORANDUM

July 5, 2016

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

THROUGH: Rick Groshong, Sr. Environmental Manager, Compliance & Enforcement

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

THROUGH: Peer Review

FROM: Ellis Fischer, P.E., Existing Source Permits Section

SUBJECT: Evaluation of Permit Application No. **2016-0555-TVR3**
Enable Gas Transmission, LLC
Chandler Compressor Station
(SIC:4922/NAICS:486210 Fac ID: 1133)
Section 21, T5N, R18E, Latimer County
Latitude: 34.88798°N; Longitude: 95.40532°W
Driving Directions: From the junction of SH 2 and US 270 near
Wilburton, travel approximately five (5) miles west on US 270, then one
and one half (1 ½) mile south to the facility on the west side of the road.

SECTION I. INTRODUCTION

Enable Gas Transmission, LLC (EGT) has submitted an application to renew their Title V operating permit for the subject facility. The facility is currently operating under Permit No. 2010-177-TVR2 (M-1), issued August 6, 2013.

EGT requests the following:

1. Engine emissions have been revised based on current facility conditions. TPY emissions have not changed. The prior safety factor for lb/hr operation is now removed.
2. Fugitive emission component count has been revised based on current facility conditions.
3. Revision of insignificant storage tank data in EUG-4.
4. A condensate storage tank truck load group (EUG-6) is added. In the previous permit the condensate loading emitted an insignificant amount of VOC emissions and was not included in the facility-wide emission table or shown as a limit in the Specific Condition. However, applicant would like to include the condensate truck loading in this permit.
5. Update Specific Condition No. 5 language.

The following will be updated:

1. Oklahoma Air Pollution Control Rules where applicable.
2. Federal Regulations where applicable.
3. Specific Conditions where applicable.

SECTION II. EQUIPMENT

Emission units have been arranged into Emission Unit Groups (EUGs) as outlined following. Emission units that emit the same regulated air pollutants, trigger the same applicable requirements, share the same compliance demonstration methods, and share the same proposed compliance assurance certifications are combined as one EUG.

EUG-1 Compressor Engines

EU	Point	Description	Horsepower	Serial #	Const. Date
SN-01	SN-01	Worthington MLV-20	8,000	G2876	1973
SN-02	SN-02	Cooper Bessemer 16W-330	8,000	49146	1998
SN-03	SN-03	Cooper Bessemer GMWC-12	4,000	45843	1982

STACK PARAMETERS

Description	SN-01	SN-02	SN-03
Stack Diameter (in)	56	59	42
Stack Height (ft)	35.5	66	55
Fuel Consumption (SCFH)	70,200	64,728	34,423
Specific Fuel Consumption (BTU/hp-hr)	7,312.5	6,975	7,418.75
Exhaust Rate (ACFM)	69,348	73,692	47,808
Exhaust Temperature (°F)	650	540	750
Moisture Content (%)	7	6	6

EUG-2 Emergency Generator

EU	Point	Description	Horsepower	Serial #	Const. Date	Manu. Date
SN-04	SN-04	Caterpillar G342	225	71B02659	4/21/2011	3/23/1977

EUG-3 Emergency Air Compressor

EU	Point	Description	Horsepower	Serial #	Const. Date
SN-05	SN-05	Caterpillar 3406DITA	360	90U17980	1973

EUG-4 Insignificant Storage Tanks

EU	Point	Description	Size (gallons)	Construction Date
SN-06	SN-06	Engine Oil Tank	7,520	1973
SN-07	SN-07	Waste Oil Tank	2,538	1973
SN-08	SN-08	Wastewater/Entrained Liquids Tank	8,820	1973
SN-09	SN-09	Condensate Tank	8,820	2004
SN-11	SN-11	Solvent Tank	1,000	1973
SN-12	SN-12	Diesel Tank	1,000	1973

EU	Point	Description	Size (gallons)	Construction Date
SN-13	SN-13	Used Glycol Tank	8,820	N/A
SN-14	SN-14	Antifreeze Tank	8,274	N/A
SN-15	SN-15	Mixed Antifreeze Tank	5,288	N/A
SN-16	SN-16	Diesel Tank (Not in Service)	550	N/A

EUG-5 Fugitive Emission Equipment

Component Type	Valves	Flanges	Compressor Seals	Pressure Relief Valves
Gas/Vapor	150	165	60	38
Light Liquid	15	17	9	8

EUG-6 Condensate Truck Loading

EU	Point	Emission Unit	Condensate Throughput (gallons/year)	Installation Date
LOAD	LOAD	Condensate Truck Loading	91,980	N/A

SECTION III. EMISSIONS

- Engine emissions are based on emission factors listed below.

