

West Virginia Department of Environmental Protection  
Division of Air Quality

*Earl Ray Tomblin*  
Governor

*Randy C. Huffman*  
Cabinet Secretary

# Permit to Operate



Pursuant to  
**Title V**  
of the Clean Air Act

*Issued to:*  
**Equitrans, L.P.**  
Copley Run Compressor Station #70  
R30-04100009-2012

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*John A. Benedict*  
Director

*Issued: December 11, 2012 • Effective: December 25, 2012*  
*Expiration: December 11, 2017 • Renewal Application Due: June 11, 2017*

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Permit Number: **R30-04100009-2012**  
Permittee: **Equitrans, L.P.**  
Facility Name: **Copley Run Compressor Station #70**  
Mailing Address: **Route 4 Box 640 Weston, WV 26452**

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*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

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Facility Location:	Weston, Lewis County, West Virginia
Telephone Number:	304-269-6429
Type of Business Entity:	Corporation
Facility Description:	Natural Gas Transmission Facility
SIC Codes:	4922
UTM Coordinates:	541.30 km Easting • 4314.80 km Northing • Zone 17

Permit Writer: Beena Modi

*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.*

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*Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.*

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## 1.0 Emission Units and Active R13, R14, and R19 Permits

### 1.1 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
001-01	C-001	Reciprocating Engine/Integral Compressor; Cooper Bessemer Model GMVH10; Serial #48769	1981	2250 HP	N/A
001-02	C-002	Reciprocating Engine/Integral Compressor; Cooper Bessemer Model GMVH6; Serial #48771	1981	1350 HP	N/A
001-03	C-003	Reciprocating Engine/Integral Compressor; Cooper Bessemer Model GMVH; Serial #48772	1981	1350 HP	N/A
001-04	C-004	Reciprocating Engine/Integral Compressor; Cooper Bessemer Model GMVH8; Serial #48770	1980	1800 HP	N/A
001-05	C-005	Reciprocating Engine/Integral Compressor; Cooper Bessemer Model GMVHR; Serial #49126	1993	1350 HP	N/A
G-001	G-001	Natural Gas Fired Electric Generator; International Harvester Model V549; Serial #174686	1987	2.2 MMBtu/hr	N/A
G-002	G-002	Natural Gas Fired Electric Generator; Cummins Model GTA12; Serial #25183763	1993	2.2 MMBtu/hr	N/A
003-01	003-01	Natural Gas Fired Heating Boiler; Ajax Model WG-675 D; Serial # 81-33656	1981	0.675 MMBtu/hr	N/A
003-02	003-02	Natural Gas Fired Hot Water Heater; WL Jackson Mfg. Co. Model G 030 05; Serial # 66552-1080	1987	0.03 MMBtu/hr	N/A
004-01	Dehy Flare	Triethylene Glycol dehydration unit; Natco Model 5 GR-3000-TX10; also consists of a flare and a natural gas fired reboiler (Dehy Boiler #1)	1992	0.65MMBtu/hr, 46MMScf/day (Dehy)	004-01 Dehy Flare
004-02	Dehy	Triethylene Glycol unit; Natco Model GS 3100E; also dehydration consists of a natural gas fired reboiler (Dehy Boiler #2) and an indirect heater.	1992	1.67 MMBtu/hr and 1.2 MMBtu/hr 140MMScf/day (Dehy)	N/A

<b>Emission Unit ID</b>	<b>Emission Point ID</b>	<b>Emission Unit Description</b>	<b>Year Installed</b>	<b>Design Capacity</b>	<b>Control Device</b>
Copley 1	Copley 1	Triethylene Glycol horizontal fixed roof storage tank	1992	4000 gallon	N/A
Copley 2	Copley 2	Pipeline Condensate horizontal fixed roof storage tank	1992	20000 gallon	N/A
Copley 3	Copley 3	Crude Oil horizontal fixed roof storage tank	1992	2000 gallon	N/A
Copley 4	Copley 4	Methanol horizontal fixed roof storage tank	1992	2000 gallon	N/A
Copley 5	Copley 5	Used Oil horizontal fixed roof storage tank	1992	7500 gallon	N/A
Copley 6	Copley 6	Ambitrol horizontal fixed roof storage tank	1992	3000 gallon	N/A

**1.2. Active R13, R14, and R19 Permits**

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

<b>Permit Number</b>	<b>Date of Issuance</b>
R13-2397B	May 7, 2007

## 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.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

### 2.2 Acronyms

<b>CAAA</b>	Clean Air Act Amendments	<b>NSPS</b>	New Source Performance Standards
<b>CBI</b>	Confidential Business Information	<b>PM</b>	Particulate Matter
<b>CEM</b>	Continuous Emission Monitor	<b>PM<sub>10</sub></b>	Particulate Matter less than 10µm in diameter
<b>CES</b>	Certified Emission Statement	<b>pph</b>	Pounds per Hour
<b>C.F.R. or CFR</b>	Code of Federal Regulations	<b>ppm</b>	Parts per Million
<b>CO</b>	Carbon Monoxide	<b>PSD</b>	Prevention of Significant Deterioration
<b>C.S.R. or CSR</b>	Codes of State Rules	<b>psi</b>	Pounds per Square Inch
<b>DAQ</b>	Division of Air Quality	<b>SIC</b>	Standard Industrial Classification
<b>DEP</b>	Department of Environmental Protection	<b>SIP</b>	State Implementation Plan
<b>FOIA</b>	Freedom of Information Act	<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>HAP</b>	Hazardous Air Pollutant	<b>TAP</b>	Toxic Air Pollutant
<b>HON</b>	Hazardous Organic NESHAP	<b>TPY</b>	Tons per Year
<b>HP</b>	Horsepower	<b>TRS</b>	Total Reduced Sulfur
<b>lbs/hr or lb/hr</b>	Pounds per Hour	<b>TSP</b>	Total Suspended Particulate
<b>LDAR</b>	Leak Detection and Repair	<b>USEPA</b>	United States Environmental Protection Agency
<b>m</b>	Thousand	<b>UTM</b>	Universal Transverse Mercator
<b>MACT</b>	Maximum Achievable Control Technology	<b>VEE</b>	Visual Emissions Evaluation
<b>mm</b>	Million	<b>VOC</b>	Volatile Organic Compounds
<b>mmBtu/hr</b>	Million British Thermal Units per Hour		
<b>mmft<sup>3</sup>/hr or mmcf/hr</b>	Million Cubic Feet Burned per Hour		
<b>NA or N/A</b>	Not Applicable		
<b>NAAQS</b>	National Ambient Air Quality Standards		
<b>NESHAPS</b>	National Emissions Standards for Hazardous Air Pollutants		
<b>NO<sub>x</sub></b>	Nitrogen Oxides		

### **2.3. Permit Expiration and Renewal**

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.  
**[45CSR§30-5.1.b.]**
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.  
**[45CSR§30-4.1.a.3.]**
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.  
**[45CSR§30-6.3.b.]**
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.  
**[45CSR§30-6.3.c.]**

### **2.4. Permit Actions**

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
**[45CSR§30-5.1.f.3.]**

### **2.5. Reopening for Cause**

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
- a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.
  - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
  - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
  - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

**[45CSR§30-6.6.a.]**

## **2.6. Administrative Permit Amendments**

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.  
[45CSR§30-6.4.]

## **2.7. Minor Permit Modifications**

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.  
[45CSR§30-6.5.a.]

## **2.8. Significant Permit Modification**

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.  
[45CSR§30-6.5.b.]

## **2.9. Emissions Trading**

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.  
[45CSR§30-5.1.h.]

## **2.10. Off-Permit Changes**

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:
- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
  - b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
  - c. The change shall not qualify for the permit shield.
  - d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
  - e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

**[45CSR§30-5.9.]**

## **2.11. Operational Flexibility**

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

**[45CSR§30-5.8]**

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

**[45CSR§30-5.8.a.]**

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

**[45CSR§30-5.8.c.]**

- 2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

**[45CSR§30-2.39]**

## **2.12. Reasonably Anticipated Operating Scenarios**

- 2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.
- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
  - b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
  - c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

## **2.13. Duty to Comply**

- 2.13.1. 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; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

## **2.14. Inspection and Entry**

- 2.14.1. 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;
  - c. 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.

