

Dominion Transmission, Inc.  
445 West Main Street, Clarksburg, WV 26301  
Web Address: www.dom.com



March 24, 2011

**BY: Overnight Mail**

#1267V3071593131692

John Benedict  
Director, Division of Air Quality  
WVDEP  
601 57<sup>th</sup> Street  
Charleston, WV 25304

**RE: Dominion Transmission Inc. – Title V Renewal Application**  
**Bridgeport Station - R30-03300100-2007**

Dear Mr. Benedict:

Enclosed please find the Title V Permit Renewal Application for Dominion Transmission, Inc.'s Bridgeport Station, Permit No. R30-03300100-2007. The enclosures consist of 3 copies of the complete application with all attachments.

If you have any questions or comments please contact Richard Gangle at 304-627-3225 or via email at [Richard.B.Gangle@Dom.com](mailto:Richard.B.Gangle@Dom.com).

Sincerely;

A handwritten signature in cursive script, appearing to read "Mark Reaser".

Mark Reaser  
Director, Gas Environmental Services  
Dominion Resources Services, Inc.

Enclosures



**Proof of Delivery**

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Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

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GRALEY

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Thank you for giving us this opportunity to serve you.

Sincerely,

UPS

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**TITLE V PERMIT  
RENEWAL APPLICATION**

**BRIDGEPORT STATION  
DOMINION TRANSMISSION, INC.**

**R30-03300100-2007**

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# **APPLICATION**



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475
www.dep.wv.gov/daq

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

1. Name of Applicant (As registered with the WV Secretary of State's Office): Dominion Transmission, Inc.
2. Facility Name or Location: Bridgeport Station
3. DAQ Plant ID No.: 0 3 3 - 0 0 1 0 0
4. Federal Employer ID No. (FEIN): 5 5 0 6 2 9 2 0 3
5. Permit Application Type: [X] Permit Renewal
6. Type of Business Entity: [X] Corporation
7. Is the Applicant the: [X] Both
8. Number of onsite employees: 13
9. Governmental Code: [X] Privately owned and operated; 0
10. Business Confidentiality Claims: [X] No

<b>11. Mailing Address</b>		
Street or P.O. Box: 445 West Main St.		
City: Clarksburg	State: WV	Zip: 26301
Telephone Number: (304) 627-3225	Fax Number: (304) 627-3222	

<b>12. Facility Location</b>		
Street: Route 2	City: Bridgeport	County: Harrison
UTM Easting: 567.05 km	UTM Northing: 4,355.39 km	Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
Directions: Exit #125 off I-79. Take Route 73 North for approximately 0.5 mile. Station is located on the right.		
Portable Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is facility located within a nonattainment area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, for what air pollutants?	
Is facility located within 50 miles of another state? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, name the affected state(s). Pennsylvania Ohio	
Is facility located within 100 km of a Class I Area <sup>1</sup> ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, name the area(s). Dolly Sods Otter Creek	
If no, do emissions impact a Class I Area <sup>1</sup> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<sup>1</sup> Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.		

<b>13. Contact Information</b>		
Responsible Official: Jeffrey Barger		Title: V.P. – Pipeline Operations
Street or P.O. Box: 445 West Main St.		
City: Clarksburg	State: WV	Zip: 26301
Telephone Number: (304) 627-3910	Fax Number: (304) 627-3323	
E-mail address: Jeffrey.L.Barger@dom.com		
Environmental Contact: Richard Gangle		Title: Env. Specialist III
Street or P.O. Box: 445 West Main St.		
City: Clarksburg	State: WV	Zip: 26301
Telephone Number: (304) 627-3225	Fax Number: (304) 627-3222	
E-mail address: Richard.B.Gangle@dom.com		
Application Preparer: Richard Gangle		Title: Env. Specialist III
Company: Dominion		
Street or P.O. Box: 445 West Main St.		
City: Clarksburg	State: WV	Zip: 26301
Telephone Number: (304) 627-3225	Fax Number: (304) 627-3222	
E-mail address: Richard.B.Gangle@dom.com		

**14. Facility Description**

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Natural Gas Compressor Station	NA	48612	4922

**Provide a general description of operations.**

Bridgeport Station is a natural gas compressor facility that services a natural gas storage pool and pipeline system. The compressor engines (EN01 & EN02) at the facility recompress natural gas for injection from the pipeline system into the storage pool or withdrawal from storage pool into the pipeline system. Prior to exiting the facility via pipeline, compressed withdrawal gas is process by the dehydration unit (DEHY01). The dehydration unit removes moisture and impurities from the gas stream.

15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to "Plot Plan - Guidelines."

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

**Section 2: Applicable Requirements**

**18. Applicable Requirements Summary**

Instructions: Mark all applicable requirements.

<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input checked="" type="checkbox"/> NESHAP (Subpart ZZZZ – Area Sources)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS	<input type="checkbox"/> Section 112(d) MACT standards
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqs.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input checked="" type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64)
<input type="checkbox"/> CAIR NO <sub>x</sub> Annual Trading Program (45CSR39)	<input type="checkbox"/> CAIR NO <sub>x</sub> Ozone Season Trading Program (45CSR40)
<input type="checkbox"/> CAIR SO <sub>2</sub> Trading Program (45CSR41)	

**19. Non Applicability Determinations**

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

40CFR63 Subpart HHH – Potential HAP emissions due not exceed the major source thresholds. The rule does not contain any area source provisions.

45CSR14 – Potential emissions do not exceed the major source thresholds (including GHGs).

Permit Shield

## 20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements).

- 45 CSR 6-3.1 – Open Burning prohibited (TV 3.1.1)
- 45 CSR 6-3.2 – Open Burning exemption (TV 3.1.2)
- 40 CFR Part 61 – Asbestos inspection and removal (TV 3.1.3)
- 45 CSR 15 – Asbestos inspection and removal (TV 3.1.3)
- State Only: 45 CSR 4-3.1 – No Objectionable odors (TV 3.1.4)
- 45 CSR 11-5.2 – Standby plans for emergency episodes (TV 3.1.5)
- WV Code 22-5-4 (a) (14) – The Secretary can request any pertinent information such as annual emission inventory reporting (TV 3.1.6)
- 40 CFR Part 82 Subpart F – Ozone depleting substances (TV 3.1.7)
- 40 CFR Part 68 – Risk Management Plan (TV 3.1.8)
- State Only: 45 CSR 17-3.1 – Fugitive Particulate Matter (TV 3.1.9)

Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 45 CSR 6-3.1 – The permittee shall prohibit open burning (TV 3.1.1)
- 45 CSR 6-3.2 – The permittee shall notify if open burning occurs (TV 3.1.2)
- 40 CFR Part 61 – Prior to demolition/construction buildings will be inspected for asbestos (TV 3.1.3)
- 45 CSR 15 – Prior to demolition/construction buildings will be inspected for asbestos (TV 3.1.3)
- 45 CSR 4 – Permittee shall maintain records of all odor complaints received (TV 3.1.4)
- 45 CSR 11 – Upon request by the Secretary, the permittee shall prepare a standby plan (TV 3.1.5)
- WV 22-5-4 – The permittee shall submit annual emission inventory reports (TV 3.1.6)
- 40 CFR Part 82 Subpart F – The permittee will prohibit maintenance, service, or repair of appliances containing Ozone depleting substances (TV 3.1.7)
- 40 CFR Part 68 – Should the permittee become subject to 40 CFR Part 68, a RMP shall be submitted (TV 3.1.8)
- 45 CSR 17 – The permittee will limit fugitive emissions from the facility by burning only pipeline quality natural gas (TV 3.1.9)
- 45 CSR 30 – Recordkeeping Requirements (TV 3.4)
- 45 CSR 30 – Reporting Requirements (TV 3.5)

Are you in compliance with all facility-wide applicable requirements?  Yes  No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.