Engine Emission Factors

Engines	NO _x	CO	VOC
SN-01 ^{a,c}	8.40 g/hp-hr	3.27 g/hp-hr	0.12 lb/MMBtu
SN-02 ^{b,c}	2.0 g/hp-hr	3.0 g/hp-hr	0.12 lb/MMBtu
SN-03 ^{b,c}	2.0 g/hp-hr	3.0 g/hp-hr	0.12 lb/MMBtu
SN-04 ^{b,d}	14.0 g/hp-hr	14.0 g/hp-hr	2.0 g/hp-hr
SN-05 ^{b,d}	11.72 g/hp-hr	3.53 g/hp-hr	0.20 g/hp-hr

^a NO_x and CO factors based on stack test performed in 1995

^b NO_x and CO factors from manufacturer’s data

^c VOC factors from AP-42 Table 3.2-1 and Table 3.2-3 factors (7/00)

^d VOC factors from manufacturer’s data

Engines SN-01, SN-02, and SN-03 are two-stroke lean burn engines. Engine SN-04 is a four-stroke rich burn emergency generator engine. Engine SN-05 is a diesel-fired emergency air compressor engine.

Brake-specific fuel consumption, stack dimensions, and the air emissions for the engines are listed above. Moisture contents of stack gases have been estimated from the stoichiometric ratio of two cubic feet of water per cubic foot of methane fuel.

- Condensate tank (SN-09) emissions are based on E&P tanks program which includes flash emissions.
- 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.

- Condensate Truck Loading emissions from loading condensate into tank trucks were estimated using AP-42 (1/95), Section 5.2, Equation 1, a maximum condensate throughput of 91,980 -gal/yr, and an emission factor of 5.713 lb/1,000 gallons of condensate.

Permit No. 2010-177-TVR2 (M-1) Emissions

EUG	EU	Description	NOx		CO		VOC	
			lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
EUG-1	SN-01 ^a	8,000-hp Worthington MLV-20	213.34	648.90	83.05	252.61	7.20	31.54
	SN-02 ^b	8,000-hp Cooper Bessemer 16W-330	40.92	154.50	61.38	231.75	7.20	31.54
	SN-03 ^b	4,000-hp Cooper Bessemer GMWC-12	24.55	77.25	30.69	115.88	3.60	15.77
EUG-2	SN-04 ^c	225-hp Caterpillar 342	3.41	0.85	5.58	1.40	0.89	0.22
EUG-3	SN-05 ^c	360-hp Quincy WSS 850 Air	11.16	2.79	2.02	0.60	2.40	0.50
EUG-4	SN-09	210-bbl Line AD Condensate Tank	-	-	-	-	0.57	2.52
EUG-5	FUG	Fugitives	-	-	-	-	0.18	0.79
Totals (Permit No. 2010-177-TVR2 (M-1))			293.38	884.29	182.72	602.24	21.47	82.88
Totals (Permit No. 2010-177-TVR2)			278.81	887.93	175.12	604.23	18.75	83.62
Change in Emissions			-	(3.64)	-	(1.99)	-	(0.74)

Notes applicable to Permit No. 2010-177-TVR2 (M-1) for clarification only.

^a A safety factor of 1.44 is applied to hourly emissions (120 % of the nominal horsepower rating and a variability factor of 1.2 of the emission factor). Annual emissions are based on continuous operation without the safety factor.

^b A safety factor of 1.16 is applied to hourly emissions (116% of the nominal horsepower rating). Annual emissions are based on continuous operation without the safety factor.

^c Annual emissions are based on 500 hours of operation per year.

This Permit No. 2016-0555-TVR3 Emissions

EUG	EU	Description	NOx		CO		VOC	
			lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
EUG-1	SN-01	8,000-hp Worthington MLV-20	148.15	648.90	57.67	252.60	7.20	30.75
	SN-02	8,000-hp Cooper Bessemer 16W-330	35.27	154.50	52.91	231.75	6.70	29.33
	SN-03	4,000-hp Cooper Bessemer GMWC-12	17.64	77.25	26.46	115.87	3.56	15.60
EUG-2	SN-04	225-hp Caterpillar G342	6.94	1.74	6.94	1.74	0.99	0.25
EUG-3	SN-05	360-hp Caterpillar 3406DITA	9.30	2.33	2.80	0.70	0.16	0.04
EUG-4	SN-09	210-bbl Condensate Tank	-	-	-	-	-	2.52
EUG-5	FUG	Fugitives	-	-	-	-	0.49	2.16
EUG-6	LOAD	Condensate Truck Loading	-	-	-	-	-	0.26
Totals (This Permit No. 2016-0555-TVR3)			217.30	884.72	146.78	602.66	18.92	80.91
Totals (Permit No. 2010-177-TVR2 (M-1))			293.38	884.29	182.72	602.24	21.47	82.88
Change in Emissions			(76.08)	0.42	(35.94)	0.42	(2.55)	(1.97)

HAPs emissions from engine SN-01 through SN-05 are based on AP-42 standards.