[45CSR§30-5.3.b.]

## **2.15. Schedule of Compliance**

- 2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:
- a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
  - b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

**[45CSR§30-5.3.d.]**

## **2.16. Need to Halt or Reduce Activity not a Defense**

- 2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of 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.

**[45CSR§30-5.1.f.2.]**

## **2.17. Emergency**

- 2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under 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.

**[45CSR§30-5.7.a.]**

- 2.17.2. 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 45CSR§30-5.7.c. are met.

**[45CSR§30-5.7.b.]**

- 2.17.3. 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. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, 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, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

**[45CSR§30-5.7.c.]**

- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

**[45CSR§30-5.7.d.]**

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

**[45CSR§30-5.7.e.]**

## **2.18. Federally-Enforceable Requirements**

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.

**[45CSR§30-5.2.a.]**

- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

## **2.19. Duty to Provide Information**

- 2.19.1. 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 modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required 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.

**[45CSR§30-5.1.f.5.]**

## **2.20. Duty to Supplement and Correct Information**

- 2.20.1. 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.

**[45CSR§30-4.2.]**

## **2.21. Permit Shield**

- 2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and

are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.

**[45CSR§30-5.6.a.]**

2.21.2. Nothing in this permit shall alter or affect the following:

- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
- b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

**[45CSR§30-5.6.c.]**

## **2.22. Credible Evidence**

2.22.1. 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 defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.

**[45CSR§30-5.3.e.3.B. and 45CSR38]**

## **2.23. Severability**

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.

**[45CSR§30-5.1.e.]**

## **2.24. Property Rights**

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

**[45CSR§30-5.1.f.4]**

## **2.25. Acid Deposition Control**

2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.

- b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
- c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

**[45CSR§30-5.1.d.]**

- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.

**[45CSR§30-5.1.a.2.]**

### 3.0 Facility-Wide Requirements

#### 3.1 Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person 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 or allow 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. [40 C.F.R. §61.145(b) and 45CSR34]
- 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. **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]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality. [W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

[40 C.F.R. 82, Subpart F]

- 3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.

[40 C.F.R. 68]

## 3.2. Monitoring Requirements

- 3.2.1 None

## 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, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are 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.
- 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 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.
3. A statement of compliance or non-compliance with each permit or rule condition.

**[WV Code §§ 22-5-4(a)(14-15) and 45CSR13, R13-2397 3.3.1]**

### **3.4. Recordkeeping Requirements**

3.4.1. **Monitoring information.** 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.

**[45CSR§30-5.1.c.2.A. and 45CSR13 - Permit No. R13-2397 - Condition 4.4.1.]**

3.4.2 **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.

**[45CSR§30-5.1.c.2.B. and 45CSR13 - Permit No. R13-2397 - Condition 3.4.1.]**

3.4.3 **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§30-5.1.c. 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.  
[45CSR§§30-4.4. and 5.1.c.3.D.]
- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.  
[45CSR§30-5.1.c.3.E.]
- 3.5.3. Except for the electronic submittal of the annual certification to the USEPA as required in 3.5.5 below, 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, mailed first class or by private carrier 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 SE  
Charleston, WV 25304  
  
Phone: 304/926-0475  
FAX: 304/926-0478

**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. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.  
[45CSR§30-8.]
- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The annual certification to the USEPA shall be submitted in electronic format only. It shall be submitted by e-mail to the following address: R3\_APD\_Permits@epa.gov. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.  
[45CSR§30-5.3.e.]

- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.

[45CSR§30-5.1.c.3.A.]

- 3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

- 3.5.8. **Deviations.**

- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:

1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

- b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

[45CSR§30-5.1.c.3.B.]

- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

[45CSR§30-4.3.h.1.B.]

### 3.6. Compliance Plan

- 3.6.1. None

### **3.7. Permit Shield**

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.
  - a. 40 CFR part 60 Subpart Dc - The boilers at Copley Run station are below 10 mmBtu/hr.
  - b. 40 CFR part 60 Subpart GG - There are no turbines at Copley Run station.
  - c. 40 CFR part 60 Subparts K, Ka - All tanks at Copley Run station are less than 40,000 gallons in capacity.
  - d. 40 CFR part 60 Subpart KKK - Copley Run station is not engaged in the extraction of natural gas liquids from field gas or in the fractionation of mixed natural gas liquids to natural gas products.
  - e. 40 CFR part 60 Subpart LLL - There are no sweetening units at Copley Run station.
  - f. 40 CFR part 60 Subpart IIII - The engines at Copley Run Station are not stationary compression ignition (CI) internal combustion engines (ICE).
  - g. 45CSR27 - Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”

#### **4.0. Source-Specific Requirements [Indirect Heat Exchangers: 003-01, 003-02]**

##### **4.1. Limitations and Standards**

- 4.1.1. 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.]

##### **4.2. Monitoring Requirements**

- 4.2.1. None

##### **4.3. Testing Requirements**

- 4.3.1. None

##### **4.4. Recordkeeping Requirements**

- 4.4.1. None

##### **4.5. Reporting Requirements**

- 4.5.1. None

##### **4.6. Compliance Plan**

- 4.6.1. None

## 5.0. Source-Specific Requirements [Reciprocating Engines/Integral Compressors: C-001 through C-005]

### 5.1. Limitations and Standards

- 5.1.1. The facility shall employ a Cooper-Bessemer GMVR Reciprocating Engine/Integral Compressor, identified as C-005. The operation of this engine shall not exceed the following maximum operating and emission limitations.
- a. The engine shall not operate more than 7,709 hours per year; and
  - b. Emissions from the engine shall not exceed the maximum hourly and annual emission limits set forth in Table 5.1.1.b.

<b>Pollutant</b>	<b>Hourly (lb/hr)</b>	<b>Annual (TPY)</b>
Oxides of Nitrogen	10.0	39
Carbon Monoxide	3.0	11.6
VOCs	0.2	0.77

[45CSR13 - Permit No. R13-2397 - Condition 4.1.1.]

### 5.2. Monitoring Requirements

- 5.2.1. None

### 5.3. Testing Requirements

- 5.3.1. None

### 5.4. Recordkeeping Requirements

- 5.4.1. The permittee shall maintain a record of the hours of operation of compressor engine C-005 to demonstrate compliance with Section 5.1.1. of this permit. Said records shall be maintained in accordance with 3.4.2. of this permit.

[45CSR13 - Permit No. R13-2397 - Condition 4.4.4.]

### 5.5. Reporting Requirements

- 5.5.1. None

### 5.6. Compliance Plan

- 5.6.1. None

## 6.0. Source-Specific Requirements [Dehy Flare (004-01) and Dehy (004-02)]

### 6.1. Limitations and Standards

- 6.1.1. No person shall cause, suffer, allow or permit particulate matter to be discharged from any incinerator into the open air in excess of the quantity determined by the use of the following formula:

Emissions(lb/hr) = F x Incinerator Capacity (tons/hr)  
where the factor, F, is as indicated in the table below:

<u>Incinerator Capacity</u>	<u>F Factor</u>
Less than 15,000 lbs/hr	5.43
15,000 lbs/hr or greater	2.72

*Calculation for PM Emissions: 5.43 \* 101.12 lb/hr \* 1 ton/2000 lbs = 0.27 lb/hr*

