# West Virginia Department of Environmental Protection

Earl Ray Tomblin Governor

Division of Air Quality

Randy C. Huffman Cabinet Secretary

# Permit to Construct



R13-3280A

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

Antero Midstream LLC Bluestone Compressor Station 033-00172

-----William F. Durham

Director

Issued: DRAFT

This permit will supersede and replace R13-3280.

Facility Location: Salem, Harrison County, West Virginia Mailing Address: 1615 Wynkoop Street, Denver, CO 80202

Facility Description: Natural gas compressor station

NAICS Codes: 486210

UTM Coordinates: 534.947 km Easting • 4,350.034 km Northing • Zone 17

Permit Type: Modification

Description of Change: Replace existing Caterpillar G3516B Compressor Engine (CE-4) with a Caterpillar

G3516LE Compressor Engine that was formerly included in G35-A004A as CE-2. Also updated Section 5.0 to reflect new engine, removed JJJJ language, and updated ZZZZ

language.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

The source is not subject to 45CSR30.

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# 1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
CE-2	1E	Caterpillar G3516LE Compressor Engine	2008	1,265 HP	N/A
T01	2E	Produced Water Storage Tank	2015	210 bbl	N/A
T02	3E	Produced Water Storage Tank	2015	50 bbl	N/A
DEHY-001	4E	TEG Dehydration Unit & Flash Tank	2015	25 mmscfd	Recycle for FT
RB-1	5E	TEG Dehydration Unit Reboiler	2015	0.5 MMBtu/hr	None
LDOUT	6E	Product Loadout Rack	2015	210 bbl/day	None

# 1.1. Control Devices

<b>Emission Unit</b>	Pollutant	Control Device	Control Efficiency
25 mmscfd TEG Dehydrator	Volatile Organic Compounds	Recycled Reboiler	95 %
Flash Tanks	Hazardous Air Pollutants		95 %
(DEHY-001)			

# 2.0. General Conditions

#### 2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

# 2.2. Acronyms

CAAA	Clean Air Act Amendments	NOx	Nitrogen Oxides
CBI	Confidential Business	NSPS	New Source Performance
	Information		Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM <sub>2.5</sub>	Particulate Matter less than 2.5
C.F.R. or CFR	Code of Federal Regulations		μm in diameter
CO	Carbon Monoxide	PM <sub>10</sub>	Particulate Matter less than
C.S.R. or CSR	Codes of State Rules		10μm in diameter
DAQ	Division of Air Quality	Ppb	Pounds per Batch
DEP	Department of Environmental	Pph	Pounds per Hour
	Protection	Ppm	Parts per Million
dscm	Dry Standard Cubic Meter	Ppmy or	Parts per Million by Volume
FOIA	Freedom of Information Act	ppmv	
HAP	Hazardous Air Pollutant	PSD	Prevention of Significant
HON	Hazardous Organic NESHAP		Deterioration
HP	Horsepower	Psi	Pounds per Square Inch
lbs/hr	Pounds per Hour	SIC	Standard Industrial
LDAR	Leak Detection and Repair		Classification
M	Thousand	SIP	State Implementation Plan
MACT	Maximum Achievable	$SO_2$	Sulfur Dioxide
	Control Technology	TAP	Toxic Air Pollutant
MDHI	Maximum Design Heat Input	TPY	Tons per Year
MM	Million	TRS	Total Reduced Sulfur
MMBtu/hr or	Million British Thermal Units	TSP	Total Suspended Particulate
mmbtu/hr	per Hour	USEPA	United States Environmental
MMCF/hr or	Million Cubic Feet per Hour		Protection Agency
mmcf/hr		UTM	Universal Transverse Mercator
NA	Not Applicable	VEE	Visual Emissions Evaluation
NAAQS	National Ambient Air Quality	VOC	Volatile Organic Compounds
•	Standards	VOL	Volatile Organic Liquids
NESHAPS	National Emissions Standards for Hazardous Air Pollutants	. 52	

# 2.3. Authority

This permit is issued in accordance with West Virginia air pollution control law W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

2.3.1. 45CSR13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;