Total HAP Emissions

HAP	Emissions	
	lb/hr	TPY
Formaldehyde	7.98	34.81
Total HAP	7.98	34.81

Formaldehyde emissions exceed 10 TPY and total HAP emissions exceed 25 TPY. Therefore, this facility is a major source of HAPs.

SECTION IV. INSIGNIFICANT ACTIVITIES

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

- (1)* 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. There are 7 tanks on-site in this category.
- (2)* 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.
- (3) Hand wiping and spraying of solvents from containers with less than 1 liter capacity used for spot cleaning and/or degreasing in ozone attainment areas.
- (4)* Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant.

SECTION V. 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]
 Subchapter 3 enumerates the primary and secondary ambient air quality standards and the significant deterioration increments. At this time, all of Oklahoma is in attainment of these standards. In addition, modeled emissions from the facility demonstrate that the facility would not have a significant impact on air quality.

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

regulated pollutants. Emission inventories have been submitted and fees paid for the past years.

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

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

Emission limits for the facility are based on the previous Title V permit and the permit renewal application.

OAC 252:100-9 (Excess Emission Reporting Requirements) [Applicable]
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for 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) [Applicable]
This subchapter specifies a particulate matter (PM) emissions limitation of 0.6 lb/MMBTU from indirect fired fuel-burning units with a rated heat input of 10 MMBTUH or less. Fuel-burning equipment with a rated heat input between 10 to 100 MMBTUH shall not exceed the limits specified in Appendix C, AP-42 (7/98), Table 1.4-2, lists the total PM emissions for natural gas to be 7.6 lb/MMft³ or about 0.0076 lb/MMBTU. For 2-cycle and 4-cycle lean burn engines burning natural gas, AP-42 (7/00), Table 3.2-1 and 2 lists the total PM emissions as 0.0483 lb/MMBTU and 0.009 lb/MMBTU, respectively. The table below demonstrates fuel-burning equipment greater than 10 but less than 100 MMBTUH comply with Subchapter 19 limits.

Point ID	Equipment	Heat Input, (MMBTUH)	Appendix C Emission Limit, (lbs/MMBTU)	PM Emission Rate, (lbs/MMBTU)
SN-01	Worthington MLV-20	60.0	0.39	0.0483
SN-02	Cooper Bessemer 16W-330	60.0	0.39	0.0483

The permit requires the use of natural gas for all fuel-burning equipment to ensure compliance with Subchapter 19.

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

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

OAC 252:100-31 (Sulfur Compounds) [Applicable]
Part 2 limits emissions of sulfur dioxide from any one existing source or any one new petroleum and natural gas process source subject to OAC 252:100-31-26(a)(1). Ambient air concentration of sulfur dioxide at any given point shall not be greater than 1,300 µg/m³ in a 5-minute period of any hour, 1,200 µg/m³ for a 1-hour average, 650 µg/m³ for a 3-hour average, 130 µg/m³ for a 24-hour average, or 80 µg/m³ for an annual average. A typical engine burning field gas with a sulfur concentration of 343 ppmv will produce a maximum ambient concentration of less than 20 µg/m³ which is in compliance.
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.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]
 This subchapter limits NO_x emissions from new gas-fired fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH. The 8,000-hp Worthington engine has a potential heat input of 58.5 MMBTU/hr and the 8,000-hp Cooper engine has a potential heat input of 55.8 MMBTU/hr. However, the limitation in Subchapter 33 of 0.2 lb/MMBtu of NO_x is equivalent to 0.56 g/hp-hr NO_x. By current standards, BACT is acceptable as 2.0 g/hp-hr and until the late 1980s, 11.0 g/hp-hr was sufficient. It is doubtful that 0.56 g/hp-hr could be attained

with current technology and when the rule was promulgated in 1971 was certainly unattainable, therefore, it is clear that the rule was not intended to affect engines.

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

OAC 252:100-37 (Volatile Organic Compounds) [Applicable]
Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. This applies to the 210 barrel condensate tank.
Part 3 requires VOC loading facilities with a throughput equal to or less than 40,000 gallons per day to be equipped with a system for submerged filling of tank trucks or trailers if the capacity of the vehicle is greater than 200 gallons. This facility does not have the physical equipment (loading arm and pump) to conduct this type of loading and is not subject to this requirement.
Part 5 limits the VOC content of coatings from any coating line or other coating operation. This facility does not normally conduct coating or painting operations except for routine maintenance of the facility and equipment, which is exempt.
Part 7 requires fuel-burning and refuse-burning equipment to be operated to minimize emissions of VOC. Temperature and available air must be sufficient to provide essentially complete combustion.
Part 7 requires all effluent water separators, which receive water containing more than 200 gallons per day of any VOC, openings to be sealed or the separator to be equipped with an external floating roof or a fixed roof with an internal floating roof or a vapor recovery system. No effluent water separators are located at this facility.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]
This subchapter regulates 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 requested
OAC 252:100-15	Mobile Sources	not in source category
OAC 252:100-17	Incinerators	not type of emission units
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	Municipal Solid Waste Landfills	not in source category

SECTION VI. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Applicable]
 Total potential emissions of NO_x and CO are greater than the level of significance of 250 TPY. Any future increases will be evaluated in comparison to the significance levels: CO 100 TPY, NO_x 40 TPY, SO₂ 40 TPY, PM 25 TPY, PM₁₀ 15 TPY, and VOC 40 TPY.

