

DRAFT

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

**MEMORANDUM**

**August 3, 2016**

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

**THROUGH:** Rick Groshong, Senior Environmental Manager, Compliance and Enforcement

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

**THROUGH:** Peer Review

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

**SUBJECT:** Evaluation of Permit Application No. 2016-0248-TVR3 **DRAFT**  
DCP Midstream, LP  
Bradley Compressor Station  
Facility ID: 1019  
Latitude 34.823° N Longitude 97.662° W  
Section 18, Township 4N, Range 4W; Garvin County  
Directions: From the intersection of Hwy 76 and Hwy 19 on the east side of Lindsay, go 1.75 miles south on Hwy 76, west 4 miles, north 0.75 miles, then east into facility.

**SECTION I. INTRODUCTION**

DCP Midstream, LP (DCP) has requested renewal of the Part 70 permit for the Bradley Compressor Station (SIC 1311) located near Lindsay in Garvin County, Oklahoma. The initial Part 70 permit, Permit No. 97-226-TV, was issued on July 26, 2006, and the facility is currently operating under Permit No. 2011-047-TVR2, issued December 21, 2011. No significant changes will be made from the previously issued permit.

DCP is requesting the following changes be made in this Title V renewal:

- Update serial numbers for engines C-1, C-2, C-4, C-5, and C-9 in EUG 1. Each engine was replaced with a like-kind engine;
- Correct tank volumes for T-1, T-2, T-3, and T-5.

In addition to the requested changes, the permit memorandum, specific conditions, standard conditions, and applicable rules and regulations for this facility will be updated.

**SECTION II. FACILITY DESCRIPTION**

The facility is a natural gas gathering compressor station responsible for removing condensate and providing compression and dehydration for natural gas being transported via pipeline. Natural gas dehydration and storage of condensate will occur on-site as well. Natural gas will be transported to the facility via a pipeline gathering system. The gas stream will enter the facility through an inlet separator where water and condensate will be removed from the inlet stream. Natural gas from the inlet gas stream will then be compressed by nine (9) Waukesha L7042GSI natural gas-fired engine driven compressors rated at 1,232-hp each. Each compressor engine will be equipped with a catalytic converter.

The glycol dehydrator will be used to remove water from the gas before the gas exits the facility. In the dehydration process, gas passes through the contactor vessel where water, methane, other VOCs, and HAPs are absorbed by the glycol. The “rich” (wet) glycol leaves the contactor saturated with gas at pipeline pressure. The gas entrained in the rich glycol, plus additional wet gas bypassing the contactor, expands through the energy-exchange driver for the glycol pump. The glycol is then circulated through a reboiler where the absorbed water, methane, other VOCs, and HAPs are boiled off. The heat is supplied by a natural gas fired 1.0 MMBTU/hr glycol reboiler (H-1) which exhausts to the atmosphere. The dehydrator still vent (D-1) will be equipped with a condenser and a dedicated 210-bbl produced water tank. Gasses from the condenser will be vented to the atmosphere. The glycol unit is also equipped with a flash tank. The flash tank off-gases will be routed to the inlet for recompression.

Free liquid (condensate) made by compression is cascaded back to the compressor inlet scrubbers, which then dump to the three (3) 210-bbl condensate tanks (T-1, T-2, and T-3). The facility also includes one (1) 210-bbl lube oil tank, one (1) 72-bbl engine antifreeze tank, and one (1) 110-bbl methanol tank. Condensate truck loading (F-2) from the condensate tanks occurs onsite.

**SECTION III. EQUIPMENT**

**EUG-1 Engines**

EU	Point	Make/Model	Serial #	Rated Hp	Installed/Replacement Date	Manufacture Date
C-1	C-1	Waukesha L7042GSI <sup>(1)</sup>	401620	1,232	1990/2015	11/1976
C-2	C-2	Waukesha L7042GSI <sup>(1)</sup>	260958	1,232	1987/2015	11/1970
C-3	C-3	Waukesha L7042GSI <sup>(1)</sup>	329199	1,232	1987/2011	10/1978
C-4	C-4	Waukesha L7042GSI <sup>(1)</sup>	251639	1,232	1987/2014	10/1989
C-5	C-5	Waukesha L7042GSI <sup>(1)</sup>	C-10758/1	1,232	1987/2002	11/1976

(1) Equipped with a catalytic converter.

EU	Point	Make/Model	Serial #	Rated Hp	Installed/Replacement Date	Manufacture Date
C-6	C-6	Waukesha L7042GSI <sup>(1)</sup>	305677	1,232	1991	11/1976
C-7	C-7	Waukesha L7042GSI <sup>(1)</sup>	202822	1,232	1992/2001	11/1970
C-8	C-8	Waukesha L7042GSI <sup>(1)</sup>	326321	1,232	1997/2010	10/1978
C-9	C-9	Waukesha L7042GSI <sup>(1)</sup>	266454	1,232	1997/2014	10/1989

(1) Equipped with a catalytic converter.

**Stack Parameters**

Point	Height (feet)	Diameter (feet)	Brake-Specific Fuel Consumption (btu/hp-hr)	Flow (acfm)	Temperature (°F)
C-1	18	1.17	7,581	5,377	1,055
C-2	18	1.17	7,581	5,377	1,055
C-3	18	1.17	7,581	5,377	1,055
C-4	18	1.17	7,581	5,377	1,055
C-5	18	1.17	7,581	5,377	1,055
C-6	18	1.17	7,581	5,377	1,055
C-7	18	1.17	7,581	5,377	1,055
C-8	18	1.17	7,581	5,377	1,055
C-9	18	1.17	7,581	5,377	1,055

**EUG-2 Glycol Dehydrator**

EU	Point	Serial #	MMBtu/hr	Installation Date
D-1	Still Vent	---	---	1989
H-1	Reboiler Heater	04384-02	1.0	2002

