

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

October 25, 2023

PERMIT TO INSTALL
206-01A

ISSUED TO

DTE Gas Company, Belle River Compressor Station Company, Downtown Headquarters

LOCATED AT
5440 Puttygut Road
China Township, Michigan 48054

IN THE COUNTY OF
St. Clair

STATE REGISTRATION NUMBER
B6478

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: July 26, 2023	
DATE PERMIT TO INSTALL APPROVED: October 25, 2023	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install 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 this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit 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 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. 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 Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department 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 condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. 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)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

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
EUDEHY	Glycol dehydration system processing with a thermal oxidizer Emissions Control Unit (ECU).	01-01-2003	FGMACTHHHLARGE
EUDEHY2	Glycol dehydration system processing contains a 2.75 MMBTU/hr natural gas-fired reboiler, with a maximum throughput of 1,100 MMSCFD. Controlled by a 2.0 MMBTU/hr natural gas-fired thermal oxidizer.	TBD	FGMACTHHHLARGE

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

**EUDEHY
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Glycol dehydration system processing.

Flexible Group ID: FGMACTHHHLARGE

POLLUTION CONTROL EQUIPMENT

EUDEHY is controlled by a thermal oxidizer. .

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Benzene	0.43 tpy	12-month rolling time period as determined at the end of each calendar month	EUDEHY	SC III. 1, SC IV. 1, SC IV. 2, SC V. 1, SC VII. 2	R 336.1205(3), R 336.1225
2. VOC	9 tpy	12-month rolling time period as determined at the end of each calendar month	EUDEHY	SC III. 1, SC IV. 1, SC IV. 2, SC V. 1, SC VII. 2	R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The glycol re-circulation rate of the EUDEHY shall not exceed a maximum of 30 gallons per minute (two 15 gallon per minute pumps running simultaneously). **(R 336.1205(3), R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not process natural gas in the EUDEHY unless the flash tank is installed, maintained, and operating properly. Proper operation requires routing the flash tank exhaust gas to the ECU for destruction. **(R 336.1205(3), R 336.1225, R 336.1702(a))**
2. The permittee shall not process natural gas in the EUDEHY unless the ECU is installed, maintained, and operating properly. Proper operation of the ECU requires a minimum VOC destruction efficiency of 99% (by weight), maintaining a minimum temperature of 1400°F and a minimum retention time of 0.5 seconds. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1910)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

- At least once each calendar year the permittee shall obtain by sampling an analysis of the wet gas stream. The sample analysis shall include analysis for nitrogen, carbon dioxide, hydrogen sulfide, C1 through C6 series, benzene, toluene, xylene, ethylbenzene, and hexane. Any request for a change in the sampling frequency must be submitted to the AQD District Supervisor for review and approval. **(R336.1205(3), R336.1225, R336.1702(a))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

- The permittee shall monitor the glycol re-circulation rate of the EUDEHY on at least once each calendar month in a manner and with instrumentation acceptable to the AQD District Supervisor. **(R 336.1205(3), R 336.1225, R 336.1702(a))**
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the temperature in the ECU on a continuous basis and trigger an alarm if the temperature falls below 1450°F and shut down EUDEHY if the temperature falls below 1400°F. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1910)**

VII. REPORTING

- The permittee shall calculate the VOC and benzene emission rates from the EUDEHY for each calendar month, using a method acceptable to the AQD District Supervisor. If GRI-GLYCalc (Version 3.0 or higher) is used to calculate the emission rates, the inputs to the model shall be representative of actual operating conditions of the EUDEHY and shall include the most recent gas analysis data. Any request for a change in the calculation frequency must be submitted to the AQD District Supervisor for review and approval. Records of VOC and benzene emission rates are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request. **(R336.1205(3), R336.1225, R336.1702(a))**
- The following records are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request.

Record	Applicable Requirements
Wet gas composition as determined through analysis of wet gas samples as required in Special Condition 6	R336.1205(3), R336.1225, R336.1702(a)
Monthly records of the glycol re-circulation rate of the EUDEHY.	R336.1205(3), R336.1225, R336.1702(a)
Monthly records of ECU low temperature alarms and shutdowns.	R336.1205(3), R336.1225, R336.1702(a)

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 Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVDEHY	48	33	R336.1225

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

EUDEHY2 EMISSION UNIT CONDITIONS

DESCRIPTION

Glycol dehydration system processing contains a 2.75 MMBTU/hr natural gas-fired reboiler with a maximum throughput of 1,100 MMSCFD.