NSPS, 40 CFR Part 60 [Not Applicable]

Subparts K, Ka, Kb, VOL Storage Vessels. All of the tanks are below the de minimis of 19,813-gallons for Subpart Kb and 40,000-gallons for Subparts K and Ka.

Subpart GG, Stationary Gas Turbines. There are no turbines at this facility.

Subpart VV, Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry. This facility is not a SOCOMI plant.

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

Subpart LLL, Onshore Natural Gas Processing: SO₂ Emissions. There is no natural gas sweetening operation at this site.

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. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. The emergency air compressor engine was manufactured before July 11, 2005, and is not subject to this subpart.

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. All engines at this facility were

manufactured prior to the effective date of Subpart JJJJ.

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

1. Each single gas well;
2. Single centrifugal compressors using wet seals that are located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment;
3. Reciprocating compressors which are single reciprocating compressors located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment;
4. Single continuous bleed natural gas driven pneumatic controllers with a natural gas bleed rate greater than 6 SCFH, which commenced construction after August 23, 2011, located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not located at a natural gas processing plant;
5. Single continuous bleed natural gas driven pneumatic controllers which commenced construction after August 23, 2011, and are located at a natural gas processing plant;
6. Single storage vessels located in the oil and natural gas production segment, natural gas processing segment, or natural gas transmission and storage segment;
7. All equipment, except compressors, within a process unit at an onshore natural gas processing plant;
8. Sweetening units located at onshore natural gas processing plants.

For each reciprocating compressor the owner/operator must replace the rod packing before 26,000 hours of operation or prior to 36 months. If utilizing the number of hours, the hours of operation must be continuously monitored. Commenced construction is based on the date of installation of the compressor (excluding relocation) at the facility. This facility is a natural gas transmission facility and not subject to this requirement.

There are no pneumatic controllers with a bleed rate of 6 SCFH installed prior to the affected date of August 23, 2011, and this facility is not a gas plant. This facility is a natural gas transmission facility and not subject to this requirement.

Storage vessels constructed, modified or reconstructed after August 23, 2011, with VOC emissions equal to or greater than 6 TPY must reduce VOC emissions by 95.0 % or greater. No storage vessels were installed as a part of this modification. All storage tanks at this facility were installed prior to the affected date of August 23, 2011. All new or modified storage vessels will have to comply with this subpart.

The group of all equipment, except compressors, within a process unit at a natural gas processing plant must comply with the requirements of NSPS, Subpart VVa, except as provided in §60.5401. This facility is not a gas plant.

A sweetening unit means a process device that removes hydrogen sulfide and/or carbon dioxide from the sour natural gas stream. There are no sweetening units at this facility.

None of the existing equipment at the facility is subject to NSPS Subpart OOOO. The permit will require any applicable additions and modifications of this facility to comply with applicable requirements of NSPS, Subpart OOOO.

NESHAP, 40 CFR Part 61

[Not Applicable]

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

NESHAP, 40 CFR Part 63

[Subpart ZZZZ Applicable]

Subpart HH, Oil and Natural Gas Production Facilities. This subpart applies to affected emission points that are located at facilities which are major sources of HAPs and either process, upgrade, or store hydrocarbons prior to the point of custody transfer or prior to which the natural gas enters the natural gas transmission and storage source category. For the purposes of Subpart HH, a “major” source of HAPs is determined from the sum of HAPs from any glycol dehydration units plus one other unit. The facility is a major source of formaldehyde but the formaldehyde is generated as a combustion product from the compressor engines. There are no dehydration units at this facility. There are no applicable requirements under this subpart.

Subpart HHH, Natural Gas Transmission and Storage Facilities. There are no dehydration units at the facility. Therefore, this subpart does not apply.

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart previously affected only RICE with a site rating greater than 500 brake horsepower that were 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 (after June 12, 2006) 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 IIII (for CI engines), or 40 CFR Part 60 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 facility is a major source of HAP emissions.

March 3, 2010, a final rule of Subpart ZZZZ was published affecting existing stationary emergency and non-emergency (CI) RICE located at major sources and at area sources of hazardous air pollutants. The effective date of this final rule was May 3, 2010. SN-05 is an existing emergency 360-hp compression ignition air compressor engine and is subject to this Subpart

August 20, 2010, a final rule of Subpart ZZZZ was published affecting existing stationary emergency and non-emergency (SI) RICE located at major sources and at area sources of

hazardous air pollutants. The effective date of this final rule was October 19, 2013. SN-04 is an existing 225-hp four stroke rich burn emergency generator engine and is subject to this Subpart. SN-01, SN-02, SN-03 are existing two stroke lean burn engines at a major source of HAPs. There are no requirements under Subpart ZZZZ for two stroke lean burn engines at a major source of HAPs.