**[45CSR§6-4.1. (004-01)]**

- 6.1.2. No person shall cause, suffer, allow or permit emission of smoke into the atmosphere from any incinerator which is twenty (20%) percent opacity or greater.  
**[45CSR§6-4.3 (004-01)]**
- 6.1.3. No person shall cause, suffer, allow or permit the emission of particles of unburned or partially burned refuse or ash from any incinerator which are large enough to be individually distinguished in the open air.  
**[45CSR§6-4.5 (004-01)]**
- 6.1.4. Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.  
**[45CSR§6-4.6. (004-01)]**
- 6.1.5. The facility shall employ one NATCO triethylene glycol dehydration unit identified as 004-01 (referred to as Dehy #1). The operation of this unit shall not exceed the following operating and emission limitations:
- The throughput of wet natural gas through the glycol dehydration unit/still column shall not exceed 46 MMscf/day;
  - The reboiler shall have a maximum design heat input of 1.5 MMBtu/hr and be limited to fuel with natural gas;
  - The vapors/overheads from the still column and flash tank shall be routed through a closed-vent system to the flare (Dehy Flare) at all times when there is a potential that vapors (emissions) can be generated from the still column and/or flash tank;
  - The flare identified as Dehy Flare shall be steam-assisted, or non-assisted;
  - The Dehy Flare shall be operated at all times when emissions may be vented to it;
  - The Dehy Flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours;
  - The Dehy Flare shall be operated with a flame present at all times;
  - Flares shall be used only with the net heating value of the gas being combusted at 11.2 MJ/scm (300 Btu/scf) or greater if the flare is steam-assisted or air-assisted; or with the net heating value of the gas being combusted at 7.45 MJ/scm (200 Btu/scf) or greater if the flare is non-assisted. The net heating value of the gas being combusted in a flare shall be calculated using the following equation:

$$H_T = K \sum_{i=1}^n C_i H_i$$

Where:

$H_T$  = Net heating value of the sample, MJ/scm; where the net enthalpy per mole of off gas is based on combustion at 25°C and 760 mm Hg, but the standard temperature for determining the volume corresponding to one mole is 20°C.

K = Constant =

$$1.740 \times 10^{-7} \left( \frac{1}{ppmv} \right) \left( \frac{\text{g-mole}}{\text{scm}} \right) \left( \frac{\text{MJ}}{\text{kcal}} \right)$$

where the standard temperature for (g-mole/scm) is 20°C.

$C_i$  = Concentration of sample component i in ppmv on a wet basis, which may be measured for organics by Test Method 18, but is not required to be measured using Method 18 (unless designated by the Director).

$H_i$  = Net heat of combustion of sample component i, kcal/g-mole at 25°C and 760 mm Hg. The heats of combustion may be determined using ASTM D2382-76 or 88 or D4809-95 if published values are not available or cannot be calculated.

n=Number of sample components.

- i. Steam-assisted and nonassisted flares shall be designed for and operated with an exit velocity less than 18.3 m/sec (60 ft/sec), except as provided by Sections 6.1.5.j. and 6.1.5.k. of this permit. The actual exit velocity of a flare shall be determined by dividing by the volumetric flow rate of gas being combusted (in units of emission standard temperature and pressure), by the unobstructed (free) cross-sectional area of the flare tip, which may be determined by Test Method 2, 2A, 2C, or 2D in appendix A to 40 CFR part 60, as appropriate, but is not required to be determined using these Methods (unless designated by the Director);
- j. Steam-assisted and nonassisted flares designed for and operated with an exit velocity, as determined by the method specified in Section 6.1.5.i. of this permit, equal to or greater than 18.3 m/sec (60 ft/sec) but less than 122 m/sec (400 ft/sec), are allowed if the net heating value of the gas being combusted is greater than 37.3 MJ/scm (1,000 Btu/scf); and
- k. Steam-assisted and nonassisted flares designed for and operated with an exit velocity, as determined by the method specified in Section 6.1.5.i. of this permit, less than the velocity  $V_{max}$ , as determined by the method specified in this paragraph, and less than 122 m/sec (400 ft/sec) are allowed. The maximum permitted velocity,  $V_{max}$ , for flares complying with this paragraph shall be determined by the following equation:

$$\text{Log}_{10}(V_{max}) = (H_T + 28.8) / 31.7$$

Where:

$V_{max}$  = Maximum permitted velocity, m/sec.

28.8 = Constant.

31.7 = Constant.

$H_T$  = The net heating value as determined in Section 6.1.5.h. of this permit.

1. Emissions from the Dehy Flare shall not exceed the maximum hourly and annual emission limits set forth in Table 6.1.5.1.

<b>Table 6.1.5.1. –Dehy Flare Emissions</b>		
<b>Pollutant</b>	<b>Emission Rates</b>	
	<b>Hourly (lb/hr)</b>	<b>Annual (TPY)</b>
Oxides of Nitrogen	0.1	0.4
Carbon Monoxide	0.3	1.3
VOC	1.6	7.2
Benzene	0.1	0.3
Total HAPs (includes benzene)	0.7	3.0

[45CSR13 - Permit No. R13-2397 - Condition 4.1.2.]

- 6.1.6. The facility shall employ one NATCO, model GS 3100E dehydration unit identified as 004-02 (referred as Dehy #2). The operation of this unit shall not exceed the following operating and emission limitations:
- The throughput of wet natural gas through the glycol dehydration unit/still column shall not exceed 140 MMscf/day;
  - The vapors/overheads from the still column and flash tank 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 still column and/or flash tank;
  - The reboiler shall be operated at all times when there is a potential of vapors (emissions) to be generated from the flash tank and/or still column;
  - The reboiler shall only be fired with vapors from the still column and flash tank, and natural gas may be used as supplemental fuel;
  - The 1.2 MMBtu/hr indirect heater shall only be fired with natural gas;
  - The vapors/overheads from the still column and flash tank shall be introduced into the flame zone of the reboiler.
  - Emissions from the reboiler shall not exceed the maximum hourly and annual emission limits set forth in Table 6.1.6.g.

<b>Table 6.1.6.g. – Reboiler Emission Limits (004-002)</b>		
<b>Pollutant</b>	<b>Emission Limits</b>	
	<b>Hourly (lb/hr)</b>	<b>Annual (TPY)</b>
Oxides of Nitrogen	0.28	1.2
Carbon Monoxide	0.14	0.6
VOC	3.4	15.1
Benzene	0.11	0.5
Total HAPs (includes benzene)	1.8	8.1

[45CSR13 - Permit No. R13-2397 - Condition 4.1.3.]

- h. The reboiler and indirect heater, on an individual basis, shall not exhibit visible emissions into the open air greater than ten (10) percent opacity based on a six-minute block average. Continuous compliance with this requirement is met by complying with fuel restrictions in Sections 6.1.6.d. and 6.1.6.e. of this permit.

**[45CSR13 - Permit No. R13-2397 - Condition 4.1.3.h. and 45CSR§2-3.1.]**

- 6.1.7. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment 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 as set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.  
**[45CSR13 - Permit No. R13-2397 - Condition 4.1.4. and 45CSR§13-5.11.]**
- 6.1.8 The reboiler (Dehy Boiler #1) shall not 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, (004-01)]**

## **6.2. Monitoring Requirements**

- 6.2.1. The permittee must input operating parameters that provide the highest HAP emissions when using GRI-GLYCalc V4 or higher. If the permittee does not want to use operating parameters that provide the highest HAP emissions, then the permittee may monitor the glycol dehydration unit while conducting the wet gas sampling requirements in Section 6.3.1. of this permit. The permittee may use actual monitored and recorded operating parameters associated with the dehydration system, in order to demonstrate compliance with the emission limits of Sections 6.1.5. and 6.1.6. of this permit using GRI-GLYCalc V4 or higher, or may use operating parameters that provide the highest HAP emissions.

As an alternative to the “Gas Analysis and Process Data”, emission estimating method discussed above, the permittee may elect to incorporate the following alternative calculation methods as provided by GLYCalc V4: [Gas Analysis and ARL Method (R/L+Gas)] or the [GRI ARL Method (for TEG units only)]

These alternative methods can be used to demonstrate compliance with Sections 6.1.5. and 6.1.6. of this permit, provided emissions are determined using the procedures documented in the Gas Research Institute (GRI) report entitled “Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions” (GRI-95/0368.1). Additionally, the alternative methods shall also adhere to the recommendations for sampling and analysis of the wet glycol stream as presented in the GLYCalc Technical Reference User Manual and Handbook V4 when applicable.

