

# DRAFT

## OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

### MEMORANDUM

February 6, 2012

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

**THROUGH:** Kendal Stegmann, Senior Environmental Manager, Compliance and Enforcement

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

**THROUGH:** Peer Review

**FROM:** Charles Stockford, P.E., Existing Source Permit Section

**SUBJECT:** Evaluation of Permit Application No. **2011-705-TV2**  
DCP Midstream, LP  
Edmond Booster Station  
SE/4, Section 31, T14N, R03W  
Oklahoma County, Oklahoma  
Latitude 35.642°N, Longitude 97.556°W  
Directions: From intersection of 164<sup>th</sup> and North Pennsylvania in Oklahoma City, travel 0.5 miles west then turn north into the facility.

### SECTION I. INTRODUCTION

DCP Midstream, LP (DCP), has requested renewal of the Part 70 operating permit for the Edmond Booster Station, which was issued on March 5, 2007. Midstream has requested that six grandfathered 600-hp Clark RA6 engines (E-ENG3 thru E-ENG6, E-ENG10 and E-ENG11) be removed from the permit as they have all been permanently removed from service. Also, AQD will require emissions testing on a non-grandfathered 85-hp Caterpillar G333 engine E-ENG14. In addition DCP is requesting that tanks P-TNK7 and P-TNK8 be added to the list of insignificant storage tanks. DCP also requests that the volume of tank P-TNK3 be corrected to 8,820 gallons and be listed as a Slop Oil/Waste Water tank.

### SECTION II. EQUIPMENT

This facility is a compressor station for a natural gas gathering system. The facility has two internal combustion engines in compressor service, two 660-hp Clark HRA6 engines. The compressors receive natural gas from nearby wells and operate at approximately 5~10 psig on the suction side and 700~900 psig on the discharge side. The facility has two engines that are used to pump water: an 85-hp Caterpillar G333 engine and a 133-hp Waukesha F1197 engine. There are eight working tanks at the site: two 40,000 gallon fresh water tanks, an 8,820-gallon

slop oil tank, two 8,820 gallon condensate tanks, a 19,500-gallon methanol tank, a 720-gallon solvent tank, and a 10,000-gallon lube oil tank. A glycol dehydration unit is disconnected and out of service.

The 660-hp Clark HRA6 engines and nine 600-hp Clark RA6 engines were installed in 1935. The 133-hp Waukesha F1197 engine was installed around the same time. The 85-hp Caterpillar G333 engine was installed as authorized by Permit No. 94-025K-C. Field-grade natural gas is the primary fuel for the engines which are operated continuously.

**EUG 1: Engines**

EU ID#	Point ID#	EU Name/Model	Serial No.	Btu/bhp-hr	Construction Date
E-ENG1	P-ENG1	660-hp Clark HRA6*	21468	8,000	1935
E-ENG2	P-ENG2	660-hp Clark HRA6*	21470	8,000	1935
E-ENG3	P-ENG3	600-hp Clark RA6**	21466	8,000	1935
E-ENG4	P-ENG4	600-hp Clark RA6**	21469	8,000	1935
E-ENG5	P-ENG5	600-hp Clark RA6**	21467	8,000	1935
E-ENG6	P-ENG6	600-hp Clark RA6**	A21002	8,000	1935
E-ENG7	P-ENG7	600-hp Clark RA6**	A21003	8,000	1935
E-ENG8	P-ENG8	600-hp Clark RA6**	A21004	8,000	1935
E-ENG9	P-ENG9	600-hp Clark RA6**	A21005	8,000	1935
E-ENG10	P-ENG10	600-hp Clark RA6**	A21006	8,000	1935
E-ENG11	P-ENG11	600-hp Clark RA6**	A21013	8,000	1935
E-ENG12	P-ENG12	133-hp Waukesha F1197*	218834	7,900	1935
E-ENG13	P-ENG13	50-hp Buda L525**	284246	9,500	1935
E-ENG14	P-ENG14	85-hp Caterpillar G333	6801712	9.500	2/1995

\* Operable grandfathered engines.

\*\* Inoperable and disconnected grandfathered engines.