A summary of the requirements for the emergency RICE located at this facility are shown below.

Engine Category	Normal Operation¹
Emergency Stationary CI and Black Start CI at a major source	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
Existing Emergency Stationary SI and Black Start SI HP <= 500-hp at a major source	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

During Startup - Minimize the engine’s time spent at idle and minimize the engine’s startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

The standards of Subpart ZZZZ have been incorporated into the permit.

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 in excess of major source levels.

Unit SN-01 does not use any control device. Units SN-02 and SN-03 are lean burn engines and do not use add-on control devices to achieve compliance with the applicable emission limit or standard. Therefore, none of them are subject to CAM.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]
The definition of a stationary source does not apply to transportation, including storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the provisions of this part. The definition of a stationary source also does not include naturally occurring hydrocarbon reservoirs. Naturally occurring hydrocarbon mixtures, prior to entry into a natural gas processing plant or a petroleum refining process unit, including: condensate, crude oil, field gas, and produced water, are exempt for the purpose of determining whether more than a threshold quantity of a regulated substance is present at the stationary source. This facility does not store any regulated substance above the applicable threshold limits. 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 VII. COMPLIANCE

Tier Classification and Public Review

This application has been determined to be a **Tier II** based on the request for a renewal of an existing Part 70 operating permit, as described in OAC252:100-8-7.2(b)(1).

The permittee has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the land. Information on all permit actions is available for review by the public on the Air Quality section of the DEQ web page at: <http://www.deq.state.ok.us>.

The applicant published the “DEQ Notice of Filing a Tier II Application” in *The Latimer County News-Tribune*, a weekly newspaper in Latimer County, on May 26, 2016. The notice stated that the application was available for public review at the Latimer County Public Library located at 301 West Ada Avenue, Wilburton, Oklahoma or at the Air Quality Division’s main office in Oklahoma City, Oklahoma. Information on all permit actions is available for review by the public on the DEQ web page at <http://www.deq.state.ok.us>.

When the draft permit is issued the applicant shall file a “Notice of Tier II Draft Permit” to satisfy the requirements of a 30-day public comment period.

A proposed permit will be submitted to EPA Region 6 for a 45-day review period.

The 30 day public comment period and the 45-day EPA review period will run concurrently.

This facility is not located within 50 miles of the Oklahoma state border. Therefore, notice of the availability of the draft permit is required to be provided to any state adjacent to the Oklahoma state border.

Testing

The most recent tests were conducted on January 21, 2016. Testing results as summarized in the following table indicated compliance with permit limitations.

EU	Source/Engine	Test Date	Test Results		Permit Limitations	
			NO _x	CO	NO _x	CO
			lb/hr	lb/hr	lb/hr	lb/hr
SN-01	8,000-hp Worthington MLV-20	1/21/16	105.08	34.09	148.15	57.67
SN-02	8,000-hp Cooper Bessemer 16W-330	1/21/16	12.53	14.53	35.27	52.91
SN-03	4,000-hp Cooper Bessemer GMWC-12	1/21/16	9.50	13.60	17.64	26.46

Inspection

Since there is only an insignificant change in emissions of VOC an initial compliance inspection is not required.

Fee Paid

The facility paid the Part 70 operating permit minor modification application fee of \$7,500.

SECTION VIII. SUMMARY

The facility is as described in the application. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues. Issuance of the modified operating permit is recommended, contingent on public and EPA review.

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

**Enable Gas Transmission, LLC
Chandler Compressor Station**

Permit Number 2016-0555-TVR3

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on April 3, 2013. The Evaluation Memorandum, dated July 5, 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, EUG-2, and EUG-3

EU	Description	NO _x		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
SN-01	8,000-hp Worthington MLV-20	148.15	648.90	57.67	252.60	7.20	30.75
SN-02	8,000-hp Cooper Bessemer 16W-330	35.27	154.50	52.91	231.75	6.70	29.33
SN-03	4,000-hp Cooper Bessemer GMWC-12	17.64	77.25	26.46	115.87	3.56	15.60
SN-04	225-hp Caterpillar G342	6.94	1.74	6.94	1.74	0.99	0.25
SN-05	360-hp Caterpillar 3406DITA	9.30	2.33	2.80	0.70	0.16	0.04

EUG-4 Insignificant Storage Tanks

EU	Point	Description	Size (gallons)
SN-06	SN-06	Engine Oil Tank	7,520
SN-07	SN-07	Waste Oil Tank	2,538
SN-08	SN-08	Wastewater/Entrained Liquids Tank	8,820
SN-09	SN-09	Condensate Tank	8,820
SN-11	SN-11	Solvent Tank	1,000
SN-12	SN-12	Diesel Tank	1,000
SN-13	SN-13	Used Glycol Tank	8,820
SN-14	SN-14	Antifreeze Tank	8,274
SN-15	SN-15	Mixed Antifreeze Tank	5,288
SN-16	SN-16	Diesel Tank (Not in Service)	550

Storage tank VOC emissions are insignificant based on existing equipment items but do not have a specific limitation.