#### 2.4. Term and Renewal

2.4.1. This permit supersedes and replaces previously issued Permit G35-A004A. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

#### 2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-3280A and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
  - [45CSR§§13-5.11 and -10.3.]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

#### 2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

# 2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

# 2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4.]

#### 2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

#### 2.10 Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§13-5.1]

### 2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

#### 2.12. Emergency

2.12.1. An "emergency" means any situation arising from sudden and reasonable 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 the 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 preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - b. The permitted facility was at the time being properly operated;
  - c. 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 the permit; and
  - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5 The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

# 2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this 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 determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

#### 2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

#### 2.15. Property Rights

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

#### 2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

#### 2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1.]

# 2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

#### 2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

# 3.0. Facility-Wide Requirements

#### 3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.

  [45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. **[45CSR§6-3.2.]**
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health Environmental Health require a copy of this notice to be sent to them.

[40CFR§61.145(b) and 45CSR§34]

- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public. [45CSR§4-3.1] [State Enforceable Only]
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.

  [45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.

  [45CSR\$11-5.2.]

#### 3.2. Monitoring Requirements

[Reserved]

## **3.3.** Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling

connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
  - 1. The permit or rule evaluated, with the citation number and language;
  - 2. The result of the test for each permit or rule condition; and,
  - 3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

# 3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.
- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

[45CSR§4. State Enforceable Only.]

#### 3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director WVDEP

Division of Air Quality 601 57<sup>th</sup> Street

Charleston, WV 25304-2345

If to the US EPA:

Associate Director

Office of Air Enforcement and Compliance

Assistance (3AP20)

U.S. Environmental Protection Agency

Region III 1650 Arch Street

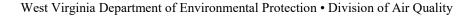
Philadelphia, PA 19103-2029

#### 3.5.4. **Operating Fee**

3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a

Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

- 3.5.4.2. In accordance with 45CSR22 Air Quality Management Fee Program, enclosed with this permit is an Application for a Certificate to Operate (CTO). The CTO will cover the time period beginning with the date of initial startup through the following June 30. Said application and the appropriate fee shall be submitted to this office prior to the date of initial startup. For any startup date other than July 1, the permittee shall pay a fee or prorated fee in accordance with Section 4.5 of 45CSR22. A copy of this schedule may be found on the reverse side of the CTO application.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.



# 4.0. Source-Specific Requirements

#### 4.1. Limitations and Standards

- 4.1.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of the analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.
- 4.1.2. **Minor Source of Hazardous Air Pollutants (HAP).** HAP emissions from the facility shall be less than 10 tons/year of any single HAP or 25 tons/year of any combination of HAPs. Compliance with this Section shall ensure that the facility is a minor HAP source.
- 4.1.3. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.

[45CSR§13-5.11.]

- 4.1.4. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
  - a. The equipment involved.
  - b. Steps taken to minimize emissions during the event.
  - c. The duration of the event.
  - d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.
- 4.1.5. The permittee shall not exceed the number and type of components (valves, pump seals, connectors, etc.) in gas/vapor or light liquid (as applicable) listed in Attachment N of Permit Application R13-3280A.
- 4.1.6. The permittee shall install, maintain, and operate all above-ground piping, valves, pumps, etc. that service lines in the transport of potential sources of regulated air pollutants to minimize any fugitive escape of regulated air pollutants (leak). Any above-ground piping, valves, pumps, etc. that shows signs of excess wear and that have a reasonable potential for fugitive emissions of regulated air pollutants shall be replaced.

4.1.7. The permittee shall monitor and maintain quarterly records (calendar year) for each facility component that was inspected for fugitive escape of regulated air pollutants. Each component shall operate with no detectable emissions, as determined using audio-visual-olfactory (AVO) inspections, USEPA 40CFR60 Method 21, USEPA alternative work practice to detect leaks from equipment using optical gas imaging (OGI) camera (ex. FLIR camera), or some combination thereof. AVO inspections shall include, but not limited to, defects as visible cracks, holes, or gaps in piping; loose connections; liquid leaks; or broken or missing caps or other closure devices. If permittee uses USEPA Method 21, then no detectable emissions is defined as less than 500 ppm in accordance with Method 21. If permittee uses an OGI camera, then no detectable emissions is defined as no visible leaks detected in accordance with USEPA alternative OGI work practices.

