



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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Denver, CO 80202-1129
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Ref: 8P-AR

Mr. Kyle Hunderman
Red Willow Production Company
14933 Highway 172
P.O. Box 369
Ignacio, Colorado 81137

FEB 17 2017

Re: Administrative Revisions to Synthetic Minor New Source Review Permits
Samson Resources Company - Jaques Compressor Station,
Permit # SMNSR-SU-000043-2015.002; and
Samson Resources Company - South Ignacio Central Delivery Point,
Permit # SMNSR-SU-000031-2015.002

Dear Mr. Hunderman:

The U.S. Environmental Protection Agency, Region 8 received a request from Red Willow Production Company (Red Willow), dated November 8, 2016, to administratively revise the synthetic minor permits that the EPA issued to Samson Resources Company, pursuant to the Tribal Minor New Source Review (MNSR) Permit Program at 40 CFR part 49, for the Jaques Compressor Station and South Ignacio Central Delivery Point, (SMNSR-SU-000043-2015.002 and SMNSR-SU-000031-2015.002, respectively). Red Willow requested to revise the two MNSR permits to reflect a change in the owner and operator of the facilities. Red Willow acquired ownership of these facilities from Samson Resources Company, effective on November 14, 2016. These facilities will be operated by Red Cedar Gathering Company (Red Cedar).

The EPA has verified that the requested revisions qualify as administrative revisions under 40 CFR 49.159(f) and has revised the permits to incorporate Red Willow as the owner and Red Cedar as the operator. We hereby issue the enclosed revised MNSR permits for the Jaques Compressor Station, and South Ignacio Central Delivery Point (SMNSR-SU-000043-2016.003 and SMNSR-SU-000031-2016.003, respectively). Administrative permit revisions are not subject to the permit application, public participation, issuance or administrative and judicial review requirements of the MNSR Permit Program.

If you have any questions concerning the enclosed final permits, please contact Colin Schwartz of my staff at (303) 312-6043.

Sincerely,

Monica Morales, Acting Director
Air Program

Enclosures (2)

cc:

Mark A. Hutson, Air Quality Technical Manager, Southern Ute Indian Reservation
Bud Guffey, Productions Superintendent, Red Willow Production Company
Ethan Hinkley, Environmental Compliance Specialist, Red Cedar Gathering Company

United States Environmental Protection Agency
Region 8 Air Program
1595 Wynkoop Street
Denver, CO 80202



**Air Pollution Control
Synthetic Minor Source Permit to Construct**

40 CFR 49.151

SMNSR-SU-000043-2016.003

*Permit to Construct to establish legally and practically enforceable limitations
and requirements on sources at an existing facility*

Permittee:

Red Cedar Gathering Company

Permitted Facility:

Jaques Compressor Station
Southern Ute Indian Reservation
La Plata County, Colorado

Summary

On November 8, 2016, Red Willow Production Company (Red Willow) notified the EPA of a transfer of ownership of Jaques Compressor Station from Samson Resources Company (Samson), effective on November 14, 2016. Jaques Compressor Station will be operated by Red Cedar Gathering Company. Red Willow requested to administratively revise a Minor New Source Review (MNSR) permit issued to Jaques Compressor Station on March 11, 2015 (permit #SMNSR-SU-000043-2015.002) to reflect the change in ownership and operation. There will be no changes in the environmental regulations and procedures that were permitted prior to the transfer of ownership.

The Jaques Compressor Station is located within the exterior boundaries of the Southern Ute Indian Reservation in Colorado and is comprised of equipment that dehydrates and compresses coalbed methane gas from several wells to transmission pipeline specifications. Gas entering the facility from the field is first fed to an inlet separator that gravimetrically removes water that may have formed or condensed during transportation from the supplying gas wells. Separator overhead gas is fed from a common suction header to one of six (6) natural gas-fired 4-stroke lean-burn (4SLB) reciprocating internal combustion engines used for gas compression. The compressors discharge gas to a common discharge heater that feeds to scrubbers. The scrubbers separate and collect liquids that may have formed during compression. The compressed gas is fed to two (2) tri-ethylene glycol (TEG) dehydration units. TEG is circulated counter-currently and absorbs water from the saturated gas. Rich TEG is circulated to a reboiler, where moisture is driven to the atmosphere by heating the TEG. Dry gas exits the contactors and is directed to the sales line, where it is metered and exits the facility. The gas processing capacity of the facility is approximately 48 million standard cubic feet per day (MMscfd) with the six (6) compressor engines operating.

This permit action applies to an existing facility operating on the Southern Ute Indian Reservation in Colorado.

This permit revision does not authorize the construction of any new emission sources, nor does it otherwise authorize any other physical modifications to the facility or its operations. This permit revision is intended only to incorporate the change in ownership and operation of the existing facility.

The EPA has determined that issuance of this MNSR permit will not contribute to National Ambient Air Quality Standards (NAAQS) violations, or have potentially adverse effects on ambient air quality.