**22. Inactive Permits/Obsolete Permit Conditions**

Permit Number	Date of Issuance	Permit Condition Number
	MM/DD/YYYY	
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**Section 3: Facility-Wide Emissions**

<b>23. Facility-Wide Emissions Summary [Tons per Year]</b>	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	65.51
Nitrogen Oxides (NO <sub>x</sub> )	186.54
Lead (Pb)	
Particulate Matter (PM <sub>2.5</sub> ) <sup>1</sup>	0.10
Particulate Matter (PM <sub>10</sub> ) <sup>1</sup>	1.21
Total Particulate Matter (TSP)	1.21
Sulfur Dioxide (SO <sub>2</sub> )	0.06
Volatile Organic Compounds (VOC)	83.38
Hazardous Air Pollutants <sup>2</sup>	Potential Emissions
Acetaldehyde	0.58
Acrolein	0.58
Benzene	0.14
Ethylbenzene	0.59
Formaldehyde	2.80
n-Hexane	0.12
Toluene	1.31
Xylene	1.60
Regulated Pollutants other than Criteria and HAP	Potential Emissions

<sup>1</sup>PM<sub>2.5</sub> and PM<sub>10</sub> are components of TSP.  
<sup>2</sup>For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

**Section 4: Insignificant Activities**

**24. Insignificant Activities (Check all that apply)**

<input checked="" type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input type="checkbox"/>	2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
<input checked="" type="checkbox"/>	3. Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
<input checked="" type="checkbox"/>	4. Bathroom/toilet vent emissions.
<input checked="" type="checkbox"/>	5. Batteries and battery charging stations, except at battery manufacturing plants.
<input type="checkbox"/>	6. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
<input type="checkbox"/>	7. Blacksmith forges.
<input type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input type="checkbox"/>	10. CO <sub>2</sub> lasers, used only on metals and other materials which do not emit HAP in the process.
<input type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input checked="" type="checkbox"/>	12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
<input checked="" type="checkbox"/>	13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
<input type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input type="checkbox"/>	15. Drop hammers or hydraulic presses for forging or metalworking.
<input type="checkbox"/>	16. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
<input type="checkbox"/>	17. Emergency (backup) electrical generators at residential locations.
<input type="checkbox"/>	18. Emergency road flares.
<input type="checkbox"/>	19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO <sub>x</sub> , SO <sub>2</sub> , VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units.  Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis:  _____ _____ _____ _____ _____ _____ _____ _____ _____

**24. Insignificant Activities (Check all that apply)**

<input type="checkbox"/>	20. Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.  Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:  _____ _____ _____ _____ _____
<input type="checkbox"/>	21. Environmental chambers not using hazardous air pollutant (HAP) gases.
<input checked="" type="checkbox"/>	22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
<input type="checkbox"/>	23. Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
<input checked="" type="checkbox"/>	24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
<input type="checkbox"/>	25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
<input type="checkbox"/>	26. Fire suppression systems.
<input checked="" type="checkbox"/>	27. Firefighting equipment and the equipment used to train firefighters.
<input type="checkbox"/>	28. Flares used solely to indicate danger to the public.
<input checked="" type="checkbox"/>	29. Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
<input type="checkbox"/>	30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
<input checked="" type="checkbox"/>	31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
<input type="checkbox"/>	32. Humidity chambers.
<input type="checkbox"/>	33. Hydraulic and hydrostatic testing equipment.
<input type="checkbox"/>	34. Indoor or outdoor kerosene heaters.
<input checked="" type="checkbox"/>	35. Internal combustion engines used for landscaping purposes.
<input type="checkbox"/>	36. Laser trimmers using dust collection to prevent fugitive emissions.
<input type="checkbox"/>	37. Laundry activities, except for dry-cleaning and steam boilers.
<input type="checkbox"/>	38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
<input type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input type="checkbox"/>	40. Ozone generators.
<input checked="" type="checkbox"/>	41. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant

24. Insignificant Activities (Check all that apply)	
	owners/operators must still get a permit if otherwise requested.)
<input type="checkbox"/>	42. Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
<input type="checkbox"/>	43. Process water filtration systems and demineralizers.
<input type="checkbox"/>	44. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
<input checked="" type="checkbox"/>	45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
<input type="checkbox"/>	46. Routing calibration and maintenance of laboratory equipment or other analytical instruments.
<input type="checkbox"/>	47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
<input type="checkbox"/>	48. Shock chambers.
<input type="checkbox"/>	49. Solar simulators.
<input checked="" type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input type="checkbox"/>	51. Steam cleaning operations.
<input type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input type="checkbox"/>	54. Steam vents and safety relief valves.
<input type="checkbox"/>	55. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
<input checked="" type="checkbox"/>	56. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
<input type="checkbox"/>	57. Such other sources or activities as the Director may determine.
<input type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input type="checkbox"/>	59. Vents from continuous emissions monitors and other analyzers.

*Section 5: Emission Units, Control Devices, and Emission Points*

**25. Equipment Table**

Fill out the Title V Equipment Table and provide it as **ATTACHMENT D**.

**26. Emission Units**

For each emission unit listed in the Title V Equipment Table, fill out and provide an **Emission Unit Form** as **ATTACHMENT E**.

For each emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**.

**27. Control Devices**

For each control device listed in the Title V Equipment Table, fill out and provide an **Air Pollution Control Device Form** as **ATTACHMENT G**.

For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H**.

**Section 6: Certification of Information**

**28. Certification of Truth, Accuracy and Completeness and Certification of Compliance**

*Note: This Certification must be signed by a responsible official. The original, signed in blue ink, must be submitted with the application. Applications without an original signed certification will be considered as incomplete.*

**a. Certification of Truth, Accuracy and Completeness**

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

**b. Compliance Certification**

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

**Responsible official (type or print)**

Name: Jeffrey Barger

Title: V.P. – Pipeline Operations

**Responsible official's signature:**

Signature: \_\_\_\_\_



Signature Date: \_\_\_\_\_

03-18-11

(Must be signed and dated in blue ink)

**Note: Please check all applicable attachments included with this permit application:**

ATTACHMENT A: Area Map

ATTACHMENT B: Plot Plan(s)

ATTACHMENT C: Process Flow Diagram(s)

ATTACHMENT D: Equipment Table

ATTACHMENT E: Emission Unit Form(s)

ATTACHMENT F: Schedule of Compliance Form(s)

ATTACHMENT G: Air Pollution Control Device Form(s)

ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

*All of the required forms and additional information can be found and downloaded from, the DEP website at [www.dep.wv.gov/dag](http://www.dep.wv.gov/dag), requested by phone (304) 926-0475, and/or obtained through the mail.*

# **Section 1**

## 1.0 INTRODUCTION

Bridgeport Station is a natural gas compressor station owned and operated by Dominion Transmission, Inc. for the purpose of servicing a natural gas storage field. The station injects and withdrawals natural gas based on demand. Bridgeport Station is located in Bridgeport, Harrison County, West Virginia.

Bridgeport Station has the potential to emit in excess of 100 tons per year of nitrogen oxides (NO<sub>x</sub>), and is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and under the West Virginia Department of Environmental Protection (WVDEP) Regulation (45 CSR Part 30).

Bridgeport Station was issued a Title V Operating Permit (Permit No: R30-03300100-200) with an expiration date of February 6, 2012. The Title V Operating Permit is for the operation of two (2) reciprocating engines (EN01 – EN02, each being rated at 1100 hp), two (2) 60 kW auxiliary generators (AUX02 – AUX03), one (1) 2.5 MMBtu/hr boiler (BLR01), one (1) 0.75 MMBtu/hr reboiler (RBR01), one (1) 110 MMSCF/day dehydration unit still column (DEHY01) with flare (DEHY 1C) and four (4) aboveground storage tanks of various sizes.

## 2.0 PROCESS DESCRIPTION

Bridgeport Station is a compressor facility that services a natural gas pipeline system and storage pool. The compressor engines (EN01 – EN02) at the facility receive natural gas flowing through a valve on the pipeline and compress it into the underground formation that makes up the storage pool. As demand warrants, the gas is then released or pumped out of the storage pool and recompressed for transport through the natural gas pipeline system. Prior to exiting the facility through the pipeline, the compressed natural gas is processed by the dehydration unit (DEHY01). The dehydration unit removes moisture and impurities from the gas stream.

