

65-00982



#### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY NATURAL MINOR OPERATING PERMIT

Issue Date:	April 13, 2022	Effective Date:	April 13, 2022		
Expiration Date:	March 31, 2027				
In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations. The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.					
State Only Permit No: 65-00982					
	Natural Minor				
	Federal Tax Id - Plant Coo	16: 25-1266604-3			
	Owner Inform	nation			
Nam	e: PEOPLES GAS CO LLC				
Mailing Addres	s: 375 N SHORE DR STE 600				
	PITTSBURGH, PA 15212-5866				
	Plant Inform	ation			
Plant: PEOF	Plant: PEOPLES GAS CO LLC/RUBRIGHT COMP STA				
Location: 65	Westmoreland County	65925 Bell	Fownship		
SIC Code: 4922	Trans. & Utilities - Natural Gas Transmission				
	Responsible	Official			
Name: PAUL	<i>W</i> BECKER				
Title: VP OP	R & ENG				
Phone: (412) 2	244 - 2531	Email: Paul.Be	cker@peoples-gas.com		
Permit Contact Person					
Name: ALEX Title: SR EN Phone: (412) 2	VENG	Email: Alex.M.P	avick@peoples-gas.com		
[Signature] MARK R. GOROG, P.E., ENVIRONMENTAL PROGRAM MANAGER, SOUTHWEST REGION					





#### **SECTION A. Table of Contents**

#### Section A. Facility/Source Identification

Table of Contents Site Inventory List

#### Section B. General State Only Requirements

- #001 Definitions.
- #002 Operating Permit Duration.
- #003 Permit Renewal.
- #004 Operating Permit Fees under Subchapter I.
- #005 Transfer of Operating Permits.
- #006 Inspection and Entry.
- #007 Compliance Requirements.
- #008 Need to Halt or Reduce Activity Not a Defense.
- #009 Duty to Provide Information.
- #010 Revising an Operating Permit for Cause.
- #011 Operating Permit Modifications
- #012 Severability Clause.
- #013 De Minimis Emission Increases.
- #014 Operational Flexibility.
- #015 Reactivation
- #016 Health Risk-based Emission Standards and Operating Practice Requirements.
- #017 Circumvention.
- #018 Reporting Requirements.
- #019 Sampling, Testing and Monitoring Procedures.
- #020 Recordkeeping.
- #021 Property Rights.
- #022 Alternative Operating Scenarios.
- #023 Reporting
- #024 Report Format

#### Section C. Site Level State Only Requirements

- C-I: Restrictions
- C-II: Testing Requirements
- C-III: Monitoring Requirements
- C-IV: Recordkeeping Requirements
- C-V: Reporting Requirements
- C-VI: Work Practice Standards
- C-VII: Additional Requirements
- C-VIII: Compliance Certification
- C-IX: Compliance Schedule

#### Section D. Source Level State Only Requirements

- D-I: Restrictions
- D-II: Testing Requirements
- D-III: Monitoring Requirements
- D-IV: Recordkeeping Requirements
- D-V: Reporting Requirements
- D-VI: Work Practice Standards
- D-VII: Additional Requirements

Note: These same sub-sections are repeated for each source!

# Section E. Source Group Restrictions

E-I: Restrictions

65-00982



**SECTION A. Table of Contents** 

- E-II: Testing Requirements
- E-III: Monitoring Requirements
- E-IV: Recordkeeping Requirements
- E-V: Reporting Requirements
- E-VI: Work Practice Standards
- E-VII: Additional Requirements

# Section F. Alternative Operating Scenario(s)

- F-I: Restrictions
- F-II: Testing Requirements
- F-III: Monitoring Requirements
- F-IV: Recordkeeping Requirements
- F-V: Reporting Requirements
- F-VI: Work Practice Standards
- F-VII: Additional Requirements

#### Section G. Emission Restriction Summary

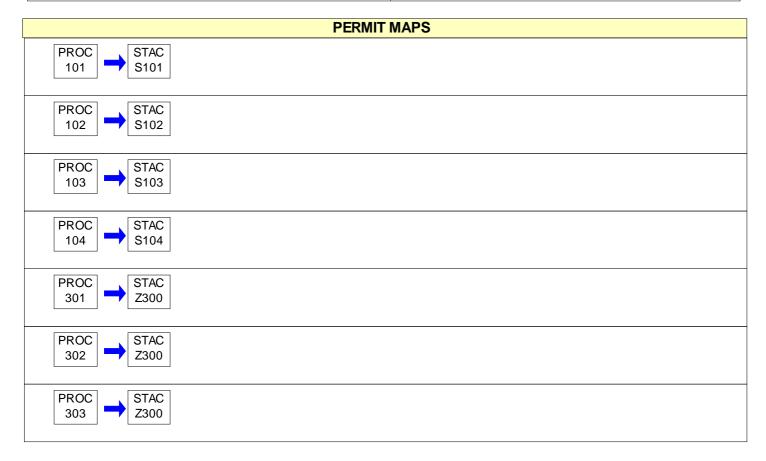
Section H. Miscellaneous





# SECTION A. Site Inventory List

Source	ID Source Name	Capacity/Throughput	Fuel/Material
101	NATURAL GAS FIRED COMPRESSOR ENGINE 1 (1,265 BHP)	100.000 MMCF/HR	Natural Gas
102	TRI-ETHYLENE GLYCOL DEHYDRATOR 1 (0.2 MMBTH/HR)		
103	NATURAL GAS FIRED COMPRESSOR ENGINE 2 (1,340 BHP)	100.000 MCF/HR	Natural Gas
104	TRI-ETHYLENE GLYCOL DEHYDRATOR 2 (0.2 MMBTH/HR)	N/A	
301	NEW OIL STORAGE TANKS (4)(300 GALLONS EACH)		
302	WASTE OIL STORAGE TANKS (2)(600 GALLONS EACH)		
303	PRODUCED FLUIDS STORAGE TANKS (3)(2,100 GALLONS EACH)		
304	WASTE WATER STORAGE TANKS (3)(2,100 GALLONS EACH)		
401	RUBRIGHT STATION COMPONENT FUGITIVE EMISSIONS		
S101	NATURAL GAS FIRED COMPRESSOR ENGINE 1 STACK		
S102	TRI-ETHYLENE GLYCOL DEHYDRATOR 1 STACK		
S103	NATURAL GAS FIRED COMPRESSOR ENGINE 2 STACK		
S104	TRI-ETHYLENE GLYCOL DEHYDRATOR 2 STACK		
Z300	TANKS FUGITIVE EMISSIONS		
Z401	STATION COMPONENT FUGITIVE EMISSIONS		







PERMIT MAPS	
$\begin{array}{c} PROC \\ 304 \end{array} \longrightarrow \begin{array}{c} STAC \\ Z300 \end{array}$	
$\begin{array}{c} PROC \\ 401 \end{array} \longrightarrow \begin{array}{c} STAC \\ Z401 \end{array}$	





# #001 [25 Pa. Code § 121.1] Definitions. Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and in 25 Pa. Code § 121.1. #002 [25 Pa. Code § 127.446] **Operating Permit Duration.** (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. #003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)] Permit Renewal. (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit. (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official. (c) The permittee shall submit with the renewal application a fee for the processing of the application as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office. (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j). (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application. #004 [25 Pa. Code § 127.703] **Operating Permit Fees under Subchapter I.** (a) The permittee shall pay the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year. (1) For a synthetic minor facility, a fee equal to: (i) Four thousand dollars (\$4,000) for calendar years 2021-2025. (ii) Five thousand dollars (\$5,000) for calendar years 2026-2030. (iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.





(2) For a facility that is not a synthetic minor, a fee equal to:

(i) Two thousand dollars (\$2,000) for calendar years 2021-2025.

(ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026-2030.

(iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.

(b) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

# #005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]

#### **Transfer of Operating Permits.**

(a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.

(b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.

(c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

# #006 [25 Pa. Code § 127.441 and 35 P.S. § 4008]

#### Inspection and Entry.

(a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:

(1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;

(2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;

(4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.