**EUG 2: Storage Tanks**

EU ID#	Point ID#	Contents	Gallons	Construction Date
E-TNK1	P-TNK1	Water	40,000	-
E-TNK2	P-TNK2	Water	40,000	-
E-TNK3	P-TNK3	Slop Oil	8,820	1961
E-TNK4	P-TNK4	Methanol	19,500	1935
E-TNK5	P-TNK5	Solvent	720	1989
E-TNK6	P-TNK6	Lube Oil	10,000	-
E-TNK7	P-TNK7	Condensate	8,820	-
E-TNK8	P-TNK8	Condensate	8,820	-

**EUG 3: Fugitive Components**

EU	Point	Equipment	Number
E-FUG	P-FUG	Valves	360
		Relief Valves	48
		Compressor Seals	11
		Flange/Connections	900
		Pumps	7

**Stack Parameters**

Source	Height	Diameter	Flow	Fuel Usage	Temp.
Make/Model	feet	feet	ACFM	SCFH	°F
660-hp Clark HRA6	13	1	5,025	5,280	750
133-hp Waukesha F1197	13	0.5	650	1,074	1,090
85-hp Caterpillar G333	12	0.5	400	808	950

**SECTION III. EMISSIONS**

**Greenhouse Gasses**

Carbon dioxide equivalent (CO<sub>2</sub>e) emissions were calculated by multiplying emissions by global warming potentials for each pollutant. Global warming potentials were obtained from 40 CFR 98 Subpart A, Table A-1. Methodology used was Calculation Based Method 2 (Generalized Approach).

Natural Gas Combustion	6,364 TPY
Tanks	42 TPY
Blowdowns	139 TPY
Fugitives	466 TPY
<b>Total</b>	<b>7,011 TPY</b>

**Criteria Pollutants**

Emissions estimates for the engines are from Permit No. 97-194-TV and are based on continuous operation and the following emission factors.

**Engine Emissions Factors**

Source	g/hp-hr		
	NO <sub>x</sub>	CO	VOC
660-hp Clark HRA6	12.0	8.6	2.0
133-hp Waukesha F1197	20.0	35.0	2.0
85-hp Caterpillar G333	17.5	14.2	0.16

Emission estimates for the condensate storage tanks (ETnk-3, ETnk-7, and ETnk-8) working and loading losses were determined using the TANKS 4.09 program and a throughput of 235,200 gallons per year per tank.

VOC emissions from the condensate flash were estimated with the Vasquez-Beggs equation software program and a throughput of 235,200 gallons per year per tank.

Fugitive emissions are based on “Protocol for Equipment Leaks, Fugitive” (EPA 453/R-93-026) rather than the latest “1995 Protocol for Equipment Leak Emission Estimates” (EPA 453/R-95-017).

**Fugitive VOC Emissions**

Component Type	Count	C3+ Content	Emission Factors	Emissions	
			lb/hr/Source	lb/hr	TPY
<b>Gas Service</b>					
Valves	360	0.15	0.0441	2.38	10.4
Pressure Relieve Valves	48	0.15	0.4145	2.98	13.1
Compressor Seals	11	0.15	0.4497	0.74	3.25
Flanges/Connections	900	0.15	0.0024	0.32	1.42
Pumps	7	0.15	0.1389	0.15	0.64
<b>Total</b>				<b>6.57</b>	<b>28.8</b>

**Total Potential Emissions**

EU	NOx		CO		VOC	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
E-ENG1	17.5	76.5	12.5	54.8	2.91	12.8
E-ENG2	17.5	76.5	12.5	54.8	2.91	12.8
E-ENG12	6.0	26.3	10.5	46.0	0.60	2.6
E-ENG14	3.3	14.3	2.7	11.7	0.03	0.1
E-TNK3*	-	-	-	-	1.19	5.2
E-TNK7*	-	-	-	-	1.19	5.2
E-TNK8*	-	-	-	-	1.19	5.2
E-FUG1	-	-	-	-	6.58	28.8
<b>Total</b>	<b>44.3</b>	<b>193.6</b>	<b>38.2</b>	<b>167.3</b>	<b>16.04</b>	<b>72.7</b>

\*Includes working, breathing and flash emissions.

**Hazardous Air Pollutants (HAP)**

Reciprocating internal combustion engines emit HAP, the most significant being formaldehyde. Potential formaldehyde emissions were estimated based on the AP-42 (7/00) Table 3.2-1 factor for 2-stroke lean-burn engines of 0.0552 lb/MMBtu for the Clark engines and Table 3.2-3 factor for 4-stroke rich-burn engines for the Waukesha and Caterpillar engines.

EU	Formaldehyde	
	lb/hr	TPY
E-ENG1	0.29	1.3
E-ENG2	0.29	1.3
E-ENG12	0.02	0.1
E-ENG14	0.02	0.1
<b>Total</b>	<b>0.62</b>	<b>2.8</b>

The facility is an area source for HAP emissions.

**SECTION IV. INSIGNIFICANT ACTIVITIES**

The insignificant activities identified in Permit No. 97-194-TV are listed below. Appropriate recordkeeping of activities indicated below with “\*” is specified in the Specific Conditions.