The dehydration process begins with the compressed natural gas entering the unit and then being passed through a triethylene glycol dehydration system consisting of a contactor bed, a reboiler (RBR01), and associated equipment. As a result of this process, the natural gas is stripped of moisture and impurities, along with a small amount of hydrocarbons. The wet gas enters the contactor where moisture and some hydrocarbons are absorbed into the lean glycol. The glycol, which has become rich with absorbed moisture and hydrocarbons, is regenerated in the still column (DEHY01) using the heat generated from the natural gas-fired reboiler (RBR01) to liberate the moisture and hydrocarbon vapors. The regenerator vapors are vented to the flare (DEHY 1C) to combust the hydrocarbons, thereby, reducing overall emissions and odor. The flare is permitted with a destruction efficiency of 95%. The compressed, dehydrated gas then enters the pipeline.

### 3.0 REGULATORY DISCUSSION

The Bridgeport Station is located near Bridgeport, Harrison County, West Virginia. The area is classified as attainment with respect to the National Ambient Air Quality Standards (NAAQS) for all criteria pollutants.

#### *Prevention of Significant Deterioration (PSD)*

West Virginia's PSD regulations are found in 45 CSR 14. The PSD program is based on a new source review process to ensure that any new sources of air pollution will not cause a significant deterioration of local ambient air quality. The PSD regulations only apply to "major" new sources or "major" modifications of existing sources. A "major" stationary source being defined as a source being classified in any one of the 28 source categories identified in 40 CFR 52.21 which has the potential to emit 100 tons or more per year of any regulated pollutant, or any other stationary source which has the potential to emit 250 tons or more per year of a regulated pollutant.

The Bridgeport Station is currently operating with the potential to emit (PTE) below the major source thresholds for the traditional criteria pollutants.

In 2010, amendments were passed to the PSD regulations creating a major source threshold for greenhouse gases. Since Bridgeport Station does not belong to one of the 27 source categories listed under 40CFR52, potential to emit does not include fugitive emissions. Fugitives would only be added into the facility potential once it already exceeds major thresholds. The major source thresholds for GHG is 100,000 CO<sub>2</sub>e tpy. CO<sub>2</sub>e is the sum of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O, with CH<sub>4</sub> and N<sub>2</sub>O multiplied by the required global warming potential factor to convert in CO<sub>2</sub>. Below is a potential calculation using the total fuel ratings for all permitted units. The basis for this calculation is 40CFR98 Subpart C which is the Mandatory Reporting Rule for GHG, specifically the combustion section. USEPA has given no guidance onto the methodology for calculating GHGs for PSD purposes, as such most industries have chosen to utilize the MRR calculations.

Fuel scf/year	194,647,200	22.22	mmbtu/hr
Pollutant	Tonnes	CO <sub>2</sub> e tonnes	CO <sub>2</sub> e tons
CO <sub>2</sub>	10609.16	10609.16	11694.58
CH <sub>4</sub>	0.20	4.20	4.63
N <sub>2</sub> O	0.02	6.20	6.84
	Total	10619.57	11706.05

CH<sub>4</sub> EF = 0.001 kg CH<sub>4</sub>/mmBtu (40 CFR Part 98, Table C-2)

N<sub>2</sub>O EF = 0.0001 kg N<sub>2</sub>O/mmBtu (40 CFR Part 98, Table C-2)

CH<sub>4</sub> tonnes \* 21 (40 CFR Part 98, Table A-1) = CO<sub>2</sub>e tonnes

N<sub>2</sub>O tonnes \* 310 (40 CFR Part 98, Table A-1) = CO<sub>2</sub>e tonnes

Total CO<sub>2</sub>e tonnes and multiply by 1.10231 (40 CFR Part 98, Table A-2)

Bridgeport Station is a minor source for GHG PSD purposes based on the potential to emit.

## ***Non-Attainment***

Harrison County, West Virginia is currently classified as attainment with respect to the NAAQS for all criteria pollutants. Article 9 of the non-attainment regulations is not applicable to this permit renewal application.

## ***West Virginia Permitting Requirements***

The requirement for renewal applications for Title V Operating Permits is provided in 45 CSR 30 (Permits for Construction, Modification, Relocation, and operation of Stationary Sources of Air Pollutants) – Regulation 30. This application is being submitted to satisfy the requirements of 45 CSR 30.

## ***National Emission Standards for Hazardous Air Pollutants (NESHAPs)***

Section 112 of the Clean Air Act provides the EPA with a means of developing standards for potentially hazardous air pollutants (HAPs) for specific source categories. The regulations have been developed and implemented under Section 112(b) and are presented in 40 CFR 63 (National Emissions Standards for Hazardous Air Pollutants). Emission limits or control requirements developed to implement Section 112 of the CAA are applicable to both new and existing sources. Sources located at a facility with PTE of 10 tons per year (tpy) of a single HAP or 25 tpy total for combined HAPs are potentially subject to NESHAP regulations.

## ***Subpart HHH***

Bridgeport Station has one dehydration unit, equipped with a flare. The flare is permitted and required to maintain a destruction efficiency of 95%. The Bridgeport Station's potential to emit Hazardous Air Pollutants (HAPs) is below the major levels specified in the NESHAP. The Bridgeport Station is limited to operating below the major source level for HAPs Title V Permit condition 3.1.11.

## ***Subpart ZZZZ***

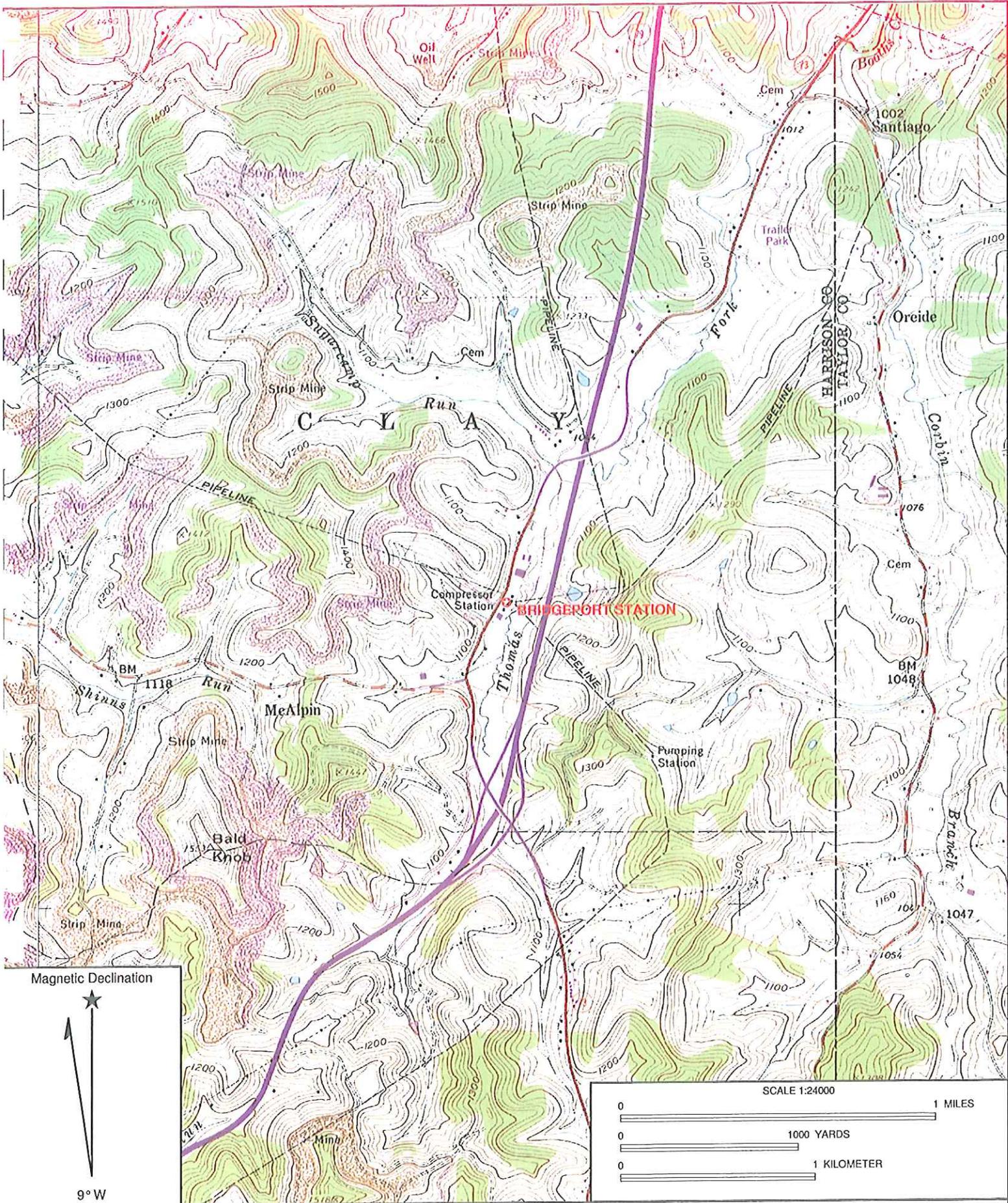
Bridgeport Station has 2 reciprocating internal combustion engines to which are subject to Subpart ZZZZ. Subpart ZZZZ outlines different applicable requirements based on if a source is a major or area source, fuel type (natural gas, diesel, LPG, etc), combustion type (4 stroke lean burn, 2 stroke lean burn, 4 stroke rich burn), and horsepower. Bridgeport Station is an area source as emissions are below the major source thresholds. EN01 & EN02 are both 2 stroke lean burn engines rated at 1,100 HP. As such both EN01 & EN02 are subject to prescribed maintenance practices consisting of: changing engine oil and filters every 4,320 operating hours or annually, inspecting spark plugs every 4,320 operating hours or annually, and inspecting belts and hoses every 4,320 operating hours or annually. Records must be maintained documenting maintenance activities. No notification or testing requirements are applicable.