EUG-05: Fugitive VOC emissions are insignificant based on existing equipment items and do not have a specific limitation.

EUG-6: Condensate Truck Loading VOC emissions are insignificant based on existing equipment items and do not have a specific limitation.

2. The fuel-burning equipment, other than SN-05, shall be fired with pipeline grade natural gas or other gaseous fuel with a sulfur content less than 343 ppmv. SN-05 shall use fuel that meets the requirements of NESHAP Subpart ZZZZ. 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; for liquid fuel, a fuel delivery ticket or other approved methods. Compliance shall be demonstrated at least once every calendar year. [OAC 252:100-31]
3. Engines shall have a permanent identification plate attached that shows the make, model, and serial number. [OAC 252:100-43]
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)(1)]
5. The emergency generator engine (SN-04) and emergency air compressor engine (SN-05) shall operate as emergency engines as defined in 40 CFR 63 NESHAP Subpart ZZZZ § 63.6675. Engine SN-04 and engine SN-05 shall each be equipped with a non-resettable hour meter.
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 Specific Condition No. 1 and each replacement engine/turbine when operating under representative conditions for that period. Testing is required for any engine/turbine that runs for more than 220 hours during that calendar quarter. Engines/turbines shall be tested no sooner than 20 calendar days after the last test. Testing shall be conducted using a portable 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 the engine/turbine to be in compliance with the emissions limitations shown in the permit, then the testing frequency may be reduced to semi-annual testing. Likewise, when the following two consecutive semi-annual tests show compliance, the testing frequency may be reduced to annual testing. Upon any showing of non-compliance with emissions limitations or testing that indicates that emissions are within 10% of the emission limitations, the testing frequency shall revert to quarterly. Reduced testing frequency does not apply to engines with catalytic converters. Any reduction in the testing frequency shall be noted in the next required semiannual monitoring and deviation report. [OAC 252:100-8-6 (a)(3)(A)]
7. When periodic compliance testing shows engine exhaust emissions in excess of the lb/hr limits in Specific Condition Number 1, the permittee shall comply with the provisions of OAC 252:100-9 for excess emissions. [OAC 252:100-9]
8. 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 no later than 7 days in advance of the start-up of the replacement engine(s)/turbine(s). Said notice shall identify the equipment removed and shall include the new engine/turbine make, model, and horsepower; date of the change, and any change in emissions.
 - b. Quarterly emissions tests for the replacement engine(s)/turbine(s) shall be conducted to confirm continued compliance with NO_x and CO emissions limitations. A copy of the first quarter testing shall be provided to AQD within 60 days of start-up of each replacement or additional engine/turbine. The test report shall include the engine/turbine fuel usage, stack flow (ACFM), stack temperature (°F), stack height (feet), stack diameter (inches), and pollutant emissions 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. An evaluation for the replacement emissions changes shall only include control devices which are federally-enforceable (e.g., required by permit or NSPS Subpart JJJJ).
 - 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.
9. The owner/operator shall comply with all applicable requirements of the NESHAP: Reciprocating Internal Combustion Engines, Subpart ZZZZ, for each affected facility including but not limited to:

What This Subpart Covers

- 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?

Emission and Operating Limitations

- e. § 63.6603 What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

General Compliance Requirements

- f. § 63.6605 What are my general requirements for complying with this subpart?

Testing and Initial Compliance Requirements

- g. § 63.6625 What are my monitoring, installation, operation, and maintenance requirements?
- h. § 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?