Flexible Group ID: FGMACTHHH

POLLUTION CONTROL EQUIPMENT

2.0 MMBTU/hr natural gas-fired thermal oxidizer.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not use stripping gas in EUDEHY2. **(R 336.1205, R 336.1225, R 336.1702(a))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUDEHY2 for more than 3,800 hours per 12-month rolling time-period as determined at the end of each calendar month. **(R 336.1205, R 336.1225, R 336.1702(a))**
2. The glycol recirculation rate for EUDEHY2 shall not exceed a maximum of 44.0 gallons per minute (22.0 gallons per minute for each pump). **(R 336.1205, R 336.1225, R 336.1702(a))**
3. Within 180 days of system start-up, the permittee shall submit to the AQD District Supervisor, for review and approval, a preventative maintenance/malfunction abatement plan (PM/MAP) for EUDEHY2. After approval of the PM/MAP by the AQD District Supervisor, the permittee shall not operate EUDEHY2 unless the PM/MAP, or an alternate plan approved by the AQD District Supervisor, is implemented, and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. At a minimum, the plan shall include:
 - a) Identification of the equipment and, if applicable, air-cleaning device and the supervisory personnel responsible for overseeing the inspection, maintenance, and repair.
 - b) Description of the items or conditions to be inspected and frequency of the inspections or repairs.
 - c) Identification of the equipment and if applicable, air-cleaning device, operating parameters that shall be monitored to detect a malfunction or failure, the normal operating range of these parameters and a description of the method of monitoring or surveillance procedures.
 - d) Identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - e) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If the plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the plan within 45 days after such an event occurs and submit the revised plan for approval to the AQD District Supervisor. Should the AQD determine the PM/MAP to be inadequate, the AQD District Supervisor may request modification of the plan to address those inadequacies. **(R 336.1205, R 336.1702(a), R 336.1910, R 336.1911, R 336.1912, 40 CFR 52.21(c) & (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUDEHY2 unless the flash tank exhaust gas and non-condensable regenerator exhaust gas are routed to the reboiler and/or thermal oxidizer for destruction. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. At least once each calendar year that EUDEHY2 operates, the permittee shall obtain, by sampling, an analysis of the wet gas stream. The permittee shall analyze the sample for nitrogen, carbon dioxide, hydrogen sulfide, C1 through C6 series hydrocarbons, benzene, toluene, xylene, ethylbenzene, and heptane plus. The permittee must submit any request for a change in the sampling frequency to the AQD District Supervisor for review and approval. **(R 336.1205, R 336.1225, R 336.1702(a))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, R 336.1225, R 336.1702(a))**
2. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period hours of operation, for EUDEHY2 as required by SC III.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1702(a))**
3. The permittee shall keep, in a satisfactory manner, records of the wet gas composition as determined through analysis of wet gas samples for EUDEHY2, as required by SC V.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702(a))**

VII. REPORTING

NA

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 Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVDEHY2	30	42	R 336.1225 40 CFR 52.21(c) & (d)

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

FLEXIBLE GROUP SPECIAL CONDITIONS

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
FGMACTHHHLARGE	Requirements for large glycol dehydrators (each dehydrator with an actual annual average natural gas flowrate equal to or greater than 283.0 thousand standard cubic meters per day) complying with the 0.9 Mg/yr control option under 40 CFR 63.1275(b)(1)(ii) at major sources of Hazardous Air Pollutants per 40 CFR Part 63, Subpart HHH.	EUDEHY and EUDEHY2

FGMACTHHHLARGE FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Requirements for large glycol dehydrators (each dehydrator with an actual annual average natural gas flowrate equal to or greater than 283.0 thousand standard cubic meters per day) complying with the 0.9 Mg/yr control option under 40 CFR 63.1275(b)(1)(ii) at major sources of Hazardous Air Pollutants per 40 CFR Part 63, Subpart HHH.

Emission Unit: EUDEHY and EUDEHY2.

POLLUTION CONTROL EQUIPMENT

EUDEHY is controlled by a thermal oxidizer.

EUDEHY2 is controlled by a 2.0 MMBTU/hr natural gas-fired thermal oxidizer.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Benzene	<0.9 Mg/yr	Annual	Each unit in FGMACTHHHLARGE	SC V.2, SC VI.25	40 CFR 63.1275(b)(1)(ii)

II. MATERIAL LIMIT(S)

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 except when the permittee is following the requirements of 40 CFR 1275(c). **(40 CFR 63.1275(b)(1)(ii), 40 CFR 63.1275(c))**
2. In all cases where the provisions of 40 CFR 63, Subpart HHH require the permittee to repair leaks by a specified time after the leak is detected, it is a violation of 40 CFR 63, Subpart HHH to fail to take action to repair the leak(s) within the specified time. If action is taken to repair the leak(s) within the specified time, failure of that action to successfully repair the leak(s) is not a violation of this standard. However, if the repairs are unsuccessful, and a leak is detected, the permittee shall take further action as required by the applicable provisions of this subpart. **(40 CFR 63.1274(g))**
3. At all times, the permittee must operate and maintain each glycol dehydrator, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.1274(h))**
4. As an alternative to the requirements of paragraph 40 CFR 63.1275(b), the permittee may comply with one of the following: **(40 CFR 63.1275(c))**

