# MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

EFFECTIVE DATE: April 20, 2018

**ISSUED TO** 

#### **Consumers Energy-Overisel Compressor Station**

State Registration Number (SRN): N5792

LOCATED AT

4131 138th Avenue, Hamilton, Michigan 49419

# RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N5792-2018

Expiration Date: April 20, 2023

Administratively Complete ROP Renewal Application Due Between October 20, 2021 and October 20, 2022

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

# SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-N5792-2018

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environmental Quality

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#### **AUTHORITY AND ENFORCEABILITY**

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environmental Quality (MDEQ) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements will be identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined or subsumed, or are state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

#### A. GENERAL CONDITIONS

# **Permit Enforceability**

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted.
   (R 336.1213(5))
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. (R 336.1213(5)(a), R 336.1214a(5))
- Those conditions that are hereby incorporated in federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. (R 336.1213(5)(b), R 336.1214a(3))

#### **General Provisions**

- 1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. (R 336.1213(1)(a))
- 2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. (R 336.1213(1)(b))
- 3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. (R 336.1213(1)(c))
- 4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities: (R 336.1213(1)(d))
  - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
  - c. Inspect, at reasonable times, any of the following:
    - i. Any stationary source.
    - ii. Any emission unit.
    - iii. Any equipment, including monitoring and air pollution control equipment.
    - iv. Any work practices or operations regulated or required under the ROP.
  - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
- 5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. (R 336.1213(1)(e))

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. (R 336.1213(1)(f))

- 7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. (R 336.1213(1)(g))
- 8. This ROP does not convey any property rights or any exclusive privilege. (R 336.1213(1)(h))

# **Equipment & Design**

- 9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). (R 336.1370)
- 10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. (R 336.1910)

#### **Emission Limits**

- 11. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; "a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of Rule 301(1)(a) or (b) unless otherwise specified in this ROP." The grading of visible emissions shall be determined in accordance with Rule 303: (R 336.1301(1) in pertinent part)
  - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
  - b. A limit specified by an applicable federal new source performance standard.
- 12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
  - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property. (R 336.1901(a))
  - b. Unreasonable interference with the comfortable enjoyment of life and property. 1 (R 336.1901(b))

#### **Testing/Sampling**

- 13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). (R 336.2001)
- 14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. (R 336.2001(2), R 336.2001(3), R 336.2003(1))
- 15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. (R 336.2001(4))

#### Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate: (R 336.1213(3)(b))

- a. The date, location, time, and method of sampling or measurements.
- b. The dates the analyses of the samples were performed.
- c. The company or entity that performed the analyses of the samples.
- d. The analytical techniques or methods used.
- e. The results of the analyses.
- f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
- 17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. (R 336.1213(1)(e), R 336.1213(3)(b)(ii))

# **Certification & Reporting**

- 18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R 336.1213(3)(c))
- 19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. (R 336.1213(4)(c))
- 20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. (R 336.1213(4)(c))
- 21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP: (R 336.1213(3)(c))
  - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
  - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
  - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

- 22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: (R 336.1213(3)(c))
  - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
  - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
- 23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. (R 336.1213(3)(c)(i))
- 24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. (R 336.1212(6))
- 25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA. (R 336.1912)

#### **Permit Shield**

- 26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied: (R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))
  - a. The applicable requirements are included and are specifically identified in the ROP.
  - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

- 27. Nothing in this ROP shall alter or affect any of the following:
  - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. (R 336.1213(6)(b)(i))
  - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. (R 336.1213(6)(b)(ii))
  - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. (R 336.1213(6)(b)(iii))

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. (R 336.1213(6)(b)(iv))
- 28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
  - a. Operational flexibility changes made pursuant to Rule 215. (R 336.1215(5))
  - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). (R 336.1216(1)(b)(iii))
  - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. (R 336.1216(1)(c)(iii))
  - d. Minor Permit Modifications made pursuant to Rule 216(2). (R 336.1216(2)(f))
  - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. (R 336.1216(4)(e))
- 29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. (R 336.1217(1)(c), R 336.1217(1)(a))

#### **Revisions**

- 30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. (R 336.1215, R 336.1216)
- 31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). (R 336.1219(2))
- 32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. (R 336.1210(9))
- 33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. (R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))

#### Reopenings

- 34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
  - a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. (R 336.1217(2)(a)(i))
  - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. (R 336.1217(2)(a)(ii))
  - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. (R 336.1217(2)(a)(iii))
  - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. (R 336.1217(2)(a)(iv))

#### Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. (R 336.1210(7))

#### **Stratospheric Ozone Protection**

- 36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.
- 37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

### **Risk Management Plan**

- 38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
- 39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
  - a. June 21, 1999,
  - b. Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
  - c. The date on which a regulated substance is first present above a threshold quantity in a process.
- 40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.
- 41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). (40 CFR, Part 68)

#### **Emission Trading**

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. (R 336.1213(12))

#### Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule. <sup>2</sup> (R 336.1201(1))

44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA. <sup>2</sup> (R 336.1201(8), Section 5510 of Act 451)

- 45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ. <sup>2</sup> (R 336.1219)
- 46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months, or has been interrupted for 18 months, the applicable terms and conditions from that PTI shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI. <sup>2</sup> (R 336.1201(4))

#### Footnotes:

<sup>&</sup>lt;sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>&</sup>lt;sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

# **B. SOURCE-WIDE CONDITIONS**

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

# C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

#### **EMISSION UNIT SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUDEGREASER1	Small cold cleaner used for parts cleaning; air vapor interface is less than 10 square feet.	01-01-95	FGCOLDCLEANER
EUGLYCDEHY	Small natural gas glycol dehydrating system using triethylene glycol that includes a reboiler, flash tank, glycol surge tank, new glycol tank, and used glycol tank.	01-01-60	NA
EUENGINE1-1	Natural gas fired reciprocating engine used for gas compression; 19 MMBtu/hr (2700 HP).	Pre 08-01-67	FGENGINES
EUENGINE1-2	Natural gas fired reciprocating engine used for gas compression; 19 MMBtu/hr (2700 HP).	Pre 08-01-67	FGENGINES
EUENGINE1-3	Natural gas fired reciprocating engine used for gas compression; 19 MMBtu/hr (2700 HP).	Pre 08-01-67	FGENGINES
EUENGINE1-4	Natural gas fired reciprocating engine used for gas compression; 19 MMBtu/hr (2700 HP).	Pre 08-01-67	FGENGINES
EUEMERGGEN	Natural gas fueled engine driving a 1,462 hp (1.3 megawatt) emergency generator. Manufactured in 2012 (PTI No. 9-13).	2013/ 11-26-13	NA
EUFUELHEATER1A	Natural gas-fired fuel gas heater in Warehouse; 150,000 Btu/hr.	06-24-05	FGBLRMACT
EUFUELHEATER1B	Natural gas-fired fuel gas heater for the Line Heaters; 150,000 Btu/hr.	06-24-05	FGBLRMACT
EUBOILER1	Natural gas-fired boiler for building heat (Auxiliary Building); 1,680,000 Btu/hr.	12-01-10	FGBLRMACT
EULINEHEATER1	Natural gas-fired pipeline heater (Salem Field); 4,000,000 Btu/hr.	04-01-61	FGBLRMACT
EULINEHEATER2	Natural gas-fired pipeline heater (Salem Field); 4,000,000 Btu/hr.	04-01-61	FGBLRMACT
EULINEHEATER3	Natural gas-fired pipeline heater (Salem Field); 4,000,000 Btu/hr.	04-01-61	FGBLRMACT
EULINEHEATER4A	Natural gas-fired pipeline heater (Overisel Field); 9,200,000 Btu/hr	10-01-04	FGBLRMACT
EULINEHEATER5A	Natural gas-fired pipeline heater (Overisel Field); 9,200,000 Btu/hr.	10-01-04	FGBLRMACT
EULINEHEATER6A	Natural gas-fired pipeline heater (Overisel Field); 9,200,000 Btu/hr.	10-01-04	FGBLRMACT