If any leak is detected, the permittee shall repair the leak as soon as possible. The first attempt at repair must be made within five (5) calendar days of discovering the leak, and the final repair must be made within fifteen (15) calendar days of discovering the leak. The permittee shall record each leak detected and the associated repair. The leak will not be considered repaired until the same monitoring method or a more detailed instrument determines the leak is repaired.

Delay of repair of a closed vent system for which leaks or defects have been detected is allowed if the repair is technically infeasible without a shutdown, or if you determine that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. You must complete repair of such equipment by the end of the next shutdown.

[45CSR§13-5.11.]

# **5.0.** Source-Specific Requirements (CE-2)

#### 5.1. Limitations and Standards

- 5.1.1. The quantity of natural gas that shall be consumed in the 1,265 hp natural gas fired reciprocating engine, Caterpillar G3516LE (CE-2) shall not exceed 8,229 cubic feet per hour or 72.09 x 10<sup>6</sup> cubic feet per year.
- 5.1.2. Maximum emissions from the 1,265 hp natural gas fired reciprocating engine, Caterpillar G3516LE (CE-2) shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)	
Nitrogen Oxides	5.58	24.43	
Carbon Monoxide	5.19	22.72	
Volatile Organic Compounds	0.73	3.18	
Formaldehyde	0.50	2.17	

# **5.2.** Monitoring Requirements

[Reserved]

# **5.3.** Testing Requirements

5.3.1. See Facility-Wide Testing Requirements Section 3.3 and Testing Requirements of Sections 10.5, 11.2, and 11.3.

#### 5.4. Recordkeeping Requirements

- 5.4.1. The permittee shall maintain records of the maintenance performed on Compressor Engine CE-2.
- 5.4.2. The permittee shall maintain a copy of the site specific maintenance plan or manufacturer maintenance plan.
- 5.4.3. The permittee shall comply with all applicable recordkeeping requirements under NSPS for Stationary Spark Ignition Internal Combustion Engines specified in 40 CFR Part 60, Subpart JJJJ, and the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Spark Ignition Internal Combustion Engines specified in 40 CFR Part 63, Subpart ZZZZ.
- 5.4.4. All records required by this section shall be maintained in accordance with section 3.4.1 of this permit.

#### 5.5. Reporting Requirements

5.5.1. See Facility-Wide Reporting Requirements Section 3.5 and Reporting Requirements of Sections 10.6 and 11.4.

# 6.0. Source-Specific Hazardous Air Pollutant Requirements (Natural Gas Dehydration Units Not Subject to MACT Standards and being controlled by a Flare Control Device)

#### 6.1. Limitations and Standards

- 6.1.1. **Maximum Throughput Limitation.** The maximum wet natural gas throughput to the TEG dehydration unit/still column (DEHY-001) shall not exceed 6.0 million standard cubic feet per day (mmscfd) for each unit. Compliance with the Maximum Throughput Limitation shall be determined using a twelve month rolling total. A twelve month rolling total shall mean the sum of the monthly throughput at any given time during the previous twelve consecutive calendar months.
- 6.1.2. Maximum emissions from the flare shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)	
Volatile Organic Compounds	1.91	8.36	

- 6.1.3. Recycled reboilers controlling the Dehydrator Flash Tanks (DEHY-001) shall be designed and operated in accordance with the following:
  - a. The vapors/overheads from the flash tanks shall be routed through a closed vent system to the reboiler at all times when there is a potential that vapors (emissions) can be generated from the flash tank.
  - b. The reboiler shall only be fired with vapors from the flash tank, and natural gas may be used as supplemental fuel.
  - c. The vapors/overheads from the flash tank shall be introduced into the flame zone of the reboiler.

# **6.2.** Monitoring Requirements

6.2.1. The permittee shall monitor the throughput of wet natural gas fed to the dehydration system on a monthly basis for each glycol dehydration unit.