1. \*Emissions from crude oil and condensate storage tanks with a capacity of less than or equal to 420,000 gallons that store crude oil and condensate prior to custody transfer. One tank, TNK3, stores slop oil (considered condensate) prior to custody transfer.
2. \*Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature. The lube oil and antifreeze tanks each have a capacity of less than 39,894 gallons and store a VOC with a vapor pressure less than 1.5 psia. Records of capacity and fluids stored are required in the permit.
3. Emissions from hydrocarbon contaminated soil aeration pads utilized for soils excavated at the facility only. No soil aeration activities were identified in the application, but future use for excavated soil is anticipated.
4. \*For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant. The type of activity and the amount of emissions from that activity (annual). None currently but the facility may have some in the future.

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

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

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

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]  
Subchapter 3 enumerates the primary and secondary ambient air quality standards and the significant deterioration increments. At this time, all of Oklahoma is in “attainment” of these standards.

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

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

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

Emissions limitations have not been established for engines E-ENG1 through E-ENG13 since they are either "grandfathered" engines, or are inoperable. Emission limits for E-ENG14 were established in Permit No. 94-025K-C.

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

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

OAC 252:100-19 (Particulate Matter) [Applicable]  
Section 19-4 regulates emissions of PM from fuel-burning equipment. Particulate emission limits are based on maximum design heat input rating. Appendix C specifies a PM emission limitation of 0.60 lbs/MMBTU for equipment with a heat input rating of 10 MMBTUH or less. AP-42 (7/98) Table 1.4-2 lists total PM emissions as 0.0076 lb/MMBTu for natural gas

combustion. AP-42, Table 3.2-2 (7/00), lists the total PM (PM<sub>10</sub>, PM<sub>2.5</sub>, and PM Condensable) emissions for natural gas fueled, 4-stroke, lean-burn engines to be 0.01 lbs/MMBTU. This permit requires the use of natural gas for all fuel-burning equipment to ensure compliance.

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

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

OAC 252:100-31 (Sulfur Compounds) [Applicable]  
Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBtu heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,000 Btu/scf, this limit corresponds to fuel sulfur content of 1,203 ppmv. The permit requires the use of gaseous fuel with sulfur content less than 343-ppmv to ensure compliance with Subchapter 31.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]  
This subchapter limits NO<sub>x</sub> emissions from new fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH. None of the engines exceed the 50 MMBTUH threshold.

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

OAC 252:100-37 (Volatile Organic Compounds) [Applicable]  
Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The condensate tank (T-3) and the methanol tank (T-4) are not subject to this requirement since they were constructed prior to 1974.

Part 3 requires VOC loading facilities with a throughput equal to or less than 40,000 gallons per day to be equipped with a system for submerged filling of tank trucks or trailers if the capacity of the vehicle is greater than 200 gallons. This facility does not have the physical equipment (loading arm and pump) to conduct this type of loading and is not subject to this requirement.

Part 5 limits the VOC content of coatings from any coating line or other coating operation. This facility does not normally conduct coating or painting operations except for routine maintenance of the facility and equipment which is exempt.

Part 7 requires fuel-burning and refuse-burning equipment to be operated to minimize emissions of VOC. Temperature and available air must be sufficient to provide complete combustion.

Part 7 requires all effluent water separator openings, which receive water containing more than 200 gallons per day of any VOC, to be sealed or the separator to be equipped with an external floating roof or a fixed roof with an internal floating roof or a vapor recovery system. There is no effluent water separator located at this facility.

Part 7 also requires all reciprocating pumps and compressors handling VOCs to be equipped with packing glands and rotating pumps and compressors handling VOCs to be equipped with mechanical seals. All of the pumps and compressors at this facility are subject to these requirements.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]

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

OAC 252:100-43 (Sampling and Testing Methods) [Applicable]

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

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

OAC 252:100-11	Alternative Emissions Reduction	not requested
OAC 252:100-15	Mobile Sources	not in source category
OAC 252:100-17	Incinerators	not type of emission unit
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Grain Elevators	not in source category
OAC 252:100-39	Nonattainment Areas	not in area category
OAC 252:100-47	Municipal Solid Waste Landfills	not in source category

**SECTION VI. FEDERAL REGULATIONS**

PSD, 40 CFR Part 52 [Not Applicable]  
 Total emissions are less than the major source threshold of 250 TPY of any single regulated pollutant and the facility is not one of the 26 specific industries with a threshold of 100 TPY.