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EURULE285(mm)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278 and 285 (mm).	NA	FGRULE285(mm)

# EUGLYCDEHY EMISSION UNIT CONDITIONS

# **DESCRIPTION**

Small natural gas glycol dehydrating system using triethylene glycol that includes a reboiler, flash tank, glycol surge tank, new glycol tank, and used glycol tank.

Flexible Group ID: NA

## **POLLUTION CONTROL EQUIPMENT**

Vapor recovery system with condenser

#### I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1	. BTEX	Calculated using the equation in Appendix 7	Annual	EUGLYCDEHY	SC V.4 SC V.5	40 CFR 63.1275(b)(1)(iii)

#### See Appendix 7

#### II. MATERIAL LIMIT(S)

	Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
ĺ	NA	NA	NA	NA	NA	NA

#### III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The process vent from each glycol dehydration unit shall be vented to a control device or a combination of control devices through a closed-vent system. (40 CFR 63.1275(b)(1)(iii)(A))
- 2. All gaseous emissions from the condenser and flash tank shall be routed to and burned in the associated reboiler burner. (R 336.1910)
- 3. The glycol dehydrator shall not be operated unless the flash tank is operating properly. (R 336.1910)
- 4. The condenser must be designed and operated such that the mass content of BTEX in the gases vented to the device as determined in accordance with the requirements of §63.1282(d) is reduced below the emission limit in I.1. (40 CFR 63.1281(f)(1)(ii))
- 5. The permittee shall operate and maintain each glycol dehydration unit, including associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. (40 CFR 63.1274(h))
- 6. The permittee shall operate each control device in accordance with the requirements specified below: **(40 CFR 63.1281(f)(2))** 
  - a. Each control device used to comply with this subpart shall be operating at all times. More than one unit may be vented to a control device.

b. For each control device monitored in accordance with requirements of conditions VI. 10 through VI. 15, the permittee shall demonstrate compliance according to the requirements of VI. 7 (40 CFR 63.1282(e))

7. When using a condenser to demonstrate continuous compliance with emission limits, the control device shall be operated at a site specific maximum operating temperature established in accordance with the requirements of VI. 10. (40 CFR 63.1282(e)(1))

### IV. <u>DESIGN/EQUIPMENT PARAMETER(S)</u>

- 1. Install and operate a continuous parameter monitoring system (CPMS) to monitor and record the condenser outlet temperature. (40 CFR 63.1283(d)(1))
- 2. The CPMS shall measure data values at least once every hour and record either: (40 CFR 63.1283(d)(1))
  - a. Each measured value; or
  - b. Each block average for each 1-hour period or shorter periods calculated from all measured data values during each period. If values are measured more frequently than once per minute, a single value for each minute may be used to calculate the hourly (or shorter period) block average instead of all measured values.
- 3. Install a device equipped with a continuous recorder to measure the condenser outlet temperature. The temperature monitoring device shall have a minimum accuracy of ±2 percent of the temperature being monitored in °C, or ±2.5 °C, whichever is greater. The temperature sensor shall be installed at a location in the exhaust vent stream from the condenser. (40 CFR 63.1283(d)(3))
- 4. The temperature monitor shall be calibrated on an annual basis and maintained according to the manufacturer's recommendations. (R 336.1213(3)(a))
- 5. The closed vent system shall be designed and operated in accordance with the following requirements: (40 CFR 63.1281(c), 40 CFR 63.1283(c)(2)(iii))
  - a. The closed-vent system shall route all gases, vapors, and fumes emitted from the material in and emission unit to a control device that meets the requirements specified in Condition III.2.
  - b. The closed-vent system shall be designed and operated with no detectable emissions.
  - c. Any bypass devices in the closed-vent system that could divert emissions from entering the control device shall be equipped with a flow indicator at the inlet to the bypass device that takes readings every 15 minutes, and that sounds an alarm when the bypass device is open; or the bypass device valve at the inlet to the bypass device shall be secured using a car-seal or lock and key.

#### V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. Once per calendar year the VOC composition of natural gas, including benzene, processed in the glycol dehydrator shall be determined. The permittee shall use the method or methods that are standard in the natural gas industry, subject to approval by the AQD. The data shall be used as inputs to the annual calculations in VI.5. (R 336.1213(3)(a))
- 2. The permittee shall perform "no detectable emissions" testing for closed vent systems using the test methods and procedures specified in 40 CFR 63.1282(b). (40 CFR 63.1282(b))
- 3. Determination of the actual flow rate of natural gas to each glycol dehydration unit shall be made using either of the following procedures: (40 CFR 63.1282(a)(1))
  - a. Install and operate a monitoring instrument that directly measures natural gas flow rate to each glycol dehydration unit with an accuracy of ±2 percent or better. The annual natural gas flow rate shall be converted to a daily average by dividing the annual flow rate by the number of days per year each emission unit processed natural gas.
  - b. Document to the AQD's satisfaction, the actual annual average natural gas flow rate to each glycol dehydration unit.
- 4. Determination of the actual average BTEX emissions from each glycol dehydration unit with condenser shall be made using GRI-GLYCalc™, Version 3.0 or higher. Inputs to the model shall be representative of actual operating conditions of each glycol dehydration unit: (40 CFR 63.1282(a)(2))

- 5. The permittee must conduct a performance test to demonstrate that a control device meets the requirements of III.4 (40 CFR 1281(f)(1)) the permittee shall conduct emissions testing for compliance with the BTEX emission limit calculated using Equation 1 using the following test methods and procedures: (40 CFR 63.1282(d)(3)
  - a. Method 1 or 1A, 40 CFR, Part 60, Appendix A, as appropriate, shall be used for selection of the sampling sites. The sampling site shall be located at the outlet of the combustion device.
  - b. The gas volumetric flow rate shall be determined using Method 2, 2A, 2C, or 2D, 40 CFR, Part 60, Appendix A, as appropriate.
  - c. To determine compliance with the BTEX emission limit, the permittee shall use one of the following methods: Method 18, 40 CFR, Part60, Appendix A; ASTM D64200-99 (Reapproved 2004); or any other method or data that have been validated according to the applicable procedures in Method 301, 40 CFR, Part 63, Appendix A.
  - d. The permittee shall conduct performance tests according to the following schedule:
    - i. An initial performance test shall be conducted no later than October 15, 2015.
    - ii. The first periodic performance test shall be conducted not later than 60 months after the initial performance test. Subsequent periodic performance tests shall be conducted at intervals no longer than 60 months following the previous periodic performance test or whenever a source desires to establish a new operating limit.