## 4.0 POTENTIAL TO EMIT

Process Control Equipment	Potential Emissions, Tons Per Year (tpy)		
	Carbon Monoxide	Nitrogen Oxides	Volatile Organic Compounds
Current Potential-to-Emit	65.51	186.54	83.38
Fugitive Emissions	--	--	26.61
Engines (EN01& EN02)	63.78	183.96	48.88
Dehydration System (RBR01, DEHY01, DEHY)	0.64	0.43	7.54
Aux Gens (AUX02 & AUX03)	0.80	1.14	0.08
Boiler (BLR02)	0.41	1.01	0.27

*The aboveground storage tanks are considered insignificant sources and are not included.*

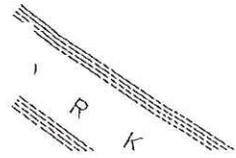
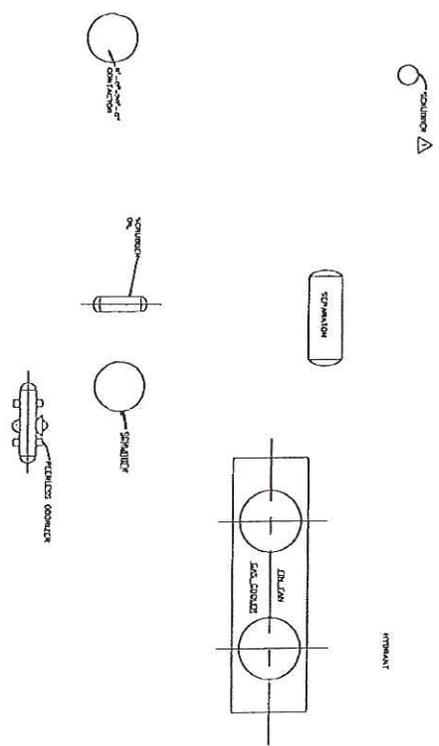
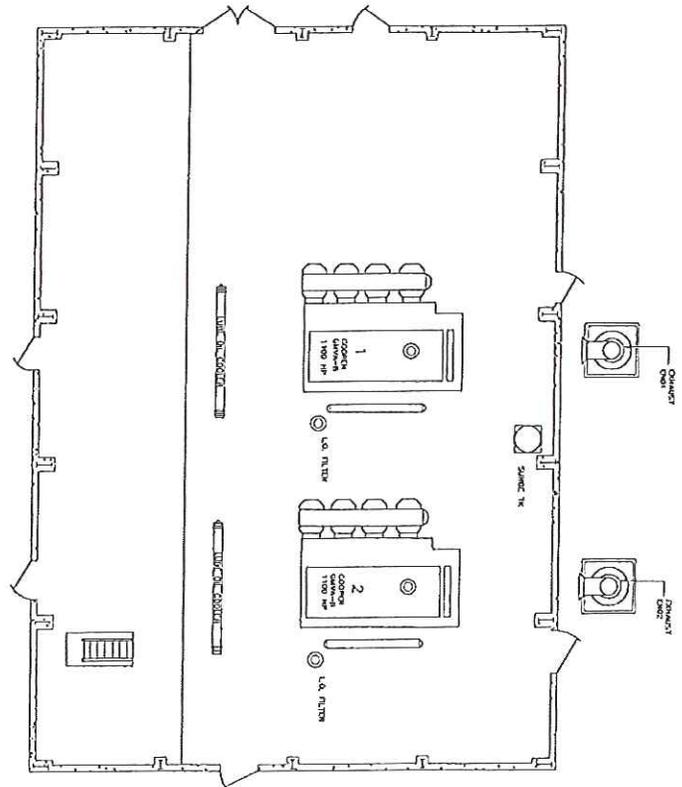
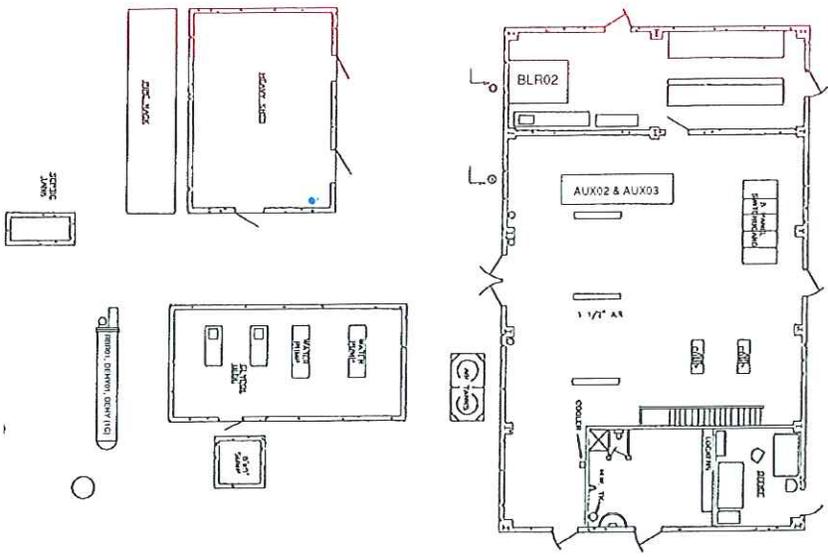
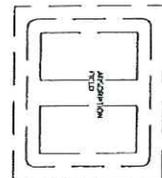
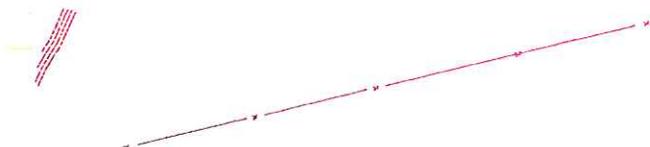
# **ATTACHMENT A**



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 Date: 8/24/2006  
 Scale: 1 inch equals 2000 feet