NSPS, 40 CFR Part 60 [Not Applicable]  
Subparts K, Ka, Kb, VOL Storage Vessels. The tanks at this site are not subject to Subparts K, Ka, or Kb since they were constructed prior to 1973. The solvent tank is below the de minimis size of Subchapter Kb of 19,813 gallons.  
Subpart GG, Stationary Gas Turbines. There are no turbines at this facility.  
Subpart KKK, Equipment Leaks of VOC from Onshore Natural Gas Processing Plants. The facility does not engage in natural gas processing.  
Subpart LLL, Onshore Natural Gas Processing: SO<sub>2</sub> Emissions. There is no natural gas sweetening operation at this site.  
Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, affects stationary compression ignition (CI) internal combustion engines (ICE) based on power and displacement ratings, depending on date of construction, beginning with those constructed after July 11, 2005. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. There are no CI ICE engines at the facility at the present time.

Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (SI-ICE). This subpart was published in the Federal Register on January 18, 2008. It promulgates emission standards for all new SI engines ordered after June 12, 2006 and all SI engines modified or reconstructed after June 12, 2006, regardless of size. The specific emission standards (either in g/hp-hr or as a concentration limit) vary based on engine class, engine power rating, lean-burn or rich-burn, fuel type, duty (emergency or non-emergency), and manufacture date. Engine manufacturers are required to certify certain engines to meet the emission standards and may voluntarily certify other engines. An initial notification is required only for owners and operators of engines greater than 500 HP that are non-certified. Emergency engines will be required to be equipped with a non-resettable hour meter and are limited to 100 hours per year of operation excluding use in an emergency (the length of operation and the reason the engine was in operation must be recorded). There are presently no engines at this facility subject to this subpart.

NESHAP, 40 CFR Part 61 [Not Applicable]  
There are no emissions of any of the regulated pollutants: arsenic, asbestos, beryllium, benzene, coke oven emissions, mercury, radionuclides or vinyl chloride except for trace amounts of benzene. Subpart J, Equipment Leaks of Benzene, only affects process streams which contain more than 10% benzene by weight. All process streams at this facility are below this threshold.

NESHAP, 40 CFR Part 63 [Not Applicable]  
Subpart HH, Oil and Natural Gas Production Facilities. This facility has no affected facilities under Subpart HH and is not a major source of HAP.

Subpart ZZZZ applies to Reciprocating Internal Combustion Engines (“RICE”) and affects RICE with a nameplate rating greater than 500 brake horsepower and which are located at major and area sources of HAP emissions. Stationary RICE located at an area source are considered as existing engines and are exempt from the subpart if construction or reconstruction commenced before June 12, 2006. On January 18, 2008, the EPA published a final rule that promulgates standards for new and reconstructed engines (after June 12, 2006) with a site rating less than or equal to 500 brake horsepower located at major sources, and for new and reconstructed engines (after June 12, 2006) located at area sources. On August 10, 2010, the EPA published an amended final rule that added requirements for all existing engines (engines manufactured before June 12, 2006) located at area sources and existing engines less than 500 brake horsepower located at major sources. Edmond is an area source for HAPs. The engines located at this site were constructed before June 12, 2006 and are identified as existing stationary RICE; therefore, the facility is subject to this subpart and currently must comply with the applicable operating limitations no later than October 19, 2013.

CAM, 40 CFR Part 64 [Not Applicable]  
Compliance Assurance Monitoring (CAM), as published in the Federal Register on October 22, 1997, applies to any pollutant specific emission unit at a major source that is required to obtain a Title V permit, if it meets all of the following criteria:

- It is subject to an emission limit or standard for an applicable regulated air pollutant
- It uses a control device to achieve compliance with the applicable emission limit or standard
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant of major source levels

None of the engines use a control device to meet an established emission limit.

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

Stratospheric Ozone Protection, 40 CFR Part 82 [Not Applicable]  
This facility does not produce, consume, recycle, import, or export any controlled substances or controlled products as defined in this part, nor does this facility perform service on motor (fleet) vehicles that involves ozone-depleting substances. Therefore, as currently operated, the facility is not subject to these requirements.

## SECTION VII. COMPLIANCE

### Inspection

A full compliance evaluation was conducted at the facility on January 21, 2011. Sean Walker, Austin Hawkins, and Camas Frey, Environmental Program Specialists for AQD, conducted the evaluation. Byron Skaley, Compliance Coordinator, and Jeff Childers, Area Supervisor, represented the facility. No violations were observed at the facility.

### Tier Classification and Public Review

This application has been determined to be a Tier II based on the request for renewal of a Part 70 permit. The permittee has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the application involves only land owned by the applicant.