**[45CSR13 - Permit No. R13-2397 - Condition 4.2.1.]**

- 6.2.2. In order to demonstrate compliance with the continuous flame requirements of Section 6.1.5.g. of this permit, the permittee shall monitor the presence or absence of a flare pilot flame using a thermocouple or any other equivalent device.  
**[45CSR13 - Permit No. R13-2397 - Condition 4.2.2., 40 CFR§64.3(a); 45CSR§30-5.1.c]**
- 6.2.3. **Commencement of operation.** The permittee shall conduct the monitoring required under 40 CFR Part 64 upon issuance of this permit that includes such monitoring, or by the initial start-up date of the flare that requires such monitoring, whichever is later.  
**[40 CFR §§ 64.7(a) and 64.6(d); 45CSR§30-5.1.c]**

- 6.2.4. **Proper Maintenance** – At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.  
[40 CFR § 64.7(b); 45CSR§30-5.1.c.]
- 6.2.5. **Continued Operation** – Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.  
[40 CFR § 64.7(c); 45CSR§30-5.1.c.]
- 6.2.6. **Documentation of Need for Improved Monitoring** – After approval of monitoring under 40 CFR Part 64, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Director and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.  
[40 CFR § 64.7(e); 45CSR§30-5.1.c.]
- 6.2.7. **Quality Improvement Plan (QIP)** – Based on the results of a determination made under 40 CFR §64.7(d)(2) (permit condition 6.4.9.b), the Administrator or the Director may require the permittee to develop and implement a QIP. If a QIP is required, then it shall be developed, implemented, and modified as required according to 40 CFR §§ 64.8(b) through (e). Refer to permit condition 6.5.5.b.3 for the reporting required when a QIP is implemented.  
[40 CFR § 64.8; 45CSR§30-5.1.c.]
- 6.2.8. **Excursions** – The dehydration unit is designed to “shutdown” if the absence of a flame is detected after automatic reignition is unsuccessful. Therefore an excursion will occur if the dehydration unit is not shutdown when the absence of a flame is detected after unsuccessful reignition.  
[40 CFR § 64.6(c)(2); 45CSR§30-5.1.c.]

### 6.3. Testing Requirements

- 6.3.1. The permittee shall demonstrate compliance with Sections 6.1.5. and 6.1.6. of this permit by using GLYCalc Version 4.0 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. The permittee may utilize other equivalent methods provided they are approved in advance by DAQ as part of a testing protocol. If alternative methods are proposed, a test protocol shall be submitted for approval no later than 60 days before the scheduled test date. As specified in the handbook, the permittee shall sample the wet gas stream at a location prior to the glycol dehydration column, but after any type of separation device, in accordance with GPA method 2166.  
[45CSR13 - Permit No. R13-2397 - Condition 4.3.1.]

- 6.3.2. In order to demonstrate compliance with the flare opacity requirements of Section 6.1.5.f. of this permit, the permittee shall conduct a Method 22 opacity test for at least two hours. This test shall demonstrate no visible emissions are observed for more than a total of 5 minutes during any 2 consecutive hour periods using 40CFR60 Appendix A Method 22. The permittee shall conduct this test within one (1) year of permit issuance and a second opacity test within one (1) year from the time the permit expires. The visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40 CFR part 60, appendix A, Method 22 or from the lecture portion of 40 CFR part 60, appendix A, Method 9 certification course. Said records of such testing shall be maintained in accordance with Section 3.4.2. of this permit.

Additionally, at any time the flare is in operation and opacity is observed, the cause of excess opacity shall be documented and a Method 22 visual emissions reading shall be conducted within 48 hours of the initial observation. The Method 22 readings shall be conducted for an amount of time adequate to assess whether visible emissions are present for a period of time greater than an aggregate of five (5) minutes over any two (2) consecutive hour period. For each incident of opacity from the flare, the records shall include, but not be limited to, the date, time, the cause of excess opacity, the results of the Method 22 observations, and what action(s) if any, was/were taken. Records shall be maintained in accordance with Section 3.4.2 of this permit.

**[45CSR13 - Permit No. R13-2397 - Condition 4.3.2., 45CSR§30-5. 1.c ]**

- 6.3.3. In order to demonstrate compliance with the flare design criteria requirements of Section 6.1.5.(i., j., and k.) of this permit, the permittee shall conduct a flare design evaluation demonstrating compliance with the criteria set forth in Section 6.1.5. of this permit. The flare design evaluation shall include, but not be limited to, net heat value calculations, exit (tip) velocity calculations, and all supporting concentration calculations. The permittee may elect to demonstrate compliance with the flare design criteria requirements of Section 6.1.5. of this permit by complying with the compliance assessment testing requirements of Section 6.3.4. of this permit.

**[45CSR13 - Permit No. R13-2397 - Condition 4.3.3.]**

- 6.3.4. The permittee shall conduct a flare compliance assessment to demonstrate compliance with the flare requirements of Section 6.1.5 of this permit and the flare design evaluation within 180 days of issuance of Permit R13-2397B (issued May 7, 2007). This compliance assessment testing shall be conducted in accordance with Test Method 18 for organics and Test Method 2, 2A, 2C, or 2D in appendix A to 40 CFR part 60, as appropriate, and in accordance with Section 3.3.1. of this permit. Also, Test Method 18 may require the permittee to conduct Test Method 4 in conjunction with Test Method 18.

**[45CSR13 - Permit No. R13-2397 - Condition 4.3.4.]**

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

- 6.4.1. **Record of Maintenance of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.1 of this permit, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

**[45CSR13 - Permit No. R13-2397 - Condition 4.4.2.]**

- 6.4.2. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.1 of this permit, 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.  
**[45CSR13 - Permit No. R13-2397 - Condition 4.4.3.]**

- 6.4.3. The permittee shall maintain a record of the wet natural gas throughput through the dehydration systems to demonstrate compliance with Sections 6.1.5.a. and 6.1.6.a. of this permit. Said records shall be maintained in accordance with Section 3.4.2. of this permit.  
**[45CSR13 - Permit No. R13-2397 - Condition 4.4.5.]**
- 6.4.4. For the purpose of demonstrating compliance with Sections 6.1.5.g and 6.2.2. of this permit, the permittee shall maintain records of the times and duration of all periods which the pilot flame was absent. Said records shall be maintained in accordance with Section 3.4.2. of this permit.  
**[45CSR13 - Permit No. R13-2397 - Condition 4.4.6.]**
- 6.4.5. For the purpose of demonstrating compliance with Sections 6.1.5. and 6.3.3. of this permit, the permittee shall maintain a record of the flare design evaluation. The flare design evaluation shall include, but not be limited to, net heat value calculations, exit (tip) velocity calculations, and all supporting concentration calculations. Said records shall be maintained in accordance with Section 3.4.2. of this permit.  
**[45CSR13 - Permit No. R13-2397 - Condition 4.4.7.]**
- 6.4.6. For the purpose of demonstrating compliance with the requirements set forth in Sections 6.1.5. and 6.3.4. of this permit, the permittee shall maintain records of testing conducted in accordance with Section 6.3.4. of this permit. Said records shall be maintained in accordance with Section 3.4.2. of this permit.  
**[45CSR13 - Permit No. R13-2397 - Condition 4.4.8.]**
- 6.4.7. For the purpose of demonstrating compliance with the requirements set forth in Section 6.3.1. of this permit and the limits set forth in Sections 6.1.5. and 6.1.6. of this permit, the permittee shall maintain records of the wet gas sampling and analysis conducted, as required, during the initial compliance determination or subsequent compliance determinations. Said records shall be maintained in accordance with Section 3.4.2. of this permit.  
**[45CSR13 - Permit No. R13-2397 - Condition 4.4.9.]**
- 6.4.8. For the purpose of demonstrating compliance with Sections 6.1.5. and 6.1.6. of this permit, the permittee shall maintain a record of the wet gas sampling required by Section 6.3.1. of this permit. This record shall include a potential to emit (PTE) HAP estimate modeled using GlyCalc Version 4 or higher software, which incorporates site specific parameters measured in accordance with Section 6.2.1. of this permit. The emission estimate shall also incorporate a copy of the lab analysis obtained from the wet gas sampling as well as a description of how and where the sample was taken. This record shall include a reference to all sampling and analytical methods utilized and identification of where the compressor station is located before or after the liquids extraction plant. Said records shall be maintained in accordance with Section 3.4.2. of this permit.  
**[45CSR13 - Permit No. R13-2397 - Condition 4.4.10.]**