#### **6.3.** Testing Requirements

6.3.1. In order to demonstrate compliance with 4.1.2, upon request of the Director, the permittee shall demonstrate compliance with the HAP emissions thresholds using GLYCalc Version 3.0 or higher. The permittee shall sample in accordance with GPA Method 2166 and analyze the samples utilizing the extended GPA Method 2286 as specified in the GRI-GLYCalc V4 Technical Reference User Manual and Handbook.

#### **6.4.** Recordkeeping Requirements

6.4.1. The permittee shall document and maintain the corresponding records specified by the on-going monitoring requirements of 6.2 and testing requirements of 6.3.

- 6.4.2. For the purpose of demonstrating compliance with section 4.1.2, the permittee shall maintain a record of all potential to emit (PTE) HAP calculations for the entire affected facility. These records shall include the natural gas compressor engines and ancillary equipment.
- 6.4.3. The permittee shall maintain a record of the wet natural gas throughput through the dehydration system to demonstrate compliance with section 6.1.1.
- 6.4.4. All records required under Section 6.4 shall be maintained on site or in a readily accessible off-site location maintained by the permittee for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

# **6.5.** Reporting Requirements

- 6.5.1 If permittee is required by the Director to demonstrate compliance with section 6.3.1, then the permittee shall submit a testing protocol at least thirty (30) days prior to testing and shall submit a notification of the testing date at least fifteen (15) days prior to testing. The permittee shall submit the testing results within sixty (60) days of testing and provide all supporting calculations and testing data.
- 6.5.2. Any deviation(s) from the allowable visible emission requirement for any emission source discovered during observations using 40CFR Part 60, Appendix A, Method 9 or 22 shall be reported in writing to the Director of the Division of Air Quality as soon as practicable, but in any case within ten (10) calendar days of the occurrence and shall include at least the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.

# 7.0. Source-Specific Requirements (Reboiler, RB-1)

#### 7.1. Limitations and Standards

- 7.1.1. Maximum Design Heat Input. The maximum design heat input for the TEG Dehydration Unit Reboiler (RB-1) shall not exceed 0.5 MMBtu/hr.
- 7.1.2. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average.

[45CSR§2-3.1.]

# 7.2. Monitoring Requirements

7.2.1. At such reasonable times as the Secretary may designate, the permittee shall conduct Method 9 emission observations for the purpose of demonstrating compliance with Section 7.1.2. Method 9 shall be conducted in accordance with 40 CFR 60 Appendix A.

# **7.3.** Testing Requirements

7.3.1. Compliance with the visible emission requirements of section 7.1.2 shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 or by using measurements from continuous opacity monitoring systems approved by the Director. The Director may require the installation, calibration, maintenance and operation of continuous opacity monitoring systems and may establish policies for the evaluation of continuous opacity monitoring results and the determination of compliance with the visible emission requirements of section 7.1.2. Continuous opacity monitors shall not be required on fuel burning units which employ wet scrubbing systems for emission control.

[45CSR§2-3.2.]

#### 7.4. Recordkeeping Requirements

7.4.1. The permittee shall maintain records of all monitoring data required by Section 7.2.1 documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6 - 10 mph NE wind) during the visual emission check(s). Should a visible emission observation be required to be performed per the requirements specified in Method 9, the data records of each observation shall be maintained per the requirements of Method 9.

# 7.5. Reporting Requirements

7.5.1. Any deviation(s) from the allowable visible emission requirement for any emission source discovered during observations using 40CFR Part 60, Appendix A, Method 9 or 22 shall be reported in writing to the Director of the Division of Air Quality as soon as practicable, but in any case within ten (10) calendar days of the occurrence and shall include at least the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.