**EUG-3 Tanks**

EU	Point	Contents	Gallons	Installation/Modification Date
Tanks	T-1	Condensate	8,820	Pre 1984
	T-2	Condensate	8,820	Pre 1984
	T-3	Condensate	8,820	Pre 1984
	T-4	Slop Oil	8,820	1989
	T-5	Methanol	4,620	Post 1974
	T-6	Engine Antifreeze	3,008	---
	T-7	Lube Oil	527	---
	T-8	Lube Oil	8,820	Pre 1984
	T-9	Slop Oil	1,321	Pre 1984
	T-10	Slop Oil	991	---
	T-11	Emulsion Breaker	42	---

EU	Point	Contents	Gallons	Installation/Modification Date
Tanks	T-12	Emulsion Breaker	42	---
	T-13	Triethylene Glycol	2,380	---

**EUG-4 Fugitives**

EU	Point	Approximate Number of Items	Type of Equipment
Fugitives	F-1	459	Valves- Inlet Gas
		91	Valves - Liquid
		32	Relief Valves
		10	Pump Seals - Liquid
		1,850	Connectors/Flanges Gas
		160	Connectors/Flanges Liquid
		36	Compressor Seals

**EUG-5 Condensate Loading**

EU	Point	Equipment	Volume, gal/yr	Const. Date
Load	F-2	Condensate Loading	2,000,000	Pre 1984

**SECTION IV. EMISSIONS**

All emissions estimates are calculated based on continuous operation of 8,760 hours per year and the following methods:

**EUG-1 Engines**

- The potential NO<sub>x</sub>, CO, and VOC emissions from the engines were calculated using emission factors obtained from manufacturer’s data. Formaldehyde emissions were based on emission factors obtained from AP-42 (7/00), Table 3.2-3. For the use of a catalytic converter on all nine (9) engines, DCP has assumed a 75% control efficiency for CO and a 76% control efficiency for formaldehyde. The following table lists the emission factors used for each engine.

**Engine Emission Factors**

Engine Specification	NO <sub>x</sub> , g/hp-hr	CO, g/hp-hr	VOC, g/hp-hr	Formaldehyde lb/MMBtu
Waukesha L7042GSI w/cc	3.0	3.0	1.0	0.00492

**Engines**

EU	Point	NO <sub>x</sub>		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
C-1	Waukesha L7042GSI w/ cat. conv.	8.15	35.69	8.15	35.69	2.72	11.90
C-2	Waukesha L7042GSI w/ cat. conv.	8.15	35.69	8.15	35.69	2.72	11.90
C-3	Waukesha L7042GSI w/ cat. conv.	8.15	35.69	8.15	35.69	2.72	11.90
C-4	Waukesha L7042GSI w/ cat. conv.	8.15	35.69	8.15	35.69	2.72	11.90
C-5	Waukesha L7042GSI w/ cat. conv.	8.15	35.69	8.15	35.69	2.72	11.90

EU	Point	NO <sub>x</sub>		CO		VOC	
C-6	Waukesha L7042GSI w/ cat. conv.	8.15	35.69	8.15	35.69	2.72	11.90
C-7	Waukesha L7042GSI w/ cat. conv.	8.15	35.69	8.15	35.69	2.72	11.90
C-8	Waukesha L7042GSI w/ cat. conv.	8.15	35.69	8.15	35.69	2.72	11.90
C-9	Waukesha L7042GSI w/ cat. conv.	8.15	35.69	8.15	35.69	2.72	11.90

- Brake-specific fuel consumption for the nine (9) engines has been listed at 7,581-btu/hp-hr for a fuel consumption of 9,340 SCFH per engine. Air emissions from each engine will be discharged through a stack 14.0 inches in diameter, 18 feet above grade, at a rate of 5,377-acfm at 1,055°F.
- The internal combustion engines will have emissions of hazardous air pollutants (HAPs), the most significant being formaldehyde. Emissions of formaldehyde for the engines were calculated using a factor of 0.0205 lb/MMBtu from AP-42, (7/00), Table 3.2-3 for four-stroke rich-burn engines with a 76% reduction for the catalytic converters. This facility is not a major source of HAPs. The following table presents estimated formaldehyde emissions for the compressor engines.

**Formaldehyde Emissions**

Point	Potential Emissions		Controlled Emissions	
	lb/hr	TPY	Lb/hr	TPY
C-1, Waukesha L7042GSI w/ cat. conv.	0.19	0.84	0.05	0.20
C-2, Waukesha L7042GSI w/ cat. conv.	0.19	0.84	0.05	0.20
C-3, Waukesha L7042GSI w/ cat. conv.	0.19	0.84	0.05	0.20
C-4, Waukesha L7042GSI w/ cat. conv.	0.19	0.84	0.05	0.20
C-5, Waukesha L7042GSI w/ cat. conv.	0.19	0.84	0.05	0.20
C-6, Waukesha L7042GSI w/ cat. conv.	0.19	0.84	0.05	0.20
C-7, Waukesha L7042GSI w/ cat. conv.	0.19	0.84	0.05	0.20
C-8, Waukesha L7042GSI w/ cat. conv.	0.19	0.84	0.05	0.20
C-9, Waukesha L7042GSI w/ cat. conv.	0.19	0.84	0.05	0.20
<b>Totals</b>	<b>1.71</b>	<b>7.56</b>	<b>0.45</b>	<b>1.81</b>

**EUG-2 Glycol Dehydrator**

- Potential VOC and HAP emissions from the glycol dehydrator still vent (D-1) and glycol dehydrator flash emissions were based on GRI-GLYCalc Version 4.0 software, an extended gas analysis, a maximum natural gas throughput of 30 MMSCFD, and a maximum glycol circulation rate of 4.5 gallons per minute (gpm). The dehydrator still vent is equipped with a condenser. The condenser outlet temperature was 120 degrees in the GlyCalc estimation. Gasses from the condenser will be vented to the atmosphere. The glycol unit is also equipped with a flash tank. The flash tank off-gases will be directed to the inlet of the facility for recompression.
- Potential emissions for the 1.0 MMBtu/hr glycol dehydrator reboiler (H-1) were calculated using AP-42 (7/98), Section 1.4 factors for natural gas fired heaters.