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The permittee shall maintain records of the annual facility natural gas throughput each year. (40 CFR 63.1270(a)(3))
- 2. The flash tank level shall be monitored and recorded daily during operation. (R 336.1213(3)(a))
- 3. The flash tank outlet pressure shall be monitored and recorded daily during operation. (R 336.1213(3)(a))
- 4. The permittee shall continuously monitor and record the temperature on the condenser and calculate the daily average temperature for each operating day: (40 CFR 63.1282(e), 40 CFR 63.1283(d)(4))
  - a. Establish a site specific maximum (condenser) temperature to define the conditions at which the control device must be operated to continuously achieve compliance with the emission limit.
  - b. Calculate the daily average of the temperature readings in accordance with Condition VI.10.
  - c. Compliance is achieved when the daily average of the temperature readings calculated under 4.b. is either equal to or less than the maximum monitoring value established under 4.a.
- 5. Using the data recorded by the monitoring system, except for inlet gas flow rate, the permittee must calculate the daily average value for each monitored operating parameter for each operating day. If the emissions unit operation is continuous, the operating day is a 24-hour period. If the emissions unit operation is not continuous, the operating day is the total number of hours of control device operation per 24-hour period. Valid data points must be available for 75 percent of the operating hours in an operating day to compute the daily average. (40 CFR 63.1283(d)(4))
- 6. A site-specific monitoring plan must be prepared that addresses the monitoring system design, data collection, and the quality assurance and quality control elements below. Each CPMS must be installed, calibrated, operated, and maintained in accordance with the procedures in the site-specific monitoring plan: (40 CFR 63.1283(d)(1)(ii))
  - a. The performance criteria and design specifications for the monitoring system equipment, including the sample interface, detector signal analyzer, and data acquisition and calculations;
  - b. Sampling interface (e.g., thermocouple) location such that the monitoring system will provide representative measurements;
  - c. Equipment performance checks, system accuracy audits, or other audit procedures;
  - d. Ongoing operation and maintenance procedures
  - e. Ongoing reporting and recordkeeping procedures
  - f. The CPMS equipment performance checks, system accuracy audits, or other audit procedures specified in the site-specified monitoring plan must be conducted at least once every 12 months.

7. For each closed-vent system, the permittee shall comply with the following requirements: (40 CFR 63.1283(c)(2-4))

- a. Except for parts of the closed-vent system or cover that are designated unsafe to inspect or difficult to inspect, each closed-vent system and each bypass device shall be inspected according to the procedures specified below according the following schedule:
  - i. For each closed-vent system joints, seams, or other connections that are permanently or semipermanently sealed (e.g., a welded joint between two sections of hard piping or a bolted or gasketed ducting flange):
    - Conduct an initial inspection to demonstrate that the closed-vent system operates with no detectable emissions.
    - B. Conduct annual visual inspections for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in piping; loose connections; or broken or missing caps or other closure devices.
  - ii. For closed-vent system components other than those specified in VI.7.a.i above:
    - A. Conduct an initial inspection to demonstrate that the closed-vent system operates with no detectable emissions.
    - B. Conduct annual inspections to demonstrate that the components or connections operate with no detectable emissions.
    - C. Conduct annual visual inspections for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in ductwork; loose connections; or broken or missing caps or other closure devices.
  - iii. For each bypass device, except low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and safety devices, the permittee shall either:
    - A. At the inlet to the bypass device that could divert the steam away from the control device to the atmosphere, set the flow indicator to take a reading at least once every 15 minutes; or
    - B. If the bypass device valve installed at the inlet to the bypass device is secured in the non-diverting position using a car-seal or a lock-and-key type configuration, visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass device.
- b. In the event that a leak or defect is detected, the permittee shall repair the leak or defect as soon as practicable, except as provided in VI.7.c.:
  - i A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.
  - ii Repair shall be completed no later than 15 calendar days after the leak is detected.
- c. Delay of repair of a closed-vent system for which leaks or defects have been detected is allowed if the repair is technically infeasible without a shutdown, as defined in § 63.1271, or if the permittee determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next shutdown.
- 8. Any parts of the closed-vent system or cover that are designated, as described below, as unsafe to inspect are exempt from the inspection requirements of Condition VI.7 if: (40 CFR 63.1283(c)(5))
  - a. The permittee determines that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with Condition VI.5.a.i or ii.
  - b. The permittee has a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times.
- 9. Any parts of the closed-vent system or cover that are designated, as described below, as difficult to inspect are exempt from the inspection requirements of Condition VI.7 if: (40 CFR 63.1283(c)(6))
  - a. The permittee determines that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface; and
  - b. The permittee has a written plan that requires inspection of the equipment at least once every 5 years.
- 10. For the control devices used to comply with 40 CFR, Part 63, Subpart HHH, the permittee shall establish a minimum operating parameter value or a maximum operating parameter value, as appropriate for the control device, to define the conditions at which the control device must be operated to continuously achieve the emission limits in Section I of EUGLYCDEHY. The maximum operating parameter value shall be established as follows: (40 CFR 63.1283(d)(5)(i))
  - a. If the permittee conducts performance tests to demonstrate that the control device achieves the applicable performance requirements, then the maximum operating parameter value shall be established based on

values measured during the performance test and supplemented, as necessary, by a condenser design analysis or control device manufacturer's recommendations or a combination of both.