The applicant shall publish the "Notice of Filing a Tier II Application" in a daily newspaper printed and published in Oklahoma County. The notice shall state that the application is available for public review at a location in Oklahoma County or at the AQD main office. The applicant shall also publish the DEQ "Notice of Tier II Draft Permit" in a daily newspaper in Oklahoma County. The notice shall state that the application is available for public review at the AQD main office, and on the DEQ website.

A copy of the "proposed" permit will be sent to EPA Region VI for a 45-day review period subsequent to the Public Review.

The status of all permit applications is available for review in the Air Quality Section of DEQ's web page at <http://www.deq.state.ok.us>. This facility is not located within 50 miles of the Oklahoma border with another state.

### Fees Paid

A fee of \$1,000 for renewal of a Part 70 permit has been paid.

## SECTION VIII. SUMMARY

The facility is constructed and operated as presented in the renewal application. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues concerning this facility. Issuance of the permit is recommended, contingent on Public and EPA review.

# DRAFT

## PERMIT TO OPERATE AIR POLLUTION CONTROL FACILITY SPECIFIC CONDITIONS

DCP Midstream, LP  
Edmond Booster Station

Permit No. 2011-705-TVR2

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on September 6, 2011, and February 3, 2012. The Evaluation Memorandum dated February 6, 2012, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein.

1. Points of emissions and emissions limitations for each point: [OAC 252:100-8-6(a)]

**EUG 1:** Engines E-ENG1 through E-ENG13 are identified as “grandfathered” engines and are limited to the existing equipment. Engines E-ENG3 thru E-ENG11, and E-ENG13, shall not be operated.

EU ID#	Point ID#	EU Name/Model	Serial No.
E-ENG1	P-ENG1	660-hp Clark HRA6	21468
E-ENG2	P-ENG2	660-hp Clark HRA6	21470
E-ENG12	P-ENG12	133-hp Waukesha F1197	218834

**EUG 1A:** Engine E-ENG14 85-hp Caterpillar G333 shall be subject to the following limits, and shall undergo quarterly stack testing.

EU	NOx		CO		VOC	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
E-ENG14	3.3	14.3	2.7	11.7	0.03	0.1

**EUG 2:** Storage tank VOC emissions:

Point ID#	Throughput Gallons	VOC Emissions	
		Lb/Hr	TPY
P-TNK3	235,200	1.19	5.2
P-TNK7	235,200	1.19	5.2
P-TNK8	235,200	1.19	5.2

**EUG 3:** Fugitive VOC emissions are insignificant based on existing equipment items and do not have a specific limitation.

Type of Equipment	Number Items *
Valves	360
Relief Valves	48
Compressor Seals	11
Flange/Connections	900
Pumps	7

\* Estimated, not a permit limit.

2. The fuel-burning equipment shall be fired with pipeline grade natural gas or other gaseous fuel with sulfur content less than 343-ppmv. Compliance can be shown by the following methods: for pipeline grade natural gas, a current gas company bill; for other gaseous fuel, a current lab analysis, gas contract, tariff sheet or other approved methods. Compliance shall be demonstrated at least once every calendar year.

[OAC 252:100-31]

3. The permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year).

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

4. The engines shall have a permanent identification plate attached which shows the make, model number, and serial number.

[OAC 252:100-43]

5. The permittee shall keep operation and maintenance (O&M) records for all engines, except E-ENG3 thru E-ENG11, and E-ENG13. Such records shall, at a minimum, include dates of operation and maintenance, type of work performed, and the increase, if any, in emissions as a result.

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

6. At least once per calendar quarter, the permittee shall conduct tests of NO<sub>x</sub> and CO emissions from engine E-ENG14 and from each replacement engine when operating under representative conditions for that period. Testing is required for any engine, which runs for more than 220 hours during that calendar quarter. Engines shall be tested no sooner than 20 calendar days after the last test. Testing shall be conducted using a portable analyzer in accordance with a protocol meeting the requirements of the “AQD Portable Analyzer Guidance” document or an equivalent method approved by Air Quality. When four consecutive quarterly tests show the engine to be in compliance with the emissions limitations shown in the permit, then the testing frequency may be reduced to semi-annual testing. Likewise, when the following two consecutive semi-annual tests show compliance, the testing frequency may be reduced to annual testing. Upon any showing of non-compliance with emissions limitations or testing that indicates that emissions are within 10% of the emission limitations, the testing frequency shall revert to quarterly. Reduced engine testing does not apply to engines with catalytic converters or oxidation catalysts.