# 8.0. Source-Specific Requirements (Storage Tanks, T01 & T02)

#### 8.1. Limitations and Standards

8.1.1. The maximum annual throughput of product to the 210 & 50 bbl storage tanks shall not exceed the following:

Storage	Product Stored	Maximum Annual
Tank ID		Throughput (gal/yr)
T01	Produced Water Tank (210)	3,066,000
T02	Produced Water Tank (50)	153,300

8.1.2. Maximum emissions from the Produced Water Tanks (T01 & T02) shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)	
Volatile Organic Compounds	0.54	2.38	

- 8.1.3. The permittee shall use a site specific sample to determine potential emissions. The permittee shall comply with the following:
  - i. The site specific sample shall be taken within thirty (30) days of startup.
  - ii. The type and location of the sample shall be appropriate for the calculation methodology or model (e.g. ProMax, E&P Tanks, HYSYS) being used to calculate the emissions. The sample location shall be equipped with appropriate sampling access.
  - iii. If the VOC potential emissions are higher than the emission limits in the registration, DAO shall be notified in accordance with section 8.4.1.
- 8.1.4. The permittee shall re-evaluate the VOC potential emissions based on the site specific sample within 90 days of receiving the analysis of the site specific sample determined per section 8.1.3. of this permit.

#### **8.2.** Monitoring Requirements

8.2.1. The permittee shall monitor the amount of produced water sent to storage tanks T01 & T02.

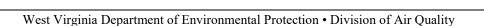
# **8.3.** Recordkeeping Requirements

- 8.3.1. All records required under Section 8.3 shall be maintained on site or in a readily accessible off-site location maintained by the permittee for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.
- 8.3.2. To demonstrate compliance with section 8.1.1 and 8.1.2, the permittee shall maintain a record of the aggregate throughput for the storage tanks on a monthly and rolling twelve month total. Said

records shall be maintained on site or in a readily accessible off-site location maintained by the registrant for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

# **8.4.** Reporting Requirements

8.4.1. The permittee shall notify the Director of the DAQ in writing for any instance when the potential emissions determined with a site specific sample in accordance with section 8.1.3. of this general permit were greater than the potential emissions provided in permit application R13-3280. The notification shall include whether or not this change in emissions affects applicability determination to NSPS, Subpart OOOO for any storage vessel. The notification to the Director shall be provided no later than 30 days from the date of discovery of the increased emissions.



# 9.0. Source-Specific Requirements (Product Loadout Rack, LDOUT)

#### 9.1. Limitations and Standards

- 9.1.1. The permittee shall install, maintain, and operate all above-ground piping, valves, pumps, etc. that service lines in the transport of potential sources of regulated air pollutants to prevent any substantive fugitive escape of regulated air pollutants. Any above-ground piping, valves, pumps, etc. that shows signs of excess wear and that have a reasonable potential for substantive fugitive emissions of regulated air pollutants shall be replaced.
- 9.1.2. The maximum quantity of produced water that shall be loaded shall not exceed 3,219,000 gallons per year. Compliance with the Maximum Yearly Operation Limitation shall be determined using a twelve month rolling total. A twelve month rolling total shall mean the sum of the hours of operation at any given time during the previous twelve consecutive calendar months.
- 9.1.3. The Condensate Truck Loading and Produced Water Truck Loading shall be operated in accordance with the plans and specifications filed in Permit Application R13-3280.

# 9.2. Recordkeeping Requirements

- 9.2.1. All records required under Section 9.2 shall be maintained on site or in a readily accessible off-site location maintained by the permittee for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.
- 9.2.2. To demonstrate compliance with section 9.1.2 and 9.1.3, the permittee shall maintain a record of the aggregate throughput for the product loadout rack (LDOUT1) on a monthly and rolling twelve month total. Said records shall be maintained on site or in a readily accessible off-site location maintained by the registrant for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

# 10.0. Source-Specific Requirements (40CFR60 Subpart OOOO Requirements, Reciprocating Compressor Engines, CE-2)

#### 10.1. Limitations and Standards

- 10.1.1. You must comply with the standards in paragraphs (a) through (d) of this section for each reciprocating compressor affected facility.
  - a. You must replace the reciprocating compressor rod packing according to either paragraph (a)(1) or (2) of this section or you must comply with paragraph (a)(3) of this section.
    - 1. Before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of your reciprocating compressor affected facility, or October 15, 2012, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later.
    - 2. Prior to 36 months from the date of the most recent rod packing replacement, or 36 months from the date of startup for a new reciprocating compressor for which the rod packing has not yet been replaced.
    - 3. Collect the emissions from the rod packing using a rod packing emissions collection system which operates under negative pressure and route the rod packing emissions to a process through a closed vent system that meets the requirements of §60.5411(a).
  - b. You must demonstrate initial compliance with standards that apply to reciprocating compressor affected facilities as required by § 60.5410.
  - c. You must demonstrate continuous compliance with standards that apply to reciprocating compressor affected facilities as required by § 60.5415.
  - d. You must perform the required notification, recordkeeping, and reporting as required by § 60.5420.