(c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

# #007 [25 Pa. Code §§ 127.441 & 127.444]

Compliance Requirements.

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:





- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source which is subject to 25 Pa. Code Article III unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued for the source is operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#### #008 [25 Pa. Code § 127.441]

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

It shall not be a defense for the permittee in an enforcement action that it was necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

### #009 [25 Pa. Code §§ 127.442(a) & 127.461]

#### Duty to Provide Information.

(a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.

(b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#### #010 [25 Pa. Code § 127.461]

#### **Revising an Operating Permit for Cause.**

This operating permit may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

(1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.

(2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.

(3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.

(4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

#### #011 [25 Pa. Code §§ 127.450, 127.462, 127.465 & 127.703]

#### **Operating Permit Modifications**

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:





(b) Administrative Amendments. The permittee shall submit the application for administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.

(c) Minor Operating Permit Modifications. The permittee shall submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.

(e) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

# #012 [25 Pa. Code § 127.441]

Severability Clause.

The provisions of this permit are severable, and if any provision of this permit is determined by a court of competent jurisdiction to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

#### #013 [25 Pa. Code § 127.449]

### De Minimis Emission Increases.

(a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

(b) The Department may disapprove or condition de minimis emission increases at any time.

(c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

(2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.

(3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:



(1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.

(2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

(5) Laboratory equipment used exclusively for chemical or physical analysis.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

# #014 [25 Pa. Code § 127.3]

#### **Operational Flexibility.**

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)





(6) Section 127.462 (relating to minor operating permit modifications) (7) Subchapter H (relating to general plan approvals and general operating permits) #015 [25 Pa. Code § 127.11] Reactivation (a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a). (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b). #016 [25 Pa. Code § 127.36] Health Risk-based Emission Standards and Operating Practice Requirements. (a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)]. (b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act. #017 [25 Pa. Code § 121.9] Circumvention. No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors. #018 [25 Pa. Code §§ 127.402(d) & 127.442] **Reporting Requirements.** (a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139. (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source. (c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the: Regional Air Program Manager PA Department of Environmental Protection (At the address given in the permit transmittal letter, or otherwise notified) (d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete. (e) Any records, reports or information submitted to the Department shall be available to the public except for such





SECTION	ON B. General State Only Requirements
	records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.
019	[25 Pa. Code §§ 127.441(c) & 135.5]
amplinç	g, Testing and Monitoring Procedures.
	(a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.
	(b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.
#020	[25 Pa. Code §§ 127.441(c) and 135.5]
Recordke	eeping.
	(a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
	(1) The date, place (as defined in the permit) and time of sampling or measurements.
	(2) The dates the analyses were performed.
	(3) The company or entity that performed the analyses.
	(4) The analytical techniques or methods used.
	(5) The results of the analyses.
	(6) The operating conditions as existing at the time of sampling or measurement.
	(b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
	(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.
#021	[25 Pa. Code § 127.441(a)]
Property	Rights.
	This permit does not convey any property rights of any sort, or any exclusive privileges.
#022	[25 Pa. Code § 127.447]
Alternativ	ve Operating Scenarios.
	The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.





#### #023 [25 Pa. Code §135.3]

#### Reporting

(a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.

(b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

# #024 [25 Pa. Code §135.4]

#### **Report Format**

If applicable, the emissions reports shall contain sufficient information to enable the Department to complete its emission inventory. Emissions reports shall be made by the source owner or operator in a format specified by the Department.





# I. RESTRICTIONS.

# **Emission Restriction(s).**

# # 001 [25 Pa. Code §121.7]

### Prohibition of air pollution.

No person may permit air pollution as that term is defined in the act.

# # 002 [25 Pa. Code §123.1]

### Prohibition of certain fugitive emissions

(a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:

(1) Construction or demolition of buildings or structures.

(2) Grading, paving and maintenance of roads and streets.

(3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.

- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Open burning operations.

(7) Blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting.

(8) Coke oven batteries, provided the fugitive air contaminants emitted from any coke oven battery comply with the standards for visible fugitive emissions in § § 123.44 and 129.15 (relating to limitations of visible fugitive air contaminants from operation of any coke oven battery; and coke pushing operations).

(9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

(i) the emissions are of minor significance with respect to causing air pollution; and

(ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

(b) An application form for requesting a determination under either subsection (a)(9) or 129.15(c) is available from the Department. In reviewing these applications, the Department may require the applicant to supply information including, but not limited to, a description of proposed control measures, characteristics of emissions, quantity of emissions, and ambient air quality data and analysis showing the impact of the source on ambient air quality. The applicant shall be required to demonstrate that the requirements of subsections (a)(9) and (c) and 123.2 (relating to fugitive particulate matter) or of the requirements of 129.15(c) have been satisfied. Upon such demonstration, the Department will issue a determination, in writing, either as an operating permit condition, for those sources subject to permit requirements under the act, or as an order containing appropriate conditions and limitations.

(c) A person responsible for any source specified in subsections (a)(1) - (7) or (9) shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

(1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.

(2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.





(3) Paving and maintenance of roadways.

(4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

(d) The requirements contained in subsection (a) and 123.2 do not apply to fugitive emissions arising from the production of agricultural commodities in their unmanufactured state on the premises of the farm operation

# # 003 [25 Pa. Code §123.2]

#### Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 123.1(a)(1) - (9) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

# # 004 [25 Pa. Code §123.31]

#### Limitations

The Owner/Operator may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside of the property of the Facility.

# # 005 [25 Pa. Code §123.41]

#### Limitations

Visible emissions from all air contamination source stacks excluding compressor engine stacks shall not be permitted in excess of the following levels:

a. Equal to or greater than 20% for a period or periods aggregating more than 3 minutes in any one hour.

b. Equal to or greater than 60% at any time.

# # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Visible emissions from compressor engine stacks shall not be permitted in excess of the following levels:

- a. Equal to or greater than 10% for a period or periods aggregating more than 3 minutes in any one hour.
- b. Equal to or greater than 30% at any time.

# II. TESTING REQUIREMENTS.

# # 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Performance testing shall be conducted as follows:

a. The Owner/Operator shall perform annual NOx emissions tests upon Engine #1 at the Facility using a Departmentapproved portable analyzer or other means as approved by the Department.

b. The Owner/Operator shall perform NOx, CO, and VOC emission tests upon Engine #2 at the Facility according to the requirements of 40 CFR §§60.4243 and 60.4244. These requirements are included as Engine #2 source conditions. NOx and CO emission testing according to EPA Method 19 and ASTM Method D6522-00, and VOC emission testing from bag samples according to Method 18 and Method 25A are acceptable testing methods.

c. The Owner/Operator shall submit one copy of a pre-test protocol to the Department for review at least 90 days prior to the performance of any EPA reference method stack test. The Owner/Operator shall submit one copy of a one-time protocol to the Department for review for the use of a portable analyzer and may repeat portable analyzer testing without additional protocol approvals provided that the same method and equipment are used. All proposed performance test methods shall be identified in the pre-test protocol and approved by the Department prior to testing.

d. The Owner/Operator shall notify the Regional Air Quality Manager at least 15 days prior to any performance test so that an observer may be present at the time of the test. Notification shall also be sent to the Division of Source Testing and Monitoring. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.





e. Pursuant to 40 CFR Part 60.8(a), a complete test report shall be submitted to the Department no later than 60 calendar days after completion of the on-site testing portion of an emission test program.

f. Pursuant to 25 Pa. Code Section 139.53(b) a complete test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:

1. A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings.

- 2. Permit number(s) and condition(s) which are the basis for the evaluation.
- 3. Summary of results with respect to each applicable permit condition.