- b. If the permittee uses a condenser design analysis to demonstrate that the control device achieves the applicable performance requirements, then the maximum operating parameter value shall be established based on the condenser design analysis and may be supplemented by the condenser manufacturer's recommendations.
- c. If the permittee operates a control device where the performance test requirement was met under manufacturers' performance test to demonstrate that the control device achieves the applicable performance requirements, then the maximum inlet gas flow rate shall be established based on the performance test and supplemented, as necessary, by the manufacturer recommendations.
- d. When using a condenser as the control device, the permittee shall also establish a condenser performance curve showing the relationship between condenser outlet temperature and condenser control efficiency. The curve shall be established using the procedures documented in the GRI report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI 95/0368.1) as inputs for the model GRI-GLYCalc, Version 3.0 or higher, to generate a condenser performance curve.
- 11. A deviation for a control device is determined to have occurred when the monitoring data (or lack of monitoring data) result in any one of the criteria specified below being met. When multiple operating parameters are monitored for the same control device and during the same operating day, and more than one of these operating parameters meets an excursion criterion specified below, then a single excursion is determined to have occurred for the control device for that operating day: (40 CFR 63.1283(d)(6)(i-iii))
  - a. When the daily average value of a monitored operating parameter is greater than the maximum operating parameter limit established for the operating parameter.
  - b. When the 30-day average condenser efficiency is less than the identified 30-day required percent reduction.
  - c. When the monitoring data are not available for at least 75 percent of the operating hours in a day.
- 12. A deviation occurs for a closed-vent system containing one or more bypass devices that could be used to divert all or a portion of the gases, vapors, or fumes from entering the control device when: (40 CFR 63.1283(d)(6)(iv))
  - a. The flow indicator indicates that flow has been detected and that the stream has been diverted away from the control device to the atmosphere.
  - b. If the seal or closure mechanism has been broken, the bypass line valve position has a changed, the key for the lock-and-key type lock has been checked out, or the car-seal has broken.
- 13. For each deviation, the permittee shall be deemed to have failed to have applied control in a manner that achieves the required operating parameter limits. Failure to achieve the required operating parameter limits is a violation of this standard. (40 CFR 63.1283(d)(7))
- 14. Nothing in Conditions VI.11 through VI.13 shall be construed to allow or excuse a monitoring parameter deviation caused by any activity that violates other applicable provisions of this subpart. (40 CFR 63.1283(d)(9))
- 15. The permittee shall maintain the records specified in 40 CFR 63.10(b)(2). (40 CFR 63.1284(b)(2))
- 16. The permittee shall maintain the following records: (40 CFR 63.1284(b)(4), 40 CFR 63.1284(g))
  - a. Continuous records of the equipment operating parameters specified to be monitored in Conditions VI.8-10.
  - b. Records of the daily average value of each continuously monitored parameter for each operating day determined according to the procedures specified in Condition VI.5.
  - c. For condensers using reduction efficiency for compliance, records of the annual 30-day rolling average condenser efficiency shall be kept in addition to the daily averages.
  - d. Hourly records of the times and durations of all periods when the vent stream is diverted from the control device or the device is not operating.
  - e. Where a seal or closure mechanism is used to comply with the closed vent bypass, hourly records of flow are not required. In such cases, the owner or operator shall record that the monthly visual inspection of the seals or closure mechanism has been done, and shall record the duration of all periods when the seal mechanism is broken, the bypass line valve position has changed, or the key for a lock-and-key type lock has been checked out, and records of any car-seal that has broken.

17. The permittee shall maintain records identifying all parts of the closed-vent system that are designated as unsafe to inspect, an explanation of why the equipment is unsafe to inspect, and the plan for inspecting the equipment. (40 CFR 63.1284(b)(5))

- 18. The permittee shall maintain records identifying all parts of the closed-vent system that are designated as difficult to inspect, an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment. (40 CFR 63.1284(b)(6))
- 19. The permittee shall maintain the following records for each inspection conducted during which a leak or defect is detected: (40 CFR 63.1284(b)(7))
  - a. The instrument identification numbers, operator name or initials, and identification of the equipment.
  - b. The date the leak or defect was detected and the date of the first attempt to repair the leak or defect.
  - c. Maximum instrument reading measured by the method specified in Condition V.3 after the leak or defect is successfully repaired or determined to be non-repairable.
  - d. "Repair delayed" and the reason for the delay if a leak or defect is not repaired within 15 calendar days after discovery of the leak or defect.
  - e. The name, initials, or other form of identification of the permittee (or designee) whose decision it was that repair could not be affected without a shutdown.
  - f. The expected date of successful repair of the leak or defect if a leak or defect is not repaired within 15 calendar days.
  - f. Dates of shutdowns that occur while the equipment is unrepaired.
  - g. The date of successful repair of the leak or defect.
- 20. For each inspection conducted in accordance with condition VI.7 during which no leaks or defects are detected, the permittee shall maintain a record that the inspection was performed, the date of the inspection, and a statement that no leaks or defects were detected. (40 CFR 63.1284(b)(8))
- 21. The permittee shall maintain records of the occurrence and duration of each malfunction of process equipment or the air pollution control equipment and monitoring equipment. The permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with Condition III.4 including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. (40 CFR 63.1284(f))

#### VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit the notification of the planned date of a performance test and site–specific test plan at least 60 days before the test. (40 CFR 63.1285(b)(3))
- 5. The permittee shall submit a Notification of Compliance Status Report as required under § 63.9(h) within 180 days after October 15, 2015. In addition to the information required under § 63.9(h) the Notification of Compliance Status Report shall include the information specified in paragraphs 5.a. through I. of this section. If an owner or operator submits the required information at different times, and/or different submittals, subsequent submittals may refer to previous submittals instead of duplicating and resubmitting the previously submitted information: (40 CFR 63.1285(d))
  - a. If a closed-vent system and a control device other than a flare are used to comply with § 63.1274, the owner or operator shall submit the information in Condition 5.a.iii and the information in either paragraph 5.a.i. or ii.:
    - i. The condenser design analysis documentation specified in § 63.1282(d)(4) if the owner or operator elects to prepare a design analysis; or