6.4.9. **Response to Excursions or Exceedances**

- a. Upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- b. Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

**[40 CFR § 64.7(d); 45CSR§30-5.1.c.]**

6.4.10. **General recordkeeping requirements for 40 CFR Part 64 (CAM)**

The permittee shall comply with the recordkeeping requirements specified in permit conditions 3.4.1. and 3.4.2. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR §64.8 (6.2.7) and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

**[40 CFR § 64.9(b); 45CSR§30-5.1.c.]**

**6.5. Reporting Requirements**

- 6.5.1. The permittee shall submit a report of the wet gas sampling required by Section 6.3.1 of this permit within 90 days of conducting the sampling of the wet gas stream. This report shall include a potential to emit (PTE) estimate modeled using GlyCalc Version 4 or higher software, which incorporates site specific parameters measured in accordance with Section 6.2.1. of this permit or operating parameters that provide the highest HAP emissions when using GRI-GLYCalc V4 or higher. The emission estimate shall also incorporate a copy of the lab analysis obtained from the wet gas sampling as well as a description of how and where the sample was taken. The report shall include a reference to all sampling and analytical methods utilized and identification of where the compressor station is located before or after the liquids extraction plant. This report shall be signed by a responsible official upon submittal.  
**[45CSR13 - Permit No. R13-2397 - Condition 4.5.1.]**
- 6.5.2. The permittee shall report the results of the testing as required in condition Section 6.3. of this permit before the close of business on the 60<sup>th</sup> day following the completion of such testing to the Director.  
**[45CSR13 - Permit No. R13-2397 - Condition 4.5.2.]**
- 6.5.3. Any violation(s) of 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 within ten (10) calendar days of the occurrence

and shall include, at a minimum, 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.

**[45CSR13 - Permit No. R13-2397 - Condition 4.5.3.]**

- 6.5.4. Any violation(s) of the flare design and operation criteria set forth in Section 6.1.5. of this permit shall be reported in writing to the Director as soon as practicable, but within ten (10) calendar days.

**[45CSR13 - Permit No. R13-2397 - Condition 4.5.4.]**

**6.5.5. General reporting requirements for 40 C.F.R. Part 64 (CAM)**

- a. On and after the date specified in 40 CFR §64.7(a) by which the permittee must use monitoring that meets the requirements of 40 CFR 64, the permittee shall submit CAM monitoring reports with the semi-annual monitoring report under permit condition 3.5.6. Incorporation by reference within the semi-annual monitoring report is not acceptable.
- b. A report for monitoring under 40 CFR 64 shall include, at a minimum, the information required under permit condition 3.5.8. and the following information, as applicable:
  1. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
  2. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
  3. A description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

**[40 CFR § 64.9(a); 45CSR§30-5.1.c.]**

**6.6. Compliance Plan**

- 6.6.1. None

**7.0 Source-Specific Requirements [Natural Gas Fired Electric Generators: G-001 and G-002]**

**7.1. Limitations and Standards**

7.1.1 For the electric generators (G-001 and G-002), the permittee shall comply with the requirements of 40 C.F.R. 63, Subpart ZZZZ – “National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines” by October 19, 2013.

a. The permittee shall meet the following operating requirements:

**Table 2c to Subpart ZZZZ of Part 63—Requirements for Existing Compression Ignition Stationary RICE Located at a Major Source of HAP Emissions and Existing Spark Ignition Stationary RICE ≤500 HP Located at a Major Source of HAP Emissions**

As stated in §§63.6600, 63.6602, and 63.6640, the permittee must comply with the following requirements for existing compression ignition stationary RICE located at a major source of HAP emissions and existing spark ignition stationary RICE ≤500 HP located at a major source of HAP emissions:

For each . . .	You must meet the following requirement, except during periods of startup . . .	During periods of startup you must . . .
6. Emergency stationary SI RICE and black start stationary SI RICE. <sup>1</sup>	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; <sup>2</sup>	Minimize the engine’s time spent at idle and minimize the engine’s startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply <sup>3</sup>
	b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first;	
	c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. <sup>3</sup>	

<sup>1</sup>If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Table 2c of this subpart, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

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

<sup>3</sup>Sources can petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.

b. The permittee shall be in compliance with the general requirements of 40 C.F.R. §63.6605.

- c. The permittee shall meet the applicable general provisions specified in Table 8 of 40 C.F.R. 63, Subpart ZZZZ with the exception of §§63.7(b) and (c), 63.8(e), (f)(4), and (f)(6), and 63.9(b)-(e), (g), and (h) which do not apply per 40 C.F.R. §63.6645(a)(5).
- d. The permittee shall demonstrate continuous compliance with the limits specified in 7.1.1. according to the methods specified in Table 6 of 40 C.F.R. 63, Subpart ZZZZ.

**Table 6 to Subpart ZZZZ of Part 63—Continuous Compliance With Emission Limitations, Operating Limitations, Work Practices, and Management Practices**

As stated in §63.6640, the permittee must continuously comply with the emissions and operating limitations and work or management practices as required by the following:

For each . . .	Complying with the requirement to . . .	You must demonstrate continuous compliance by . . .
9. Existing emergency and black start stationary RICE ≤500 HP located at a major source of HAP	a. Work or Management practices	i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 C.F.R. §§63.6595(a)(1), 63.6602, 63.6605, 63.6640(a), 63.6645(a)(5), 63.6665, and Table 2c and Table 6 of 40 C.F.R. 63 Subpart ZZZZ; 45CSR34]

**7.2 Monitoring Requirements**

- 7.2.1 For Emission Unit IDs G-001-and G-002, the permittee shall comply with the Monitoring, Installation, Collection, Operation and Maintenance Requirements of 40 C.F.R. §§ 63.6625(e), (f), (h), (j).  
 [40 C.F.R. §§63.6625 (e), (f), (h), (j); 45CSR34]

**7.3. Testing Requirements**

None

**7.4. Recordkeeping Requirements**

- 7.4.1 For Emission Unit IDs G-001-and G-002, the permittee shall comply with recordkeeping requirements of 40 C.F.R. §§63.6655(a), (b), (d), (e), (f).  
 [40 C.F.R. 63 Subpart ZZZZ §§63.6655(a), (b), (d), (e), (f); 45CSR34]

**7.5. Reporting Requirements**

- 7.5.1 For Emission Unit IDs G-001 and G-002, the permittee shall comply with reporting requirements of footnote 1 of 40 C.F.R. 63, Subpart ZZZZ, Table 2c.  
 [Footnote 1 of 40 C.F.R. 63, Subpart ZZZZ, Table 2c; 45CSR34]

- 7.5.2. The permittee shall report each instance in which they did not meet each operating limitation in 7.1.1.a. These instances are deviations from the operating limitations in this subpart. These deviations must be reported according to the requirements in 40 C.F.R. §63.6650. **[40 C.F.R. §63.6640(b); 45CSR34]**
- 7.5.3. The permittee shall report each instance in which they did not meet the requirements in Table 8 of 40 C.F.R. 63, Subpart ZZZZ that applies. **[40 C.F.R. §63.6640(e); 45CSR34]**
- 7.5.4. The permittee shall operate the emergency stationary RICE according to the requirements in 7.5.4.a through 7.5.4.c. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs 7.5.4.a through 7.5.4.c of this sections, is prohibited. If you do not operate the engine according to the requirements in 7.5.4.a through 7.5.4.c of this section, the engine will not be considered an emergency engine under 40 C.F.R. 63, Subpart ZZZZ and will need to meet all requirements for non-emergency engines.
- a. There is no time limit on the use of emergency stationary RICE in emergency situations.
  - b. You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.
  - c. You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph 7.5.4.c, as long as the power provided by the financial arrangement is limited to emergency power.

**[40 C.F.R. §63.6640(f)(1); 45CSR34]**

## **7.6. Compliance Plan**

None

## 8.0 Source-Specific Requirements [40 C.F.R. 63, Subpart HH for Dehy Flare (004-01)]

### 8.1 Limitations and Standards

8.1.1. The permittee has defined the facility as an area source of HAPs for MACT applicability purposes. As a result the subject facility shall conduct monitoring, testing, and reporting as specified below in order to provide adequate justification for maintaining minor source status. These requirements are tailored to incorporate the methods specified in 40 CFR 63, Subpart HH. Additionally, these requirements shall in no way restrict the permittee from conducting more frequent testing to quantify emission increases.