4. Statement of compliance or non-compliance with each applicable permit condition.

g. Pursuant to 25 Pa. Code § 139.3 to all submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.

h. All testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.

i. Pursuant to 25 Pa. Code Section 139.53(a)(1) and 139.53(a)(3) all submittals, besides notifications, shall be accomplished through PSIMS\*Online available through https://www.depgreenport.state.pa.us/ecomm/Login.jsp when it becomes available. If internet submittal can not be accomplished, one electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) shall be sent to both PSIMS Administration in Central Office and to Regional Office AQ Program Manager. Electronic copies shall be sent at the following e-mail addresses:

CENTRAL OFFICE: RA-EPstacktesting@pa.gov

SOUTHWEST REGIONAL OFFICE: RA-EPSWstacktesting@pa.gov

j. The permittee shall ensure all federal reporting requirements contained in the applicable subpart of 40 CFR are followed, including timelines more stringent than those contained herein. In the event of an inconsistency or any conflicting requirements between state and the federal, the most stringent provision, term, condition, method or rule shall be used by default.

# # 008 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

If, at any time, the Department has cause to believe that air contaminant emissions from the sources listed in this Operating Permit may be in excess of the limitations specified in this operating permit, the permittee may be required to conduct test methods and procedures deemed necessary by the Department to determine the actual emissions rate. Such testing shall be conducted in accordance with Title 25 PA Code Chapter 139, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.

#### III. MONITORING REQUIREMENTS.

# # 009 [25 Pa. Code §123.43]

# **Measuring techniques**

Visible emissions may be measured using either of the following:

(1) A device approved by the Department and maintained to provide accurate opacity measurements.

(2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.





# # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The Owner/Operator shall conduct a weekly facility-wide inspection during daylight hours while the sources are in operation for the presence of any visible stack emissions, and also any fugitive emissions or malodors at the property line. If visible stack emissions, fugitive emissions, or malodors are apparent, the Owner/Operator shall take corrective action. Records of each inspection shall be maintained in a log and at the minimum include the date, time, name and title of the observer, along with any corrective action taken as a result.

#### IV. RECORDKEEPING REQUIREMENTS.

#### # 011 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The Owner/Operator shall maintain the following comprehensive and accurate records:

a. The number of hours of operation per month that each engine operated.

b. The amount of fuel used per month by each engine.

c. Records including a description of testing methods, results, all engine operating data collected during tests, and a copy of the calculations performed to determine compliance with emission standards for each internal combustion engine.

d. Copies of the report that demonstrates that the engines were operating at rated bhp and speed conditions during performance testing.

e. Records of a maintenance plan and any conducted maintenance on the compressor engines.

f. The dehydrator VOC emissions using GRI-GLYCalc or an alternative method approved by the Department.

g. Records of estimated throughput per day and the glycol circulation rate for each dehydrator.

#### # 012 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

All logs and required records shall be maintained on site for a minimum of five years and shall be made available to the Department upon request.

# # 013 [25 Pa. Code §135.21]

#### **Emission statements**

(a) Except as provided in subsection (d), this section applies to stationary sources or facilities:

(1) Located in an area designated by the Clean Air Act as a marginal, moderate, serious, severe or extreme ozone nonattainment area and which emit oxides of nitrogen or VOC.

(2) Not located in an area described in subparagraph (1) and included in the Northeast Ozone Transport Region which emit or have the potential to emit 100 tons or more oxides of nitrogen or 50 tons or more of VOC per year.

(b) The owner or operator of each stationary source emitting oxides of nitrogen or VOC's shall provide the Department with a statement, in a form as the Department may prescribe, for classes or categories of sources, showing the actual emissions of oxides of nitrogen and VOCs from that source for each reporting period, a description of the method used to calculate the emissions and the time period over which the calculation is based. The statement shall contain a certification by a company officer or the plant manager that the information contained in the statement is accurate.

(c) Annual emission statements are due by March 1 for the preceding calendar year beginning with March 1, 1993, for calendar year 1992 and shall provide data consistent with requirements and guidance developed by the EPA. The guidance document is available from: United States Environmental Protection Agency, 401 M. Street, S.W., Washington, D.C. 20460. The Department may require more frequent submittals if the Department determines that one or more of the following applies:

(1) A more frequent submission is required by the EPA.

(2) Analysis of the data on a more frequent basis is necessary to implement the requirements of the act.

(d) Subsection (a) does not apply to a class or category of stationary sources which emits less than 25 tons per year of VOC's or oxides of nitrogen, if the Department in its submissions to the Administrator of the EPA under section 182(a)(1) or





(3)(B)(ii) of the Clean Air Act (42 U.S.C.A. 7511a(a)(1) or (3)(B)(ii)) provides an inventory of emissions from the class or category of sources based on the use of the emission factors established by the Administrator or other methods acceptable to the Administrator. The Department will publish in the Pennsylvania Bulletin a notice of the lists of classes or categories of sources which are exempt from the emission statement requirement under this subsection.

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### VI. WORK PRACTICE REQUIREMENTS.

# # 014 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Air contamination sources at the Facility shall be operated and maintained in accordance with the manufacturer's specifications.

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this permit including Section B (relating to State Only General Requirements).

#### IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.





Source ID: 101

Source Name: NATURAL GAS FIRED COMPRESSOR ENGINE 1 (1,265 BHP)

Source Capacity/Throughput:

100.000 MMCF/HR Natural Gas

 $\begin{array}{c} \mathsf{PROC} \\ \mathsf{101} \end{array} \xrightarrow{\mathsf{STAC}} \\ \mathsf{S101} \end{array}$ 

# I. RESTRICTIONS.

#### **Emission Restriction(s).**

# 001 [25 Pa. Code §127.441] Operating permit terms and conditions.
Emissions From Engine #1 shall be limited to the following:
At rated bhp and speed:

a. NOx - 2.0 g/bhp-hr
b. CO - 2.0 g/bhp-hr
c. VOC - 2.0 g/bhp-hr

At all operating conditions excluding startup, shutdown, and malfunction:

a. NOx - 5.58 lb/hr
b. CO - 5.58 lb/hr
c. VOC - 5.58 lb/hr

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).





#### VII. ADDITIONAL REQUIREMENTS.

#### # 002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6585] Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

#### Am I subject to this subpart?

You are subject to this subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

(a) A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

(b) A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site.

(c) An area source of HAP emissions is a source that is not a major source.

(d) If you are an owner or operator of an area source subject to this subpart, your status as an entity subject to a standard or other requirements under this subpart does not subject you to the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart as applicable.

(e) Not applicable.

(f) Not applicable.

[69 FR 33506, June 15, 2004, as amended at 73 FR 3603, Jan.

#### # 003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6590]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

#### What parts of my plant does this subpart cover?

This subpart applies to each affected source.

(a) Affected source. An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

(1) Not applicable.

(2) New stationary RICE.(i) Not applicable.

(ii) Not applicable.

(iii) A stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.

(3) Not applicable.

(b) Not applicable.

(2) Not applicable.





#### (3) Not applicable.

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

(1) A new or reconstructed stationary RICE located at an area source;

(2) Not applicable.

(3) Not applicable.

(4) Not applicable;

(5) Not applicable.

(6) Not applicable.

(7) Not applicable.

[69 FR 33506, June 15, 2004, as amended at 73 FR 3604, Jan. 18, 2008; 75 FR 9674, Mar. 3, 2010; 75 FR 37733, June 30, 2010; 75 FR 51588, Aug. 20, 2010; 78 FR 6700, Jan. 30, 2013]



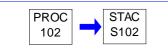


Source ID: 102

Source Name: TRI-ETHYLENE GLYCOL DEHYDRATOR 1 (0.2 MMBTH/HR)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 1) DEHYDRATORS



#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VII. ADDITIONAL REQUIREMENTS.