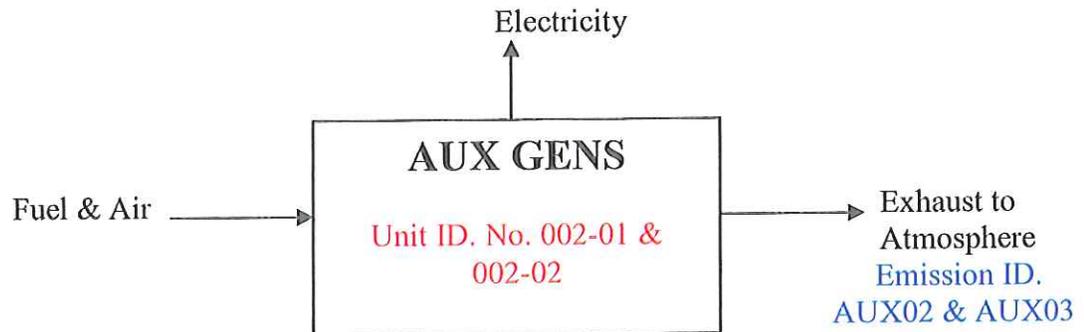
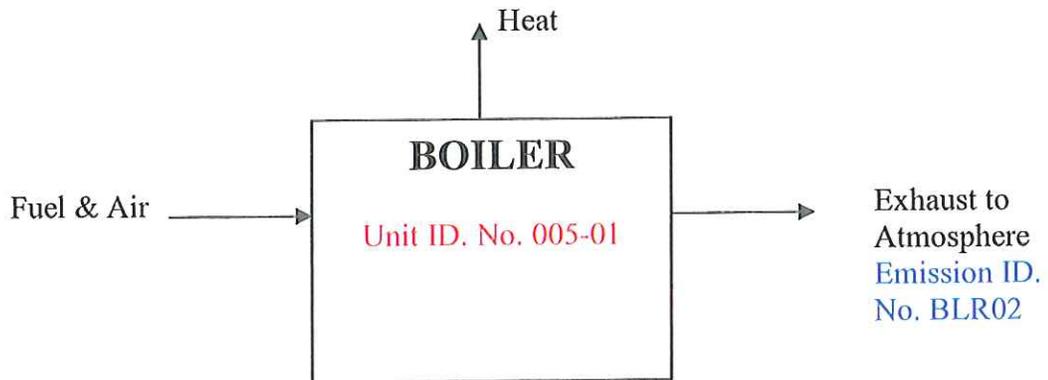
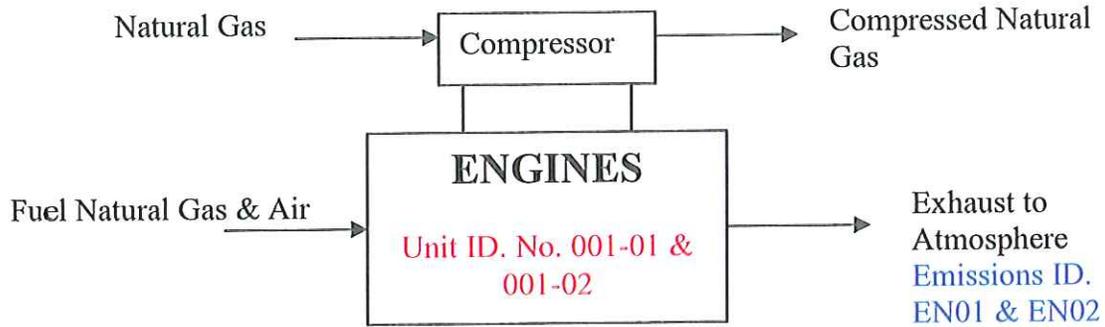
Location: 039.3473659° N 080.2220443° W NAD 83  
 Caption: BRIDGEPORT STATION

# **ATTACHMENT B**



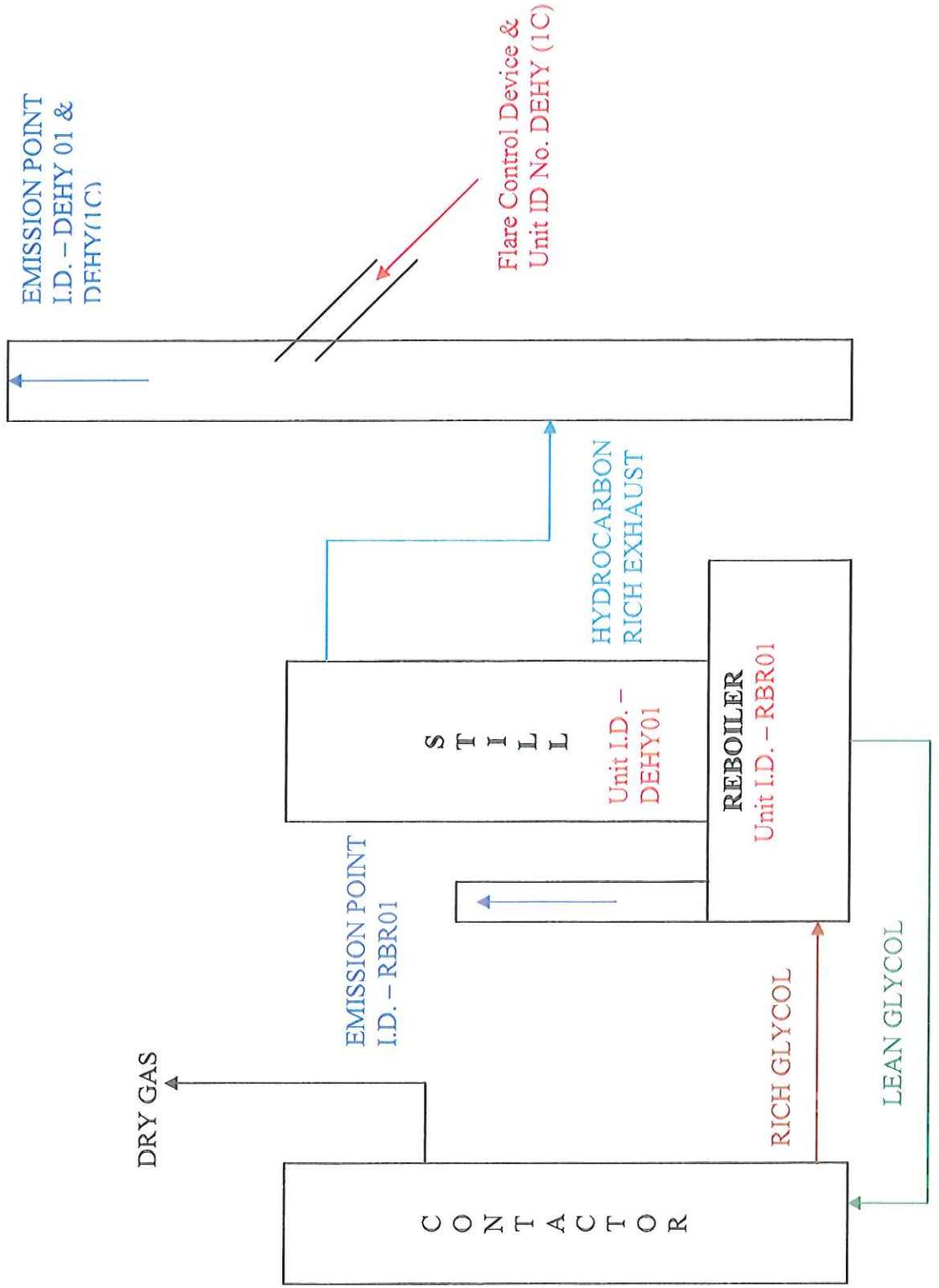
# **ATTACHMENT C**

## Process Flow Diagrams



# PROCESS FLOW DIAGRAMS

## Glycol Dehydration Unit



# **ATTACHMENT D**

**ATTACHMENT D - Emission Units Table**  
(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Unit ID <sup>1</sup>	Emission Point ID <sup>1</sup>	Emission Unit Description	Year Installed/Modified	Design Capacity	Control Device <sup>1</sup>
001-01	EN01	Reciprocating Engine/Integral Compressor; Cooper GMVA-8	1960	1100 HP	N/A
001-02	EN02	Reciprocating Engine/Integral Compressor; Cooper GMVA-8	1963	1100 HP	N/A
002-01	AUX02	Capstone C-60 Microturbine	2002	60 kW	N/A
002-02	AUX03	Capstone C-60 Microturbine	2002	60 kW	N/A
004-01	DEHY01	Glycol Dehydration Unit Still Column	2004	110 mmscf/day	Flare (1C)
005-01	BLR02	Boiler; Ajax WN-2500	2002	2.5 MMBtu/hr	N/A
005-02	RBR01	Glycol Dehydration Unit Reboiler	2004	0.75 MMBtu/hr	N/A
DEHY (1C)	DEHY (1C)	Dehydration Unit Flare; 95% destruction efficiency	2004	57scf/min	N/A
TK01	TK01	Horizontal Aboveground Storage Tank – Tri-Ethylene Glycol	1978	1,500-gallon	N/A
TK02	TK02	Vertical Aboveground Storage Tank – Ethylene Glycol	1978	4,200-gallon	N/A
TK03	TK03	Vertical Aboveground Storage Tank – Pipeline Fluids	1978	4,200-gallon	N/A
TK04	TK04	Horizontal Aboveground Storage Tank – Engine Oil	2003	8,000-gallon	N/A
TK05	TK05	Horizontal Aboveground Storage Tank – Odorant	2003	1,000-gallon	N/A