- a) The permittee shall control air emissions by connecting the process vent to a process natural gas line. **(40 CFR 63.1275(c)(1))**
 - b) The owner or operator shall demonstrate, to the Administrator's satisfaction, that the total HAP emissions to the atmosphere from the large glycol dehydration unit process vent are reduced by 95.0 percent through process modifications or a combination of process modifications and one or more control devices, in accordance with the requirements specified in 40 CFR 63.1281(e).
 - c) Control of HAP emissions from gas-condensate-glycol (GCG) separator (flash tank) vent is not required if the permittee demonstrates, to the Administrator's satisfaction, that total emissions to the atmosphere from the glycol dehydration unit process vent are reduced by one of the levels specified in paragraph 40 CFR 63.1275(c)(3)(i) through (iv) through the installation and operation of controls as specified in paragraph 40 CFR 63.1275(b)(1). **(40 CFR 63.1275(c)(3))**
 - i. For any large glycol dehydration unit, HAP emissions are reduced by 95.0 percent or more. **(40 CFR 63.1275(c)(3)(i))**
 - ii. For any large glycol dehydration unit, benzene emissions are reduced to a level less than 0.90 megagrams per year. **(40 CFR 63.1275(c)(3)(ii))**
5. For each glycol dehydrator's control device whose model was tested under 40 CFR 63.1282(g), the permittee shall develop an inspection and maintenance plan for each control device. At a minimum, the plan shall contain the control device manufacturer's recommendations for ensuring proper operation of the device. Semi-annual inspections shall be conducted for each control device with maintenance and replacement of control device components made in accordance with the plan. **(40 CFR 63.1283(b))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install and operate a continuous parameter monitoring system (CPMS) for each glycol dehydrator in accordance with the following requirements: **(40 CFR 63.1283(d)(1))**
 - a) Each CPMS shall measure data values at least once every hour and record either:
 - i. Each measured data value.
 - ii. Each block average value for each one-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.
2. For each glycol dehydrator, the permittee shall install, calibrate, operate, and maintain a device equipped with a continuous recorder to measure the values of operating parameters appropriate for the control device as specified below. **(40 CFR 63.1283(d)(3))**
 - a) For a thermal vapor incinerator (i.g. thermal oxidizer) that demonstrates during the performance test conducted under § 63.1282(d) that combustion zone temperature is an accurate indicator of performance, a temperature monitoring device equipped with a continuous recorder. The monitoring device shall have a minimum accuracy of ± 2 percent of the temperature being monitored in $^{\circ}\text{C}$, or ± 2.5 $^{\circ}\text{C}$, whichever value is greater. The temperature sensor shall be installed at a location representative of the combustion zone temperature.
3. The permittee shall not operate the applicable glycol dehydration unit unless each process vent is connected to a control device or combination of control devices through a closed-vent system. The closed vent system shall be designed and operated in accordance with the following requirements: **(40 CFR 63.1274(c), 40 CFR 63.1275(b)(1)(ii), 40 CFR 63.1275(c), 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 an emission unit to a control device that meets the requirements specified in 40 CFR 63.1281(d). **(40 CFR 63.1281(c)(1))**
 - b) The closed-vent system shall be designed and operated with no detectable emissions. **(40 CFR 63.1281(c)(2))**
 - c) For each bypass device, except as provided for in 40 CFR 63.1281(c)(3)(ii), in the closed-vent system that could divert all or a portion of the gases, vapors, or fumes from entering the control device, the permittee shall either: **(40 CFR 63.1281(c)(3)(i))**