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I. Conditional Permit to Construct

A. General Information

<u>Facility:</u>	Red Cedar Gathering Company, Jacques Compressor Station
<u>Permit Number:</u>	SMNSR-SU-000043-2016.003
<u>SIC Code and SIC Description:</u>	1311- Crude Petroleum and Natural Gas
<u>Site Location:</u>	<u>Corporate Office Location</u>
Jacques Compressor Station	Red Cedar Gathering Company
NW ¼, Sec 26 T33N R8W	125 Mercado Street
Southern Ute Indian Reservation	Suite 201
La Plata County, CO	Durango, CO 81301

The equipment listed in this permit may only be operated by the Red Cedar Gathering Company at the following location:

Latitude 37.077944N, Longitude -107.691W

B. Applicability

1. This permit is being issued under authority of the MNSR permit program.
2. The requirements in this permit have been created, at the Permittee's request to establish legally and practically enforceable restrictions for limiting TEG dehydration unit benzene emissions and facility-wide formaldehyde (CH₂O) and total hazardous air pollutant (HAP) emissions.
3. Any conditions established for this facility or any specific units at this facility pursuant to any permit issued under the authority of the Prevention of Significant Deterioration (PSD) Permit Program or the MNSR Permit Program shall continue to apply.
4. By issuing this permit, the EPA does not assume any risk of loss which may occur as a result of the operation of the permitted facility by the Permittee, Owner, and/or Operator, if the conditions of this permit are not met by the Permittee, Owner, and/or Operator.

C. Facility-Wide Requirements

1. Emission Limits
 - (a) Facility-wide emissions of CH₂O shall not exceed 9.5 tons during any consecutive 12 months.
 - (b) Facility-wide emissions of total HAP shall not exceed 23.0 tons during any consecutive 12 months.
 - (c) Emission limits shall apply at all times.

2. CH₂O Monitoring Requirements

- (a) Facility-wide actual CH₂O emissions shall be calculated by the Permittee, in tons, and recorded at the end of each month, beginning with the first calendar month that this permit is effective.
- (b) Prior to 12 full months of facility-wide emissions calculations, the Permittee shall, at the end of each calendar month, add the emissions for that month to the calculated emissions for all previous calendar months and record the total. Thereafter, the Permittee shall, at the end of each calendar month, add the facility-wide emissions for that month to the calculated facility-wide emissions for the preceding 11 months and record a new 12 month total.
- (c) The Permittee shall include emissions from all controlled and uncontrolled emission sources at the facility in the calculations, including but not limited to insignificant emission units, as defined in 40 CFR 71.5(c)(11)(ii).
- (d) The facility-wide emissions of CH₂O shall be calculated as follows:
 - (i) Emission units with control devices:
 - (A) For engines equipped with catalytic control systems, CH₂O emissions for the month shall be calculated by multiplying the most recent performance test results for CH₂O for each engine in lb/hr, by the number of operating hours for the engine for that month. If data on operating hours are not available for that unit for that month, full-time operation of the unit (24 hours per day, 7 days per week) for that month shall be assumed.
 - (B) Monthly emissions for any engine break-in period, as specified in this permit, where the engine was operated without the catalyst control system installed, shall be calculated by multiplying the manufacturer-specified CH₂O emission factors for an uncontrolled engine by the hours the engine operated without the emission control system installed for that month.
 - (C) The calculated CH₂O emissions for each engine with catalytic control systems shall be added together to calculate the total CH₂O emissions for controlled engines for that month.
 - (ii) Emission units without control devices. For remaining emission units at the facility, emissions for the month for each unit shall be calculated by multiplying the CH₂O emission factor for that unit, in pounds per hour, by the number of operating hours for that unit for that month. If data on operating hours are not available for a unit for that month, full-time operation of that unit shall be assumed.

3. Total HAP Monitoring Requirements

- (a) Facility-wide actual HAP emissions shall be calculated by the Permittee, in tons, and recorded at the end of each month, beginning with the first full calendar month after operations at the facility commenced.
- (b) Prior to 12 full months of facility-wide emissions calculations, the Permittee shall, at the end of each calendar month, add the emissions for that month to the calculated emissions for all previous calendar months and record the total. Thereafter, the Permittee shall, at the end of each calendar month, add the facility-wide emissions for that month to the calculated facility-wide emissions for the preceding 11 months and record a new 12 month total.
- (c) The Permittee shall include emissions from all controlled and uncontrolled emission sources at the facility in the calculations, including but not limited to insignificant emission units, as defined in 40 CFR 71.5(c)(11)(ii).
- (d) The facility-wide emissions of total HAPs shall be calculated as follows:
 - (i) TEG Dehydration systems. Total HAP emissions from each TEG dehydration system shall be calculated according to the requirements for determining total HAPs from each dehydration system still vent in this permit;
 - (ii) CH₂O Emissions. CH₂O emissions shall be calculated according to the requirements for determining facility-wide CH₂O emissions in this permit; and
 - (iii) All other HAP emissions. For remaining emission units at the facility, emissions for the month for each unit shall be calculated by multiplying the HAP emission factors for that unit, in lb/hr, by the number of operating hours for that unit for that month. If data on operating hours are not available for a unit for that month, full-time operation of that unit shall be assumed. The Permittee shall provide the basis for the HAP emission calculations with the next annual emissions report required by this permit.

4. Recordkeeping Requirements

The Permittee shall maintain the following records:

- (a) The actual monthly and rolling 12-month facility-wide CH₂O and HAP emissions, in tpy;
- (b) All input parameters and calculations used to determine the monthly emissions from all controlled and uncontrolled emission sources at the facility; and
- (c) All deviations from the requirements of this permit.