[OAC 252:100-8-6 (a)(3)(A)]

7. When periodic compliance testing shows engine E-ENG14 exhaust emissions in excess of the lb/hr limits in Specific Condition Number 1, the permittee shall comply with the provisions of OAC 252:100-9 for excess emissions. [OAC 252:100-9]

8. Replacement (including temporary periods of 6 months or less for maintenance purposes), of internal combustion engines/turbines with emissions limitations specified in this permit with engines of lesser or equal emissions of each pollutant (in lbs/hr and TPY) are authorized under the following conditions. [OAC 252:100-8]

- a. The permittee shall notify AQD in writing no later than 7 days in advance of the start-up of the replacement engine(s)/turbine(s). Said notice shall identify the equipment removed and shall include the new engine/turbine make, model, serial number, and horsepower; date of the change, and any change in emissions.
- b. Quarterly emissions tests for the replacement engine(s)/turbine(s) shall be conducted to confirm continued compliance with NO<sub>x</sub> and CO emissions limitations. A copy of the first quarter testing shall be provided to AQD within 60 days of start-up of each replacement or additional engine/turbine. The test report shall include the engine/turbine fuel usage, stack flow (ACFM), stack temperature (°F), stack height (feet), stack diameter (inches), and pollutant emissions rates (g/hp-hr, lbs/hr, and TPY) at maximum rated horsepower for the altitude/location.
- c. Replacement equipment and emissions are limited to equipment and emissions which are not a modification under NSPS or NESHAP, or a significant modification under PSD. For existing PSD facilities, the permittee shall calculate the PTE or the net emissions increase resulting from the replacement to document that it does not exceed significance levels and submit the results with the notice required by a. of this Specific Condition.
- d. Engines installed as allowed under the replacement allowances in this Specific Condition that are subject to 40 CFR Part 63, Subpart ZZZZ and/or 40 CFR Part 60, Subpart JJJJ shall comply with all applicable requirements.

9. The following records shall be maintained on-site to verify Insignificant Activities. No recordkeeping is required for those operations that qualify as Trivial Activities.

[OAC 252:100-8-6 (a)(3)(B)]

- a. For crude oil and condensate storage tanks with a capacity of less than or equal to 420,000 gallons that store crude oil and condensate prior to custody transfer: records of capacity of the tanks and the amount of throughput (annual).
- b. For fluid storage tanks with a capacity of less than 39,894 gallons and a true vapor pressure less than 1.5 psia: records of capacity of the tanks and contents.
- c. For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant: the type of activity and the amount of emissions from that activity (annual).

10. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site or at a local field office for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-8-6 (a)(3)(B)]

- a. Operation and maintenance records as listed in Specific Condition No. 5.
- b. The appropriate document(s) as described in Specific Condition No. 2 for the fuel burned.

11. No later than 30 days after each anniversary date of the issuance of the Title V permit (November 6, 2001), the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit. [OAC 252:100-8-6 (c)(5)(A) & (D)]

12. The owner/operator shall comply with all applicable requirements of the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), Subpart ZZZZ at Area Sources, for each affected engine, including but not limited to: [40 CFR 63, Subpart ZZZZ]

- a. § 63.6580 What is the purpose of subpart ZZZZ?
- b. § 63.6585 Am I subject to this subpart?
- c. § 63.6590 What parts of my plant does this subpart cover?
- d. § 63.6595 When do I have to comply with this subpart?
- e. § 63.6600 What emission limitations and operating limitations must I meet?
- f. § 63.6605 What are my general requirements for complying with this subpart?
- g. § 63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations?
- h. § 63.6615 When must I conduct subsequent performance tests?
- i. § 63.6620 What performance tests and other procedures must I use?
- j. § 63.6625 What are my monitoring, installation, operation, and maintenance requirements?
- k. § 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?
- l. § 63.6635 How do I monitor and collect data to demonstrate continuous compliance?
- m. § 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?
- n. § 63.6645 What notifications must I submit and when?
- o. § 63.6650 What reports must I submit and when?
- p. § 63.6655 What records must I keep?
- q. § 63.6660 In what form and how long must I keep my records?
- r. § 63.6665 What parts of the General Provisions apply to me?
- s. § 63.6670 Who implements and enforces this subpart?
- t. § 63.6675 What definitions apply to this subpart?

13. The condensate storage tanks shall each be equipped for submerged fill. The total condensate throughput for the facility shall not exceed 705,600 gallons per year based on a 12-month rolling total.

14. This permit supersedes all previous Air Quality permits for this facility which are now null and void.

15. The Permit Shield (Standard Conditions, Section VI) is extended to the following requirements that have been determined to be inapplicable to this facility.