- i. At the inlet to the bypass device that could divert the stream away from the control device to the atmosphere, properly install, calibrate, maintain, and operate a flow indicator that is capable of taking periodic readings and sounding an alarm when the bypass device is open such that the stream is being, or could be, diverted away from the control device to the atmosphere.
 - ii. Secure the bypass device valve installed at the inlet to the bypass device in the non-diverting position using a car-seal or lock-and-key type configuration.
 - d) Low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and safety devices are not subject to the requirements of 40 CFR 63.1281(c)(3)(i). **(40 CFR 63.1281(c)(3)(ii))**
4. The control device(s) for each glycol dehydrator shall be designed and operated in accordance with the following requirements: **(40 CFR 63.1274(c), 40 CFR 63.1281(d))**
 - a. An enclosed combustion device (e.g., thermal vapor incinerator, catalytic vapor incinerator) shall be designed and operated in accordance with one of the following performance requirements: **(40 CFR 63.1281(d)(1)(i))**
 - (A) Reduces the mass content of either TOC or total HAP in the gases vented to the device by 95.0 percent by weight or greater as determined in accordance with the requirements of 40 CFR 63.1282(d).
 - (B) Reduces the concentration of either TOC or total HAP in the exhaust gases at the outlet to the device to a level equal to or less than 20 parts per million by volume on a dry basis corrected to 3 percent oxygen as determined in accordance with the requirements of 40 CFR 63.1282(d).
 - (C) Operates at a minimum temperature of 760 degrees C, provided the control device has demonstrated, under 40 CFR 63.1282(d), that combustion zone temperature is an indicator of destruction efficiency.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. 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) The permittee shall install and operate a monitoring instrument that directly measures natural gas flowrate to each glycol dehydration unit with an accuracy of plus or minus two (± 2) percent or better. The permittee shall convert the annual natural gas flowrate to a daily average by dividing the annual flowrate by the number of days per year the glycol dehydration unit processed natural gas.
 - b) The permittee shall document to the Administrator's satisfaction, the actual annual average natural gas flow rate to each glycol dehydration unit.
2. Determination of actual average benzene emissions from each glycol dehydration unit shall be made using the procedures of either 40 CFR 63.1282(a)(2) (i) or (ii) below. Emissions shall be determined either uncontrolled or with federally enforceable controls in place. **(40 CFR 63.1282(a)(2))**
 - a) The permittee shall determine actual average benzene emissions using the model GRI-GLYCalcTM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalcTM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1).
 - b) The permittee shall determine an average mass rate of benzene emissions in kilograms per hour through direct measurement by performing three runs of Method 18 in 40 CFR part 60, Appendix A, or ASTM D6420-99 (Reapproved 2004) (incorporated by reference as specified in 40 CFR 63.14), as specified in 40 CFR 63.772(a)(1)(ii), or an equivalent method, and averaging the results of the three runs. Annual

emissions in kilograms per year shall be determined by multiplying the mass rate by the number of hours the unit is operated per year. This result shall be converted to megagrams per year.

3. For each glycol dehydrator, 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))**
4. For glycol dehydrators using a thermal oxidizer as the control device, the permittee shall demonstrate that the thermal oxidizer meets the requirements of 40 CFR 1281(d)(1) by conducting a performance test in accordance with 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 sites shall be located at the inlet of the first control device and at the outlet of the final control device.
 - b) The gas volumetric flowrate shall be determined using Method 2, 2A, 2C, or 2D, 40 CFR Part 60, Appendix A, as appropriate.
 - c) To determine compliance with the control device percent reduction performance requirement in 40 CFR 63.1281(d)(1)(i)(A) the owner or operator shall use either Method 18, 40 CFR Part 60, appendix A, or Method 25A, 40 CFR Part 60, appendix A; or ASTM D6420–99 (incorporated by reference as specified in 40 CFR 63.14), as specified in 40 CFR 63.772(a)(1)(ii); alternatively, any other method or data that have been validated according to the applicable procedures in Method 301 of appendix A within 40 CFR Part 63 may be used. The percentage of reduction shall be calculated using the procedures in 40 CFR 63.1282(d)(3)(iii).
 - D) To determine compliance with the enclosed combustion device total HAP concentration limit specified in 40 CFR 63.1281(d)(1)(i)(B), the permittee shall use either Method 18, 40 CFR part 60, appendix A; or Method 25A, 40 CFR part 60, appendix A; or ASTM D6420–99 (Reapproved 2004) (incorporated by reference as specified in 40 CFR 63.14), as specified in 40 CFR 63.772(a)(1)(ii), to measure either TOC (minus methane and ethane) or total HAP. Alternatively, any other method or data that have been validated according to Method 301 of appendix A within 40 CFR Part 63, may be used. The HAP concentration shall be calculated using the procedures in 40 CFR 63.1282(d)(3)(iv).
 - e) The permittee shall conduct performance tests according to the following schedule:
 - i. An initial performance test shall be conducted no later than 180 days after startup.
 - ii. Except as specified in 40 CFR 63.1282(e)(3)(vi)(B)(1) and (2) below, periodic performance tests shall be conducted for all control devices required to conduct initial performance tests. The first periodic performance test shall be conducted no later than 60 months after the initial performance test required in 40 CFR 63.1282(d)(3)(vi)(A). 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. Combustion control devices meeting the criteria in either 40 CFR 63.1282(d)(3)(vi)(B)(1) and (2) below are not required to conduct periodic performance tests:
 - A. A combustion control device whose model is tested under, and meets the criteria of, the manufacturers performance testing in 40 CFR 63.1282(g).
 - B. A combustion control device demonstrating during the performance test under 40 CFR 63.1282(d) that combustion zone temperature is an indicator of destruction efficiency and operates at a minimum temperature of 1400 degrees Fahrenheit.
5. As an alternative to conducting a performance test under 40 CFR 63.1282(d)(3), the permittee may use a control device that can be demonstrated to meet the performance requirements of 40 CFR 63.1281(d)(1) through a performance test conducted by the manufacturer, as specified in 40 CFR 63.1282(g). **(40 CFR 63.1282(d))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall maintain records of the annual facility natural gas throughput each year. **(40 CFR 63.1270(a)(3))**