D. Requirements for Engines

1. Construction and Operational Limits

- (a) The Permittee may install and operate no more than six (6) reciprocating internal combustion engines used for compression, each meeting the following specifications:

- (i) Operated as a 4-stroke lean-burn engine;
 - (ii) Fired with natural gas; and
 - (iii) Limited to a maximum site rating of 1,400 horsepower (hp).
- (b) The Permittee shall install, operate, and maintain a catalytic control system, as specified in this permit, on at least four (4) of the six (6) engines.
- (c) Only the natural gas-fired engines that are operated and controlled as specified in this permit are approved for installation under this permit.

2. Emission Limits

- (a) Emissions from each of the four (4) engines equipped with catalytic control systems, shall not exceed 0.21 lb/hr of CH₂O.
- (b) Emission limits shall apply at all times, unless otherwise specified in this permit.

3. Control and Operational Requirements

- (a) The Permittee shall ensure that the catalytic control system on each of the four (4) controlled engines is capable of reducing uncontrolled emissions of CH₂O to meet the emission limits specified in this permit.
- (b) The Permittee shall install, operate, and maintain temperature sensing devices (e.g., thermocouple or resistance temperature detectors) before the inlet to the catalyst bed on each of the four (4) engines equipped with catalytic control systems in order to continuously monitor the engine exhaust temperature at the inlet to the catalyst bed. Each temperature sensing device shall be calibrated and operated by the Permittee according to manufacturer specifications or equivalent specifications developed by the Permittee or vendor.
- (c) Except during startups, which shall not exceed 30 minutes, the engine exhaust temperature at the inlet to the catalyst bed on each of the four (4) engines equipped with catalytic control systems shall be maintained at all times the engines operate with an inlet temperature of at least 450 °F and no more than 1,350 °F.
- (d) During operation, the pressure drop across the catalyst bed on each engine shall be maintained to within ± 2 inches of water from the baseline pressure drop measured during the most recent performance test. The baseline pressure drop for the catalyst bed shall be determined at 100% \pm 10% of the engine load measured during the most recent performance test.
- (e) The Permittee shall only fire the six (6) 1,400 hp engines with natural gas. The natural gas shall be pipeline-quality in all respects except that the CO₂ concentration in the gas shall not be required to be within pipeline-quality.

- (f) The Permittee shall follow, for each engine and any respective catalytic control system, the manufacturer's recommended maintenance schedule and procedures, or equivalent procedures developed by the Permittee or vendor, to ensure optimum performance of each engine and its respective catalyst control system, as appropriate.
- (g) The Permittee may rebuild an existing permitted engine or replace an existing permitted engine with an engine of the same horsepower rating, and configured to operate in the same manner as the engine being rebuilt or replaced. Any emission limits, requirements, control technologies, testing or other provisions that apply to the permitted engines that are rebuilt or replaced shall also apply to the rebuilt or replaced engines.
- (h) The Permittee may resume operation without the catalytic control system during an engine break-in period, which shall not exceed 200 operating hours, for rebuilt and replaced engines.

4. Performance Testing Requirements

- (a) Performance tests shall be conducted on all six (6) 1,400 hp engines at the facility for measuring CH₂O emissions to demonstrate compliance with the facility-wide emission limits specified in this permit. The performance tests shall be conducted in accordance with appropriate reference methods specified in 40 CFR part 60, appendix A, 40 CFR part 63, appendix A, or an appropriate EPA-approved American Society for Testing and Materials (ASTM) methods. The Permittee may submit to the EPA a written request for approval of an alternate test method, but shall only use that alternate test method after obtaining approval from the EPA.
 - (i) The initial performance tests shall be conducted within 90 calendar days of startup of a new engine.
 - (ii) Subsequent performance tests for each of the four (4) engines at the facility that are equipped with catalytic control systems shall be performed within 90 calendar days of the most recent performance test to demonstrate compliance with the lb/hr CH₂O emission limits specified in this permit.
 - (iii) Performance tests shall be conducted within 90 calendar days of startup of all rebuilt engines and replaced engines.
 - (iv) Performance tests shall be conducted within 90 calendar days of each catalyst replacement on each of the four (4) engines at the facility that are equipped with catalytic control systems.
 - (v) For any one (1) of the four (4) engines equipped with catalytic control systems: If the results of two (2) consecutive subsequent quarterly performance tests demonstrate compliance with CH₂O emission limit, required testing frequency for CH₂O may change from quarterly to semi-annually.
 - (vi) For any one (1) of the four (4) engines equipped with catalytic control systems: If the results of any subsequent semi-annual performance tests demonstrate non-compliance with the CH₂O emission limits, required monitoring frequency for CH₂O shall revert back to quarterly.
- (b) The Permittee shall not perform engine tuning or make any adjustments to engine settings, catalytic control system settings, processes, or operational parameters the day of or during the engine testing. Any such tuning or adjustments may result in a

determination by the EPA that the test is invalid. Artificially increasing an engine load to meet testing requirements is not considered engine tuning or adjustments.