<sup>1</sup>For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

# **ATTACHMENT E**

## ATTACHMENT E - Emission Unit Form

**Emission Unit Description**

<b>Emission unit ID number:</b> EN01	<b>Emission unit name:</b> Cooper GMVA-8 Reciprocating Engine/Integral Compressor	<b>List any control devices associated with this emission unit:</b>  N/A
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**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**  
Natural Gas-fired reciprocating engine/integral compressor – 1100 HP

<b>Manufacturer:</b> Cooper	<b>Model number:</b> GMVA-8	<b>Serial number:</b>
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<b>Construction date:</b> 1960	<b>Installation date:</b> 1960	<b>Modification date(s):</b> N/A
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**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
1100 HP

<b>Maximum Hourly Throughput:</b> 8.5 mmbtu/hr	<b>Maximum Annual Throughput:</b> 74.46 mmcf	<b>Maximum Operating Schedule:</b> 8760
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**Fuel Usage Data (fill out all applicable fields)**

<b>Does this emission unit combust fuel?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, is it?</b>  <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
--	---

<b>Maximum design heat input and/or maximum horsepower rating:</b>  1100 HP	<b>Type and Btu/hr rating of burners:</b>  8.5 mmbtu/hr
---	---

**List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.**

Natural Gas – 8.5 mmbtu/hr

**Describe each fuel expected to be used during the term of the permit.**

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	20 gr Sulfur/100 cu. ft.		

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	7.28	31.89
Nitrogen Oxides (NO <sub>x</sub> )	21	91.98
Lead (Pb)	N/A	N/A
Particulate Matter (PM <sub>2.5</sub> )	< 0.01	< 0.01
Particulate Matter (PM <sub>10</sub> )	0.09	0.37
Total Particulate Matter (TSP)	0.09	0.37
Sulfur Dioxide (SO <sub>2</sub> )	0.01	0.02
Volatile Organic Compounds (VOC)	5.58	24.44
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.32	1.40
Benzene	0.02	0.07
Toluene	0.01	0.04
Ethylbenzene	< 0.01	< 0.01
n-Hexane	< 0.01	0.02
Xylene	< 0.01	0.01
Acetaldehyde	0.07	0.29
Acrolein	0.07	0.29
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).  
CO, NO<sub>x</sub>, VOC Emission Rates based on Manufacturer's information.  
PM10, PM2.5, and SO2 Emission Factors were obtained from USEPA's AIRS Report (March 1990).  
HAP emission factors based on USEPA's AP-42 Table 3.2-2.

*Applicable Requirements*

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

63.6603 – Comply with Table 2d

63.6595 – Must comply with requirements no later than October 19, 2013

63.6605(a) – Must be in compliance with requirements at all times

63.6640(a) – Demonstrate compliance with Table 2d through Table 6

63.6640(b) – Report deviations

Permit Shield

**For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)**

63 Subpart ZZZZ Table 2d – Every 4,320 hours or annually change oil and filter, inspect spark plugs, and inspect all belts/hoses. Have option of using oil analysis program of 63.6625(i)

63 Subpart ZZZZ Table 6 – Maintain maintenance plan

63.6625(e) – Maintain maintenance plan

63.6625(h) – Minimize engine idle during startup to 30 minutes

63.6625(j) – Option to utilize an oil analysis program

63.6655 – Recordkeeping requirements

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

## ATTACHMENT E - Emission Unit Form

**Emission Unit Description**

<b>Emission unit ID number:</b> EN02	<b>Emission unit name:</b> Cooper GMVA-8 Reciprocating Engine/Integral Compressor	<b>List any control devices associated with this emission unit:</b> N/A
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**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**  
 Natural Gas-fired reciprocating engine/integral compressor – 1100 HP

<b>Manufacturer:</b> Cooper	<b>Model number:</b> GMVA-8	<b>Serial number:</b>
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<b>Construction date:</b> 1963	<b>Installation date:</b> 1963	<b>Modification date(s):</b> N/A
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**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
 1100 HP

<b>Maximum Hourly Throughput:</b> 8.5 mmbtu/hr	<b>Maximum Annual Throughput:</b> 74.46 mmcf	<b>Maximum Operating Schedule:</b> 8760
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**Fuel Usage Data (fill out all applicable fields)**

<b>Does this emission unit combust fuel?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, is it?</b> <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
--	---

<b>Maximum design heat input and/or maximum horsepower rating:</b> 1100 HP	<b>Type and Btu/hr rating of burners:</b> 8.5 mmbtu/hr
---	---

**List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.**

Natural Gas – 8.5 mmbtu/hr

**Describe each fuel expected to be used during the term of the permit.**

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	20 gr Sulfur/100 cu. ft.		

**Emissions Data**

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	7.28	31.89
Nitrogen Oxides (NO <sub>x</sub> )	21	91.98
Lead (Pb)	N/A	N/A
Particulate Matter (PM <sub>2.5</sub> )	< 0.01	< 0.01
Particulate Matter (PM <sub>10</sub> )	0.09	0.37
Total Particulate Matter (TSP)	0.09	0.37
Sulfur Dioxide (SO <sub>2</sub> )	0.01	0.02
Volatile Organic Compounds (VOC)	5.58	24.44
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.32	1.40
Benzene	0.02	0.07
Toluene	0.01	0.04
Ethylbenzene	< 0.01	< 0.01
n-Hexane	< 0.01	0.02
Xylene	< 0.01	0.01
Acetaldehyde	0.07	0.29
Acrolein	0.07	0.29
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).  
CO, NO<sub>x</sub>, VOC Emission Rates based on Manufacturer's information.  
PM<sub>10</sub>, PM<sub>2.5</sub>, and SO<sub>2</sub> Emission Factors were obtained from USEPA's AIRS Report (March 1990).  
HAP emission factors based on USEPA's AP-42 Table 3.2-2.

**Applicable Requirements**

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 63.6603 – Comply with Table 2d
- 63.6595 – Must comply with requirements no later than October 19, 2013
- 63.6605(a) – Must be in compliance with requirements at all times
- 63.6640(a) – Demonstrate compliance with Table 2d through Table 6
- 63.6640(b) – Report deviations

\_\_\_\_ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

63 Subpart ZZZZ Table 2d – Every 4,320 hours or annually change oil and filter, inspect spark plugs, and inspect all belts/hoses. Have option of using oil analysis program of 63.6625(i)

- 63 Subpart ZZZZ Table 6 – Maintain maintenance plan
- 63.6625(e) – Maintain maintenance plan
- 63.6625(h) – Minimize engine idle during startup to 30 minutes
- 63.6625(j) – Option to utilize an oil analysis program
- 63.6655 – Recordkeeping requirements

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

## ATTACHMENT E - Emission Unit Form

*Emission Unit Description*

<b>Emission unit ID number:</b> AUX02	<b>Emission unit name:</b> Capstone C-60 microturbine	<b>List any control devices associated with this emission unit:</b> N/A
--	--	--

**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**  
 Natural Gas-fired microturbine for electricity

<b>Manufacturer:</b> Capstone	<b>Model number:</b> C-60	<b>Serial number:</b> N/A
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<b>Construction date:</b> 2002	<b>Installation date:</b> 2002	<b>Modification date(s):</b> N/A
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**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
 60 kW

<b>Maximum Hourly Throughput:</b> 0.81 mmbtu/hr	<b>Maximum Annual Throughput:</b> 7.10 mmcf	<b>Maximum Operating Schedule:</b> 8760
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*Fuel Usage Data (fill out all applicable fields)*

<b>Does this emission unit combust fuel?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, is it?</b> ___ Indirect Fired <input checked="" type="checkbox"/> Direct Fired
--	--

<b>Maximum design heat input and/or maximum horsepower rating:</b> 0.81 mmbtu/hr	<b>Type and Btu/hr rating of burners:</b> 0.81 mmbtu/hr
---	--

**List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.**

Natural Gas – 0.81 mmbtu/hr

**Describe each fuel expected to be used during the term of the permit.**

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	20 gr Sulfur/100 cu. ft.		