#### [40CFR§60.5385, Reciprocating Compressor Engines]

#### 10.2. Initial Compliance Demonstration

- 10.2.1. You must determine initial compliance with the standards for each affected facility using the requirements in paragraph (c) of this section. The initial compliance period begins on October 15, 2012 or upon initial startup, whichever is later, and ends no later than one year after the initial startup date for your affected facility or no later than one year after October 15, 2012. The initial compliance period may be less than one full year.
  - c. To achieve initial compliance with the standards for each reciprocating compressor affected facility you must comply with paragraphs (c)(1) through (4) of this section.
    - 1. If complying with §60.5385(a)(1) or (2), during the initial compliance period, you must continuously monitor the number of hours of operation or track the number of months since the last rod packing replacement.
    - 2. If complying with \$60.5385(a)(3), you must operate the rod packing emissions collection system under negative pressure and route emissions to a process through a closed vent system that meets the requirements of \$60.5411(a).

- 3. You must submit the initial annual report for your reciprocating compressor as required in § 60.5420(b).
- 4. You must maintain the records as specified in § 60.5420(c)(3) for each reciprocating compressor affected facility.

#### [40CFR§60.5410]

#### 10.3. Continuous Compliance Demonstration

- 10.3.1. For each reciprocating compressor affected facility complying with \$60.5385(a)(1) or (2), you must demonstrate continuous compliance according to paragraphs (c)(1) through (3) of this section. For each reciprocating compressor affected facility complying with \$60.5385(a)(3), you must demonstrate continuous compliance according to paragraph (c)(4) of this section.
  - 1. You must continuously monitor the number of hours of operation for each reciprocating compressor affected facility or track the number of months since initial startup, or October 15, 2012, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later.
  - 2. You must submit the annual report as required in § 60.5420(b) and maintain records as required in § 60.5420(c)(3).
  - 3. You must replace the reciprocating compressor rod packing before the total number of hours of operation reaches 26,000 hours or the number of months since the most recent rod packing replacement reaches 36 months.
  - 4. You must operate the rod packing emissions collection system under negative pressure and continuously comply with the closed vent requirements in §60.5411(a). [40CFR§60.5415]

#### 10.4. Notification, Recordkeeping and Reporting Requirements

- 10.4.1. You must submit the notifications according to paragraphs (a)(1) and (2) of this section if you own or operate one or more of the affected facilities specified in § 60.5365 that was constructed, modified, or reconstructed during the reporting period.

  [40CFR§60.5420(a)]
- 10.4.2. Reporting requirements. You must submit annual reports containing the information specified in paragraphs (b)(1) and (4) of this section to the Administrator and performance test reports as specified in paragraph (b)(7) of this section. The initial annual report is due no later than 90 days after the end of the initial compliance period as determined according to § 60.5410. Subsequent annual reports are due no later than same date each year as the initial annual report. If you own or operate more than one affected facility, you may submit one report for multiple affected facilities provided the report contains all of the information required as specified in paragraphs (b)(1) and (4) of this section. Annual reports may coincide with title V reports as long as all the required elements of the annual report are included. You may arrange with the Administrator a common schedule on which reports required by this part may be submitted as long as the schedule does not extend the reporting period.
  - (1) The general information specified in paragraphs (b)(1)(i) through (iv) of this section.
    - (i) The company name and address of the affected facility.
    - (ii) An identification of each affected facility being included in the annual report.