- Continuous Compliance Requirements
- i. § 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?
- Notifications, Reports, and Records
- j. § 63.6650 What reports must I submit and when?
 - k. § 63.6655 What records must I keep?
 - l. § 63.6660 In what form and how long must I keep my records?
- Other Requirements and Information
- m. § 63.6665 What parts of the General Provisions apply to me?
 - n. § 63.6670 Who implements and enforces this subpart?
 - o. § 63.6675 What definitions apply to this subpart?
10. The permittee shall comply with NSPS, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transportation, and Distribution, for all affected facilities located at this site.
- a. § 60.5360 What is the purpose of this subpart?
 - b. § 60.5365 Am I subject to this subpart?
 - c. § 60.5370 When must I comply with this subpart?
 - d. § 60.5375 What standards apply to gas well affected facilities?
 - e. § 60.5380 What standards apply to centrifugal compressor affected facilities?
 - f. § 60.5385 What standards apply to reciprocating compressor affected facilities?
 - g. § 60.5390 What standards apply to pneumatic controller affected facilities?
 - h. § 60.5395 What standards apply to storage vessel affected facilities?
 - i. § 60.5400 What equipment leak standards apply to affected facilities at an onshore natural gas processing plant?
 - j. § 60.5401 What are the exceptions to the equipment leak standards for affected facilities at onshore natural gas processing plants?
 - k. § 60.5402 What are the alternative emission limitations for equipment leaks from onshore natural gas processing plants?
 - l. § 60.5405 What standards apply to sweetening units at onshore natural gas processing plants?
 - m. § 60.5406 What test methods and procedures must I use for my sweetening units affected facilities at onshore natural gas processing plants?
 - n. § 60.5407 What are the requirements for monitoring of emissions and operations from my sweetening unit affected facilities at onshore natural gas processing plants?
 - o. § 60.5408 What is an optional procedure for measuring hydrogen sulfide in acid gas-Tutwiler Procedure?
 - p. § 60.5410 How do I demonstrate initial compliance with the standards for my gas well affected facility, my centrifugal compressor affected facility, my reciprocating compressor affected facility, my pneumatic controller affected facility, my storage vessel affected facility, and my equipment leaks and sweetening unit affected facilities at onshore natural gas processing plants?
 - q. § 60.5411 What additional requirements must I meet to determine initial compliance for my closed vent systems routing emissions from storage vessels or centrifugal

- compressor wet seal fluid degassing systems?
- r. § 60.5412 What additional requirements must I meet for determining initial compliance with control devices used to comply with the emission standards for my storage vessel or centrifugal compressor affected facility?
 - s. § 60.5413 What are the performance testing procedures for control devices used to demonstrate compliance at my storage vessel or centrifugal compressor affected facility?
 - t. § 60.5415 How do I demonstrate continuous compliance with the standards for my gas well affected facility, my centrifugal compressor affected facility, my stationary reciprocating compressor affected facility, my pneumatic controller affected facility, my storage vessel affected facility, and my affected facilities at onshore natural gas processing plants?
 - u. § 60.5416 What are the initial and continuous cover and closed vent system inspection and monitoring requirements for my storage vessel or centrifugal compressor affected facility?
 - v. § 60.5417 What are the continuous control device monitoring requirements for my storage vessel or centrifugal compressor affected facility?
 - w. § 60.5420 What are my notification, reporting, and recordkeeping requirements?
 - x. § 60.5421 What are my additional recordkeeping requirements for my affected facility subject to VOC requirements for onshore natural gas processing plants?
 - y. § 60.5422 What are my additional reporting requirements for my affected facility subject to VOC requirements for onshore natural gas processing plants?
 - z. § 60.5423 What additional recordkeeping and reporting requirements apply to my sweetening unit affected facilities at onshore natural gas processing plants?
 - aa. § 60.5425 What parts of the General Provisions apply to me?
 - bb. § 60.5430 What definitions apply to this subpart?
11. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site or at a local field office for at least five years after the date of recording and shall be provided to regulatory personnel upon request. These records may be kept in computerized format. [OAC 252:100-8-6 (a)(3)(B)]
- a. O&M log for any engine/turbine not tested in each 6 month period.
 - b. Periodic emission testing for each engine and each replacement engine/turbine.
 - c. For the fuel(s) burned, the appropriate document(s) as described in Specific Condition No. 2.
 - d. Records as required by 40 CFR Part 60, Subpart OOOO.
 - e. Records as required by 40 CFR Part 63, Subpart ZZZZ.
12. The following records shall be maintained on-site to verify Insignificant Activities. No recordkeeping is required for those operations that qualify as Trivial Activities. [OAC 252:100-8-6 (a)(3)(B)]
- a. For 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.
- b. 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.
 - c. For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant; the type of activities, the amount of emissions (cumulative annual), and Operation and Maintenance records that demonstrate no increase of emissions.
13. No later than 30 days after each anniversary date of the issuance of the original Title V operating permit (August 23, 2001), the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit. [OAC 252:100-8-6 (c)(5)(A) & (D)]
14. The Permit Shield (Standard Conditions, Section VI) is extended to the following requirements that have been determined to be inapplicable to this facility. [OAC 252:100-8-6(d)(2)]
- a. OAC 252:100-11 Alternative Emissions Reduction
 - b. OAC 252:100-15 Mobile Sources
 - c. OAC 252:100-23 Cotton Gins
 - d. OAC 252:100-24 Grain Elevators
 - e. OAC 252:100-39 Nonattainment Areas
15. This permit supersedes all existing Air Quality operating permits for this facility, which are now cancelled.