**[40 C.F.R. §63.10(b)(3); 40CFR63, Subpart HH][004-01]**

8.1.2. The owner or operator of an affected area source that is not located in an Urban-1 county, as defined in §63.761, the construction or reconstruction of which commences before July 8, 2005, shall achieve compliance with the provisions of this subpart no later than the dates specified in paragraphs (f)(5)(i) or (ii) of this section §63.760.

(f)(5)(ii) If the affected area source is not located within any UA plus offset and UC boundary, as defined in §63.761, the compliance date is January 5, 2009.

**[40 C.F.R. §63.760(f)(5)(ii)] [004-01]**

8.1.3. §63.764 *General standards.*

(a) Table 2 of the Part 63 Subpart HH specifies the provisions of subpart A (General Provisions) of Part 63 that apply and those that do not apply to owners and operators of affected sources subject to this subpart.

(b) All reports required under this subpart shall be sent to the Administrator at the appropriate address listed in §63.13. Reports may be submitted on electronic media.

(d) Except as specified in paragraph (e)(1) of this requirement, the owner or operator of an affected source located at an existing or new area source of HAP emissions shall comply with the applicable standards specified in paragraph (d) of this section.

(2) Each owner or operator of an area source not located in a UA plus offset and UC boundary (as defined in §63.761) shall comply with paragraphs (d)(2)(i) through (iii) of this requirement.

(i) Determine the optimum glycol circulation rate using the following equation:

$$L_{OPT} = 1.15 * 3.0 \frac{\text{gal TEG}}{\text{lb H}_2\text{O}} * \left( \frac{F * (I - O)}{24 \text{ hr/day}} \right)$$

Where:

$L_{OPT}$  = Optimal circulation rate, gal/hr.

F = Gas flowrate (MMSCF/D).

I = Inlet water content (lb/MMSCF).

O = Outlet water content (lb/MMSCF).

3.0 = The industry accepted rule of thumb for a TEG-to water ratio (gal TEG/lb H<sub>2</sub>O).

1.15 = Adjustment factor included for a margin of safety.

- (ii) Operate the TEG dehydration unit such that the actual glycol circulation rate does not exceed the optimum glycol circulation rate determined in accordance with paragraph (d)(2)(i) of this section. If the TEG dehydration unit is unable to meet the sales gas specification for moisture content using the glycol circulation rate determined in accordance with paragraph (d)(2)(i), the owner or operator must calculate an alternate circulation rate using GRI-GLYCalc™, Version 3.0 or higher. The owner or operator must document why the TEG dehydration unit must be operated using the alternate circulation rate and submit this documentation with the initial notification in accordance with §63.775(c)(7).
  - (iii) Maintain a record of the determination specified in paragraph (d)(2)(ii) in accordance with the requirements in §63.774(f) and submit the Initial Notification in accordance with the requirements in §63.775(c)(7). If operating conditions change and a modification to the optimum glycol circulation rate is required, the owner or operator shall prepare a new determination in accordance with paragraph (d)(2)(i) or (ii) of this section and submit the information specified under §§63.775(c)(7)(ii) through (v).
- (e) *Exemptions.* (1) The owner or operator of an area source is exempt from the requirements of paragraph (d) of this section if the criteria listed in paragraph (e)(1)(ii) of this section is met, except that the records of the determination of this criteria must be maintained as required in §63.774(d)(1).
- (ii) The actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram per year, as determined by the procedures specified in §63.772(b)(2) of this subpart.

**[40 C.F.R. §§63.764(a), (b), (d), (e)] [004-01]**

- 8.1.4. If the annual emissions of benzene from the dehydration unit ever equals or exceeds 0.90 megagram per year (1 tpy) as calculated per §63.772(b)(2), the permittee shall comply with section (d)(2)(i) through (iii) of §63.764.

**[45CSR§30-5.1.c] [004-01]**

## **8.2 Monitoring Requirements**

- 8.2.1. In order to demonstrate compliance with the area source status, claimed within 8.1.1, 8.1.2, 8.1.4, as well as the 1 ton per year benzene exemption provided under 8.1.3(e)(1)(ii), using GRI-GLYCalc V3 or higher, the dehydration system must be accurately defined by monitoring and recording actual annual average operating parameters associated with the dehydration system. These parameters shall be measured at least quarterly, with the exception of wet gas composition, in order to define annual average values or, if monitoring is not practical, some parameters may be assigned default values in accordance with the stipulations listed below. Annual average operating parameter, shall be interpreted as the average result of periodic monitoring recorded a number of times throughout the calendar year, sufficient enough to reflect annual variation. Therefore, this term is operating parameter and site dependent.

The WV Division of Air Quality requires the following actual operating parameters be measured or assumed to equal the default values listed below in order to satisfy this monitoring requirement when using the Gas Analysis and Process Data, GLYCalc emission modeling method:

**Note: if you are measuring and using actual wet or dry gas water content then you should also be measuring the glycol recirculation rate rather than using this default value.**

- Natural Gas Flowrate:
  - number of days operated per year,
  - monthly throughput (MMscf/month),
  - annual daily average (MMscf/day), and
  - maximum design capacity (MMscf/day)
- Absorber temperature and pressure
- Lean glycol circulation rate
- Glycol pump type
- Flash tank temperature and pressure, if applicable
- Stripping Gas flow rate, if applicable
- Wet gas composition (upstream of the absorber – dehydration column) sampled in accordance with GPA method 2166 and analyzed consistent with GPA extended method 2286 as well as the procedures presented in the GRI-GLYCalc Technical Reference User Manual and Handbook V4.
- Wet gas water content (lbs H<sub>2</sub>O/MMscf)
- Dry gas water content (lbs H<sub>2</sub>O/MMscf) at a point directly after exiting the dehydration column and before any additional separation points

The following operating parameter(s) may be assigned default values when using GRI-GLYCalc:

- Dry Gas water content can be assumed to be equivalent to pipeline quality at 7 lb H<sub>2</sub>O / MMscf.
- Wet gas water content can be assumed to be saturated
- Lean glycol water content if not directly measured may use the default value of 1.5 % water as established by GRI.
- Lean glycol circulation rate may be estimated using the recirculation ratio of 3 gal TEG / lb H<sub>2</sub>O removed.

[45CSR§30-5.1.c] [004-01]

### 8.3 Testing Requirements

- 8.3.1. Within the 3<sup>rd</sup> year of this permit term, the permittee shall determine the composition of the wet natural gas by sampling in accordance with GPA Method 2166 and analyzing according to extended GPA Method 2286 analysis as specified in the GRI-GLYCalc V4 Technical Reference User Manual and Handbook. As specified in the handbook, the permittee shall sample the wet gas stream at a location prior to the glycol dehydration contactor column, but after any type of separation device, in accordance with GPA method 2166. The permittee may utilize other equivalent methods provided they are approved in advance by DAQ as part of a testing protocol. If alternative methods are proposed, a test protocol shall be submitted for approval no later than 60 days before the scheduled test date.

[45CSR§30-5.1.c] [004-01]

- 8.3.2. The following testing and compliance provisions of Part 63 Subpart HH *National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities* are applicable to the facility:

§ 63.772 *Test methods, compliance procedures, and compliance demonstrations.*

(b) *Determination of glycol dehydration unit flowrate or benzene emissions.* The procedures of this paragraph shall be used by an owner or operator to determine glycol dehydration unit natural gas flowrate or benzene emissions to meet the criteria for an exemption from control requirements under §63.764(e)(1) (requirement 8.1.3).

(2) The determination of actual average benzene emissions from a glycol dehydration unit shall be made using the procedures of paragraph (b)(2)(i) of this requirement. Emissions shall be determined either uncontrolled, or with federally enforceable controls in place.

(i) The owner or operator shall determine actual average benzene emissions using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit.