*Emissions Data*

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.08	0.35
Nitrogen Oxides (NO <sub>x</sub> )	0.13	0.57
Lead (Pb)	N/A	N/A
Particulate Matter (PM <sub>2.5</sub> )	< 0.01	< 0.01
Particulate Matter (PM <sub>10</sub> )	0.04	0.18
Total Particulate Matter (TSP)	0.04	0.18
Sulfur Dioxide (SO <sub>2</sub> )	<0.01	<0.01
Volatile Organic Compounds (VOC)	0.01	0.04
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	< 0.01	< 0.01
Benzene	< 0.01	< 0.01
Toluene	< 0.01	< 0.01
Ethylbenzene	< 0.01	< 0.01
Xylene	< 0.01	< 0.01
Acetaldehyde	< 0.01	< 0.01
Acrolein	< 0.01	< 0.01
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).  
CO, NO<sub>x</sub>, VOC, SO<sub>2</sub>, & PM Emission Rates based on Manufacturer's information.  
HAP emission factors based on USEPA's AP-42 Table 3.1-3

***Applicable Requirements***

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (*Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.*)

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

## ATTACHMENT E - Emission Unit Form

**Emission Unit Description**

<b>Emission unit ID number:</b> AUX03	<b>Emission unit name:</b> Capstone C-60 microturbine	<b>List any control devices associated with this emission unit:</b> N/A
--	--	--

**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**  
 Natural Gas-fired microturbine for electricity

<b>Manufacturer:</b> Capstone	<b>Model number:</b> C-60	<b>Serial number:</b>
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<b>Construction date:</b> 2002	<b>Installation date:</b> 2002	<b>Modification date(s):</b> N/A
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**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
 60 kW

<b>Maximum Hourly Throughput:</b> 0.81 mmbtu/hr	<b>Maximum Annual Throughput:</b> 7.10 mmcf	<b>Maximum Operating Schedule:</b> 8760
--	--	--

**Fuel Usage Data (fill out all applicable fields)**

<b>Does this emission unit combust fuel?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, is it?</b> ___ Indirect Fired <input checked="" type="checkbox"/> Direct Fired
--	--

<b>Maximum design heat input and/or maximum horsepower rating:</b> 0.81 mmbtu/hr	<b>Type and Btu/hr rating of burners:</b> 0.81 mmbtu/hr
---	--

**List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.**

Natural Gas – 0.81 mmbtu/hr

**Describe each fuel expected to be used during the term of the permit.**

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	20 gr Sulfur/100 cu. ft.		

**Emissions Data**

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.08	0.35
Nitrogen Oxides (NO <sub>x</sub> )	0.13	0.57
Lead (Pb)	N/A	N/A
Particulate Matter (PM <sub>2.5</sub> )	< 0.01	< 0.01
Particulate Matter (PM <sub>10</sub> )	0.04	0.18
Total Particulate Matter (TSP)	0.04	0.18
Sulfur Dioxide (SO <sub>2</sub> )	<0.01	<0.01
Volatile Organic Compounds (VOC)	0.01	0.04
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	< 0.01	< 0.01
Benzene	< 0.01	< 0.01
Toluene	< 0.01	< 0.01
Ethylbenzene	< 0.01	< 0.01
Xylene	< 0.01	< 0.01
Acetaldehyde	< 0.01	< 0.01
Acrolein	< 0.01	< 0.01
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).  CO, NO<sub>x</sub>, VOC, SO<sub>2</sub>, &amp; PM Emission Rates based on Manufacturer's information.  HAP emission factors based on USEPA's AP-42 Table 3.1-3</p>		

***Applicable Requirements***

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (*Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.*)

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

## ATTACHMENT E - Emission Unit Form

*Emission Unit Description*

<b>Emission unit ID number:</b> 004-01	<b>Emission unit name:</b> DEHY01	<b>List any control devices associated with this emission unit:</b> DEHY (1C)
---	--------------------------------------	--

**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**  
Dehydration Unit Still Column

<b>Manufacturer:</b> ETI	<b>Model number:</b>	<b>Serial number:</b>
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<b>Construction date:</b> 2004	<b>Installation date:</b> 2004	<b>Modification date(s):</b>
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**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
110 mmscf/day

<b>Maximum Hourly Throughput:</b>	<b>Maximum Annual Throughput:</b> 40,150 mmcf	<b>Maximum Operating Schedule:</b> 8760
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**Fuel Usage Data (fill out all applicable fields)**

<b>Does this emission unit combust fuel?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>If yes, is it?</b> <input type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
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<b>Maximum design heat input and/or maximum horsepower rating:</b>	<b>Type and Btu/hr rating of burners:</b>
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**List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.**  
Natural Gas – 110 mmscf/day throughput

**Describe each fuel expected to be used during the term of the permit.**

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	NA	NA
Nitrogen Oxides (NO <sub>x</sub> )	NA	NA
Lead (Pb)	NA	NA
Particulate Matter (PM <sub>2.5</sub> )	NA	NA
Particulate Matter (PM <sub>10</sub> )	NA	NA
Total Particulate Matter (TSP)	NA	NA
Sulfur Dioxide (SO <sub>2</sub> )	NA	NA
Volatile Organic Compounds (VOC)	1.71	7.51
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Benzene	<0.01	<0.01
Ethylbenzene	0.13	0.58
nHexane	0.02	0.07
Toluene	0.28	1.24
Xylenes	0.36	1.58
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

Emission rates for the dehydration unit were obtained from GRI GLYCalc V4.0, with 95% destruction efficiency for the flare.

*Applicable Requirements*

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Applicable requirements listed under Attachment G.

\_\_\_ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Applicable requirements listed under Attachment G.

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

## ATTACHMENT E - Emission Unit Form

*Emission Unit Description*

<b>Emission unit ID number:</b> 005-01	<b>Emission unit name:</b> Boiler	<b>List any control devices associated with this emission unit:</b> N/A
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**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**  
Boiler- 2.5 MMBtu/hr

<b>Manufacturer:</b> Ajax	<b>Model number:</b> WN-2500	<b>Serial number:</b>
<b>Construction date:</b> 2002	<b>Installation date:</b> 2002	<b>Modification date(s):</b> N/A

**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
2.5 MMBtu/hr

<b>Maximum Hourly Throughput:</b> 2.5 MMBtu/hr	<b>Maximum Annual Throughput:</b> 21.9 mmcf/yr	<b>Maximum Operating Schedule:</b> 8760
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*Fuel Usage Data (fill out all applicable fields)*

<b>Does this emission unit combust fuel?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, is it?</b>  <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
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<b>Maximum design heat input and/or maximum horsepower rating:</b> 2.5 MMBtu/hr	<b>Type and Btu/hr rating of burners:</b>
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**List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.**

Natural Gas – 2.5 MMBtu/hr

**Describe each fuel expected to be used during the term of the permit.**

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	20 gr Sulfur/100 cu. ft.		

**Emissions Data**

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.09	0.41
Nitrogen Oxides (NO <sub>x</sub> )	0.23	1.01
Lead (Pb)	---	---
Particulate Matter (PM <sub>2.5</sub> )	0.02	0.08
Particulate Matter (PM <sub>10</sub> )	0.02	0.08
Total Particulate Matter (TSP)	0.02	0.08
Sulfur Dioxide (SO <sub>2</sub> )	< 0.01	0.01
Volatile Organic Compounds (VOC)	0.06	0.27

Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
n-Hexane	< 0.01	0.02
Formaldehyde	<0.01	<0.01
Benzene	<0.01	<0.01
Toluene	<0.01	<0.01

Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

NO<sub>x</sub>, CO, & VOC emissions are based on manufacturer's information.  
All other emissions rates based on AP-42 Tables 1.4-2, and 1.4-3.