**Glycol Dehydrator**

EU	Point	NO <sub>x</sub>		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
D-1	Still Vent	--	--	--	--	4.92	21.58
H-1	Reboiler Heater	0.10	0.44	0.08	0.37	0.006	0.02
<b>Total</b>		<b>0.10</b>	<b>0.44</b>	<b>0.08</b>	<b>0.37</b>	<b>4.926</b>	<b>21.6</b>

- Dehydration units using glycol desiccants emit benzene, toluene, ethyl benzene, xylene, (BTEX) and n-hexane from the glycol reboiler vapor stack. These compounds are regulated as hazardous air pollutants (HAP). Controlled emissions of each HAP are less than 10 TPY, and controlled total HAP emissions are less than 25 TPY. The facility is, therefore, an area source of HAPs. The following table lists estimates of HAP emissions from the glycol dehydrator still vent.

**HAP Emissions**

Pollutant	Estimated Emissions			
	Uncontrolled		Controlled	
	lbs/hr	TPY	lbs/hr	TPY
Benzene	1.20	5.26	0.21	0.93
Toluene	1.16	5.10	0.24	1.06
Ethyl benzene	---	---	---	---
Xylene	---	---	---	---
n-Hexane	0.90	0.39	0.05	0.22
<b>Total</b>	<b>3.26</b>	<b>10.75</b>	<b>0.50</b>	<b>2.21</b>

**EUG-3 Tanks**

- The potential VOC emissions (breathing/working losses) from the three (3) 300-bbl condensate storage tanks were estimated using EPA’s TANKS 4.0 model program with a maximum annual throughput of 2,000,000 gallons each tank, an average vapor pressure of 6.246 psia, and a vapor molecular weight of 92. The condensate tanks are connected in series. Therefore, flashing from condensate occurs in tank T-1. Flashing emissions were calculated with the E&P Tanks program.

**Storage Tanks**

EU	Point	Significant
T-1	Condensate Tank	Yes
T-2	Condensate Tank	No, but DCP requests 5 TPY limit
T-3	Condensate Tank	No, but DCP requests 5 TPY limit
T-4	Dehy Used Oil Tank	No
T-5	Methanol Tank	No
T-13	Triethylene Glycol	No
T-14	Glycol	No

**EUG-4 Fugitives**

- Potential VOC emissions from process piping fugitives were estimated from Table 2-4 of EPA's *Protocol for Equipment Leak Emission Estimates*, November 1995, EPA-453/R-95-017, 8,760 hours per year of operation, component counts from a similar facility, and a representative extended gas analysis data.

**Fugitive Emissions**

Equipment	Source Count	Emission Factor lb/hr/source	% VOC (C <sub>3+</sub> )	VOC	
				lb/hr	TPY
Valves- Inlet Gas	459	0.00992	25.7	1.169	5.12
Valves - Liquid	91	0.00550	100	0.501	2.19
Relief Valves	32	0.01940	25.7	0.159	0.70
Pump Seals - Liquid	10	0.02866	100	0.287	1.26
Connectors/Flanges Gas	1,850	0.00086	25.7	0.409	1.79
Connectors/Flanges Liquid	160	0.00024	100	0.038	0.17
Compressor Seals	36	0.01940	25.7	0.179	0.79
<b>Total</b>				<b>2.742</b>	<b>12.02</b>

**EUG-5 Condensate Loading**

- Emissions from the condensate truck loading operation were calculated using 2,000,000 gallons per year throughput, a 66 lb/lb-mole molecular weight, and a 5.2 psia vapor pressure, using the methods of AP-42 (1/95), Section 5.2.

**Condensate Loading**

EU	Point	Quantity	VOC	
			lb/hr	TPY
Load	Condensate Loading	2,000,000 gal/yr	--	<b>4.93</b>

**Facility-Wide Emissions**

Source	NO <sub>x</sub>		CO		VOC	
	lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY
C-1, Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-2, Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-3, Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-4, Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-5, Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-6, Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-7, Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-8, Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-9, Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
VENT-1, Blowdown <sup>(2)</sup>	---	---	---	---	---	---

(1) Equipped with a catalytic converter.

(2) Blowdown emissions are routed back to the inlet of the facility.

**Facility-Wide Emissions (continued)**

Source	NO <sub>x</sub>		CO		VOC	
	lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY
H-1, Reboiler Heater	0.11	0.46	0.02	0.10	<0.01	0.02
D-1, Dehydrator Still Vent <sup>(3)</sup>	---	---	---	---	4.92	21.58
T-1, Condensate Tank <sup>(4)</sup>	---	---	---	---	1.70	7.45
T-2, Condensate Tank <sup>(5)</sup>	---	---	---	---	1.11	5.00
T-3, Condensate Tank <sup>(5)</sup>	---	---	---	---	1.11	5.00
T-4, Dehy Used Oil Tank	---	---	---	---	0.05	0.22
T-5, Methanol Tank	---	---	---	---	0.02	0.10
T-13, Dehy Drip Tank	---	---	---	---	---	0.16
F-1, Fugitive Emissions	---	---	---	---	2.74	12.02
Load, Condensate Loading	---	---	---	---	---	4.93
<b>Estimate from 2011-047-TV2</b>	<b>73.46</b>	<b>321.67</b>	<b>73.37</b>	<b>321.31</b>	<b>32.41</b>	<b>229.66</b>
<b>Total</b>	<b>73.46</b>	<b>321.67</b>	<b>73.37</b>	<b>321.31</b>	<b>33.41</b>	<b>163.58</b>
<b>Difference</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1.00</b>	<b>-66.08</b>

(3) With controls (condenser, flash tank, and recirculation).

(4) Includes condensate storage tanks' working, breathing, and flashing losses. Tanks in series.

(5) Includes condensate storage tanks' working and breathing losses. Tanks in series.

Controlled HAP emissions were estimated to equal 4.02 TPY from the engines and the glycol dehydration unit. Emissions of each HAP are therefore less than 10 TPY, and total HAP emissions are less than 25 TPY. The facility is a synthetic minor source of HAPs.