[40 C.F.R. §63.772 (b)(2)(i)] [004-01]

## 8.4 Recordkeeping Requirements

8.4.1. For the purpose of documenting compliance with the emission limitations, HAP major source thresholds, as well as the 1 ton per year benzene exemption, the permittee shall maintain records of all monitoring data, wet gas sampling, and annual GLYCalc emission estimates.  
[45CSR§30-5.1.c] [004-01]

8.4.2. An owner or operator of a glycol dehydration unit that meets the exemption criteria in 40 C.F.R. §63.764(e)(1)(ii) shall maintain the records of the actual average benzene emissions (in terms of benzene emissions per year) as determined in accordance with §63.772(b)(2).  
[40 CFR § 63.774 (d)(1)] [004-01]

## 8.5 Reporting Requirements

8.5.1. The permittee shall submit by March 31<sup>st</sup> of the year following the wet gas analysis, an emission summary for the dehydration unit (Dehy Flare), which incorporates the wet gas testing results required by 8.3.1. The permittee shall also supply a copy of the most recent report within the facility's subsequent Title V renewal application. These reports shall include an actual annual average emission estimate for the calendar year of the sample, modeled using GLYCalc V3 or higher software, which incorporates site specific parameters measured in accordance with 8.2.1. The permittee shall also supply all supporting documentation where site specific operating parameters are tabulated to define the annual average values. The report shall incorporate a copy of the lab analysis obtained from the wet gas testing as well as a description of how and where the sample was taken. The report shall include a reference to all sampling and analytical methods utilized. Additionally, the permittee shall identify where the compressor station is located with respect to a custody transfer point, which is referenced within 40 C.F.R 63, subpart HH as the point where the gas enters into a natural gas transmission and/or storage pipeline. This report shall be signed by a responsible official upon submittal.  
[45CSR§30-5.1] [004-01]

## 8.6 Compliance Plan

N/A

## 9.0 Source-Specific Requirements [40 C.F.R. 63, Subpart HHH for Dehy (004-02)]

### 9.1. Limitations and Standards

9.1.1 The affected source is each new and existing glycol dehydration unit specified in paragraphs (b)(1) through (3) of 40 C.F.R. § 63.1270.

- (1) Each large glycol dehydration unit

**[40 C.F.R. §63.1270(b)(1); 45CSR34]**

9.1.2 The owner or operator of each affected source shall achieve compliance with the provisions of 40 C.F.R. §63.1270 by the following dates:

Except as specified in paragraphs (d)(3) through (4) of 40 C.F.R. §63.1270, the owner or operator of an affected source, the construction or reconstruction of which commenced before February 6, 1998, shall achieve compliance with this provisions of the subpart no later than June 17, 2002 except as provided for in §63.6(i). The owner or operator of an area source, the construction or reconstruction of which commenced before February 6, 1998, that increases its emissions of (or its potential to emit) HAP such that the source becomes a major source that is subject to this subpart shall comply with this subpart 3 years after becoming a major source.

**[40 C.F.R. §63.1270(d)(1); 45CSR34]**

#### 9.1.3 General Standards of 40 C.F.R. §63.1274

- (a) Table 2 of 40 C.F.R. 63, Subpart HHH specifies the provisions of subpart A (General Provisions) that apply and those that do not apply to owners and operators of affected sources subject to this subpart.
- (b) All reports required under 40 C.F.R. 63, Subpart HHH shall be sent to the Administrator at the appropriate address listed in §63.13. Reports may be submitted on electronic media.
- (c) The owner or operator of an affected source (*i.e.*, glycol dehydration unit) located at an existing or new major source of HAP emissions shall comply with the requirements in this subpart as follows:
  - (1) The control requirements for glycol dehydration unit process vents specified in §63.1275;
  - (2) The monitoring requirements specified in §63.1283, and
  - (3) The recordkeeping and reporting requirements specified in §§63.1284 and 63.1285.
- (e) Each owner or operator of a major HAP source subject to 40 C.F.R. §63.1274 is required to apply for a part 70 or part 71 operating permit from the appropriate permitting authority. If the Administrator has approved a State operating permit program under part 70, the permit shall be obtained from the State authority. If a State operating permit program has not been approved, the owner or operator shall apply to the EPA Regional Office pursuant to part 71.
- (g) In all cases where the provisions of 40 C.F.R. §63.1274 require an owner or operator to repair leaks by a specified time after the leak is detected, it is a violation of this standard to fail to take action to repair the leak(s) within the specified time. If action is taken to repair the leak(s) within the specified time,

failure of that action to successfully repair the leak(s) is not a violation of this standard. However, if the repairs are unsuccessful, and a leak is detected, the owner or operator shall take further action as required by the applicable provisions of 40 C.F.R. § 63.1274.

- (h) At all times the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

**[40 C.F.R. §§ 63.1274(a), (b), (c), (e), (g), (h); 45CSR34]**

**9.1.4 Process Vent Standards of 40 C.F.R. §63.1275**

- (a) This section applies to each glycol dehydration unit subject to 40 C.F.R. 63, subpart HHH that must be controlled for air emissions as specified in paragraph (c)(1) of §63.1274.
- (b) Except as provided in paragraph (c) of 40 C.F.R. §63.1275, an owner or operator of a glycol dehydration unit process vent shall comply with the requirements specified in paragraphs (b)(1) and (b)(2) of 40 C.F.R. §63.1275.
  - (1) For each glycol dehydration unit process vent, the owner or operator shall control air emissions by either paragraph (b)(1)(i) or (iii) of 40 C.F.R. §63.1275.
    - (i) The owner or operator of a large glycol dehydration unit, as defined in §63.1271, shall connect the process vent to a control device or a combination of control devices through a closed-vent system. The closed-vent system shall be designed and operated in accordance with the requirements of §63.1281(c). The control device(s) shall be designed and operated in accordance with the requirements of §63.1281(d).
  - (2) One or more safety devices that vent directly to the atmosphere may be used on the air emission control equipment installed to comply with paragraph (b)(1) of this section.
- (c) As an alternative to the requirements of paragraph (b) of this section, the owner or operator may comply with one of the following:
  - (3) Control of HAP emissions from a GCG separator (flash tank) vent is not required if the owner or operator demonstrates, to the Administrator's satisfaction, that total emissions to the atmosphere from the glycol dehydration unit process vent are reduced by one of the levels specified in paragraph (c)(3)(i) through (iv) through the installation and operation of controls as specified in paragraph (b)(1) of this section.
    - (i) For any large glycol dehydration unit, HAP emissions are reduced by 95.0 percent or more.
    - (ii) For any large glycol dehydration unit, benzene emissions are reduced to a level less than 0.90 megagrams per year.

**[40 C.F.R. §§63.1275(a), (b)(1)(i), (b)(2), (c)(3); 45CSR34]**

**9.1.5 Closed-vent system requirements of 40 C.F.R. §63.1281(c).**

- (1) The closed-vent system shall route all gases, vapors, and fumes emitted from the material in an emissions unit to a control device that meets the requirements specified in paragraph (d) of 40 C.F.R. §63.1281.
- (2) The closed-vent system shall be designed and operated with no detectable emissions.
- (3) If the closed-vent system contains one or more bypass devices that could be used to divert all or a portion of the gases, vapors, or fumes from entering the control device, the owner or operator shall meet the requirements specified in paragraphs (c)(3)(i) and (c)(3)(ii) of 40 C.F.R. §63.1281.
  - (i) For each bypass device, except as provided for in paragraph (c)(3)(ii) of 40 C.F.R. §63.1281, the owner or operator shall either:
    - (A) At the inlet to the bypass device that could divert the stream away from the control device to the atmosphere, properly install, calibrate, maintain, and operate a flow indicator that is capable of taking periodic readings and sounding an alarm when the bypass device is open such that the stream is being, or could be, diverted away from the control device to the atmosphere; or
    - (B) Secure the bypass device valve installed at the inlet to the bypass device in the non-diverting position using a car-seal or a lock-and-key type configuration.
  - (ii) Low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and safety devices are not subject to the requirements of paragraph (c)(3)(i) of 40 C.F.R. §63.1281.