2. For each glycol dehydrator, the permittee shall comply with the requirements below in order to show compliance with 40 CFR 63.1281(d)(1): **(40 CFR 63.1281(d)(1), 40 CFR 63.1282(e))**
 - a) Establish a site-specific minimum monitoring parameter value according to the requirements of 40 CFR 63.1283(d)(5)(i).
 - b) The permittee shall calculate the daily average of the applicable monitored parameter in accordance with 40 CFR 63.1283(d)(4) except that the inlet gas flowrate to the control device shall not be averaged.
 - c) Compliance is achieved when the daily average of the monitoring parameter value calculated under paragraph 40 CFR 63.1282(e)(2) is equal to or greater than the minimum monitoring value established under paragraph 40 CFR 63.1282(e)(1). For inlet gas flowrate, compliance with the operating parameter limit is achieved when the value is equal to or less than the value established under the performance test conducted under 40 CFR 63.1282(d), as applicable. 40 CFR 63.1283(d)(4) except that the inlet gas flowrate to the control device shall not be averaged.
3. For each glycol dehydrator, the permittee shall operate the CPMS at all times when the glycol dehydration system is operating except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (including, as applicable, system accuracy audits and required zero and span adjustments). A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. Monitoring system repairs are required to be completed in response to monitoring system malfunctions and to return the monitoring system to operation as expeditiously as practicable. **(40 CFR 63.1282(e)(4))**
4. Data recorded during monitoring system malfunctions, repairs associated with monitoring system malfunctions, or required monitoring system quality assurance or control activities may not be used in calculations used to report emissions or operating levels. All the data collected during all other required data collection periods must be used in assessing the operation of the control device and associated control system. **(40 CFR 63.1282(e)(5))**
5. Except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required quality monitoring system quality assurance or quality control activities (including, as applicable, system accuracy audits and required zero and span adjustments), failure to collect required data is a deviation of the monitoring requirements. **(40 CFR 63.1282(e)(6))**
6. Except as provided in paragraphs 40 CFR 63.1283(c)(5) and (6), the permittee shall inspect each closed-vent system and each bypass device for each glycol dehydrator according to the procedures and schedule specified below: **(40 CFR 63.1274(c), 40 CFR 63.1283(c)(2))**
 - a) For each closed-vent system joints, seams, or other connections that are permanently or semi-permanently sealed (e.g., a welded joint between two sections of hard piping or a bolted or gasketed ducting flange) the permittee shall: **(40 CFR 63.1283(c)(2)(i))**
 - i. Conduct an initial inspection according to 40 CFR 63.1282(b) to demonstrate that the closed-vent system operates with no detectable emissions.
 - ii. 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.
 - b) For closed-vent system components other than those specified in 40 CFR 63.1283(c)(2)(i), the permittee shall: **(40 CFR 63.1283(c)(2)(ii))**
 - i. Conduct an initial inspection according to 40 CFR 63.1282(b) to demonstrate that the closed-vent system operates with no detectable emissions.
 - ii. Conduct annual inspections according to 40 CFR 63.1282(b) to demonstrate that the components or connections operate with no detectable emissions.
 - iii. 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.

- c) 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: **(40 CFR 63.1283(c)(2)(iii))**
 - i. 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.
 - ii. 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.
7. 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 (40 CFR 63.1283(c)(4)). **(40CFR 63.1274(c), 40 CFR 63.1283(c)(3))**
 - a) A first attempt at repair shall be made no later than five calendar days after the leak is detected.
 - b) Repair shall be completed no later than 15 calendar days after the leak is detected.
8. 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 40 CFR 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. **(40 CFR 63.1274(c), 40 CFR 63.1283(c)(4))**
9. 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 40 CFR 63.1283(c)(2)(i) and (ii). **(40 CFR 63.1274(c), 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 40 CFR 63.1283(c)(2)(i) and (ii).
 - b) The permittee has a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times.
10. 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 40 CFR 63.1283(c)(2)(i) and (ii) if: **(40 CFR 63.1274(c), 40 CFR 63.1283(c)(6))**
 - a) The permittee determines that the equipment cannot be inspected without elevating the inspecting personnel more than two meters above a support surface.
 - b) The permittee has a written plan that requires inspection of the equipment at least once every five years.
11. A site-specific monitoring plan must be prepared for each glycol dehydrator 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 approved site-specific monitoring plan. Using the process described in 40 CFR 63.8(f)(4), the permittee may request approval of monitoring system quality assurance and quality control procedures alternative to those specified in 40 CFR 63.1283(d)(1)(ii)(A)-(E), in the site-specific monitoring plan. **(40 CFR 63.1274(c), 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 in accordance with provisions in 40 CFR 63.8(c)(1) and (c)(3).