- ii. If the owner or operator is required to conduct a performance test, the performance test results including the information specified in Condition 5.a.ii.A and B Results of a performance test conducted prior to the compliance date of this subpart can be used provided that the test was conducted using the methods specified in § 63.1282(d)(3), and that the test conditions are representative of current operating conditions. If the owner or operator operates a combustion control device model tested under § 63.1282(g), an electronic copy of the performance test results shall be submitted via email to Oil\_and\_Gas\_PT@EPA.GOV unless the test results for that model of combustion control device are posted at the following Web site: epa.gov/air quality/oil and gas.
  - A. The percent reduction of HAP or TOC, or the outlet concentration of HAP or TOC (parts per million by volume on a dry basis), determined as specified in § 63.1282(d)(3); and
  - B. The value of the monitored parameters specified in § 63.1283(d), or a site-specific parameter approved by the permitting agency, averaged over the full period of the performance test.
- iii. The results of the closed-vent system initial inspections performed according to the requirements in § 63.1283(c)(2)(i) and (ii).
- b. The owner or operator shall submit one complete test report for each test method used for a particular source.
  - i. For additional tests performed using the same test method, the results specified in Condition 5.a.ii shall be submitted, but a complete test report is not required.
  - ii. A complete test report shall include a sampling site description, description of sampling and analysis procedures and any modifications to standard procedures, quality assurance procedures, record of operating conditions during the test, record of preparation of standards, record of calibrations, raw data sheets for field sampling, raw data sheets for field and laboratory analyses, documentation of calculations, and any other information required by the test method.
- c. For each control device other than a flare used to meet the requirements of § 63.1274, the owner or operator shall submit the information specified in Condition 5.d.i. through iv for each operating parameter required to be monitored in accordance with the requirements of § 63.1283(d).
  - i. The minimum operating parameter value or maximum operating parameter value, as appropriate for the control device, established by the owner or operator to define the conditions at which the control device must be operated to continuously achieve the applicable performance requirements of § 63.1281(d)(1) or (e)(3)(ii).
  - ii. An explanation of the rationale for why the owner or operator selected each of the operating parameter values established in § 63.1283(d)(5). This explanation shall include any data and calculations used to develop the value, and a description of why the chosen value indicates that the control device is operating in accordance with the applicable requirements of § 63.1281(d)(1), (e)(3)(ii), or (f)(1).
  - iii. A definition of the source's operating day for purposes of determining daily average values of monitored parameters. The definition shall specify the times at which an operating day begins and ends.
- d. Results of any continuous monitoring system performance evaluations shall be included in the Notification of Compliance Status Report.
- e. The owner or operator shall comply with all requirements for compliance status reports contained in the source's title V permit, including reports required under 40 CFR, Part 63, Subpart HHH. Each time a notification of compliance status is required under this subpart, the owner or operator of such source shall submit the notification of compliance status to the appropriate permitting authority following completion of the relevant compliance demonstration activity specified in this subpart.
- f. The owner or operator shall submit an analysis demonstrating whether an affected source is a major source using the maximum throughput calculated according to § 63.1270(a).
- g. The owner or operator shall submit a statement as to whether the source has complied with the requirements of this subpart.
- 6. The permittee shall prepare Periodic Reports in accordance with a. and b. below and submit them to the Administrator: (40 CFR 63.1285(e))
  - a. The permittee shall submit Periodic Reports semiannually beginning 60 calendar days after the end of the applicable reporting period. The first report shall be submitted no later than 240 days after the date the Notification of Compliance Status Report is due and shall cover the 6-month period beginning on the date the Notification of Compliance Status Report is due. The report shall include certification by a responsible official of truth, accuracy, and completeness.
  - b. The permittee shall include the following information and any other information as applicable in §63.1285(e)(2):
    - i. A description of all deviations as defined in Conditions VI.12-14 that have occurred during the 6-month reporting period, and the information described in §63.1285(e)(2)(ii).

- ii. For each inspection conducted in accordance with Condition VI.5 during which a leak or defect is detected, the records described in Condition VI.21 must be included in the next Periodic Report.
- iii. For each closed-vent system with a bypass line, records required under Condition VI.18.e and f.
- iv. A statement identifying if there were no deviations during the reporting period.
- v. Any change in compliance methods as described in §63.1282(e).
- vi. The results of any periodic test conducted during the reporting period.
- 7. Whenever a process change is made, or a change in any of the information submitted in the Notification of Compliance Status Report, the permittee shall submit a report within 180 days after the process change is made or as a part of the next Periodic Report, whichever is sooner. The report shall include: (40 CFR 63.1285(f))
  - a. A brief description of the process change;
  - b. A description of any modification to standard procedures or quality assurance procedures;
  - c. Revisions to any of the information reported in the original Notification of Compliance Status Report under Condition VII.5
  - d. Information required by the Notification of Compliance Status Report under Condition VII.5 for changes involving the addition of processes or equipment.
- 8. Within 60 days after the date of completing a performance test (defined in § 63.2) you must submit the results of the performance tests to EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). Performance test data must be submitted in the file format generated through use of EPA's Electronic Reporting Tool (ERT) (see http://www.epa.gov/ttn/chief/ert/index.html). Only data collected using test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE. All reports required by this subpart not subject to the above electronic reporting requirements must be sent to the Administrator at the appropriate address. The Administrator may request a report in any form suitable for the specific case (e.g., by commonly used electronic media such as Excel spreadsheet, on CD or hard copy). The Administrator retains the right to require submittal of reports in paper format. (40 CFR 63.1285(g))
- 9. The permittee shall notify the AQD Technical Programs Unit Supervisor and the district Supervisor no less than 7 days prior to the anticipated test date. (R 336.2001(4))

#### See Appendix 8

#### VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

# IX. OTHER REQUIREMENT(S)

- 1. The permittee shall comply with all applicable requirements of 40 CFR 63, Subpart A and Subpart HHH-National Emission Standards for Hazardous Air Pollutants (NESHAP) from Natural Gas Transmission and Storage Facilities. (40 CFR Part 63, Subpart HHH)
- 2. The permittee shall determine the maximum values for other parameters used to calculate potential emissions as the maximum over the same period for which maximum throughput is determined. These parameters shall be based on an annual average or the highest single measured value. 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 40 CFR 63.1.270(a)(4))

# Footnotes:

<sup>&</sup>lt;sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b). <sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

# EUEMERGGEN EMISSION UNIT CONDITIONS

#### **DESCRIPTION**

Natural gas fueled engine driving a 1,462 hp (1.3 megawatt) emergency generator. Manufactured in 2012 (PTI No. 9-13).

Flexible Group ID: NA

#### **POLLUTION CONTROL EQUIPMENT**

NA

#### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	2 g/hp-hr <sup>2</sup>	Stack Testing	EUEMERGGEN	SC V.1	40 CFR 60.4233(e)
2. CO	4 g/hp-hr <sup>2</sup>	Stack Testing	EUEMERGGEN	SC V.1	40 CFR 60.4233(e)
*Test Protocol shall determine averaging time.					