Source ID: 103

Source Name: NATURAL GAS FIRED COMPRESSOR ENGINE 2 (1,340 BHP)

Source Capacity/Throughput:

100.000 MCF/HR

Natural Gas



# I. RESTRICTIONS.

#### **Emission Restriction(s).**

# 001 [25 Pa. Code §127.441] Operating permit terms and conditions. Emissions from Source 103 (Engine #2) shall be limited to the following: At rated bhp and speed: a. NOx - 2.0 g/bhp-hr and 160 ppmvd at 15% O2. b. CO - 2.0 g/bhp-hr and 540 ppmvd at 15% O2. c. VOC - 1.0 g/bhp-hr and 86 ppmvd at 15% O2. [These limits represent the most stringent emission limits from GP5 and 40 CFR Part 60 Subpart JJJJ, Please see Table 1 in the review memo for an overview of the emission limits. This engine was tested in October of 2018 and showed compliance with these limits.] At all operating conditions excluding startup, shutdown, and malfunction: a. NOx - 5.91 lb/hr b. CO - 5.91 lb/hr c. VOC - 2.95 lb/hr # 002 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4233] Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine? (a) Not applicable. (b) Not applicable. (c) Not applicable. (d) Owners and operators of stationary SI ICE with a maximum engine power greater than 19 KW (25 HP) and less than 75 KW (100 HP) (except gasoline and rich burn engines that use LPG) must comply with the emission standards for field testing in 40 CFR 1048.101(c) for their non-emergency stationary SI ICE and with the emission standards in Table 1 to this subpart for their emergency stationary SI ICE. Owners and operators of stationary SI ICE with a maximum engine power greater than 19 KW (25 HP) and less than 75 KW (100 HP) manufactured prior to January 1, 2011, that were certified to the standards in Table 1 to this subpart applicable to engines with a maximum engine power greater than or equal to 100 HP and less than 500 HP, may optionally choose to meet those standards.

(e) Owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 75 KW (100 HP) (except gasoline and rich burn engines that use LPG) must comply with the emission standards in Table 1 to this subpart for their stationary SI ICE. For owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 100 HP (except gasoline and rich burn engines that use LPG) manufactured prior to January 1, 2011 that were certified to the certification emission standards in 40 CFR part 1048 applicable to engines that are not severe duty engines, if such stationary SI ICE was certified to a carbon monoxide (CO) standard above the standard in Table 1 to this subpart, then the owners and operators may meet the CO certification (not field testing) standard for which the engine was certified.

(f) Owners and operators of any modified or reconstructed stationary SI ICE subject to this subpart must meet the requirements as specified in paragraphs (f)(1) through (5) of this section.





- (1) Not applicable.
- (2) Not applicable.
- (3) Not applicable.

(4) Owners and operators of stationary SI natural gas and lean burn LPG engines with a maximum engine power greater than 19 KW (25 HP), that are modified or reconstructed after June 12, 2006, must comply with the same emission standards as those specified in paragraph (d) or (e) of this section, except that such owners and operators of non-emergency engines and emergency engines greater than or equal to 130 HP must meet a nitrogen oxides (NOX) emission standard of 3.0 grams per HP-hour (g/HP-hr), a CO emission standard of 4.0 g/HP-hr (5.0 g/HP-hr for non-emergency engines less than 100 HP), and a volatile organic compounds (VOC) emission standard of 1.0 g/HP-hr, or a NOX emission standard of 250 ppmvd at 15 percent oxygen (O2), a CO emission standard 540 ppmvd at 15 percent O2 (675 ppmvd at 15 percent O2, where the date of manufacture of the engine is:

(i) Prior to July 1, 2007, for non-emergency engines with a maximum engine power greater than or equal to 500 HP;

- (ii) Not applicable;
- (iii) Not applicable.
- (5) Not applicable.

(g) Owners and operators of stationary SI wellhead gas ICE engines may petition the Administrator for approval on a caseby-case basis to meet emission standards no less stringent than the emission standards that apply to stationary emergency SI engines greater than 25 HP and less than 130 HP due to the presence of high sulfur levels in the fuel, as specified in Table 1 to this subpart. The request must, at a minimum, demonstrate that the fuel has high sulfur levels that prevent the use of aftertreatment controls and also that the owner has reasonably made all attempts possible to obtain an engine that will meet the standards without the use of aftertreatment controls. The petition must request the most stringent standards reasonably applicable to the engine using the fuel.

(h) Owners and operators of stationary SI ICE that are required to meet standards that reference 40 CFR 1048.101 must, if testing their engines in use, meet the standards in that section applicable to field testing, except as indicated in paragraph (e) of this section.

# 003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4234] Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines How long must I meet the emission standards if I am an owner or operator of a stationary SI internal combustion engine

Owners and operators of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in §60.4233 over the entire life of the engine.

#### II. TESTING REQUIREMENTS.

# 004 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4244] Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines What test methods and other procedures must I use if I am an owner or operator of a stationary SI internal combustion engine?

Owners and operators of stationary SI ICE who conduct performance tests must follow the procedures in paragraphs (a)





through (f) of this section.

a. Each performance test must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and according to the requirements in §60.8 and under the specific conditions that are specified by Table 2 to this subpart. b. You may not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in §60.8(c). If your stationary SI internal combustion engine is non-operational, you do not need to startup the engine solely to conduct a performance test; however, you must conduct the performance test immediately upon startup of the engine. c. You must conduct three separate test runs for each performance test required in this section, as specified in §60.8(f). Each test run must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and last at least 1 hour.

d. To determine compliance with the NOx mass per unit output emission limitation, convert the concentration of NOx in the engine exhaust using Equation 1 of this section:

ER = (Cd\*1.912\*10^(-3)\*Q\*T)/(HP-hr) (Eq. 1)

Where:

ER = Emission rate of NOx in g/HP-hr

Cd = Measured NOx concentration in parts per million by volume (ppmv).

1.912×10-3 = Conversion constant for ppm NOx to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meter per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, horsepower-hour (HP-hr).

e. To determine compliance with the CO mass per unit output emission limitation, convert the concentration of CO in the engine exhaust using Equation 2 of this section:

ER = (Cd\*1.164\*10^(-3)\*Q\*T)/(HP-hr) (Eq. 2)

Where:

ER = Emission rate of CO in g/HP-hr.

Cd= Measured CO concentration in ppmv.

1.164×10-3 = Conversion constant for ppm CO to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, in HP-hr.

f. For purposes of this subpart, when calculating emissions of VOC, emissions of formaldehyde should not be included. To determine compliance with the VOC mass per unit output emission limitation, convert the concentration of VOC in the engine exhaust using Equation 3 of this section:

 $ER = (Cd^{1.833^{10^{-3}}}Q^{T})/(HP-hr) (Eq. 3)$ 

Where:





ER = Emission rate of VOC in g/HP-hr.

Cd= VOC concentration measured as propane in ppmv.

1.833×10-3 = Conversion constant for ppm VOC measured as propane, to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, in HP-hr.

g. If the owner/operator chooses to measure VOC emissions using either Method 18 of 40 CFR part 60, appendix A, or Method 320 of 40 CFR part 63, appendix A, then it has the option of correcting the measured VOC emissions to account for the potential differences in measured values between these methods and Method 25A. The results from Method 18 and Method 320 can be corrected for response factor differences using Equations 4 and 5 of this section. The corrected VOC concentration can then be placed on a propane basis using Equation 6 of this section.

RFi = CMi/CAi (Eq. 4)

Where:

RFi= Response factor of compound i when measured with EPA Method 25A.

CMi= Measured concentration of compound i in ppmv as carbon.

CAi= True concentration of compound i in ppmv as carbon.

Cicorr = RFi\*Cimeas (Eq. 5)

Where:

Cicorr = Concentration of compound i corrected to the value that would have been measured by EPA Method 25A, ppmv as carbon.

Cimeas = Concentration of compound i measured by EPA Method 320, ppmv as carbon.

Cpeq = 0.6098\*Cicorr (Eq. 6)

Where:

Cpeq = Concentration of compound i in mg of propane equivalent per DSCM.

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).





#### V. REPORTING REQUIREMENTS.

# # 005 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4] Subpart A - General Provisions

#### Address.

Engine #2, manufactured after January 1, 2008, is subject to New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines (40 CFR Part 60, Subpart JJJJ). In accordance with 40 CFR 60.4, copies of all requests, reports, applications, submittals and other communications regarding the second engine shall be forwarded to both EPA and the Department at the addresses listed below unless otherwise noted.