**SECTION V. INSIGNIFICANT ACTIVITIES**

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

1. Space heaters, boilers, process heaters and emergency flares less than or equal to 5-MMbtu/hr heat input (commercial natural gas). The dehydrator heater (H-1) is rated at 1.0-MMbtu/hr.
2. Emissions from crude oil and condensate storage tanks with a capacity of less than or equal to 420,000 gallons that store crude oil and condensate prior to custody transfer. Tanks T-1, T-2 and T-3 have capacities less than the 420,000 gallon threshold.
3. \* Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0-psia at maximum storage temperature. Glycol, amine, and lube oil storage tanks all have capacities less than 10,000 gallons and store liquids with a vapor pressure below 1.0-psia.
4. Emissions from crude oil or condensate storage marine and truck loading equipment operations at crude oil and natural gas production sites where the loading rate does not exceed 10,000 gallons per day averaged over a 30-day period. The maximum anticipated condensate throughput (2,000,000 gal) is equivalent to 5,479 gallons per day.
5. Activities having the potential to emit no more than 5 TPY of any criteria pollutant. The methanol tanks, blowdowns (VENT-1), and truck loading operation are in this category.

**SECTION VI. OKLAHOMA AIR POLLUTION CONTROL RULES**

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

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

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

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

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

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

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

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

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

OAC 252:100-19 (Particulate Matter (PM)) [Applicable]  
 Section 19-4 regulates emissions of PM from new and existing fuel-burning equipment, with emission limits based on maximum design heat input rating. Fuel-burning equipment is defined in OAC 252:100-19 as any internal combustion engine or gas turbine, or other combustion device used to convert the combustion of fuel into usable energy. Appendix C specifies a PM emission limitation of 0.60 lbs/MMBTU for equipment with a heat input rating of 10 MMBTUH or less. AP-42 (7/98), Section 1.4 lists total PM emissions for the heater at 0.0076 lb/MMBTU, and AP-42 (7/00), Section 3.2 lists PM emissions from the engines at 0.01 lb/MMBTU. The following table compares the applicable limits to expected PM emissions. The equipment at this facility is in compliance with the requirements of this subchapter.

**Fuel Burning Equipment PM Emissions**

Unit	Heat Input Capacity, MMBTUH	PM Emission Limitation of OAC 252:100-19, lb/MMBTU	PM Emission Rate, lb/MMBTU
C-1	9.34	0.60	0.00991
C-2	9.34	0.60	0.00991
C-3	9.34	0.60	0.00991
C-4	9.34	0.60	0.00991
C-5	9.34	0.60	0.00991
C-6	9.34	0.60	0.00991
C-7	9.34	0.60	0.00991
C-8	9.34	0.60	0.00991
C-9	9.34	0.60	0.00991
H-1	1.0	0.60	0.0075

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

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

OAC 252:100-31 (Sulfur Compounds) [Applicable]

Part 2 limits the ambient air concentration of hydrogen sulfide (H<sub>2</sub>S) emissions from any facility to 0.2 ppmv (24-hour average) at standard conditions which is equivalent to 283 µg/m<sup>3</sup>. Engines and boilers combusting fuel with an H<sub>2</sub>S content of less than 343 ppmv are unlikely to exceed the ambient air concentration limit. A fuel sulfur limit of 343 ppmv will ensure compliance with the ambient air concentration limit.

Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBTU heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,020 Btu/scf, this limit corresponds to fuel sulfur content of 1,227 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 new gas-fired fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.20 lbs of NO<sub>x</sub> per MMBTU, three-hour average. There are no equipment items that exceed the 50 MMBTUH threshold.

OAC 252:100-35 (Carbon Monoxide) [Not Applicable]

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

OAC 252:100-37 (Volatile Organic Compounds) [Applicable]

Part 3 requires VOC 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 three (3) condensate tanks and methanol tank. The condensate tanks are equipped with submerged fill pipes, and the methanol tank is bottom-filled.

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. Therefore, this requirement is not applicable.

Part 5 limits the VOC content of coatings used in coating lines or operations. Any painting operation will involve maintenance coating of buildings and equipment, which will emit less than 100 pounds per day of VOCs and is therefore exempt.

Part 7 requires fuel-burning and refuse-burning equipment to be operated to minimize emissions of VOC. The equipment at this location is subject to this requirement.

Part 7 requires all effluent water separator openings, which receive water containing more than 200 gallons per day of any VOC, to be sealed or the separator to be equipped with an external floating roof or a fixed roof with an internal floating roof or a vapor recovery system. Tank T-1 is an effluent water separator. However, this facility operates under SIC code 1311 and T-1 is exempt from Part 7 per OAC 252:100-37-4(b).

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

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

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

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

**SECTION VII. FEDERAL REGULATIONS**

PSD, 40 CFR Part 52 [Not Applicable]  
 Total emissions for NO<sub>x</sub> and CO are greater than the major source threshold level of 250 TPY. Any future emission increases must be evaluated for PSD if they exceed a significance level (100 TPY CO, 40 TPY NO<sub>x</sub>, 40 TPY VOC, 40 TPY SO<sub>2</sub>, 25 TPY PM, 15 TPY PM<sub>10</sub>, 0.6 TPY Lead).

NSPS, 40 CFR Part 60 [Not Applicable]  
Subpart Kb, VOL Storage Vessels. This subpart regulates hydrocarbon storage tanks larger than 19,813 gallons capacity and built after July 23, 1984. There are no tanks larger than the threshold of applicability.  
Subpart GG, Stationary Gas Turbines. No turbines are located at this facility.

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

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

Subpart LLL, Onshore Natural Gas Processing: SO<sub>2</sub> Emissions. This subpart affects sweetening units and sweetening units followed by sulfur recovery units. There is no sweetening unit at this facility.