# II. MATERIAL LIMIT(S)

1. The permittee shall burn only natural gas in EUEMERGGEN.<sup>2</sup> (40 CFR 60.4230)

# III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee may operate EUEMERGGEN for no more than 100 hours per year based on a 12-month rolling time period as determined at the end of each calendar month for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per year. EUEMERGGEN may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply non-emergency power as part of a financial arrangement with another entity.<sup>2</sup> (40 CFR 60.4243(d))
- 2. The permittee shall operate and maintain EUEMERGGEN such that it meets the emission limits in SC I.1 and I.2 over the entire life of the engine.<sup>2</sup> (40 CFR 60.4234, 40 CFR 60.4243(b))

#### IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall equip and maintain EUEMERGGEN with a non-resettable hour meters to track the operating hours.<sup>2</sup> (R 336.1205(1)(a) and (3), R 336.1225, 40 CFR 60.4237)
- 2. The nameplate capacity of EUEMERGGEN shall not exceed 1,462 hp (1.3 megawatts), as certified by the equipment manufacturer.<sup>2</sup> (40 CFR 60.4230)

#### V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall conduct an initial performance test for EUEMERGGEN within one year after startup of the engine to demonstrate compliance with the emission limits in 40 CFR 60.4233(e). If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4244. No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. After conducting the initial performance test, the permittee shall conduct subsequent performance testing, every 8,760 hours or 3 years, whichever comes first. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.<sup>2</sup> (40 CFR 60.4243, 40 CFR 60.4244, 40 CFR Part 60, Subpart JJJJ)

#### See Appendix 5

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))
- 2. The permittee shall keep, in a satisfactory manner, records of testing required in SC V.1 or manufacturer certification and maintenance records documenting that EUEMERGGEN meets the applicable emission limitations contained in the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subpart JJJJ. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> (40 CFR 60.4245)
- 3. The permittee shall monitor and record the hours of operation of EUEMERGGEN during emergencies and non-emergencies, on a monthly and 12-month rolling time period basis, in a manner acceptable to the District Supervisor, Air Quality Division. The permittee shall record the time of operation of EUEMERGGEN and the reason it was in operation during that time.<sup>2</sup> (40 CFR 60.4243)
- 4. The permittee shall keep records of the following information for EUEMERGGEN:
  - a. All notifications submitted to comply with 40 CFR Part 60 Subpart JJJJ and all documentation supporting any notification.
  - b. Maintenance conducted on EUEMERGGEN.
  - c. If EUEMERGGEN is a certified engine, documentation from the manufacturer that the EUEMERGGEN is certified to meet the emission standards and information as required in 40 CFR Parts 90, 1048, 1054, and 1060, as applicable.
  - d. If EUEMERGGEN is not a certified engine or is a certified engine operating in a non-certified manner and subject to 40 CFR 60.4243(a)(2), documentation that EUEMERGGEN meets the emission standards.<sup>2</sup> (40 CFR 60.4245(a))
- 5. The permittee 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. (40 CFR 60.4243(b)(2)(ii))

#### VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

#### See Appendix 8

#### VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVEMERGGEN	222	18.5 <sup>2</sup>	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

### IX. OTHER REQUIREMENT(S)

- 1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subpart A and Subpart JJJJ, as they apply to EUEMERGGEN.<sup>2</sup> (40 CFR Part 60, Subparts A and JJJJ)
- 2. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart ZZZZ, as they apply to EUEMERGGEN.<sup>2</sup> (40 CFR Part 63, Subparts A and ZZZZ, 40 CFR 63.6595)

#### Footnotes:

<sup>&</sup>lt;sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>&</sup>lt;sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

# D. FLEXIBLE GROUP CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

# **FLEXIBLE GROUP SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h), or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EUDEGREASER1
FGENGINES	Four (4) existing natural gas fired reciprocating engines used for gas compression; 19 MMBtu/hr (2700 HP) each.	EUENGINE1-1 EUENGINE1-2 EUENGINE1-3 EUENGINE1-4
FGBLRMACT	New and existing industrial boilers and process heaters fired by natural gas and subject to 40 CFR Part 63, Subpart A and Subpart DDDDD.	EUFUELHEATER1A EUFUELHEATER1B EUBOILER1 EULINEHEATER1 EULINEHEATER2 EULINEHEATER3 EULINEHEATER4A EULINEHEATER5A EULINEHEATER6A
FGRULE285(mm)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 285(mm).	EURULE285(mm)

# FGCOLDCLEANERS FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h), or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

**Emission Unit: EUDEGREASER1** 

# **POLLUTION CONTROL EQUIPMENT**

NA

#### I. EMISSION LIMIT(S)

NA

## II. MATERIAL LIMIT(S)

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. (R 336.1213(2))

#### III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. (R 336.1611(2)(b), R 336.1707(3)(b))
- 2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. (R 336.1213(3))

#### IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The cold cleaner must meet one of the following design requirements:
  - a. The air/vapor interface of the cold cleaner is no more than ten square feet. (R 336.1281(h))
  - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. (R 336.1285(r)(iv))
- 2. The cold cleaner shall be equipped with a device for draining cleaned parts. (R 336.1611(2)(b), R 336.1707(3)(b))
- 3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. (R 336.1611(2)(a), R 336.1707(3)(a))
- 4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. (R 336.1707(3)(a))
- 5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
  - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. (R 336.1707(2)(a))

- b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (R 336.1707(2)(b))
- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. (R 336.1707(2)(c))

#### V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. (R 336.1213(3))
- 2. The permittee shall maintain the following information on file for each cold cleaner: (R 336.1213(3))
  - a. A serial number, model number, or other unique identifier for each cold cleaner.
  - b. The date the unit was installed, manufactured or that it commenced operation.
  - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(h).
  - d. The applicable Rule 201 exemption.
  - e. The Reid vapor pressure of each solvent used.
  - f. If applicable, the option chosen to comply with Rule 707(2).
- 3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. (R 336.1611(3), R 336.1707(4))
- 4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. (R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))

#### VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

# FGENGINES FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

Four (4) existing natural gas fired reciprocating engines for gas compression; 19,000,000 Btu/hr each.

Emission Units: EUENGINE1-1, EUENGINE1-2, EUENGINE1-3, EUENGINE1-4

#### **POLLUTION CONTROL EQUIPMENT**

NA

#### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	• •	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

# II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	• •	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

#### III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall only fire natural gas in the reciprocating engines at this facility. (R 336.1201(1))

#### IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

#### V. <u>TESTING/SAMPLING</u>

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

# VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall monitor and record the natural gas consumption rate for each emission unit listed in FGENGINES for each calendar month. (R 336.1213(3)(b))

#### VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

#### See Appendix 8

#### VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

# IX. OTHER REQUIREMENT(S)

- 1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines, but the initial compliance date if the units become subject due to reconstruction. (40 CFR, Part 63, Subparts A and ZZZZ)
- The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart JJJJ, for Stationary Reciprocating Internal Combustion Engines, but the initial compliance date if the units become subject due to reconstruction. (40 CFR, Part 63, Subparts A and JJJJ)

#### Footnotes:

<sup>&</sup>lt;sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>&</sup>lt;sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

# FGBLRMACT FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

New and existing industrial boilers and process heaters fired by natural gas and subject to 40 CFR Part 63, Subpart A and Subpart DDDDD.