[OAC 252:100-8-6(d)(2)]

- a. OAC 252:100-8, Part 7, PSD
- b. OAC 252:100-33, Control of Emissions of NO<sub>x</sub>
- c. OAC 252:100-35, Control of Emissions of CO
- d. OAC 252:100-37-16, VOC Loading
- e. 40 CFR Part 50, PSD
- f. 40 CFR Part 52.21, PSD
- g. 40 CFR Part 60, NSPS
- h. 40 CFR Part 61, NESHAP
- i. 40 CFR Part 72, Acid Rain

DCP Midstream, LP  
Mr. Jay J. Hadley  
370 17<sup>th</sup> Street, Suite 2500  
Denver, Colorado 80202

Permit Number: **2011-705-TVR2**  
Permit Writer: Charles Stockford

**SUBJECT:** Edmond Booster Station  
SE/4, Section 31, T14N, R03W  
Oklahoma County, Oklahoma

Dear Mr. Hadley:

Air Quality has received the permit application for the referenced facility and completed initial review. This application is a Tier II application. In accordance with 27A O.S. 2-14-301 and 302 and OAC 252:4-7-13(c) the enclosed draft permit is now ready for public review. The requirements for public review of the draft permit include the following steps, which **you** must accomplish:

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

The permit review time is hereby tolled pending the receipt of the affidavit of publication. Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact the permit writer at (405) 702-4100.

Sincerely,

Charles Stockford, P.E.  
Existing Source Permit Section  
**AIR QUALITY DIVISION**



# PART 70 PERMIT

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

Permit No. 2011-705-TVR2

DCP Midstream,LP,

having complied with the requirements of the law, is hereby granted permission to operate all the sources within their boundaries at the Edmond Booster, Section 31, Township 14N, Range 3W, Oklahoma County, Oklahoma, subject to Standard Conditions dated July 21, 2009 and Specific Conditions, both attached.

This permit shall expire five (5) years from the date below, except as authorized under Section VIII of the Standard Conditions.

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

\_\_\_\_\_  
Date

**MAJOR SOURCE AIR QUALITY PERMIT  
STANDARD CONDITIONS  
(July 21, 2009)**

**SECTION I. DUTY TO COMPLY**

A. This is a permit to operate / construct this specific facility in accordance with the federal Clean Air Act (42 U.S.C. 7401, et al.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.

[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations. [OAC 252:100-8-6(a)(7)(B)]

**SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS**

A. Any exceedance resulting from an emergency and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV (Emergencies). [OAC 252:100-8-6(a)(3)(C)(iii)(I) & (II)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements. [OAC 252:100-8-6(a)(3)(C)(iv)]

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F. [OAC 252:100-8-6(a)(3)(C)(iv)]

**SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING**

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[OAC 252:100-8-6 (a)(3)(B)(ii), OAC 252:100-8-6(c)(1), and OAC 252:100-8-6(c)(2)(B)]

B. Records of required monitoring shall include:

- (1) the date, place and time of sampling or measurement;
- (2) the date or dates analyses were performed;
- (3) the company or entity which performed the analyses;
- (4) the analytical techniques or methods used;
- (5) the results of such analyses; and
- (6) the operating conditions existing at the time of sampling or measurement.

[OAC 252:100-8-6(a)(3)(B)(i)]

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report.

[OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions.

[OAC 252:100-8-6(a)(3)(C)(iii)]

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act.

[OAC 252:100-43]

F. Any Annual Certification of Compliance, Semi Annual Monitoring and Deviation Report, Excess Emission Report, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f), OAC 252:100-8-6(a)(3)(C)(iv), OAC 252:100-8-6(c)(1), OAC 252:100-9-7(e), and OAC 252:100-5-2.1(f)]

G. Any owner or operator subject to the provisions of New Source Performance Standards (“NSPS”) under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants (“NESHAPs”) under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 C.F.R. §§60.7 and 63.10, 40 CFR Parts 61, Subpart A, and OAC 252:100, Appendix Q]

H. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted. [OAC 252:100-8-6(c)(4)]

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer’s instructions and in accordance with a protocol meeting the requirements of the “AQD Portable Analyzer Guidance” document or an equivalent method approved by Air Quality.

[OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter (PM<sub>10</sub>). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 C.F.R. Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards. [OAC 252:100-8-6(c)(1) and OAC 252:100, Appendix Q]

#### **SECTION IV. COMPLIANCE CERTIFICATIONS**

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.

[OAC 252:100-8-6(c)(5)(A), and (D)]

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source.