Director	PADEP
Air Protection Section	Air Quality Program
Mail Code 3AP00	400 Waterfront Drive
US EPA, Region III	Pittsburgh, PA 15222-4745
1650 Arch Street	
Philadelphia, PA 19101-2029	

# 006 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4245] Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?

Owners or operators of stationary SI ICE must meet the following notification, reporting, and recordkeeping requirements:

a. Owners and operators of all stationary SI ICE must keep records of the information in paragraphs (a)(1) through (4) of this section.

i. All notifications submitted to comply with this subpart and all documentation supporting any notification.

ii. Maintenance conducted on the engine.

iii. If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.

iv. If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to 60.4243(a)(2), documentation that the engine meets the emission standards.

b. N/A

c. Owners and operators of stationary SI ICE greater than or equal to 500 HP that have not been certified by an engine manufacturer to meet the emission standards in 60.4231 must submit an initial notification as required in 60.7(a)(1). The notification must include the information in paragraphs (c)(1) through (5) of this section.

i. Name and address of the owner or operator;

ii. The address of the affected source;

iii. Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement;

iv. Emission control equipment; and

v. Fuel used.

d. Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in §60.4244 within 60 days after the test has been completed.

e. NA

#### VI. WORK PRACTICE REQUIREMENTS.

# # 007 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4243] Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?

(a) If you are an owner or operator of a stationary SI internal combustion engine that is manufactured after July 1, 2008, and must comply with the emission standards specified in §60.4233(a) through (c), you must comply by purchasing an engine certified to the emission standards in §60.4231(a) through (c), as applicable, for the same engine class and maximum engine power. You must also meet the requirements as specified in 40 CFR part 1068, subparts A through D, as they apply to you. If you adjust engine settings according to and consistent with the manufacturer's instructions, your stationary SI internal combustion engine will not be considered out of compliance. In addition, you must meet one of the requirements





specified in (a)(1) and (2) of this section.

(1) Not applicable.

(2) If you do not operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, your engine will be considered a non-certified engine, and you must demonstrate compliance according to (a)(2)(i) through (iii) of this section, as appropriate.

(i) Not applicable.

(ii) Not applicable.

(iii) If you are an owner or operator of a stationary SI internal combustion engine greater than 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test within 1 year of engine startup and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.

(b) If you are an owner or operator of a stationary SI internal combustion engine and must comply with the emission standards specified in §60.4233(d) or (e), you must demonstrate compliance according to one of the methods specified in paragraphs (b)(1) and (2) of this section.

(1) Not applicable.

(2) Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in §60.4233(d) or (e) and according to the requirements specified in §60.4244, as applicable, and according to paragraphs (b)(2)(i) and (ii) of this section.

(i) Not applicable.

(ii) If you are an owner or operator of a stationary SI internal combustion engine greater than 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.

(c) If you are an owner or operator of a stationary SI internal combustion engine that must comply with the emission standards specified in 60.4233(f), you must demonstrate compliance according paragraph (b)(2)(i) or (ii) of this section, except that if you comply according to paragraph (b)(2)(i) of this section, you demonstrate that your non-certified engine complies with the emission standards specified in 60.4233(f).

(d) Not applicable.

(e) Owners and operators of stationary SI natural gas fired engines may operate their engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of §60.4233.

(f) Not applicable.

(g) It is expected that air-to-fuel ratio controllers will be used with the operation of three-way catalysts/non-selective catalytic reduction. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.

(h) If you are an owner/operator of an stationary SI internal combustion engine with maximum engine power greater than or





equal to 500 HP that is manufactured after July 1, 2007 and before July 1, 2008, and must comply with the emission standards specified in sections 60.4233(b) or (c), you must comply by one of the methods specified in paragraphs (h)(1) through (h)(4) of this section.

(1) Not applicable.

(2) Keeping records of performance test results for each pollutant for a test conducted on a similar engine. The test must have been conducted using the same methods specified in this subpart and these methods must have been followed correctly.

(3) Keeping records of engine manufacturer data indicating compliance with the standards.

(4) Keeping records of control device vendor data indicating compliance with the standards.

(i) Not applicable.

#### VII. ADDITIONAL REQUIREMENTS.

# 008 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4230] Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines Am I subject to this subpart?

Source 103 (Engine #2) at this facility is subject to the requirements under 40 CFR Part 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

# 009 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4248] Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines What definitions apply to this subpart?

All terms used in 40 CFR Part 60 Subpart JJJJ shall have the meaning given in 40 CFR §60.4248 or else in the Clean Air Act and 40 CFR Part 60 Subpart A.

# 010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6585]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

#### Am I subject to this subpart?

You are subject to this subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

(a) A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

(b) A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site.

(c) An area source of HAP emissions is a source that is not a major source.

(d) If you are an owner or operator of an area source subject to this subpart, your status as an entity subject to a standard or other requirements under this subpart does not subject you to the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart as applicable.

(e) Not applicable.





#### (f) Not applicable.

[69 FR 33506, June 15, 2004, as amended at 73 FR 3603, Jan.

# 011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6590]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

#### What parts of my plant does this subpart cover?

This subpart applies to each affected source.

(a) Affected source. An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

(1) Not applicable.

(2) New stationary RICE.(i) Not applicable.

(ii) Not applicable.

(iii) A stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.

- (3) Not applicable.
- (b) Not applicable.

(2) Not applicable.

(3) Not applicable.

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

(1) A new or reconstructed stationary RICE located at an area source;

- (2) Not applicable.
- (3) Not applicable.
- (4) Not applicable;
- (5) Not applicable.
- (6) Not applicable.
- (7) Not applicable.

[69 FR 33506, June 15, 2004, as amended at 73 FR 3604, Jan. 18, 2008; 75 FR 9674, Mar. 3, 2010; 75 FR 37733, June 30, 2010; 75 FR 51588, Aug. 20, 2010; 78 FR 6700, Jan. 30, 2013]

65-00982

PEOPLES GAS CO LLC/RUBRIGHT COMP STA



# SECTION D. Source Level Requirements

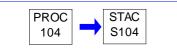
Source ID: 104

Source Name: TRI-ETHYLENE GLYCOL DEHYDRATOR 2 (0.2 MMBTH/HR)

Source Capacity/Throughput:

N/A

Conditions for this source occur in the following groups: 1) DEHYDRATORS



#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VII. ADDITIONAL REQUIREMENTS.



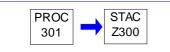


Source ID: 301

Source Name: NEW OIL STORAGE TANKS (4)(300 GALLONS EACH)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 2) TANKS



#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VII. ADDITIONAL REQUIREMENTS.



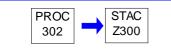


Source ID: 302

Source Name: WASTE OIL STORAGE TANKS (2)(600 GALLONS EACH)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 2) TANKS



#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VII. ADDITIONAL REQUIREMENTS.



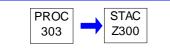


Source ID: 303

Source Name: PRODUCED FLUIDS STORAGE TANKS (3)(2,100 GALLONS EACH)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 2) TANKS



#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

#### # 001 [25 Pa. Code §129.57]

#### Storage tanks less than or equal to 40,000 gallons capacity containing VOCs

The provisions of this section shall apply to above ground stationary storage tanks with a capacity equal to or greater than 2,000 gallons which contain volatile organic compounds with vapor pressure greater than 1.5 psia (10.5 kilopascals) under actual storage conditions. Storage tanks covered under this section shall have pressure relief valves which are maintained in good operating condition and which are set to release at no less than .7 psig (4.8 kilopascals) of pressure or .3 psig (2.1 kilopascals) of vacuum or the highest possible pressure and vacuum in accordance with state or local fire codes or the National Fire Prevention Association guidelines or other national consensus standards acceptable to the Department. Section 129.56(g) (relating to storage tanks greater than 40,000 gallons capacity containing volatile organic compounds) applies to this section. Petroleum liquid storage vessels which are used to store produced crude oil and condensate prior to lease custody transfer shall be exempt from the requirements of this section.