- (c) The Permittee shall not abort any engine tests that demonstrate non-compliance with the CH₂O emission limits.
- (d) Performance tests for CH₂O emissions shall meet the following requirements:
 - (i) For each of the four (4) engines at the facility that are equipped with catalytic control systems, the pressure drop across the catalyst bed and the inlet temperature to each catalyst bed shall be measured and recorded at least once per test during all performance tests;
 - (ii) All tests shall be performed at a maximum operating rate (90% to 110% of the maximum achievable load available at the time of the test). The Permittee may submit to the EPA a written request for approval of an alternate load level for testing, but shall only test at that alternate load level after obtaining written approval from the EPA;
 - (iii) During each test run, data shall be collected on all parameters necessary to document how emissions were measured or calculated (such as test run length, minimum sample volume, volumetric flow rate, moisture and oxygen corrections, etc.);
 - (iv) Each test shall consist of at least three 1-hour or longer valid test runs. Emission results shall be reported as the arithmetic average of all valid test runs and shall be in terms of the emission limits;
 - (v) Performance test plans shall be submitted to the EPA for approval 60 calendar days prior to the date the test is planned;
 - (vi) Performance test plans that have already been approved by the EPA for the emission units approved in this permit may be used in lieu of new test plans unless the EPA requires the submittal and approval of new test plans. The Permittee may submit new test plans for EPA approval at any time; and
 - (vii) The test plans shall include and address the following elements:
 - (A) Purpose of the test;
 - (B) Engines and any respective catalytic control systems to be tested;
 - (C) Expected engine operating rate(s) during the test;
 - (D) Sampling and analysis procedures (sampling locations, test methods, laboratory identification);
 - (E) Quality assurance plan (calibration procedures and frequency, sample recovery and field documentation, chain of custody procedures); and
 - (F) Data processing and reporting (description of data handling and quality control procedures, report content).

- (e) The Permittee shall notify the EPA at least 30 calendar days prior to scheduled performance testing. The Permittee shall notify the EPA at least 1 week prior to scheduled performance testing if the testing cannot be performed.
- (f) If the results of a complete and valid performance test of the emissions from any of the four (4) engines equipped with catalytic control systems demonstrate noncompliance with the emission limits in this permit, the engine shall be shut down as soon as safely possible, and appropriate corrective action shall be taken (e.g., repairs, catalyst cleaning, catalyst replacement). The Permittee shall notify the EPA in writing within 24 hours of each such shut down. The engine must be retested within 7 days of being restarted and the emissions must meet the applicable limits in this permit. If the retest shows that the emissions continue to exceed the limits in this permit, the engine shall again be shut down as soon as safely possible, and the engine may not operate, except for purposes of startup and testing, until the Permittee demonstrates through testing that the emissions do not exceed the emission limits in this permit.
- (g) If a permitted engine is not operating, the Permittee does not need to start up the engine solely to conduct a performance test. The Permittee may conduct the performance test when the engine is started up again.

5. Monitoring Requirements

- (a) The Permittee shall continuously measure the engine exhaust temperature at the inlet to the catalyst bed on each of the four (4) engines equipped with catalytic control systems.
- (b) Except during startups, which shall not exceed 30 minutes, if the engine exhaust temperature at the inlet to the catalyst bed deviates from the acceptable ranges specified in this permit then the following actions shall be taken. The Permittee's completion of any or all of these actions shall not constitute, nor qualify as, an exemption from any other emission limits in this permit.
 - (i) Within 24 hours of determining a deviation of the engine exhaust temperature at the inlet to the catalyst bed, the Permittee shall investigate. The investigation shall include testing the temperature sensing device, inspecting the engine for performance problems and assessing the catalytic control system for possible damage that could affect catalytic system effectiveness (including, but not limited to, catalyst housing damage, and fouled, destroyed or poisoned catalyst).
 - (ii) If the engine exhaust temperature at the inlet to the catalyst bed can be corrected by following the engine manufacturer recommended procedures, or equivalent procedures developed by the Permittee or vendor, and the catalytic control system has not been damaged, then the Permittee shall correct the engine exhaust temperature at the inlet to the catalyst bed within 24 hours of inspecting the engine and catalytic control system.
 - (iii) If the engine exhaust temperature at the inlet to the catalyst bed cannot be corrected using the engine manufacturer recommended procedures, or equivalent procedures developed by the Permittee or vendor, or the catalytic control system has been damaged, then the affected engine shall cease operating immediately and

shall not be returned to routine service until the following has been met:

- (A) The engine exhaust temperature at the inlet to the catalyst bed is measured and found to be within the acceptable temperature range for that engine; and
 - (B) The catalytic control system has been repaired or replaced, if necessary.
- (c) The Permittee shall monitor the pressure drop across the catalyst bed of each of the four (4) engines equipped with catalytic control systems once every calendar week using pressure sensing devices before and after the catalyst bed to obtain a direct reading of the pressure drop (also referred to as the differential pressure). *[Note to Permittee: Differential pressure measurements, in general, are used to show the pressure across the filter elements. This information will determine when the elements in the catalyst bed are fouling, blocked or blown out and thus require cleaning or replacement.]*
- (d) The Permittee shall perform the first measurement of the pressure drop across each catalyst bed no more than 7 days from the date of the initial performance test. Thereafter, the Permittee shall measure the pressure drop across the catalyst bed, at a minimum every 7 days. Subsequent performance tests, as required in this permit, can be used to meet the periodic pressure drop monitoring requirement provided it occurs within the 7-day window. The pressure drop reading can be a one-time measurement on that day, the average of performance test runs conducted on that day, or an average of all the measurements taken on that day if continuous readings are taken.
- (e) If the pressure drop reading exceeds ± 2 inches of water from the baseline pressure drop reading taken during the most recent performance test, then the following actions shall be taken. The Permittee's completion of any or all of these actions shall not constitute, nor qualify as, an exemption from any other emission limits in this permit.
 - (i) Within 24 hours of determining a deviation of the pressure drop across the catalyst bed, the Permittee shall investigate. The investigation shall include testing the pressure transducers and assessing the catalytic control system for possible damage that could affect catalytic system effectiveness (including, but not limited to, catalyst housing damage, and plugged, fouled, destroyed or poisoned catalyst).
 - (ii) If the pressure drop across the catalyst bed can be corrected by following the catalytic control system manufacturer recommended procedures, or equivalent procedures developed by the Permittee or vendor, and the catalytic control system has not been damaged, then the Permittee shall correct the problem within 24 hours of inspecting the catalytic control system.
 - (iii) If the pressure drop across the catalyst bed cannot be corrected using the catalytic control system manufacturer recommended procedures, or equivalent procedures developed by the Permittee or vendor, or the catalytic control system is damaged, then the Permittee shall do one of the following:
 - (A) Conduct a performance test as specified in this permit to ensure that the CH₂O emission limits are being met and to re-establish the pressure drop across the catalyst bed; or