[OAC 252:100-8-6(c)(5)(C)(i)-(v)]

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.

[OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

## **SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM**

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification.

[OAC 252:100-8-6(c)(6)]

## **SECTION VI. PERMIT SHIELD**

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit.

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

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit.

[OAC 252:100-8-6(d)(2)]

**SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT**

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.

[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

**SECTION VIII. TERM OF PERMIT**

A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance. A complete renewal application has been submitted at least 180 days before the date of expiration. [OAC 252:100-8-7.1(d)(1)]

C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]

D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

**SECTION IX. SEVERABILITY**

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

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

**SECTION X. PROPERTY RIGHTS**

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

[OAC 252:100-8-6(a)(7)(D)]

B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued. [OAC 252:100-8-6(c)(6)]

**SECTION XI. DUTY TO PROVIDE INFORMATION**

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing, terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit.

[OAC 252:100-8-6(a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment.

[OAC 252:100-8-6(a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer.

[Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

## **SECTION XII. REOPENING, MODIFICATION & REVOCATION**

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation and reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.

[OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances: [OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

- (1) Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
- (2) The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (3) The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.
- (4) DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

C. The permit may be reopened for cause by EPA, pursuant to the provisions of OAC 100-8-7.3(d). [OAC 100-8-7.3(d)]

D. The permittee shall notify AQD before making changes other than those described in Section XVIII (Operational Flexibility), those qualifying for administrative permit amendments, or those defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII). The notification should include any changes which may alter the status of a “grandfathered source,” as defined under AQD rules. Such changes may require a permit modification.

[OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited. [OAC 252:100-8-6(c)(6)]

## **SECTION XIII. INSPECTION & ENTRY**

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the

permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(18) for confidential information submitted to or obtained by the DEQ under this section):

- (1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

[OAC 252:100-8-6(c)(2)]

#### SECTION XIV. EMERGENCIES

A. Any exceedance resulting from an emergency shall be reported to AQD promptly but no later than 4:30 p.m. on the next working day after the permittee first becomes aware of the exceedance. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken.

[OAC 252:100-8-6 (a)(3)(C)(iii)(I) and (IV)]

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance. [OAC 252:100-8-6(a)(3)(C)(iii)(II)]

C. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. [OAC 252:100-8-2]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that: [OAC 252:100-8-6 (e)(2)]

- (1) an emergency occurred and the permittee can identify the cause or causes of the emergency;
- (2) the permitted facility was at the time being properly operated;
- (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [OAC 252:100-8-6(e)(3)]

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.

[OAC 252:100-8-6(a)(3)(C)(iv)]

#### **SECTION XV. RISK MANAGEMENT PLAN**

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date.

[OAC 252:100-8-6(a)(4)]

#### **SECTION XVI. INSIGNIFICANT ACTIVITIES**

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or Federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

- (1) 5 tons per year of any one criteria pollutant.
- (2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.

[OAC 252:100-8-2 and OAC 252:100, Appendix I]

#### **SECTION XVII. TRIVIAL ACTIVITIES**

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list.

[OAC 252:100-8-2 and OAC 252:100, Appendix J]

#### **SECTION XVIII. OPERATIONAL FLEXIBILITY**

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating.

[OAC 252:100-8-6(a)(10) and (f)(1)]

B. The permittee may make changes within the facility that:

- (1) result in no net emissions increases,
- (2) are not modifications under any provision of Title I of the federal Clean Air Act, and
- (3) do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this paragraph. [OAC 252:100-8-6(f)(2)]

## SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

- (1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]
- (2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]
- (3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for: [OAC 252:100-25]
  - (a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
  - (b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
  - (c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
  - (d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.
- (4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]
- (5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]

- (6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]
- (7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

## **SECTION XX. STRATOSPHERIC OZONE PROTECTION**

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances: [40 CFR 82, Subpart A]

- (1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
- (2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and
- (3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

B. If the permittee performs a service on motor (fleet) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]

C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B: [40 CFR 82, Subpart F]

- (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
- (2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
- (3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161;
- (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
- (5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
- (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

**SECTION XXI. TITLE V APPROVAL LANGUAGE**

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Source's Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in OAC 252:100-8-7.2(a) only if the following procedures are followed:

- (1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
- (2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).
- (3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).
- (4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R. § 70.8(a) and (c).
- (5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.
- (6) The DEQ complies with 40 C.F.R. § 70.8(d).
- (7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).
- (8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
- (9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).
- (10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

B. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

**SECTION XXII. CREDIBLE EVIDENCE**

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[OAC 252:100-43-6]