- e) Ongoing reporting and recordkeeping procedures in accordance with provisions in 40 CFR 63.10(c), (e)(1) and (e)(2)(i).
12. The permittee must conduct the CPMS equipment performance checks, system accuracy audits, or other audit procedures specified in the site-specific monitoring plan at least once every 12 months. **(40 CFR 63.1274(c), 40 CFR 63.1283(d)(1)(iii))**
13. The permittee shall conduct a performance evaluation of each CPMS in accordance with the site-specific monitoring plan. **(40 CFR 63.1274(c), 40 CFR 63.1283(d)(1)(iv))**
14. Using the data recorded by the monitoring system, except for inlet gas flowrate, 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))**
15. For 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 applicable performance requirements specified in 40 CFR 63.1281(d)(1). Each minimum or maximum operating parameter value shall be established as follows: **(40 CFR 63.1282(e)(1), 40 CFR 63.1283(d)(5)(ii))**
 - a) If the permittee conducts performance tests in accordance with the requirements of 40 CFR 63.1282(d)(3) to demonstrate that the control device achieves the applicable performance requirements specified in 40 CFR 63.1281(d)(1), then the minimum operating parameter value or 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 operates a control device where the performance test requirement was met under 40 CFR 63.1282(g) to demonstrate that the control device achieves the applicable performance requirements specified in 40 CFR 63.1281(d)(1), then the maximum inlet gas flowrate shall be established based on the performance test and supplemented, as necessary, by the manufacturer recommendations. For each excursion, 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.
16. Nothing required in 40 CFR 63.1283(d)(1) through (d)(8) shall be construed to allow or excuse a monitoring parameter deviation caused by any activity that violates other applicable provisions of 40 CFR Part 63 Subpart HHH. **(40 CFR 63.1274(c), 40 CFR 63.1283(d)(9))**
17. The permittee shall maintain files of all information (including all reports and notifications) required by this 40 CFR 63, Subpart HHH. The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or period. **(40 CFR 63.1284(b)(1))**
 - a) All applicable records shall be maintained in such a manner that they can be readily accessed.
 - b) The most recent 12 months of records shall be retained on site or shall be accessible from a central location by computer or other means that provides access within two hours after a request.
 - c) The remaining four years of records may be retained offsite.
 - d) Records may be maintained in hard copy or computer-readable form including, but not limited to, on paper, microfilm, computer, floppy disk, magnetic tape, or microfiche.
18. The permittee shall maintain the records specified in 40 CFR 63.10(b)(2). **(40 CFR 63.1284(b)(2))**

19. The permittee shall maintain records specified in 40 CFR 63.10(c) for each monitoring system in accordance with the requirements of 40 CFR 63.1283(d). Notwithstanding the previous sentence, monitoring data recorded during periods identified in paragraphs 40 CFR 63.1284(b)(3)(i) through (iv) below shall not be included in any average or percent leak rate computed under 40 CFR Part 63 HHH. Records shall be kept of the times and durations of all such periods and any other periods during process or control device operation when monitors are not operating or failed to collect required data. **(40 CFR 63.1284(b)(3))**
 - a) Monitoring system breakdown, repairs, calibration checks, and zero (low-level) and high-level adjustments.
 - b) Periods of non-operation resulting in cessation of the emissions to which the monitoring applies.
 - c) Excursions due to invalid data as defined in 40 CFR 63.1283(d)(6)(iii).

20. The permittee shall keep the following records up-to-date and readily accessible: **(40 CFR 63.1274, 40 CFR 63.1284(b)(4), 40 CFR 63.1284(g), 40 CFR 63.1284(h))**
 - a) Continuous record of the equipment operating parameters specified to be monitored under 40 CFR 63.1283(d) or specified by the Administrator in accordance with 40 CFR 63.1283(d)(3)(iii).
 - b) Records of the daily average value of each continuously monitored parameter for each operating day determined according to the procedures specified in 40 CFR 63.1283(d)(4) except as specified in paragraphs 40 CFR 63.1284(b)(4)(ii)(A) through (C).
 - c) 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.
 - d) Where a seal or closure mechanism is used to comply with 40 CFR 63.1281(c)(3)(i)(B), hourly records of flow are not required. In such cases, the permittee 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.