#### VII. ADDITIONAL REQUIREMENTS.





Source ID: 304

Source Name: WASTE WATER STORAGE TANKS (3)(2,100 GALLONS EACH)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 2) TANKS



#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

#### # 001 [25 Pa. Code §129.57]

#### Storage tanks less than or equal to 40,000 gallons capacity containing VOCs

The provisions of this section shall apply to above ground stationary storage tanks with a capacity equal to or greater than 2,000 gallons which contain volatile organic compounds with vapor pressure greater than 1.5 psia (10.5 kilopascals) under actual storage conditions. Storage tanks covered under this section shall have pressure relief valves which are maintained in good operating condition and which are set to release at no less than .7 psig (4.8 kilopascals) of pressure or .3 psig (2.1 kilopascals) of vacuum or the highest possible pressure and vacuum in accordance with state or local fire codes or the National Fire Prevention Association guidelines or other national consensus standards acceptable to the Department. Section 129.56(g) (relating to storage tanks greater than 40,000 gallons capacity containing volatile organic compounds) applies to this section. Petroleum liquid storage vessels which are used to store produced crude oil and condensate prior to lease custody transfer shall be exempt from the requirements of this section.

#### VII. ADDITIONAL REQUIREMENTS.





Source ID: 401

#### Source Name: RUBRIGHT STATION COMPONENT FUGITIVE EMISSIONS

Source Capacity/Throughput:



#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### V. REPORTING REQUIREMENTS.

# 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

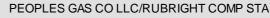
The emissions from fugitive emissions components during the reporting period must be included in the emissions inventory report.

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).







#### Group Name: 1) DEHYDRATORS

Group Description: This source group contains requirements relating to tri-ethylene glycol dehydration units.

#### Sources included in this group

	ID	Name
	102	TRI-ETHYLENE GLYCOL DEHYDRATOR 1 (0.2 MMBTH/HR)
	104	TRI-ETHYLENE GLYCOL DEHYDRATOR 2 (0.2 MMBTH/HR)

#### I. RESTRICTIONS.

#### **Emission Restriction(s).**

#### # 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

VOC emissions from this source shall not exceed 10 tons per year, calculated as a 12-month rolling total.

[From condition #19 of GP-5]

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### III. MONITORING REQUIREMENTS.

# 002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.772] Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities Test methods, compliance procedures, and compliance demonstrations.

(a) [Paragraph 63.772(a) of the regulation is not applicable to this source.]

(b) Determination of glycol dehydration unit flowrate, benzene emissions, or BTEX emissions. The procedures of this paragraph shall be used by an owner or operator to determine glycol dehydration unit natural gas flowrate, benzene emissions, or BTEX emissions.

(1) The determination of actual flowrate of natural gas to a glycol dehydration unit shall be made using the procedures of either paragraph (b)(1)(i) or (b)(1)(i) of this section.

(i) The owner or operator shall install and operate a monitoring instrument that directly measures natural gas flowrate to the glycol dehydration unit with an accuracy of plus or minus 2 percent or better. The owner or operator shall convert annual natural gas flowrate to a daily average by dividing the annual flowrate by the number of days per year the glycol dehydration unit processed natural gas.

(ii) The owner or operator shall document, to the Administrator's satisfaction, the actual annual average natural gas flowrate to the glycol dehydration unit.

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

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

(ii) The owner or operator shall determine an average mass rate of benzene or BTEX emissions in kilograms per hour through direct measurement using the methods in §63.772(a)(1)(i) or (ii), or an alternative method according to §63.7(f). Annual emissions in kilograms per year shall be determined by multiplying the mass rate by the number of hours the unit is operated per year. This result shall be converted to megagrams per year.





# SECTION E. Source Group

65-00982

(c) - (i) [Paragraphs 63.772(c) through (i) of the regulation are not applicable to this source.]

[Source: 64 FR 32628, June 17, 1999, as amended at 66 FR 34552, June 29, 2001; 72 FR 38, Jan. 3, 2007; 77 FR 49573, Aug. 16, 2012]

#### IV. RECORDKEEPING REQUIREMENTS.

# 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

For each glycol dehydration unit, the owner or operator shall maintain the following records in accordance with Section A Condition 12, including information on:

(a) The location of the glycol dehydration unit;

Source Group Restrictions.

(b) The calculation for the optimum glycol circulation rate or the alternative glycol circulation rate in accordance with 40 CFR § 63.775(c)(7), if applicable;

(c) The determination of the actual average benzene or BTEX emissions in accordance with 40 CFR § 63.774(d)(1), if applicable;

(d) The emissions calculations for each glycol dehydrator in accordance with 25 Pa. Code § 135.5; and

(e) Records of deviations and malfunctions in accordance with 40 CFR § 63.774(g), if applicable.

#### # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall maintain the following records for this source.

(1) Monthly and 12-month rolling total VOC emissions, using GRI-GLYCalcTM computer software or an alternative method as approved by the Department and;

(2) A record of actual natural gas throughput per day and the glycol (TEG) circulation rate.

[From condition #8(d) of GP-5]

# # 005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.10]

Subpart A--General Provisions

#### Recordkeeping and reporting requirements.

Applicable requirements from 63.10(b)(2) are printed here in accordance with 63.774(b). Non-applicable paragraphs (vi) through (xiv) of 63.10(b)(2) are omitted.]

(b)(2) The owner or operator of an affected source subject to the provisions of this part shall maintain relevant records for such source of—

(i) The occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards;

(ii) The occurrence and duration of each malfunction of operation (i.e., process equipment) or the required air pollution control and monitoring equipment;

(iii) All required maintenance performed on the air pollution control and monitoring equipment;

(iv) (A) Actions taken during periods of startup or shutdown when the source exceeded applicable emission limitations in a relevant standard and when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan (see §63.6(e)(3)); or

(B) Actions taken during periods of malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan (see §63.6(e)(3));

(v) All information necessary, including actions taken, to demonstrate conformance with the affected source's startup, shutdown, and malfunction plan (see §63.6(e)(3)) when all actions taken during periods of startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), and malfunction (including corrective actions to restore malfunctioning process and air pollution control and





65-00982

monitoring equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the startup, shutdown, and malfunction plan may be recorded using a "checklist," or some other effective form of recordkeeping, in order to minimize the recordkeeping burden for conforming events);

[59 FR 12430, Mar. 16, 1994, as amended at 64 FR 7468, Feb. 12, 1999; 67 FR 16604, Apr. 5, 2002; 68 FR 32601, May 30, 2003; 69 FR 21752, Apr. 22, 2004; 71 FR 20455, Apr. 20, 2006]

# 006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.774] Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities Recordkeeping requirements.

(a) The recordkeeping provisions of [the General Provisions of] 40 CFR part 63, subpart A, that apply and those that do not apply to owners and operators of sources subject to this subpart are listed in Table 2 of this subpart. [Refer to regulation for Table 2 in the Appendix of 40 CFR Part 63 Subpart HH.]

(b) Except as specified in paragraphs (c), (d), and (f) of this section, each owner or operator of a facility subject to this subpart shall maintain the records specified in paragraphs (b)(1) through (11) of this section:

(1) The owner or operator of an affected source subject to the provisions of this subpart shall maintain files of all information (including all reports and notifications) required by this subpart. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or period.

(i) All applicable records shall be maintained in such a manner that they can be readily accessed.

(ii) The most recent 12 months of records shall be retained on site or shall be accessible from a central location by computer or other means that provides access within 2 hours after a request.

(iii) The remaining 4 years of records may be retained offsite.

(iv) Records may be maintained in hard copy or computer-readable form including, but not limited to, on paper, microfilm, computer, floppy disk, magnetic tape, or microfiche.

(2) Records specified in §63.10(b)(2);

(3) - (11) [Paragraphs 63.774(b)(3)-(11) of the regulation are not applicable to this source.]

(c) [Paragraph 63.774(c) of the regulation is not applicable to this source.]

(d)(1) An owner or operator of a glycol dehydration unit that meets the exemption criteria in 63.764(e)(1)(i) or 63.764(e)(1)(i) shall maintain the records specified in paragraph (d)(1)(i) or paragraph (d)(1)(ii) of this section, as appropriate, for that glycol dehydration unit.