**Emission Units:** EUFUELHEATER1A, EUFUELHEATER1B, EUBOILER1, EULINEHEATER1, EULINEHEATER2, EULINEHEATER3, EULINEHEATER4A, EULINEHEATER5A, EULINEHEATER6A

The collection at a major source of all existing industrial, commercial, and institutional boilers and process heaters within the units designed to burn gas 1 fuel subcategory as defined in 40 CFR Part 63.7575. At the time of permit renewal:

Less than 5 MMBtu/hr	EUFUELHEATER1A, EUFUELHEATER1B, EUBOILER1, EULINEHEATER1, EULINEHEATER2, EULINEHEATER3
Equal to or greater than 5 MMBtu/hr and less than 10 MMBtu/hr	EULINEHEATER4A, EULINEHEATER5A, EULINEHEATER6A
Equal to or greater than 10 MMBtu/hr	NA NA

#### POLLUTION CONTROL EQUIPMENT

NA

#### I. EMISSION LIMIT(S)

NA

#### II. MATERIAL LIMIT(S)

1. The permittee shall only burn natural gas as defined in 40 CFR 63.7575 in each emission unit in FGBLRMACT. (40 CFR 63.7499(I))

# III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee must meet the tune-up and Energy Assessment work practice standards for each applicable boiler or process heater at the source. (40 CFR 63.7500(a)(1), 40 CFR Part 63, Subpart DDDDD, Table 3, Nos. 1-4)
- 2. The permittee must operate and maintain affected sources 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 that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR 63.7500(a)(3))
- 3. The permittee may obtain approval from the Administrator to use an alternative to the work practice standards noted in SC III.1 and/or SC III.2. (40 CFR 63.7500(b))
- 4. The permittee must:
  - a. Complete a tune-up every 5 years (61 months) for boilers/process heaters less than or equal to 5 million Btu per hour. (40 CFR 63.7500(e), 40 CFR 63.7515(d))
  - b. Complete a tune-up every 2 years (25 months) for boilers greater than 5 million Btu per hour and less than 10 million Btu per hour. (40 CFR 63.7500(e), 40 CFR 63.7515(d))

- c. Complete a tune-up annually (13 months) for boilers greater than 10 million Btu per hour. (40 CFR 63.7540(a)(10), 40 CFR 63.7515(d))
- d. Conduct the tune-up within 30 calendar days of startup, if the unit is not operating on the required date for a tune-up. (40 CFR 63.7540(a)(13))
- e. Follow the procedures described in SC IX 4.a through SC IX 4.f for all initial and subsequent tune ups. (40 CFR 63.7540(a)(10), 40 CFR Part 63, Subpart DDDDD, Table 3)
- f. Complete the Initial tune ups on all affected units no later than January 31, 2016, except as provided in 40 CFR 63.7510(j), 40 CFR 63.7540(a)(13).
- 5. The permittee must complete the one-time energy assessment no later than January 31, 2016. (40 CFR 63.7510(e))

# IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

#### V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The permittee must keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). (40 CFR 63.7555(a)(1))
- 2. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee can keep the records off site for the remaining 3 years. (40 CFR 63.7560(a), (b), and (c))

#### VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee must submit a Notification of Compliance Status that includes each boiler or process heater before the close of business on the 60th day following the completion of the initial compliance demonstrations for all boiler or process heaters at the facility. The Notification of Compliance Status report must contain the following information: (40 CFR 63.7545(e))
  - a. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with 40 CFR Part 63, Subpart DDDDD, description of the fuel(s) burned. (40 CFR 63.7545(e)(1))
  - b. Certification(s) of compliance, as applicable, and signed by a responsible official: (40 CFR 63.7545(e)(8))
    - i. "This facility complies with the required initial tune-up according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi)." (40 CFR 63.7545(e)(8)(i))

ii. "This facility has had an energy assessment performed according to 40 CFR 63.7530(e)." (40 CFR 63.7545(e)(8)(ii))

- 5. Unless the EPA Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), the permittee must submit each report, according to paragraph (h) of 40 CFR 63.7550, stated in SC VII.7, by the date in Table 9 of 40 CFR Part 63, Subpart DDDDD and according to the requirements in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below. For units that are subject only to a requirement to conduct an annual tune-up according to 40 CFR 63.7540(a)(10), stated in SC IX.4.a, biennial tune-up according to 40 CFR 63.7540(a)(11), stated in SC IX.4.b, or 5-year tune-up according to 40 CFR 63.7540(a)(12), stated in SC IX.4.c, and not subject to emission limits or operating limits, the permittee may submit only an annual, biennial, or 5-year compliance report, as applicable, as specified in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below, instead of a semi-annual compliance report: (40 CFR 63.7550(b))
  - a. When submitting an annual, biennial, or 5-year compliance report, the first compliance report must cover the period beginning on January 31, 2016 and ending on December 31 within 1, 2, or 5 years, as applicable, after the compliance date that is specified in 40 CFR 63.7495.

    (40 CFR 63.7550(b)(1))
  - b. The first annual, biennial, or 5-year compliance report must be postmarked or submitted no later than March 15. (40 CFR 63.7550(b)(2), 40 CFR 63.7550(b)(5))
  - c. Annual, biennial, and 5-year compliance reports must cover the applicable 1-, 2-, or 5-year periods from January 1 to December 31. (40 CFR 63.7550(b)(3))
  - d. Annual, biennial, and 5-year compliance reports must be postmarked or submitted no later than March 15. (40 CFR 63.7550(b)(4), 40 CFR 63.7550(b)(5))
- 6. The permittee must include the following information in the compliance report: (40 CFR 63.7550(c), 40 CFR 63.7550(c)(1))
  - a. Company and Facility name and address. (40 CFR 63.7550(c)(5)(i))
  - b. Process unit information, emissions limitations, and operating parameter limitations. (40 CFR 63.7550(c)(5)(ii))
  - c. Date of report and beginning and ending dates of the reporting period. (40 CFR 63.7550(c)(5)(iii))
  - d. The total operating time during the reporting period. (40 CFR 63.7550(c)(5)(iv))
  - e. Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. (40 CFR 63.7550(c)(5)(xiv))
  - f. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. (40 CFR 63.7550(c)(5)(xvii)
- 7. The permittee must submit the reports according to the procedures specified in paragraph (h)(3) of 40 CFR 63.7550, as listed below: **(40 CFR 63.7550(h))** 
  - a. The permittee must submit all reports required by Table 9 of 40 CFR Part 63, Subpart DDDDD electronically to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD. Instead of using the electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (http://www.epa.gov/ttn/chief/cedri/index.html), once the XML schema is available. If the reporting form specific to 40 CFR Part 63, Subpart DDDDD is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in 40 CFR 63.13. The permittee must begin submitting reports via CEDRI no later than 90-days after the form becomes available in CEDRI. (40 CFR 63.7550(h)(3))