21. The permittee shall maintain records identifying all parts of the closed-vent system that are designated as unsafe to inspect in accordance with 40 CFR 63.1283(c)(5), an explanation of why the equipment is unsafe to inspect, and the plan for inspecting the equipment. **(40 CFR 63.1283(c)(7), 40 CFR 63.1284(b)(5))**

22. The permittee shall maintain records identifying all parts of the closed-vent system that are designated as difficult to inspect in accordance with 40 CFR 63.1283(c)(6), an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment. **(40 CFR 63.1283(c)(6), 40 CFR 63.1284(b)(6))**

23. The permittee shall maintain the following records for each inspection conducted in accordance with 40 CFR 63.1283(c), during which a leak or defect is detected: **(40 CFR 63.1283(c)(7), 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 40 CFR 63.1282(b) after the leak or defect is successfully repaired or determined to be nonrepairable.
 - 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 owner or operator (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.
 - g) Dates of shutdowns that occur while the equipment is unrepaired.
 - h) The date of successful repair of the leak or defect.

24. For each inspection conducted in accordance with 40 CFR 63.1283(c) 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 63.1283(c)(7), 40 CFR 63.1284(b)(8))**
25. For each glycol dehydrator, the permittee shall provide, to the Administrator's satisfaction, the following items in order to comply with the benzene emission limit specified in 40 CFR 63.1275(b)(1)(ii): **(40 CFR 63.1275(b)(1)(ii), 40 CFR 63.1284(c))**
 - a) The method used for achieving compliance and the basis for using this compliance method; and
 - b) The method used for demonstrating compliance with 0.90 megagrams per year of benzene.
 - c) Any information necessary to demonstrate compliance as required in the methods specified in 40 CFR 63.1284(c)(1) and (c)(2) above.
26. The permittee shall maintain records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control equipment and monitoring equipment. The permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.1274(h), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. **(40 CFR 63.1274(c), 40 CFR 63.1284(f))**

VII. REPORTING

1. 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))**
2. The permittee shall submit a Notification of Compliance Status Report as required under 40 CFR 63.9(h) within 180 days after startup. In addition to the information required under 40 CFR 63.9(h) the Notification of Compliance Status Report shall include the information specified below. If the permittee 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(b)(4), 40 CFR 63.1285(d))**
 - a) If a closed-vent system and a control device other than a flare are used to comply with 40 CFR 63.1274, the permittee shall submit the information in 40 CFR 63.1285(d)(1)(iii), and the information in either 40 CFR 63.1285(d)(1)(ii). **(40 CFR 63.1285(d)(1))**
 - i. If the permittee is required to conduct a performance test, the performance test results including the information specified in 40 CFR 63.1285(d)(1)(ii) and in (A) and (B) below. 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 40 CFR 63.1282(d)(3), and that the test conditions are representative of current operating conditions. If the permittee operates a combustion control device model tested under 40 CFR 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/airquality/oilandgas/.
 - 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 40 CFR 63.1282(d)(3).
 - B. The value of the monitored parameters specified in 40 CFR 63.1283(d), or a site-specific parameter approved by the permitting agency, averaged over the full period of the performance test.
 - ii. The results of the closed-vent system initial inspections performed according to the requirements in 40 CFR 63.1283(c)(2)(i) and (ii).
 - b) The permittee shall submit one complete test report for each test method used for a particular source. **(40 CFR 63.1285(d)(3))**
 - i. For additional tests performed using the same test method, the results specified in 40 CFR 63.1285(d)(3)(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 40 CFR 63.1274, the permittee shall submit the information specified in 40 CFR 63.1285(d)(4)(i)-(iv), as applicable, below for each operating parameter required to be monitored in accordance with the requirements of **40 CFR 63.1283(d), (40 CFR 63.1285(d)(4))**
- a) 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 40 CFR 63.1281(d)(1) or 40 CFR 63.1281(e)(3)(ii).
 - b) An explanation of the rationale for why the permittee selected each of the operating parameter values established in 40 CFR 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 40 CFR 63.1281(d)(1).
 - c) 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. **(40 CFR 63.1285(d)(5))**
 - e) The permittee 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 40 CFR Part 63, Subpart HHH, the permittee shall submit the notification of compliance status to the appropriate permitting authority following completion of the relevant compliance demonstration activity specified in this subpart. **(40 CFR 63.1285(d)(6))**
 - f) For each glycol dehydrator, the permittee shall submit the records required under 40 CFR 63.1284(c) to comply with 40 CFR 63.1275(b)(1)(ii). **(40 CFR 63.1285(d)(7))**
 - g) The permittee shall submit an analysis demonstrating whether an affected source is a major source using the maximum throughput calculated according to 40 CFR 63.1270(a). **(40 CFR 63.1285(d)(8))**
 - h) The permittee shall submit a statement as to whether the source has complied with the requirements of 40 CFR Part 63, Subpart HHH. **(40 CFR 63.1285(d)(9))**
 - i) If the permittee installs a combustion control device model tested under the manufacturer's performance test procedures in 40 CFR 63.1282(g), the Notification of Compliance Status Report shall include the data listed under 40 CFR 63.1282(g)(8). **(40 CFR 63.1285(d)(11))**
 - j) For each combustion control device model tested under 40 CFR 63.1282(g), the information listed in 40 CFR 63.1285(d)(12)(i)-(vi) below: **(40 CFR 63.1285(d)(12))**
 - i. Name, address, and telephone number of the control device manufacturer.
 - ii. Control device model number.
 - iii. Control device serial number.
 - iv. Date the model of control device was tested by the manufacturer.
 - v. Manufacturer's HAP destruction efficiency rating.
 - vi. Control device operating parameters, maximum allowable inlet gas flowrate.
3. The permittee shall prepare Periodic Reports in accordance with 40 CFR 63.1285(e)(1) and (2) below and submit them to the Administrator. **(40 CFR 63.1285(e))**
- a) A 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. **(40 CFR 63.1285(e)(1))**