(i) The actual annual average natural gas throughput (in terms of natural gas flowrate to the glycol dehydration unit per day) as determined in accordance with §63.772(b)(1), or

(ii) The actual average benzene emissions (in terms of benzene emissions per year) as determined in accordance with 63.772(b)(2).

(2) [Paragraph 63.774(d)(2) of the regulation is not applicable to this source.]

(e) - (f) [Paragraphs 63.774(e) & (f) of the regulation are not applicable to this source.]

(g) The owner or operator of an affected source subject to this subpart shall maintain records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control equipment and monitoring equipment. The owner or operator shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with §63.764(j), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.





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# SECTION E. Source Group Restrictions.

(h) - (i) [Paragraphs 63.774(h) & (i) of the regulation are not applicable to this source.]

[Source: 64 FR 32628, June 17, 1999, as amended at 66 FR 34554, June 29, 2001; 72 FR 39, Jan. 3, 2007; 77 FR 49579, Aug. 16, 2012]

### V. REPORTING REQUIREMENTS.

# 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

In the required annual report, the information about each glycol dehydration unit operated during the reporting period shall include:

(a) The records of the optimum or alternative glycol circulation rate in accordance with 40 CFR § 63.775(c)(7), if applicable; and

(b) The records of any deviations and malfunctions in accordance with 40 CFR § 63.775(c)(6), if applicable.

The emissions from each glycol dehydration unit operated during the reporting period must be included in the emissions reporting.

# 008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.760] Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities Applicability and designation of affected source.

(a) - (b) [Paragraphs (a) and (b) are printed under Additional Requirements in this section of permit.]

(c) Any source that determines it is not a major source but has actual emissions of 5 tons per year or more of a single HAP, or 12.5 tons per year or more of a combination of HAP (i.e., 50 percent of the major source thresholds), shall update its major source determination within 1 year of the prior determination or October 15, 2012, whichever is later, and each year thereafter, using gas composition data measured during the preceding 12 months.

(d) - (h) [Not Applicable]

[64 FR 32628, June 17, 1999, as amended at 66 FR 34550, June 29, 2001; 72 FR 36, Jan. 3, 2007; 77 FR 49568, Aug. 16, 2012]

#### VI. WORK PRACTICE REQUIREMENTS.

# 009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.764] Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities General standards.

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

(b) - (c) [Paragraphs 63.764(b) - (c) of the regulation are not applicable to this source.]

(d) [This source is exempt from the requirements of 63.764(d) according to the following paragraph (e).]

(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)(i) or (ii) of this section are met, except that the records of the determination of these criteria must be maintained as required in 63.774(d)(1).

(i) The actual annual average flowrate of natural gas to the glycol dehydration unit is less than 85 thousand standard cubic meters per day, as determined by the procedures specified in §63.772(b)(1) of this subpart; or

(ii) The actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are





65-00982

less than 0.90 megagram per year, as determined by the procedures specified in §63.772(b)(2) of this subpart.

(2) [Paragraph 63.764(e)(2) of the regulation is not applicable to this source.]

(f) [Paragraph 63.764(f) of the regulation is not applicable to this source.]

(g) - (h) [Paragraphs 63.764(g) and (h) of the regulation are reserved.]

(i) In all cases where the provisions of this subpart 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 this subpart.

(j) 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 records, and inspection of the source.

[Source: 64 FR 32628, June 17, 1999, as amended at 66 FR 34551, June 29, 2001; 72 FR 38, Jan. 3, 2007; 77 FR 49570, Aug. 16, 2012]

#### VII. ADDITIONAL REQUIREMENTS.

#### # 010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.760]

Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities Applicability and designation of affected source.

(a) This subpart applies to the owners and operators of the emission points, specified in paragraph (b) of this section that are located at oil and natural gas production facilities that meet the specified criteria in paragraphs (a)(1) and either (a)(2) or (a)(3) of this section.

(1) Facilities that are major or area sources of hazardous air pollutants (HAP) as defined in §63.761. Emissions for major source determination purposes can be estimated using the maximum natural gas or hydrocarbon liquid throughput, as appropriate, calculated in paragraphs (a)(1)(i) through (iii) of this section. As an alternative to calculating the maximum natural gas or hydrocarbon liquid throughput, the owner or operator of a new or existing source may use the facility's design maximum natural gas or hydrocarbon liquid throughput to estimate the maximum potential emissions. Other means to determine the facility's major source status are allowed, provided the information is documented and recorded to the Administrator's satisfaction in accordance with §63.10(b)(3). A facility that is determined to be an area source, but subsequently increases its emissions or its potential to emit above the major source starting on the applicable compliance date specified in paragraph (f) of this section. Nothing in this paragraph is intended to preclude a source from limiting its potential to emit through other appropriate mechanisms that may be available through the permitting authority.

(i) If the owner or operator documents, to the Administrator's satisfaction, a decline in annual natural gas or hydrocarbon liquid throughput, as appropriate, each year for the 5 years prior to October 15, 2012, the owner or operator shall calculate the maximum natural gas or hydrocarbon liquid throughput used to determine maximum potential emissions according to the requirements specified in paragraph (a)(1)(i)(A) of this section. In all other circumstances, the owner or operator shall calculate the maximum throughput used to determine whether a facility is a major source in accordance with the requirements specified in paragraph (a)(1)(i)(B) of this section.

(A) The maximum natural gas or hydrocarbon liquid throughput is the average of the annual natural gas or hydrocarbon liquid throughput for the 3 years prior to October 15, 2012, multiplied by a factor of 1.2.

(B) The maximum natural gas or hydrocarbon liquid throughput is the highest annual natural gas or hydrocarbon liquid throughput over the 5 years prior to October 15, 2012, multiplied by a factor of 1.2.

(ii) The owner or operator shall maintain records of the annual facility natural gas or hydrocarbon liquid throughput





each year and upon request submit such records to the Administrator. If the facility annual natural gas or hydrocarbon liquid throughput increases above the maximum natural gas or hydrocarbon liquid throughput calculated in paragraph (a)(1)(i)(A) or (a)(1)(i)(B) of this section, the maximum natural gas or hydrocarbon liquid throughput must be recalculated using the higher throughput multiplied by a factor of 1.2.

(iii) The owner or operator shall determine the maximum values for other parameters used to calculate emissions as the maximum for the period over which the maximum natural gas or hydrocarbon liquid throughput is determined in accordance with paragraph (a)(1)(i)(A) or (B) of this section. Parameters, other than glycol circulation rate, shall be based on either highest measured values or annual average. For estimating maximum potential emissions from glycol dehydration units, the glycol circulation rate used in the calculation shall be the unit's maximum rate under its physical and operational design consistent with the definition of potential to emit in  $\S63.2$ .

(2) Facilities that process, upgrade, or store hydrocarbon liquids.

(3) Facilities that process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. For the purposes of this subpart, natural gas enters the natural gas transmission and storage source category after the natural gas processing plant, when present. If no natural gas processing plant is present, natural gas enters the natural gas transmission and storage source category after the point of custody transfer.

(b) The affected sources for major sources are listed in paragraph (b)(1) of this section and for area sources in paragraph (b)(2) of this section.

(1) [Not applicable]

(2) For area sources, the affected source includes each triethylene glycol (TEG) dehydration unit located at a facility that meets the criteria specified in paragraph (a) of this section.

(c) [Paragraph (c) is printed under Reporting Requirements in this section of the permit.]

(d) - (h) [Not Applicable]

[64 FR 32628, June 17, 1999, as amended at 66 FR 34550, June 29, 2001; 72 FR 36, Jan. 3, 2007; 77 FR 49568, Aug. 16, 2012]

# 011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.761]

Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities Definitions.

All terms used in this subpart shall have the meaning given them in the Clean Air Act (Act), subpart A of this part (General Provisions), and in this section. If the same term is defined in subpart A and in this section, it shall have the meaning given in this section for purposes of this subpart.

[Selected definitions from 40 CFR §63.761 are printed here. Refer to regulations for remaining definitions.]