**[40 C.F.R. §63.1281(c); 45CSR34]**

**9.1.6 Control device requirements of 40 C.F.R. §63.1281(d)**

- (1) The control device used to reduce HAP emissions in accordance with the standards of this subpart shall be one of the control devices specified in paragraphs (d)(1)(i) through (iii) of 40 C.F.R. §63.1281.
  - (i) An enclosed combustion device (e.g., thermal vapor incinerator, catalytic vapor incinerator, boiler, or process heater) that is designed and operated in accordance with one of the following performance requirements:
    - (A) Reduces the mass content of either TOC or total HAP in the gases vented to the device by 95.0 percent by weight or greater, as determined in accordance with the requirements of §63.1282(d);
    - (B) Reduces the concentration of either TOC or total HAP in the exhaust gases at the outlet to the device to a level equal to or less than 20 parts per million by volume on a dry basis corrected to 3 percent oxygen as determined in accordance with the requirements of §63.1282(d); or
    - (C) Operates at a minimum temperature of 760 degrees C, provided the control device has demonstrated, under §63.1282(d), that combustion zone temperature is an indicator of destruction efficiency.

- (D) If a boiler or process heater is used as the control device, then the vent stream shall be introduced into the flame zone of the boiler or process heater.
- (ii) A vapor recovery device (e.g., carbon adsorption system or condenser) or other non-destructive control device that is designed and operated to reduce the mass content of either TOC or total HAP in the gases vented to the device by 95.0 percent by weight or greater as determined in accordance with the requirements of §63.1282(d).
- (iii) A flare, as defined in §63.1271, that is designed and operated in accordance with the requirements of §63.11(b).
- (3) The owner or operator shall demonstrate that a control device achieves the performance requirements of paragraph (d)(1) of this section by following the procedures specified in §63.1282(d).
- (4) The owner or operator shall operate each control device in accordance with the requirements specified in paragraphs (d)(4)(i) and (ii) of this section.
  - (i) Each control device used to comply with this subpart shall be operating at all times when gases, vapors, and fumes are vented from the emissions unit or units through the closed vent system to the control device as required under §63.1275. An owner or operator may vent more than one unit to a control device used to comply with this subpart.
  - (ii) For each control device monitored in accordance with the requirements of §63.1283(d), the owner or operator shall demonstrate compliance according to the requirements of §63.1282(e), or (f) as applicable.

**[40 C.F.R. §§63.1281(d)(1), (d)(3), (d)(4); 45CSR34]**

## **9.2 Monitoring Requirements**

- 9.2.1 For Emission Unit ID 004-02, the permittee shall comply with the Monitoring, Installation, Collection, Operation and Maintenance Requirements of 40 C.F.R. §§63.1283(a)-general applicability, (c)-closed vent systems, (d)(2)(i)-monitoring exemption.

The control device monitoring exemption of 40 C.F.R. §63.1283(d)(2)(i) is stated as follows:

- (2) An owner or operator is exempted from the monitoring requirements specified in paragraphs (d)(3) through (7) of this section for the following types of control devices:
  - (i) Except for control devices for small glycol dehydration units, a boiler or process heater in which all vent streams are introduced with the primary fuel or are used as the primary fuel;

**[40 C.F.R. §§63.1283(a), (c), (d)(2)(i); 45CSR34]**

## **9.3 Testing Requirements**

- 9.3.1 For Emission Unit ID 004-02, the permittee shall comply with the testing requirements of 40 C.F.R. §§63.1282(b) and (d)(1)(iii) as follows:

- (b) *No detectable emissions test procedure for closed vent system LDAR.*

- (1) The procedure shall be conducted in accordance with Method 21, 40 CFR part 60, appendix A.
- (2) The detection instrument shall meet the performance criteria of Method 21, 40 CFR part 60, appendix A, except the instrument response factor criteria in section 3.1.2(a) of Method 21 shall be for the average composition of the fluid, and not for each individual organic compound in the stream.
- (3) The detection instrument shall be calibrated before use on each day of its use by the procedures specified in Method 21, 40 CFR part 60, appendix A.
- (4) Calibration gases shall be as follows:
  - (i) Zero air (less than 10 parts per million by volume hydrocarbon in air); and
  - (ii) A mixture of methane in air at a methane concentration of less than 10,000 parts per million by volume.
- (5) An owner or operator may choose to adjust or not adjust the detection instrument readings to account for the background organic concentration level. If an owner or operator chooses to adjust the instrument readings for the background level, the background level value must be determined according to the procedures in Method 21 of 40 CFR part 60, appendix A.
- (6)
  - (i) Except as provided in paragraph (b)(6)(ii) of this section, the detection instrument shall meet the performance criteria of Method 21 of 40 CFR part 60, appendix A, except the instrument response factor criteria in section 3.1.2(a) of Method 21 shall be for the average composition of the process fluid not each individual volatile organic compound in the stream. For process streams that contain nitrogen, air, or other inert gases that are not organic HAP or VOC, the average stream response factor shall be calculated on an inert-free basis.
  - (ii) If no instrument is available at the facility that will meet the performance criteria specified in paragraph (b)(6)(i) of this section, the instrument readings may be adjusted by multiplying by the average response factor of the process fluid, calculated on an inert-free basis as described in paragraph (b)(6)(i) of this section.
- (7) An owner or operator must determine if a potential leak interface operates with no detectable emissions using the applicable procedure specified in paragraph (b)(7)(i) or (b)(7)(ii) of this section.
  - (i) If an owner or operator chooses not to adjust the detection instrument readings for the background organic concentration level, then the maximum organic concentration value measured by the detection instrument is compared directly to the applicable value for the potential leak interface as specified in paragraph (b)(8) of this section.
  - (ii) If an owner or operator chooses to adjust the detection instrument readings for the background organic concentration level, the value of the arithmetic difference between the maximum organic concentration value measured by the instrument and the background organic concentration value as determined in paragraph (b)(5) of this section is compared with the applicable value for the potential leak interface as specified in paragraph (b)(8) of this section.

(8) A potential leak interface is determined to operate with no detectable organic emissions if the organic concentration value determined in paragraph (b)(7) is less than 500 parts per million by volume.

(d) *Control device performance test procedures.* This paragraph applies to the performance testing of control devices. The owners or operators shall demonstrate that a control device achieves the performance requirements of §63.1281(d)(1), (e)(3)(ii), or (f)(1) using a performance test as specified in paragraph (d)(3) of this section. Owners or operators using a condenser have the option to use a design analysis as specified in paragraph (d)(4) of this section. The owner or operator may elect to use the alternative procedures in paragraph (d)(5) of this section for performance testing of a condenser used to control emissions from a glycol dehydration unit process vent. Flares shall meet the provisions in paragraph (d)(2) of this section. As an alternative to conducting a performance test under this section for combustion control devices, a control device that can be demonstrated to meet the performance requirements of §63.1281(d)(1), (e)(3)(ii), or (f)(1) through a performance test conducted by the manufacturer, as specified in paragraph (g) of this section, can be used.

(1) The following control devices are exempt from the requirements to conduct performance tests and design analyses under this section:

(iii) Except for control devices used for small glycol dehydration units, a boiler or process heater into which the vent stream is introduced with the primary fuel or is used as the primary fuel;

[40 C.F.R.§§63.1282(b), (d)(1)(iii); 45CSR34]

#### 9.4. Recordkeeping Requirements

9.4.1 For Emission Unit ID004-02, the permittee shall comply with the recordkeeping requirements of 40 C.F.R.§§63.1284(a), (b)(1), (b)(2), (b)(4)(iii) and (iv), (b)(5), (b)(6), (b)(7), (b)(8), and (f).

[40 C.F.R.§§63.1284(a), (b)(1), (b)(2), (b)(4)(iii) and (iv), (b)(5), (b)(6), (b)(7), (b)(8), (f); 45CSR34]

#### 9.5. Reporting Requirements

9.5.1 For Emission Unit ID 004-02, the permittee shall comply with reporting requirements of 40 C.F.R.§§ 63.1285(a), (b)(1)(i), (b)(5), (b)(6), (e), and (f).

[40 C.F.R.§§63.1285(a), (b)(1)(i), (b)(5), (b)(6), (e), (f); 45CSR34]

#### 9.6. Compliance Plan

9.6.1 None