See Appendix 8

# VIII. STACK/VENT RESTRICTION(S)

NA

# IX. OTHER REQUIREMENT(S)

- 1. The permittee must comply with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016, for existing boilers and process heaters, unless an extension has been granted per 40 CFR 63.6(i). (40 CFR 63.7495(b))
- 2. The permittee must be in compliance with the applicable work practice standards. (40 CFR 63.7505(a))
- 3. For affected sources (as defined in 40 CFR 63.7490) that have not operated since the previous compliance demonstration and more than one year has passed since the previous compliance demonstration, the permittee must complete a subsequent tune-up within 30 days of startup by following the procedures described in SC IX 4.a through 4.f. (40 CFR 63.7515(g))
- 4. The permittee must demonstrate continuous compliance with the tune-up requirement by completing the following: (40 CFR 63.7540(a))
  - a. Inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. (40 CFR 63.7540(a)(10)(i))
  - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. (40 CFR 63.7540(a)(10)(ii))
  - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. (40 CFR 63.7540(a)(10)(iii))
  - d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any  $NO_x$  requirement to which the unit is subject. (40 CFR 63.7540(a)(10)(iv))
  - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. (40 CFR 63.7540(a)(10)(v))
  - f. Maintain on-site and submit, if requested by the Administrator, the most recent periodic report containing the information as listed below: (40 CFR 63.7540(a)(10)(vi))
    - i. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. (40 CFR 63.7540(a)(10)(vi)(A))
    - ii. A description of any corrective actions taken as a part of the tune-up. (40 CFR 63.7540(a)(10)(vi)(B))
    - iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. (40 CFR 63.7540(a)(10)(vi)(C))
- 5. If the boiler or process heater has a heat input capacity of less than or equal to 5 million Btu per hour, the permittee may delay the burner inspection specified in SC IX 4.a until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72 months. (40 CFR 63.7540(a)(12))

#### Footnotes:

<sup>&</sup>lt;sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>&</sup>lt;sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

# FGRULE285(mm) FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278, 278a and 285(2)(mm).

Emission Unit: EURULE285(mm)

# **POLLUTION CONTROL EQUIPMENT**

NA

# I. EMISSION LIMIT(S)

NA

# II. MATERIAL LIMIT(S)

NA

#### III. PROCESS/OPERATIONAL RESTRICTION(S)

1. For venting of natural gas for routine maintenance or relocation of transmission and distribution systems in amounts greater than 1,000,000 standard cubic feet, the permittee shall, at a minimum, implement measures to assure safety of employees and the public and minimize impacts to the environment. (R 336.1285(2)(mm)(ii)(B))

## IV. <u>DESIGN/EQUIPMENT PARAMETER(S)</u>

NA

#### V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

# VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

- 4. For venting of natural gas for routine maintenance or relocation of transmission and distribution systems in amounts greater than 1,000,000 standard cubic feet, the permittee shall notify the AQD District Supervisor prior to a scheduled pipeline venting. (R 336.1285(2)(mm)(ii)(A))
- 5. For venting of natural gas for routine maintenance or relocation of transmission and distribution systems in amounts greater than 1,000,000 standard cubic feet, the permittee shall provide necessary notification in accordance with the Michigan gas safety standards, the federal pipeline and hazardous materials safety administration standards, and the federal energy regulatory commission standards, as applicable. The permittee is not required to copy the AQD on the notifications. (R 336.1285(2)(mm)(ii)(B))
- 6. For emergency venting of natural gas in amounts greater than 1,000,000 standard cubic feet per event, the permittee shall notify the pollution emergency alert system (PEAS) within 24 hours of an emergency pipeline venting. For purposes of this requirement, an emergency is considered an unforeseen event that disrupts normal operating conditions and poses a threat to human life, health, property, or the environment if not controlled immediately. (R 336.1285(2)(mm)(iv))

## See Appendix 8

# VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

#### IX. OTHER REQUIREMENT(S)

NA

#### Footnotes:

<sup>&</sup>lt;sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>&</sup>lt;sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

# **E. NON-APPLICABLE REQUIREMENTS**

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

# **APPENDICES**

# Appendix 1. Abbreviations and Acronyms

The following is an alphabetical listing of abbreviations/acronyms that may be used in this permit.

	is an alphabetical listing of abbreviations/acro	nyms that n MM	nay be used in this permit.  Million
AQD	Air Quality Division		
acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
СОМ	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Environmental Quality	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
GC	General Condition	psig	Pounds per square inch gauge
gr	Grains	PeTE	Permanent Total Enclosure
HAP	Hazardous Air Pollutant	PTI	Permit to Install
Hg	Mercury	RACT	Reasonable Available Control Technology
hr	Hour	ROP	Renewable Operating Permit
HP	Horsepower	SC	Special Condition
H <sub>2</sub> S	Hydrogen Sulfide	scf	Standard cubic feet
HVLP	High Volume Low Pressure *	sec	Seconds
ID	Identification (Number)	SCR	Selective Catalytic Reduction
IRSL	Initial Risk Screening Level	SO <sub>2</sub>	Sulfur Dioxide
ITSL	Initial Threshold Screening Level	SRN	State Registration Number
LAER	Lowest Achievable Emission Rate	TAC	Toxic Air Contaminant
lb	Pound	Temp	Temperature
m	Meter	THC	Total Hydrocarbons
MACT	Maximum Achievable Control Technology	tpy	Tons per year
MAERS	Michigan Air Emissions Reporting System	μg	Microgram
MAP	Malfunction Abatement Plan	VE	Visible Emissions
MDEQ	Michigan Department of Environmental Quality	VOC	Volatile Organic Compounds
mg	Milligram	yr	Year
mm	Millimeter		

<sup>\*</sup>For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 pounds per square inch gauge (psig).

#### Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

#### **Appendix 3. Monitoring Requirements**

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

#### Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

# **Appendix 5. Testing Procedures**

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

# Appendix 6. Permits to Install

At the time of permit issuance, no Permits to Install have been issued to this facility. Therefore, this appendix is not applicable.

Source-Wide PTI No MI-PTI-N5792-2012A is being reissued as Source-Wide PTI No. MI-PTI-N5792-2018.

#### **Appendix 7. Emission Calculations**

The permittee shall use the following equation, or alternate equation approved by the AQD, in conjunction with monitoring, testing or recordkeeping data to determine compliance with the emission limit of BTEX referenced in EUGLYCDEHY, I.1, BTEX emissions (40 CFR 63.1275 equation 1):

$$EL_{BTEX} = 3.10x10^{-4} * Throughput * C_{i,BTEX} * 365 \frac{days}{yr} * \frac{1 Mg}{1x10^6 \ grams}$$
 Equation 1

Where:

EL<sub>BTEX</sub> = Unit-specific BTEX emission limit, megagrams per year;

 $3.10 \times 10^{-4} = BTEX$  emission limit, grams BTEX/standard cubic meter-ppmv;

Throughput = Annual average daily natural gas throughput, standard cubic meters per day;

C<sub>i,BTEX</sub> = Annual average BTEX concentration of the natural gas at the inlet to the glycol dehydration unit, ppmv.

# Appendix 8. Reporting

#### A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ Report Certification form (EQP 5736) and MDEQ Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

#### **B.** Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.