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

Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (SI-ICE). This subpart was published in the Federal Register on January 18, 2008. It promulgates emission standards for new SI engines ordered after June 12, 2006, that are manufactured after certain dates, and for SI engines modified or reconstructed after June 12, 2006. The specific emission standards (either in g/hp-hr or as a concentration limit) vary based on engine class, engine power rating, lean-burn or rich-burn, fuel type, duty (emergency or non-emergency), and manufacture date. Engine manufacturers are required to certify certain engines to meet the emission standards and may voluntarily certify other engines. An initial notification is required only for owners and operators of engines greater than 500 HP that are non-certified. Emergency engines will be required to be equipped with a non-resettable hour meter and are limited to 100 hours per year of operation excluding use in an emergency (the length of operation and the reason the engine was in operation must be recorded). The nine (9) 1,232-hp Waukesha L7042GSI engines in this permit were manufactured prior to June 12, 2006 and are not subject to this subpart.

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

1. Each gas well affected facility, which is a single natural gas well.
2. Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals that is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment.
3. Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment.
4. Each pneumatic controller affected facility, which is:
  - a. For the oil production segment (between the wellhead and the point of custody transfer to an oil pipeline): a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 SCFH.
  - b. For the natural gas production segment (between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not including natural gas processing plants): a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 SCFH.

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

All of the equipment in this permit was constructed prior to August 23, 2011.

NESHAP, 40 CFR Part 61

[Not Applicable]

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

NESHAP, 40 CFR Part 63

[Subparts HH and ZZZZ]

Subpart HH, Oil and Natural Gas Production Facilities. This subpart applies to triethylene glycol (TEG) dehydration units at area sources and affected emission points that are located at facilities that are major sources of HAP emissions 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 this subpart, natural gas enters the natural gas transmission and storage source category after the natural gas processing plant, when present. If no natural gas processing plant is present, natural gas enters the natural gas transmission and storage source category after the point of custody transfer. This facility is

considered an area source of HAP. Even though the TEG dehydration unit at this facility is considered an affected source, it is exempt from the requirements of § 63.764(c)(1) and (d) since the criteria § 63.764(e)(1)(i) or (ii) are met. However, the facility must maintain records of the de minimis determination as required in § 63.774(d)(1). The applicant has stated and demonstrated that the glycol unit is exempt from the glycol optimization requirements by meeting the exemption of §63.764(e)(1) for actual benzene emissions below 0.99 TPY. The applicable recordkeeping requirements have been incorporated into the permit.

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

	Construction/Reconstruction Dates	
	Engines >500 hp	Engines ≤ 500hp
<b>Existing Unit</b>		
Located at Major HAP Source	Before 12/19/02	Before 6/12/06
Located at Area HAP Source	Before 6/12/06	
<b>New or Reconstructed Unit</b>		
Located at Major HAP Source	On and After 12/19/02	On and After 6/12/06
Located at Area HAP Source	On and After 6/12/06	

EU ID #	Make/Model	Size (HP)	Mfg. Date	Status
C-1	Waukesha L7042GSI	1,232	11/1976	Existing
C-2	Waukesha L7042GSI	1,232	11/1970	Existing
C-3	Waukesha L7042GSI	1,232	10/1978	Existing
C-4	Waukesha L7042GSI	1,232	10/1989	Existing
C-5	Waukesha L7042GSI	1,232	11/1976	Existing
C-6	Waukesha L7042GSI	1,232	11/1976	Existing
C-7	Waukesha L7042GSI	1,232	11/1970	Existing
C-8	Waukesha L7042GSI	1,232	10/1978	Existing
C-9	Waukesha L7042GSI	1,232	10/1989	Existing

Engine Category	Requirements From Table 2d to Subpart ZZZZ of Part 63
Existing Non-Emergency, Non-Black Start, 4SRB Remote Stationary Rice > 500-hp	Change oil and filter every 2,160 hours of operation or annually, whichever comes first <sup>1</sup> . Inspect spark plugs, and inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.

<sup>1</sup>Sources have the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.

The engines at the facility are existing non-emergency 4-stroke rich-burn remote engines greater than 500 HP located at an area source of HAP emissions. As such they are subject to the maintenance practices specified in Table 2d of Subpart ZZZZ as required by §63.6603 as shown preceding.

Compliance Assurance Monitoring, 40 CFR Part 64 [Applicable]  
Compliance Assurance Monitoring, as published in the Federal Register on October 22, 1997, applies to any pollutant specific emission unit at a major source, that is required to obtain a Title V permit, if it meets all of the following criteria:

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

Since potential pre-control emissions from each of the nine compressor engines equal or exceed major source levels (100 TPY of a regulated pollutant or 10/25 TPY of a HAP), they are subject to CAM. Specifications for CAM for these units are incorporated into the permit.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]  
This facility will not process or store more than the threshold quantity of any regulated substance (Section 112r of the Clean Air Act 1990 Amendments). More information on this federal program is available on the web page: [www.epa.gov/rmp](http://www.epa.gov/rmp).

Stratospheric Ozone Protection, 40 CFR Part 82 [Subpart A and F Applicable]  
These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).

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

This facility does not utilize any Class I & II substances.

## SECTION VIII. COMPLIANCE

### Testing

Portable engine analyzer testing was performed for the engines on April 6 & 7, 2011, as shown in the following table:

EU	Serial No.	Test Date	Permit Limitations (lb/hr)		Test Results (lb/hr)	
			NO <sub>x</sub>	CO	NO <sub>x</sub>	CO
C-1	401620	01/20/2016	8.15	8.15	2.38	1.05
C-2	260958	01/20/2016	8.15	8.15	3.37	1.66
C-3	329199	01/20/2016	8.15	8.15	1.11	0.55
C-4	251639	01/20/2016	8.15	8.15	1.29	0.56
C-5	C-10758/1	04/14/2016	8.15	8.15	1.48	1.03
C-6	305677	04/14/2016	8.15	8.15	5.39	4.28
C-7	202822	04/14/2016	8.15	8.15	4.29	2.74
C-8	326321	04/14/2016	8.15	8.15	2.37	0.91
C-9	266454	04/14/2016	8.15	8.15	1.36	1.16

### Inspection

A full compliance evaluation (FCE) was performed on October 19, 2015 by Nick Snay and Jon Livermore of the Oklahoma Department of Environmental Quality Air Quality Division. Also present for the inspection were Ruben Jacobs, Compliance Coordinator and Jay Laughlin, Environmental Specialist of DCP Midstream, LP. There were no issues reported in the FCE that require modification of the operating permit.