**Applicable Requirements**

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

45 CSR 2-3.1 – Visible Emission limit (TV 4.1.1)

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45 CSR 2-3.1 – Compliance with 4.1.1 is demonstrated by combusting natural gas.

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

## ATTACHMENT E - Emission Unit Form

**Emission Unit Description**

<b>Emission unit ID number:</b> 005-02	<b>Emission unit name:</b> Glycol Dehydration Unit Reboiler	<b>List any control devices associated with this emission unit:</b> N/A
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):  
Reboiler – 0.75 MMBtu/hr

<b>Manufacturer:</b> ETI	<b>Model number:</b>	<b>Serial number:</b>
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<b>Construction date:</b> 2004	<b>Installation date:</b> 2004	<b>Modification date(s):</b> N/A
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**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
0.75 MMBtu/hr

<b>Maximum Hourly Throughput:</b> 0.75 MMBtu/hr	<b>Maximum Annual Throughput:</b> 6.57 mmcf/yr	<b>Maximum Operating Schedule:</b> 8760
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**Fuel Usage Data (fill out all applicable fields)**

<b>Does this emission unit combust fuel?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, is it?</b>  <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
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<b>Maximum design heat input and/or maximum horsepower rating:</b> 0.75 MMBtu/hr	<b>Type and Btu/hr rating of burners:</b>
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**List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.**

Natural Gas – 0.75 MMBtu/hr

**Describe each fuel expected to be used during the term of the permit.**

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	20 gr Sulfur/100 cu. ft.		

**Emissions Data**

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.02	0.07
Nitrogen Oxides (NO <sub>x</sub> )	0.08	0.33
Lead (Pb)	---	---
Particulate Matter (PM <sub>2.5</sub> )	0.01	0.02
Particulate Matter (PM <sub>10</sub> )	0.01	0.02
Total Particulate Matter (TSP)	0.01	0.02
Sulfur Dioxide (SO <sub>2</sub> )	< 0.01	< 0.01
Volatile Organic Compounds (VOC)	<0.01	0.02

Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
n-Hexane	< 0.01	0.01
Formaldehyde	<0.01	<0.01
Benzene	<0.01	<0.01
Toluene	<0.01	<0.01

Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).  
All emissions rates based on AP-42 Tables 1.4-1, 1.4-2, and 1.4-3.

***Applicable Requirements***

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

45 CSR 2-3.1 – Visible Emission limit (TV 4.1.1)

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (*Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.*)

45 CSR 2-3.1 – Compliance with 4.1.1 is demonstrated by combusting natural gas.

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

## ATTACHMENT E - Emission Unit Form

*Emission Unit Description*

<b>Emission unit ID number:</b> DEHY (1C)	<b>Emission unit name:</b> Flare	<b>List any control devices associated with this emission unit:</b> N/A
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**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**  
 Control Device Flare – 0.35 mmbtu/hr pilot

<b>Manufacturer:</b> NATCO	<b>Model number:</b> SHV4	<b>Serial number:</b>
<b>Construction date:</b> 2004	<b>Installation date:</b> 2004	<b>Modification date(s):</b> N/A

**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
 450 lbs/hr of incineration

<b>Maximum Hourly Throughput:</b> 0.35 MMBtu/hr	<b>Maximum Annual Throughput:</b> 3.07 mmcf/yr	<b>Maximum Operating Schedule:</b> 8760
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*Fuel Usage Data (fill out all applicable fields)*

<b>Does this emission unit combust fuel?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, is it?</b> ___ Indirect Fired <input checked="" type="checkbox"/> Direct Fired
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<b>Maximum design heat input and/or maximum horsepower rating:</b> 0.35 MMBtu/hr	<b>Type and Btu/hr rating of burners:</b>
---	---

**List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.**

Natural Gas – 0.35 MMBtu/hr

**Describe each fuel expected to be used during the term of the permit.**

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	20 gr Sulfur/100 cu. ft.		

**Emissions Data**

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.13	0.57
Nitrogen Oxides (NO <sub>x</sub> )	0.02	0.10
Lead (Pb)	---	---
Particulate Matter (PM <sub>2.5</sub> )	<0.01	0.01
Particulate Matter (PM <sub>10</sub> )	<0.01	0.01
Total Particulate Matter (TSP)	<0.01	0.01
Sulfur Dioxide (SO <sub>2</sub> )	< 0.01	<0.01
Volatile Organic Compounds (VOC)	<0.01	0.01

Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
n-Hexane	< 0.01	<0.01
Formaldehyde	<0.01	<0.01
Benzene	<0.01	<0.01
Toluene	<0.01	<0.01

Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).  
 All emissions rates based on AP-42 Tables 13.5-1, 1.4-2, and 1.4-3.

***Applicable Requirements***

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Requirements are listed under Attachment G for APCD.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Requirements are listed under Attachment G for APCD.

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

# **ATTACHMENT G**

## ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: DEHY (1C)	List all emission units associated with this control device. 004-01
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Manufacturer: NATCO	Model number: SHV4	Installation date: 2004
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**Type of Air Pollution Control Device:**

<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input checked="" type="checkbox"/> Flare	<input type="checkbox"/> Other (describe) _____
<input type="checkbox"/> Wet Plate Electrostatic Precipitator		<input type="checkbox"/> Dry Plate Electrostatic Precipitator

**List the pollutants for which this device is intended to control and the capture and control efficiencies.**

Pollutant	Capture Efficiency	Control Efficiency
VOC		95%
Benzene		95%
Ethylbenzene		95%
n-Hexane		95%
Toluene		95%
Xylene		95%

**Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).**  
 0.35 mmbtu/hr pilot, 450 lb/hr capacity

**Is this device subject to the CAM requirements of 40 C.F.R. 64?**  Yes  No

If Yes, Complete ATTACHMENT H

If No, Provide justification. The Permittee is conducting reasonable assurance compliance monitoring to maintain minor source classification in accordance with the requirements of 40 CFR 63, Subpart HHh.

**Describe the parameters monitored and/or methods used to indicate performance of this control device.**

- 45 CSR 6-4.1 – Particulate Matter emission limit (TV 5.1.1) – DEHY
- 45 CSR 6-4.3 – Visible Emission limit (TV 5.1.2) – DEHY
- 45 CSR 6-4.4 – Visible Emission limit for start-up (TV 5.1.3) – DEHY
- 45 CSR 6-4.5 – Incinerator operating requirements (TV 5.1.4) – DEHY
- 45 CSR 6-4.6 – Incinerator odor prevention requirements (TV 5.1.5) – DEHY
- 45 CSR 10-4.1 – Sulfur Dioxide emission limit (TV 5.1.6) – DEHY
- 45 CSR 10-5.1 – Hydrogen Sulfide emission limit (TV 5.1.7) – DEHY
- 45 CSR 13 – Wet gas throughput limit (TV 5.1.8) - DEHY
- 45 CSR 13 – Operation and Maintenance of APCE (TV 5.1.9) – DEHY
- 40 CFR 60.18 – Operational Requirements (TV 5.1.10) – DEHY
- 45 CSR 13 – Visible Emission limit (TV 5.1.11) – DEHY
- 45 CSR 13 – Flare monitoring for operation (TV 5.1.12) – DEHY
- 45 CSR 13 – Flare minimum net heating value (TV 5.1.13) – DEHY
- 45 CSR 13 – Flare exit velocity limit (TV 5.1.14) – DEHY
- 45 CSR 13 – Operational Requirement (TV 5.1.15) – DEHY

**Monitoring**

- 45 CSR 30-5.1.c - Compliance with 5.1.6 will be demonstrated by annual inlet gas sampling (TV 5.2.1) – DEHY
- 45 CSR 30-5.1.c - Compliance with 5.1.7 will be demonstrated by annual inlet gas sampling (TV 5.2.2) – DEHY

**Recordkeeping**

- 45 CSR 13 – Visible Emission Test records (TV 5.4.1.a) – DEHY
- 45 CSR 13 – Maintain design records (TV 5.4.1.b) - DEHY
- 45 CSR 13 – Pilot Flame Absence records (TV 5.4.1.c) – DEHY
- 45 CSR 13 – Record retention (TV 5.4.2) - DEHY

**Reporting**

- 45 CSR 13 – Reporting of Visible Emission Limit Exceedances (TV 5.5.1) – DEHY