Facility means any grouping of equipment where hydrocarbon liquids are processed, upgraded (i.e., remove impurities or other constituents to meet contract specifications), or stored prior to the point of custody transfer; or where natural gas is processed, upgraded, or stored prior to entering the natural gas transmission and storage source category. For the purpose of a major source determination, facility (including a building, structure, or installation) means oil and natural gas production and processing equipment that is located within the boundaries of an individual surface site as defined in this section. Equipment that is part of a facility will typically be located within close proximity to other equipment located at the same facility. Pieces of production equipment or groupings of equipment located on different oil and gas leases, mineral fee tracts, lease tracts, subsurface or surface unit areas, surface fee tracts, surface lease tracts, or separate surface sites, whether or not connected by a road, waterway, power line or pipeline, shall not be considered part of the same facility. Examples of facilities in the oil and natural gas production source category include, but are not limited to, well sites, satellite tank batteries, central tank batteries, a compressor station that transports natural gas to a natural gas processing plant, and natural gas processing plants.





Hazardous air pollutants or HAP means the chemical compounds listed in section 112(b) of the Clean Air Act. All chemical compounds listed in section 112(b) of the Act need to be considered when making a major source determination. Only the HAP compounds listed in Table 1 of this subpart need to be considered when determining compliance. [Table 1 of this subpart is printed below in this condition.]

UA plus offset and UC is defined as the area occupied by each urbanized area, each urban cluster that contains at least 10,000 people, and the area located two miles or less from each urbanized area boundary.

Urban-1 County is defined as a county that contains a part of a Metropolitan Statistical Area with a population greater than 250,000, based on the Office of Management and Budget's Standards for defining Metropolitan and Micropolitan Statistical Areas (December 27, 2000), and Census 2000 Data released by the U.S. Census Bureau.

Urbanized area refers to Census 2000 Urbanized Area, which is defined in the Urban Area Criteria for Census 2000 (March 15, 2002). Essentially, an urbanized area consists of densely settled territory with a population of at least 50,000 people.

Urban cluster refers to a Census 2000 Urban Cluster, which is defined in the Urban Area Criteria for Census 2000 (March 15, 2002). Essentially, an urban cluster consists of densely settled territory with at least 2,500 people but fewer than 50,000 people.

[Source: 64 FR 32628, June 17, 1999, as amended at 66 FR 34551, June 29, 2001; 72 FR 37, Jan. 3, 2007; 77 FR 49569, Aug. 16, 2012]

Table 1 to Subpart HH of Part 63 -- List of Hazardous Air Pollutants for Subpart HH

CAS Number Chemical name

75070	Acetaldehyde
71432	Benzene (includes benzene in gasoline)
75150	Carbon disulfide
463581	Carbonyl sulfide
100414	Ethyl benzene
107211	Ethylene glycol
50000	Formaldehyde
110543	n-Hexane
91203	Naphthalene
108883	Toluene
540841	2,2,4-Trimethylpentane
1330207	Xylenes (isomers and mixture)
95476	o-Xylene
108383	m-Xylene
106423	p-Xylene

[Source: 64 FR 32628, June 17, 1999, as amended at 66 FR 34554, June 29, 2001; 71 FR 20457, Apr. 20, 2006; 72 FR 40, Jan. 3, 2007; 73 FR 78214, Dec. 22, 2008; 77 FR 49581, Aug. 16, 2012]

# 012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.762]

Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities Startups, shutdowns, and malfunctions.

§ 63.762 Affirmative defense for violations of emission standards during malfunction.

(a) The provisions set forth in this subpart shall apply at all times.

(b) - (c) [Reserved]





(d) In response to an action to enforce the standards set forth in this subpart, you may assert an affirmative defense to a claim for civil penalties for violations of such standards that are caused by malfunction, as defined in 40 CFR 63.2. Appropriate penalties may be assessed; however, if you fail to meet your burden of proving all of the requirements in the affirmative defense, the affirmative defense shall not be available for claims for injunctive relief.

(1) To establish the affirmative defense in any action to enforce such a standard, you must timely meet the reporting requirements in paragraph (d)(2) of this section, and must prove by a preponderance of evidence that:

(i) The violation:

(A) Was caused by a sudden, infrequent, and unavoidable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner; and

(B) Could not have been prevented through careful planning, proper design or better operation and maintenance practices; and

(C) Did not stem from any activity or event that could have been foreseen and avoided, or planned for; and

(D) Was not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and

(ii) Repairs were made as expeditiously as possible when a violation occurred. Off-shift and overtime labor were used, to the extent practicable to make these repairs; and

(iii) The frequency, amount and duration of the violation (including any bypass) were minimized to the maximum extent practicable; and

(iv) If the violation resulted from a bypass of control equipment or a process, then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and

(v) All possible steps were taken to minimize the impact of the violation on ambient air quality, the environment, and human health; and

(vi) All emissions monitoring and control systems were kept in operation if at all possible, consistent with safety and good air pollution control practices; and

(vii) All of the actions in response to the violation were documented by properly signed, contemporaneous operating logs; and

(viii) At all times, the affected source was operated in a manner consistent with good practices for minimizing emissions; and

(ix) A written root cause analysis has been prepared, the purpose of which is to determine, correct, and eliminate the primary causes of the malfunction and the violation resulting from the malfunction event at issue. The analysis shall also specify, using best monitoring methods and engineering judgment, the amount of any emissions that were the result of the malfunction.

(2) Report. The owner or operator seeking to assert an affirmative defense shall submit a written report to the Administrator with all necessary supporting documentation, that it has met the requirements set forth in paragraph (d)(1) of this section. This affirmative defense report shall be included in the first periodic compliance, deviation report or excess emission report otherwise required after the initial occurrence of the violation of the relevant standard (which may be the end of any applicable averaging period). If such compliance, deviation report or excess emission report is due less than 45 days after the initial occurrence of the violation, the affirmative defense report may be included in the second compliance, deviation report or excess emission report or excess emission report due after the initial occurrence of the violation of the relevant standard.

[77 FR 49569, Aug. 16, 2012]







#### Group Name: 2) TANKS

Group Description: This source group contains requirements relating to tanks.

#### Sources included in this group

ID	Name
301	NEW OIL STORAGE TANKS (4)(300 GALLONS EACH)
302	WASTE OIL STORAGE TANKS (2)(600 GALLONS EACH)
303	PRODUCED FLUIDS STORAGE TANKS (3)(2,100 GALLONS EACH)
304	WASTE WATER STORAGE TANKS (3)(2,100 GALLONS EACH)

#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### III. MONITORING REQUIREMENTS.

#### # 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Emissions calculation for each storage vessel must be calculated using Department-approved methods such as direct measurement; modeling programs such as the most recent version of EPA TANKS, ProMax, and API E&P Tanks; process simulation software such as HYSIM, HYSIS, WINSIM, and PROSIM; or calculation methodologies such as the Vazquez-Beggs equation.

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).





# SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.





# SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.





## SECTION H. Miscellaneous.

65-00982

a) This renewal application was orginally received by the Department on February 3, 2015 for Peoples TWP, LLC and included Sources 101, 102, 103 and 104. In April 2021 the renewal was assigned to the author as part of an overtime assignment. On May 11, 2021, the Department reached out to Peoples Natural Gas Senior Environmental Engineer Alex Pavick to determine if any source changes had occured at the compressor station between application submittal and the present Engineer Pavick advised that the sources at the Rubright Station were active and needed to be included in the permit renewal. There are four (4) sources from previous permitting included in the permit, 101 (Compressor Engine #1), 102 (TEG Dehydrator #1), 103 (Compressor Engine #2), and 104 (TEG Dehydrator #2).

Sources 301 (New Oil Storage Tanks), 302 (Waste Oil Storage Tanks), 303 (Waste Water Storage Tanks), 304 (Waste Water Storage4 Tanks) and 401 (Rubright Station Component Fugitive Emissions) were added to improve AIMS reporting for the site.





\*\*\*\*\*\* End of Report \*\*\*\*\*\*