### Tier Classification and Public Review

This application has been determined to be a Tier II based on the fact that it is a request for renewal for a Title V operation permit. 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 where the facility is located.

### Public Review

The applicant published the "Notice of Filing a Tier II Application" in *Garvin County News Star*, a weekly newspaper printed and published in the City of Maysville, Garvin County, Oklahoma, on April 22, 2016. The notice stated that the permit application is available for public review at the Maysville Public Library, located at 508 Williams Ave.; Maysville, Oklahoma, or at the Air Quality Division's Main Office in Oklahoma City, Oklahoma. The applicant will also publish a "Notice of Draft Tier II Permit" in a local newspaper to inform the public of the 30 day public review. The notice will state that the draft permit can be reviewed locally or at the Air Quality Division's Main Office in Oklahoma City, Oklahoma. In addition, a copy of the draft permit will be available on the Air Quality section of the DEQ web page at [www.deq.state.ok.us](http://www.deq.state.ok.us). The facility is not located within 50 miles of the boarder of Oklahoma and any other state.

### EPA Review

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

### Fees Paid

The applicant has submitted the application fee of \$7,500 for the renewal of a Part 70 permit.

**SECTION IX. SUMMARY**

The facility is constructed and is operating as described in the permit application. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues concerning this facility that would prohibit issuance of the permit. Issuance of the modified operating permit is recommended following public and EPA review.

# DRAFT

## PERMIT TO OPERATE AIR POLLUTION CONTROL FACILITY SPECIFIC CONDITIONS

DCP Midstream, LP  
Bradley Compressor Station

Permit No. 2016-0248-TVR3

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on March 3, 2016. The Evaluation Memorandum dated August 3, 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 Engines

EU	Engine	NO <sub>x</sub>		CO		VOC	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
C-1	Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-2	Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-3	Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-4	Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-5	Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-6	Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-7	Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-8	Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90
C-9	Waukesha L7042GSI <sup>(1)</sup>	8.15	35.69	8.15	35.69	2.72	11.90

(1) Equipped with a catalytic converter.

### EUG-2 Glycol Dehydrator

Emissions of HAP shall be less than 10 TPY for any individual HAP or 25 TPY for the aggregate of all HAP

The following emissions limitations apply to the glycol dehydration unit.

EU	Equipment	VOC	
		lb/hr	TPY
D-1	Still Vent	4.92	21.58

**EUG-3 Tanks**

Throughput shall not exceed 2,000,000 gal/yr. Tanks shall be configured in series.

EU	Point	Contents	VOC (TPY)
Tanks	T-1	Condensate <sup>(1)</sup>	7.45
	T-2	Condensate <sup>(2)</sup>	5.00
	T-3	Condensate <sup>(2)</sup>	5.00

(1) Includes breathing, working, and flashing losses.

(2) Included working and breathing losses.

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

**EUG-2 Glycol Dehydrator**

EU	Point	Description	MMBTUH
H-1	Reboiler Heater	Glycol Dehydrator Reboiler	1.0

**EUG-3 Tanks**

EU	Point	Contents
Tanks	T-4	Dehy Used Oil
	T-5	Methanol
	T-13	Triethylene Glycol
	T-14	Glycol

**EUG-4 Fugitives**

EU	Point	Approximate Number of Items	Type of Equipment
Fugitives	F-1	459	Valves- Inlet Gas
		91	Valves - Liquid
		32	Relief Valves
		10	Pump Seals - Liquid
		1,850	Connectors/Flanges Gas
		160	Connectors/Flanges Liquid
		36	Compressor Seals

**EUG-5 Condensate Loading**

EU	Point	Equipment
Load	Condensate Loading	Condensate Truck Loading

3. The fuel-burning equipment shall be fired with pipeline grade natural gas or other gaseous fuel with a sulfur content less than 343 ppmv. Compliance can be shown by the following methods: for pipeline grade natural gas, a current gas company bill; for other gaseous fuel, a current lab analysis, stain-tube analysis, gas contract, tariff sheet, or other approved methods. Compliance shall be demonstrated at least once per calendar year.[OAC 252:100-31]
4. The permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year). [OAC 252:100-8-6(a)]
5. Each engine at the facility shall have a permanent identification plate attached which shows the make, model number, and serial number. [OAC 252:100-43]
6. At least once per calendar quarter, the permittee shall conduct tests of NO<sub>x</sub> and CO emissions in exhaust gases from each engine in EUG 1 and each replacement engine when operating under representative conditions for that period. Testing is required for any engine or replacement engine, which runs for more than 220 hours during that calendar quarter. Engines shall be tested no sooner than 20 days after the last test. Testing shall be conducted using a portable engine analyzer in accordance with a protocol meeting the requirements of the "AQD Portable Analyzer Guidance" document or an equivalent method approved by Air Quality. When four consecutive quarterly tests show an engine to be in compliance with the emissions limitations shown in the permit, then the testing frequency may be reduced to semi-annual testing. A semi-annual test may be conducted no sooner than 60 calendar days nor later than 180 calendar days after the most recent test. Likewise, when the following two consecutive semi-annual tests show compliance, the testing frequency may be reduced to annual testing. An annual test may be conducted no sooner than 120 calendar days nor later than 365 calendar days after the most recent test. Upon any showing of non-compliance with emissions limitations or testing that indicate that emissions are within 10% of the emission limitation, the testing frequency shall revert to quarterly. Reduced engine testing does not apply to engines with catalytic converter/oxidation catalyst. [OAC 252:100-8-6 (a)(3)(A)]
7. Each engine shall be operated with exhaust gases passing through a properly functioning catalytic converter. [OAC 252:100-8-6(a)(1)]
8. When periodic compliance testing shows engine exhaust emissions in excess of the lb/hr limits in Specific Condition Number 1, the permittee shall comply with the provisions of OAC 252:100-9. Requirements of OAC 252:100-9 include immediate notification and written notification of Air Quality and demonstrations that the excess emissions meet the criteria specified in OAC 252:100-9. [OAC 252:100-9]
9. Replacement (including temporary periods of 6 months or less for maintenance purposes), of internal combustion engines/turbines with emissions limitations specified in this permit with engines of lesser or equal emissions of each pollutant (in lbs/hr and TPY) are authorized under the following conditions. [OAC 252:100-8-6 (f)(2)]
  - a. The permittee shall notify AQD in writing not later than 7 days prior to start-up of the replacement engine(s)/turbine(s). Said notice shall identify the old engine/turbine and