- b) The permittee shall include the following information and any other information as applicable in 40 CFR 63.1285(e)(2). **(40 CFR 63.1285(e)(2))**
 - i. The information required under 40 CFR 63.10(e)(3). For the purposes of 40 CFR Part 63, Subpart HHH and the information required under 40 CFR 63.10(e)(3), excursions (as defined in 40 CFR 63.1283(d)(6)) shall be considered excess emissions.
 - ii. A description of all excursions as defined in 40 CFR 63.1283(d)(6) that have occurred during the six-month reporting period, and the information described below.
 - A. For each excursion caused when the daily average value of a monitored operating parameter is less than the minimum operating parameter limit (or, if applicable, greater than the maximum operating parameter limit), as specified in 40 CFR 63.1283(d)(6)(i), the report must include the daily average values of the monitored parameter, the applicable operating parameter limit, and the date and duration of the period that the excursion occurred.
 - B. For each excursion caused by lack of monitoring data, as specified in 40 CFR 63.1283(d)(6)(iii), the report must include the date and duration of period when the monitoring data were not collected and the reason why the data were not collected.
 - C. For each excursion caused when the maximum inlet gas flowrate identified under 40 CFR 63.1282(g) is exceeded, the report must include the values of the inlet gas identified and the date and duration of the period that the excursion occurred.
 - D. For each excursion caused when visible emissions determined under 40 CFR 63.1282(h) exceed the maximum allowable duration, the report must include the date and duration of the period that the excursion occurred, repairs affected to the unit, and date the unit was returned to service.
 - iii. For each inspection conducted in accordance with 40 CFR 63.1283(c) during which a leak or defect is detected, the records described in condition 40 CFR 63.1284(b)(7) must be included in the next Periodic Report.
 - iv. For each closed-vent system with a bypass line subject to 40 CFR 63.1281(c)(3)(i)(A), records required under 40 CFR 63.1284(b)(4)(iii) of all periods when the vent stream is diverted from the control device through a bypass line. For each closed-vent system with a bypass line subject to 40 CFR 63.1281(c)(3)(i)(B), records required under 40 CFR 63.1284(b)(4)(iv) of all periods in which the seal or closure mechanism is broken, the bypass valve position has changed, or the key to unlock the bypass line valve was checked out.
 - A. A statement identifying there were no excursions during the reporting period if applicable.
 - B. A statement identifying no continuous monitoring system has been inoperative, out of control, repaired, or adjusted if applicable.
 - v. Any change in compliance methods as described in 40 CFR 63.1282(e).
 - vi. The results of any periodic test as required in 40 CFR 63.1282(d)(3) conducted during the reporting period.
 - vii. For combustion control device inspections conducted in accordance with 40 CFR 63.1283(b) for control devices complying with the manufacturer's performance testing, the records specified in 40 CFR 63.1284(h).
 - viii. Certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
4. 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 the following: **(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 40 CFR 63.1285(d).
 - d) Information required by the Notification of Compliance Status Report under 40 CFR 63.1285(d) for changes involving the addition of processes or equipment.

5. Within 60 days after the date of completing a performance test (defined in 40 CFR 63.2) the permittee 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))**

VIII. STACK/VENT RESTRICTION(S)

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 HHH: Natural Gas Transmission and Storage Facilities. **(40 CFR Part 63, Subpart HHH)**