- (iii) Beginning and ending dates of the reporting period.
- (iv) A certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (4) For each reciprocating compressor affected facility, the information specified in paragraphs (b)(4)(i) through (ii) of this section.
- (i) The cumulative number of hours of operation or the number of months since initial startup, since October 15, 2012, or since the previous reciprocating compressor rod packing replacement, whichever is later.
- (ii) Records of deviations specified in paragraph (c)(3)(iii) of this section that occurred during the reporting period.
- (7)(i) Within 60 days after the date of completing each performance test (see § 60.8 of this part) as required by this subpart you must submit the results of the performance tests required by this subpart to EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) ( www.epa.gov/cdx ). Performance test data must be submitted in the file format generated through use of EPA's Electronic Reporting Tool (ERT) (see http://www.epa.gov/ttn/chief/ert/index.html ). Only data collected using test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE. Owners or operators who claim that some of the information being submitted for performance tests is confidential business information (CBI) must submit a complete ERT file including information claimed to be CBI on a compact disk or other commonly used electronic storage media (including, but not limited to, flash drives) to EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: WebFIRE Administrator, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT file with the CBI omitted must be submitted to EPA via CDX as described earlier in this paragraph. At the discretion of the delegated authority, you must also submit these reports, including the confidential business information, to the delegated authority in the format specified by the delegated authority.
- (ii) All reports required by this subpart not subject to the requirements in paragraph (a)(2)(i) of this section must be sent to the Administrator at the appropriate address listed in § 63.13 of this part. The Administrator or the delegated authority may request a report in any form suitable for the specific case (e.g., by commonly used electronic media such as Excel spreadsheet, on CD or hard copy). The Administrator retains the right to require submittal of reports subject to paragraph (a)(2)(i) and (ii) of this section in paper format.

# [40CFR§60.5420]

- 10.4.3. Recordkeeping requirements. You must maintain the records identified as specified in § 60.7(f) and in paragraph (c)(1) of this section. All records must be maintained for at least 5 years.
  - (3) For each reciprocating compressors affected facility, you must maintain the records in paragraphs (c)(3)(i) through (iii) of this section.
    - (i) Records of the cumulative number of hours of operation or number of months since initial startup or October 15, 2012, or the previous replacement of the reciprocating compressor rod packing, whichever is later.
    - (ii) Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in §60.5385(a)(3).

(iii) Records of deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in § 60.5385. **[40CFR§60.5420]** 



# 11.0. Source-Specific Requirements (40CFR63 Subpart ZZZZ Requirements, CE-2)

#### 11.1. Limitations and Standards

11.1.1. The permittee must comply with the applicable operating limitations in this section no later than October 19, 2013.

[40 C.F.R. § 63.6595(a)(1)] (E01, E02)

11.1.2. Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of 40 CFR 63.6590 must meet the requirements of 40 CFR part 63 Subpart ZZZZ by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

The permittee meets the criteria of paragraph (c)(1), which is for a new or reconstructed stationary RICE located at an area source. The permittee must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart JJJJ. (G3) [40CFR§63.65690(c)]

11.1.3. Following, are the applicable RICE MACT requirements according to the "Summary of Requirements" table provided by EPA.

Emission Unit ID	Emission Limita- tions	Operating Limita- tions	Monitoring Require- ments	Continuous Compliance	Notifica- tion Require- ments	Record- keeping Require- ments
CE-2	§ 63.6603 Table 2d, Item 8	§ 63.6603	§§ 63.6625 (h), (j)	§ 63.6605 § 63.6640 (a), (e) Table 6, Item 9	§ 63.6645 (a) (5)	§§ 63.6655 (a), (d), (e)

CE-2 is an existing stationary non-emergency natural gas fired remote 4SLB engine located at an area source.

#### CERTIFICATION OF DATA ACCURACY

	I, the undersigned, here	eby certify that, based on	information and beli	ef formed after reasonable
inquiry, all in	formation contained in the	attached		, representing the
period beginn	ing	and ending		, and any supporting
	documents app	pended hereto, is true, acc	curate, and complete.	
Signature <sup>1</sup>				
(please use blue ink)	Responsible Official or Authorized Repre	esentative		Date
Name & Title	<u> </u>		TV.1	
(please print or type)	Name		Title	
Telephone No.		i	Fax No	

- This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:
  - a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
    - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
    - (ii) the delegation of authority to such representative is approved in advance by the Director;
  - b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
  - c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
  - d. The designated representative delegated with such authority and approved in advance by the Director.