shall include the new engine/turbine make and model, serial number, horsepower rating, and pollutant emission rates (g/hp-hr, lb/hr, and TPY) at maximum horsepower for the altitude/location.

- b. Quarterly emissions tests for the replacement engine(s)/turbine(s) shall be conducted to confirm continued compliance with NO<sub>x</sub> and CO emission limitations. A copy of the first quarter testing shall be provided to AQD within 60 days of start-up of each replacement engine/turbine. The test report shall include the engine/turbine fuel usage, stack flow (ACFM), stack temperature (°F), and pollutant emission rates (g/hp-hr, lbs/hr, and TPY) at maximum rated horsepower for the altitude/location.
- c. Replacement equipment and emissions are limited to equipment and emissions which are not a modification under NSPS or NESHAP, or a significant modification under PSD. For existing PSD facilities, the permittee shall calculate the PTE or the net emissions increase resulting from the replacement to document that it does not exceed significance levels and submit the results with the notice required by a. of this Specific Condition.
- d. Engines installed as allowed under the replacement allowances in this Specific Condition that are subject to 40 CFR Part 63, Subpart ZZZZ and/or 40 CFR Part 60, Subpart JJJJ shall comply with all applicable requirements.

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

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

- a. The natural gas throughput shall not exceed 30 MMSCFD (averaged monthly).
- b. The lean glycol circulation rate shall not exceed 4.5 gallons per minute.
- c. The permittee shall monitor and record the lean glycol circulation rate at least once a month. When three consecutive months show no exceedance of the limit, the frequency may be reduced to quarterly. Upon any showing of non-compliance, the monitoring and recordkeeping frequency shall revert to monthly. With each inspection the lean glycol circulation rate shall be recorded as follows:

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

The circulation rate requirement of Specific Condition 10.c. is waived if the rated pump capacity is less than or equal to 4.5 gallons per minute and the pump model or capacity is clearly identified.

- d. The glycol dehydration unit shall be equipped with a flash tank on the rich glycol stream.
- e. The flash tank off-gas emissions shall be routed to the station inlet for recompression.
- f. The glycol dehydrator still vent shall be equipped with a condenser.

11. The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Oil and Natural Gas Production, Subpart HH, for each affected dehydration unit including but not limited to the following:  
[40 CFR 60.764]
- a. An owner or operator of a glycol dehydration unit that meets the exemption criteria in § 63.764(e)(1) shall maintain the records specified in §§ 63.774(d)(1), as appropriate, for that glycol dehydration unit.
12. The owner/operator shall comply with all applicable requirements of the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE) at Area Sources, Subpart ZZZZ, for any engine at the facility subject to Subpart ZZZZ, including but not limited to:  
[40 CFR 60.630 to 60.636]
- a. § 63.6580 What is the purpose of subpart ZZZZ?
  - b. § 63.6585 Am I subject to this subpart?
  - c. § 63.6590 What parts of my plant does this subpart cover?
  - d. § 63.6595 When do I have to comply with this subpart?
  - e. § 63.6600 What emission limitations and operating limitations must I meet?
  - f. § 63.6605 What are my general requirements for complying with this subpart?
  - g. § 63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations?
  - h. § 63.6615 When must I conduct subsequent performance tests?
  - i. § 63.6620 What performance tests and other procedures must I use?
  - j. § 63.6625 What are my monitoring, installation, operation, and maintenance requirements?
  - k. § 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?
  - l. § 63.6635 How do I monitor and collect data to demonstrate continuous compliance?
  - m. § 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?
  - n. § 63.6645 What notifications must I submit and when?
  - o. § 63.6650 What reports must I submit and when?
  - p. § 63.6655 What records must I keep?
  - q. § 63.6660 In what form and how long must I keep my records?
  - r. § 63.6665 What parts of the General Provisions apply to me?
  - s. § 63.6670 Who implements and enforces this subpart?
  - t. § 63.6675 What definitions apply to this subpart?
13. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site for at least five years after the date of recording and shall be provided to regulatory personnel upon request.  
[OAC 252:100-43]
- a. Operating hours for each engine, if operated less than 220 hours per quarter and not tested.
  - b. Periodic emissions testing results (NO<sub>x</sub> and CO) for each engine and each replacement engine.

- c. For the fuel(s) burned, the appropriate document(s) as described in Specific Condition No. 3.
  - d. Records required by 40 CFR Part 60, Subpart HH.
  - e. Records of the lean glycol circulation rate as required by Specific Condition 10c.
  - f. Records required by 40 CFR Part 63, Subpart ZZZZ.
  - g. Facility natural gas throughput, MMSCFD (monthly average).
14. The following records shall be maintained on-site to verify Insignificant Activities. No recordkeeping is required for those operations which qualify as Trivial Activities.  
[OAC 252:100-8-6 (a)(3)(B)]
- a. For fluid storage tanks with a capacity of less than 39,894 gallons and a true vapor pressure less than 1.5 psia: records of capacity of the tanks and contents.
  - b. For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant: the type of activity and the amount of emissions from that activity (annual).
15. No later than 30 days after each six month period, after the date of issuance of the original Part 70 operating permit (9/28/2000), the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from the permit requirements since the previous report shall be clearly identified in the report.  
[OAC 252:100-8-6(a)(3)(C)(i) & (ii)]

16. All of the engines in EUG-1 are subject to Compliance Assurance Monitoring (CAM). These engines shall comply with all applicable requirements and shall perform monitoring as approved in the following table.