- (B) Cease operating the affected engine immediately. The engine shall not be returned to routine service until the pressure drop is measured and found to be within the acceptable pressure range for that engine as determined from the most recent performance test. Corrective action may include removal and cleaning of the catalyst or replacement of the catalyst.
- (iv) The Permittee is not required to conduct parametric monitoring of exhaust temperature and catalyst differential pressure on engines that have not operated during the monitoring period. The Permittee shall certify that the engine(s) did not operate during the monitoring period in the annual report specified in this permit.

6. Recordkeeping Requirements

- (a) Records shall be kept of manufacturer specifications and maintenance requirements developed by the manufacturer, vendor, or Permittee for each engine, and each catalytic control system, temperature-sensing device, and pressure-measuring device required in this permit.
- (b) Records shall be kept of all calibration and maintenance conducted for each engine, and each catalytic control system, temperature-sensing device, and pressure-measuring device required in this permit.
- (c) Records shall be kept that are sufficient to demonstrate that the fuel used for each engine is pipeline quality natural gas in all respects, with the exception of CO₂ concentrations.
- (d) Records shall be kept of all temperature measurements required in this permit, as well as a description of any corrective actions taken pursuant to this permit.
- (e) Records shall be kept of all pressure drop measurements required in this permit, as well as a description of any corrective actions taken pursuant to this permit.
- (f) Records shall be kept of all required testing and monitoring in this permit. The records shall include the following:
 - (i) The date, place, and time of sampling or measurements;
 - (ii) The date(s) analyses were performed;
 - (iii) The company or entity that performed the analyses;
 - (iv) The analytical techniques or methods used;
 - (v) The results of such analyses or measurements; and
 - (vi) The operating conditions as existing at the time of sampling or measurement.
- (g) Records shall be kept of all catalyst replacements or repairs, engine rebuilds, and engine replacements.
- (h) Records shall be kept of each rebuilt or replaced engine break-in period for the four (4) engines equipped with catalytic control systems, pursuant to the requirements of this permit, where an existing engine that has been rebuilt or replaced resumes operation without the catalyst control system, for a period not to exceed 200 hours.

- (i) Records shall be kept of each time any of the four (4) engines equipped with catalytic control systems is shut-down due to a deviation in the inlet temperature to the catalyst bed or pressure drop across a catalyst bed. The Permittee shall include in the record the cause of the problem, the corrective action taken, and the timeframe for bringing the pressure drop and inlet temperature range into compliance.

E. Requirements for TEG Dehydration Systems

1. Construction and Operational Limits

- (a) The Permittee shall install and operate emission controls as specified in this permit on following TEG dehydration units:
 - (i) One (1) unit limited to a maximum natural gas processing capacity of 18 million standard cubic feet per day (MMscfd), equipped with a 0.6 million British thermal units per hour (MMBtu/hr) natural gas fired TEG reboiler; and
 - (ii) One (1) unit limited to a maximum natural gas processing capacity of 30 MMscfd, equipped with a 0.6 MMBtu/hr natural gas fired TEG reboiler.
- (b) Only the TEG dehydration units that are operated and controlled as specified in this permit are approved for installation and operation under this permit.

2. Emission Limits

- (a) Emissions of benzene from each of the TEG dehydration systems shall not exceed 0.9 tons in any consecutive 12 months.
- (b) The emission limits shall apply at all times.