Enable Gas Transmission, LLL
Sean Walker
Sr. Environmental Specialist
P.P. Box 24300, M/C LS700
Oklahoma City, OK 73124

Permit Writer: Ellis Fischer, P.E.

SUBJECT: Permit No. **2016-0555-TV3**
Chandler Compressor Station (FAC ID: 1133)
Section 21, T5N, R18E, Latimer County
Latitude: 34.88798°N; Longitude: 95.40532°W

Dear Mr. Walker:

Air Quality Division has completed the initial review of your 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 252:4-7-13(c) the draft permit is now ready for public review. The requirements for public review of the draft permit include the following steps which you must accomplish:

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located. (Instructions enclosed).
2. Provide for public review (for a period of 30 days following the date of the newspaper announcement) a copy of this draft permit at a convenient location **within the county** of the facility (preferably at a public library).
3. Send AQD a written affidavit of publication for the notice from Item #1 above together with any additional comments or requested changes which you may have for the permit application within 20 days of publication.
4. At the end of the public review period, send AQD a written notice of any public comments that you may have received from the public.

After public review, a Proposed Permit will be drafted and submitted for EPA review. Contingent on public and EPA review, the permit will be issued as a "Title V Renewal" operating permit. The permit review time is hereby tolled pending the receipt of the affidavit of publication. Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact the permit writer at (405) 702-4100 or email at ellis.fischer@deq.ok.gov.

Sincerely,

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

Enclosure

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

APPLICANT RESPONSIBILITIES

Permit applicants are required to give public notice that a Tier II or Tier III draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD. Note that if either the applicant or the public requests a public meeting, this must be arranged through the Customer Services Division of the DEQ.

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

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

SAMPLE NOTICE on page 2.

SAMPLE NOTICE (*Italicized print is to be filled in by the applicant.*):

DEQ NOTICE OF TIER ...II or III... DRAFT PERMIT

A Tier ...II or III... application for an air quality ...type of permit or permit action being sought (e.g., Construction Permit for a Major Facility)... has been filed with the Oklahoma Department of Environmental Quality (DEQ) by applicant, ...name and address.

The applicant requests approval to ...brief description of purpose of application... at the ...site/facility name ... [proposed to be] located at ...physical address (if any), driving directions, and legal description including county.....

In response to the application, DEQ has prepared a draft permit [modification] (Permit Number: ...xx-xxx-x...), which may be reviewed at ...locations (one must be in the county where the site/facility is located)... or at the Air Quality Division's main office (see address below). The draft permit is also available for review in the Air Quality Section of DEQ's Web Page: <http://www.deq.state.ok.us/>

This draft permit would authorize the facility to emit the following regulated pollutants: (list each pollutant and amounts in tons per year (TPY))

The public comment period ends 30 days after the date of publication of this notice. Any person may submit written comments concerning the draft permit to the Air Quality Division contact listed below. [Modifications only, add: Only those issues relevant to the proposed modification(s) are open for comment.] A public meeting on the draft permit [modification] may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ/CSD staff.

In addition to the public comment opportunity offered under this notice, this draft permit is subject to U.S. Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8. [For Construction Permits, add: The requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process. Therefore, no additional opportunity to provide comments or EPA review, EPA objection, and petitions to EPA will be available to the public when requirements from the construction permit are incorporated into the Title V permit.]

If the Administrator (EPA) does not object to the proposed permit, the public has 60 days following the Administrator's 45 day review period to petition the Administrator to make such an objection as provided in 40 CFR 70.8(d) and in OAC 252:100-8-8(j). Information on all permit actions and applicable review time lines is available in the Air Quality section of the DEQ Web page: <http://www.deq.state.ok.us/>.

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



PART 70 PERMIT

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

Permit No. 2016-0555-TVR3

Enable Gas Transmission, LLC

having complied with the requirements of the law, is hereby granted permission to operate all the sources within the boundaries of the Chandler Compressor Station (Fac ID: 1133) at Wilburton, Latimer County, Oklahoma, subject to the Specific Conditions, and the Standard Conditions dated July 21, 2009, both attached.

This permit shall expire five years from December 12, 2011, the issuance date of Permit No. 2010-177-TVR2, except as authorized under Section VIII of the Standard Conditions.

Permits and Engineering Group Manager

Date

Enable Gas Transmission, LLL
Sean Walker
Sr. Environmental Specialist
P.P. Box 24300, M/C LS700
Oklahoma City, OK 73124

Permit Writer: Ellis Fischer, P.E.

SUBJECT: Permit No. **2016-0555-TV3**
Chandler Compressor Station (FAC ID: 1133)
Section 21, T5N, R18E, Latimer County
Latitude: 34.88798°N; Longitude: 95.40532°W

Dear Mr. Walker:

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

Also note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed 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. If you have any questions, please refer to the permit number above and contact the permit writer at (405) 702-4100 or email ellis.fischer@deq.ok.gov.

Sincerely,

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

Enclosure

**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]