	<b>Indicator No. 1</b>	<b>Indicator No. 2</b>	<b>Indicator No. 3</b>	<b>Indicator No. 4</b>
I. NSCR Performance Indicator	Temperature of exhaust gas into catalyst.*	O <sub>2</sub> concentration measured in millivolts into catalyst.*	Pressure drop across the catalyst.*	Quarterly verification of catalytic converter operation through use of portable analyzer to directly monitor NO <sub>x</sub> and CO emissions.
Measurement Approach	Exhaust gas temperature is measured continuously using an in-line thermocouple.	O <sub>2</sub> concentration into the catalyst is measured continuously using an in-line O <sub>2</sub> sensor.	Pressure drop across the catalyst beds is measured monthly using a differential pressure gauge.	O <sub>2</sub> sensors replaced quarterly. Thermocouple calibrated annually.
II. Indicator Range	Acceptable inlet temperature range is 700°F to 1250°F. Excursions above 1250°F trigger engine shutdown.	The indicator range is O <sub>2</sub> % < 0.5%. Excursion is an alarmed event lasting 30 minutes or longer. Excursions trigger corrective action, logging and reporting in semiannual report.	The indicator range is +/- 4 in. H <sub>2</sub> O from the benchmark. Excursions trigger corrective action, logging and reporting in semiannual report.	DCP will investigate any engine shutdown and perform corrective action, logging, and reporting in semiannual report.
III. Performance Criteria				
A. Data Representativeness	Temperature is measured at the inlet to the catalyst by a thermocouple. The minimum accuracy is +/- 5 °F.	Presence of oxygen is measured at the engine exhaust while the engine is operating.	Pressure drop across the catalyst is measured at the catalyst inlet and exhaust. The minimum accuracy of the device is ±0.25 in. H <sub>2</sub> O.	Quarterly verifications are performed on the engine emissions, O <sub>2</sub> sensor, AFR and the catalyst.
B. QA/QC Practices and Criteria	Thermocouple scanner or other end device is calibrated annually.	O <sub>2</sub> sensor replaced quarterly.	Pressure gauge calibrated quarterly. Pressure taps checked monthly for plugging.	Qualified personnel perform catalyst inspections.
C. Monitoring Frequency	Temperature is measured continuously.	O <sub>2</sub> % is measured continuously.	Pressure drop is measured monthly.	Inspections in accordance with quarterly verifications.
D. Data Collection Procedures	Temperature recorded daily by data logger. No observation required for days when engine is not operated.	O <sub>2</sub> is measured whenever the oxygen sensor is replaced. Records are maintained to document alarmed events and any required maintenance.	Records are maintained to document monthly readings and any required maintenance.	Records are maintained to document data recorded and any required maintenance. Record any shutdowns that require action. If no shutdowns, compliance is assumed on a daily basis.
E. Averaging Period	None, not to exceed minimums and max.	None.	None, not to exceed maximum.	NA

\* Ranges may need to be revised in the future.

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



# PART 70 PERMIT

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

DRAFT

Permit No. 2016-0248-TVR3

DCP Midstream LP,

having complied with the requirements of the law, is hereby granted permission to operate their Bradley Compressor Station in Section 18, Township 4N, Range 4W; near Lindsay, Garvin County, Oklahoma, subject to the Standard Conditions dated June 21, 2016, and Specific Conditions, both of which are attached.

This permit shall expire five years after the date of Issuance, except as authorized under Section VIII of the Standard Conditions.

DRAFT

\_\_\_\_\_  
Division Director, Air Quality Division

\_\_\_\_\_  
Date

DEQ Form #100-890

DCP Midstream, LP  
Attn: Ms. Bailey O'Leary, Environmental Engineer  
370 17<sup>th</sup> Street, Suite 2500  
Denver, CO 80202

RE: Operating Permit No. **2016-0248-TVR3**  
DCP Midstream, LP  
Bradley Compressor Station (Facility ID: 1019)  
Section 18, Township 4N, Range 4W  
Garvin County, Oklahoma

Dear Ms. O'Leary:

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

Also note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed on approved AQD forms and submitted (hardcopy or electronically) by April 1<sup>st</sup> of every year. Any questions concerning the form or submittal process should be referred to the Emissions Inventory Staff at 405-702-4100.

Thank you for your cooperation in this matter. If we may be of further service, or you have any questions about this permit, please contact me at [kyle.walker@deq.ok.gov](mailto:kyle.walker@deq.ok.gov) or (405) 702-4193.

Sincerely,

**DRAFT**

Kyle Walker, E.I.  
Engineering Section  
**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 (PM<sub>10</sub>). 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]

Ms. Bailey O'Leary, Sr. Environmental Engineer  
DCP Midstream, LP  
370 17<sup>th</sup> Street, Suite 2500  
Denver, CO 80202

Re: Permit Application **No. 2016-0248-TV3**  
Bradley Compressor Station (Facility ID: 1019)  
Section 18, Township 4N, Range 4W; Garvin County, Oklahoma

Dear Ms. O'Leary:

Air Quality Division has completed the initial review of your construction permit application referenced above. This application has been determined to be a **Tier II**. In accordance with 27A O.S. §2-14-302 and OAC 252:002-31 the enclosed draft permit is now ready for public review. The requirements for public review include the following steps which you must accomplish:

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located. (Instruction enclosed)
2. Provide for public review (for a period of 30 days following the date of the newspaper announcement) a copy of this draft permit and a copy of the application at a convenient location within the county of the facility.
3. Send to AQD a copy of the proof of publication notice from Item #1 above together with any additional comments or requested changes, which you may have on the draft permit.

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

Sincerely,

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

Enclosure