3. Control and Operational Requirements

- (a) *TEG Dehydration Units.* The Permittee shall meet the following requirements for the TEG dehydration unit:
 - (i) Each TEG dehydration unit must be equipped with flash gas separators that route the flash gas back into the sales line, condensers, or an enclosed combustor capable of 98.0% benzene emission destruction efficiency;
 - (ii) All emissions from each TEG dehydration unit shall be routed through a closed-vent system to an emissions control system as specified in this permit; and
 - (iii) The Permittee shall follow, for each TEG dehydration unit and respective emission control system, the manufacturer's recommended maintenance schedule and procedures to ensure optimum performance.
- (b) *Closed-Vent Systems.* The Permittee shall meet the following requirements for the closed-vent systems:
 - (i) Each closed-vent system shall route all hydrocarbon emissions from the dehydration units to the control system required by this permit;

- (ii) All vent lines, connections, fittings, valves, relief valves, or any other appurtenance employed to contain and collect gases, vapors, and fumes and transport them to control equipment shall be maintained and operated during any time the control equipment is operating;
- (iii) Each closed-vent system shall be designed to operate with no detectable emissions;
- (iv) If any closed-vent system contains one or more bypass devices that could be used to divert all or a portion of the gases, vapors, or fumes from entering the control devices, the Permittee shall meet one of following requirements for each bypass device:
 - (A) At the inlet to the bypass device that could divert the stream away from the control device and into 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 and into the atmosphere;
 - (B) Secure the bypass device valve installed at the inlet to the bypass device in the non-diverting position using a car-seal or a lock-and-key type configuration; or
 - (C) Low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and safety devices are not subject to the requirements applicable to bypass devices; and
- (v) The Permittee shall minimize leaks of hydrocarbon emissions from all vent lines, connections, fittings, valves, relief valves, or any other appurtenance employed to contain, collect, and transport gases, vapors, and fumes to the control device.
- (c) *Enclosed Combustion Devices.* The Permittee shall meet the following requirements for each enclosed combustion device:
 - (i) For each enclosed combustion device, the Permittee shall follow the manufacturer's written operating instructions, procedures and maintenance schedule to ensure good air pollution control practices for minimizing emissions;
 - (ii) The Permittee shall ensure that each enclosed combustion device has sufficient capacity to achieve at least a 98.0% benzene emission destruction efficiency for the minimum and maximum hydrocarbon volumetric flow rate and BTU content routed to the device;
 - (iii) The Permittee must ensure that each enclosed combustion device is:
 - (A) A model demonstrated by a manufacturer to meet the benzene destruction efficiency requirements of this permit using the procedures specified in 40 CFR 60.5413(d) for VOC emissions by the due date of the first annual report specified in Condition I.G.1. of this permit; or
 - (B) Demonstrated by the Permittee to meet the benzene destruction efficiency

requirements of this permit by using the EPA approved performance test methods specified in 40 CFR 63.772 (e)(i) – (iii) for hazardous air pollutants, by the due date of the first annual report specified in Condition I.G.1. of this permit; and

- (iv) The Permittee must ensure that each enclosed combustion device is:
 - (A) Operated properly at all times that natural gas is routed to it;
 - (B) Operated with a liquid knock-out system to collect any condensable vapors (to prevent liquids from going through the control device);
 - (C) Equipped with a flash-back flame arrestor;
 - (D) Equipped with one of the following:
 - I. A continuous burning pilot flame, a thermocouple, and a malfunction alarm and notification system if the pilot flame fails; or
 - II. An electronically controlled auto-ignition system with a malfunction alarm and notification system if the pilot flame fails while produced natural gas or natural gas emissions are flowing to the enclosed combustor;
 - (E) Maintained in a leak-free condition; and
 - (F) Operated with no visible smoke emissions.
- (d) The Permittee shall follow, for each TEG dehydration unit and respective emission control system, the manufacturer's recommended maintenance schedule and procedures to ensure optimum performance.

4. Testing Requirements

The Permittee shall obtain extended wet gas analyses of the inlet wet gas stream to each TEG dehydration system at least once per calendar month. The analysis shall include the inlet gas temperature and pressure at which the sample was taken.

5. Monitoring Requirements

- (a) The Permittee shall monitor each closed vent system for leaks of hydrocarbon emissions from all vent lines, connections, fittings, valves, relief valves, or any other appurtenance employed to contain, collect, and transport gases, vapors, and fumes to the enclosed combustion devices as follows:
 - (i) Visit the facility on a quarterly basis to inspect all closed vent systems for defects that could result in hydrocarbon emissions and document each inspection. 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. If a

- quarterly visit is not feasible due to sudden, infrequent, and unavoidable events (i.e. weather, road conditions), the Permittee shall notify the EPA in writing within 24 hours of cancelling the visit and every effort shall be made to visit the facility as close to the quarterly timeframe as possible;
- (ii) The inspections shall be based on audio, visual, and olfactory procedures at a minimum; and
 - (iii) Any leaks detected in any closed vent system shall be addressed immediately unless the repair requires resources not currently available. If the resources are not available, the leak shall be repaired no later than 15 days after initial detection of the leak.
- (b) The Permittee shall monitor each enclosed combustion device to confirm proper operation as follows:
- (i) Continuously monitor the proper functioning of each enclosed combustion device's combustion source using a thermocouple or other or other heat sensing monitoring device and a recording device that indicates the continuous ignition of the flame while gas is flowing to it;
 - (ii) Visually inspect the combustion source (continuous burning pilot flame or automatic igniter) to ensure proper operation whenever an operator is on site, at a minimum, quarterly; and
 - (iii) Visually confirm that no smoke is present during operation of each smokeless enclosed combustion device whenever an operator is on site, at a minimum, quarterly.
- (c) Benzene and total HAP emissions from each of the TEG dehydration systems shall be determined monthly using the most recent version of the GRI GlyCalc model and the following input parameters:
- (i) The inlet wet gas stream properties for the current month;
 - (ii) Temperature and pressure of the gas provided in the inlet wet gas analysis;
 - (iii) The emissions control device efficiency, unless the closed-vent system or control device was bypassed or down or a malfunction alarm was triggered. In such cases, the emission control device efficiency used in the calculation shall be 0.0%; and
 - (iv) The maximum gas throughput and glycol pump recirculation rate for each TEG dehydration system as follows:

TEG Dehydration Unit Description	Maximum Glycol Pump Recirculation Rate
18 MMscfd maximum gas throughput	8 gallons per minute
30 MMscfd maximum gas throughput	13 gallons per minute

- (d) Benzene and total HAP emissions from each TEG dehydration system shall be calculated and recorded at the end of each month, beginning with the first full calendar month after

operations commenced. Prior to 12 full months of operation, the Permittee shall, at the end of each month, add the emissions for that month to the calculated emissions for all previous months since operations commenced, where applicable, and record the total. Thereafter, the Permittee shall, at the end of each month, add the emissions for that month to the calculated emissions for the preceding 11 months and record a new 12-month total.

6. Recordkeeping Requirements

The Permittee shall keep records of the following:

- (a) The monthly benzene, total HAP emissions, GRI GlyCalc model input parameters and GRI GlyCalc model reports for each TEG dehydration system;
- (b) Written, site-specific designs, operating instructions, operating procedures, and maintenance schedules;
- (c) All required monitoring of the control device operations;
- (d) The exceedances of the operating parameters specified in manufacturer or vendor guarantees or engineering specifications with regard to the TEG dehydration units, closed-vent systems and control devices. The records shall include each TEG dehydration unit, closed-vent system, enclosed combustion device total operating times during the calendar month in which the exceedance occurred, the date, time and duration that the parameters were exceeded, and the corrective actions taken and any preventative measures adopted to operate the facility within that operating parameter;
- (e) Any instances in which any closed-vent system or control device was bypassed or down in each calendar month, the date, time, duration, and the reason for each incident, and the corrective actions taken and any preventative measures adopted to avoid such bypasses or downtimes;
- (f) Any instances in which the pilot flame is not present in the combustor or the auto ignition system was not operating, the date, time, and duration of each observation and the corrective actions taken and any preventative measures adopted to limit the malfunctions;
- (g) Any instances in which the thermocouple (or other heat sensing monitoring device) installed to detect the presence of a flame in the combustor is not operational, the date, time, and duration during which it was not operational, and the corrective actions taken and any preventative measures adopted to limit the malfunctions;
- (h) Any time periods in which the recording device installed to record data from the thermocouple is not operational;
- (i) Any time periods in which visible emissions are observed emanating from a control system;
- (j) The emissions calculations included in the consecutive 12-month facility-wide total;

- (k) Each leak detection inspection. All leak detection inspection records must include, at a minimum, the following information:
 - (i) A description of the methods used for the inspection;
 - (ii) The date of the inspection;
 - (iii) The findings of the inspection;
 - (iv) Any corrective action taken and the date of the corrective action;
 - (v) Reason for any delays to corrective actions; and
 - (vi) The inspector's name and signature; and
- (l) All input parameters and calculations used to determine the monthly emissions.

F. Requirements for Records Retention

- 1. The Permittee shall retain all records required by this permit for a period of at least five (5) years from the date the record was created.
- 2. Records shall be kept in the vicinity of the facility, such as at the facility, the location that has day-to-day operational control over the facility, or the location that has day-to-day responsibility for compliance of the facility.

G. Requirements for Reporting

1. Annual Emission Reports

- (a) The Permittee shall submit a written annual report of the actual annual emissions from all emission units at the facility each year no later than April 1st. The annual report shall cover the period for the previous calendar year. All reports must be certified to truth and accuracy by the person primarily responsible for Clean Air Act compliance for the Permittee.
- (b) The report shall include total HAP, CH₂O, and benzene emissions.
- (c) The report shall be submitted to:

U.S. Environmental Protection Agency, Region 8
Office of Partnerships and Regulatory Assistance
Tribal Air Permitting Program, 8P-AR
1595 Wynkoop Street
Denver, Colorado 80202

The report may be submitted via electronic mail to r8AirPermitting@epa.gov.

- 2. All other documents required to be submitted under this permit, with the exception of the Annual Emission Reports, shall be submitted to:

U.S. Environmental Protection Agency, Region 8
Office of Enforcement, Compliance & Environmental Justice

Air Toxics and Technical Enforcement Program, 8ENF-AT

1595 Wynkoop Street

Denver, Colorado 80202

Documents may be submitted electronically to r8airreportenforcement@epa.gov.

3. The Permittee shall promptly submit to the EPA a written report of any deviations of permit requirements, a description of the probable cause of such deviations and any corrective actions or preventative measures taken. A "prompt" deviation report is one that is post marked or submitted via electronic mail to r8airreportenforcement@epa.gov as follows:
 - (a) Within 30 days from the discovery of any deviation of the emission limits or operational limits that are left un-corrected for more than 5 days after discovering the deviation; and
 - (b) By April 1st for the discovery of a deviation of recordkeeping or other permit conditions during the preceding calendar year that do not affect the Permittee's ability to meet the emission limits.
4. The Permittee shall submit a written report for any required performance tests to the EPA within 60 days after completing the tests.
5. The Permittee shall submit any record or report required by this permit upon EPA request.

II. General Provisions

A. Conditional Approval

Pursuant to the authority of 40 CFR 49.151, the EPA hereby conditionally grants this permit.

This authorization is expressly conditioned as follows:

1. *Document Retention and Availability:* This permit and any required attachments shall be retained and made available for inspection upon request at the location set forth herein.
2. *Permit Application:* The Permittee shall abide by all representations, statements of intent and agreements contained in the application submitted by the Permittee. The EPA shall be notified 10 days in advance of any significant deviation from this permit application as well as any plans, specifications or supporting data furnished.
3. *Permit Deviations:* The issuance of this permit may be suspended or revoked if the EPA determines that a significant deviation from the permit application, specifications, and supporting data furnished has been or is to be made. If the proposed source is constructed, operated, or modified not in accordance with the terms of this permit, the Permittee will be subject to appropriate enforcement action.
4. *Compliance with Permit:* The Permittee shall comply with all conditions of this permit, including emission limitations that apply to the affected emissions units at the permitted facility/source. Noncompliance with any permit term or condition is a violation of this permit and may constitute a violation of the Clean Air Act and is grounds for enforcement action and for a permit termination or revocation.

5. *Fugitive Emissions:* The Permittee shall take all reasonable precautions to prevent and/or minimize fugitive emissions during the construction period.
6. *National Ambient Air Quality Standard and PSD Increment:* The permitted source shall not cause or contribute to a National Ambient Air Quality Standard violation or a PSD increment violation.
7. *Compliance with Federal and Tribal Rules, Regulations, and Orders:* Issuance of this permit does not relieve the Permittee of the responsibility to comply fully with all other applicable federal and tribal rules, regulations, and orders now or hereafter in effect.
8. *Enforcement:* It is not a defense, for the Permittee, in an enforcement action, to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
9. *Modifications to Existing Permitted Emissions Units/Limits:* For proposed modifications, as defined at 40 CFR 49.152(d), that would increase an emissions unit allowable emissions of pollutants above its existing permitted annual allowable emissions limit, the Permittee shall first obtain a permit modification pursuant to the MNSR regulations approving the increase. For a proposed modification that is not otherwise subject to review under the PSD or MNSR regulations, such proposed increase in the annual allowable emissions limit shall be approved through an administrative permit revision as provided at 40 CFR 49.159(f).
10. *Relaxation of Legally and Practically Enforceable Limits:* At such time that a new or modified source within this permitted facility/source or modification of this permitted facility/source becomes a major stationary source or major modification solely by virtue of a relaxation in any legally and practically enforceable limitation which was established after August 7, 1980, on the capacity of the permitted facility/source to otherwise emit a pollutant, such as a restriction on hours of operation, then the requirements of the PSD regulations shall apply to the source or modification as though construction had not yet commenced on the source or modification.
11. *Revise, Reopen, Revoke and Reissue, or Terminate for Cause:* This permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee, for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. The EPA may reopen this permit for a cause on its own initiative, e.g., if this permit contains a material mistake or the Permittee fails to assure compliance with the applicable requirements.
12. *Severability Clause:* The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.
13. *Property Rights:* This permit does not convey any property rights of any sort or any exclusive privilege.
14. *Information Requests:* The Permittee shall furnish to the EPA, within a reasonable time, any information that the EPA may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating this permit or to determine compliance with this permit. For any such information claimed to be confidential, you shall also submit a claim of

confidentiality in accordance with 40 CFR part 2, subpart B.

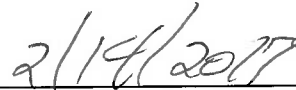
15. *Inspection and Entry:* The EPA or its authorized representatives may inspect this permitted facility/source during normal business hours for the purpose of ascertaining compliance with all conditions of this permit. Upon presentation of proper credentials, the Permittee shall allow the EPA or its authorized representative to:
 - (a) Enter upon the premises where this permitted facility/source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of this permit;
 - (c) Inspect, during normal business hours or while this permitted facility/source is in operation, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements; and
 - (e) Record any inspection by use of written, electronic, magnetic and photographic media.
16. *Permit Effective Date:* This permit is effective immediately upon issuance unless comments resulted in a change in the proposed permit, in which case the permit is effective 30 days after issuance. The Permittee may notify the EPA, in writing, that this permit or a term or condition of it is rejected. Such notice should be made within 30 days of receipt of this permit and should include the reason or reasons for rejection.
17. *Permit Transfers:* Permit transfers shall be made in accordance with 40 CFR 49.159(f). The Air Program Director shall be notified in writing at the address shown below if the company is sold or changes its name.

U.S. Environmental Protection Agency, Region 8
Office of Partnerships and Regulatory Assistance
Tribal Air Permitting Program, 8P-AR
1595 Wynkoop Street
Denver, Colorado 80202
18. *Invalidation of Permit:* This permit becomes invalid if construction is not commenced within 18 months after the effective date of this permit, construction is discontinued for 18 months or more, or construction is not completed within a reasonable time. The EPA may extend the 18-month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between the construction of the approved phases of a phased construction project. The Permittee shall commence construction of each such phase within 18 months of the projected and approved commencement date.
19. *Notification of Start-Up:* The Permittee shall submit a notification of the anticipated date of initial start-up of this permitted source to the EPA within 60 days of such date, unless this

permitted source is an existing source.

B. Authorization

Authorized by the United States Environmental Protection Agency, Region 8



Monica Morales, Acting Director
Air Program

Date