Schwartz, Colin

From: Schwartz, Colin
Sent: Monday, January 8, 2018 4:43 PM
To: 'Scott R Bassett'
Cc: Fallon, Gail; minnieg@utetribe.com; 'bpargeets@utetribe.com'
Subject: Final Part 71 Permit for Fidlar Compressor Station
Attachments: DEQP Fidlar CS TV RTC & Final Permit V-UO-000002-2013.00.pdf

Mr. Bassett,

I have attached the final requested permit and the accompanying response to comments document for the Dominion Energy Questar Pipeline, LLC Fidlar Compressor Station issued pursuant to the Title V Operating Permit Program at 40 CFR Part 71 (Part 71). We will also be posting the final Part 71 permit and response to comments in PDF format on our website at: https://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-8.

In accordance with the regulations at §71.11(i), the permit will be effective 30 days after the date of this notice, on February 7, 2018. Within 30 days after a final permit decision has been issued, any person who filed comments on the draft permit or participated in the public hearing may petition the Environmental Appeals Board (EAB) to review any condition of the permit decision. The 30-day period within which a person may request review under this section begins when we have fulfilled the notice requirements for the final permit decision. Motions to reconsider a final order by the EAB must be filed within 10 days after service of the final order. A petition to the EAB is under Section 307(b) of the CAA, a prerequisite to seeking judicial review of the final agency action. For purposes of judicial review, final agency action occurs when we issue or deny a final permit and agency review procedures are exhausted.

If you have any questions or concerns regarding this final permit action please contact me.

Thank you,

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

Schwartz, Colin

From: Schwartz, Colin
Sent: Monday, January 8, 2018 4:42 PM
Subject: Notice of Issuance of Renewed Title V Operating Permit on the Uintah and Ouray Indian Reservation

This is to notify you that the EPA has issued a final renewed Clean Air Act (CAA) Title V operating permit for the Dominion Energy Questar Pipeline, LLC Fidlar Compressor Station pursuant to the Title V Operating Permit Program at 40 CFR Part 71 (Part 71). The final Part 71 permit and response to comments can be accessed in PDF format on our website at: https://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-8.

In accordance with the regulations at §71.11(i), the permit will be effective 30 days after the date of this notice, on February 7, 2018. Within 30 days after a final permit decision has been issued, any person who filed comments on the draft permit or participated in the public hearing may petition the Environmental Appeals Board (EAB) to review any condition of the permit decision. The 30-day period within which a person may request review under this section begins when we have fulfilled the notice requirements for the final permit decision. Motions to reconsider a final order by the EAB must be filed within 10 days after service of the final order. A petition to the EAB is under Section 307(b) of the CAA, a prerequisite to seeking judicial review of the final agency action. For purposes of judicial review, final agency action occurs when we issue or deny a final permit and agency review procedures are exhausted.

Thank you,

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

Dominion Energy Services, Inc.
5000 Dominion Boulevard
Glen Allen, VA 23060
DominionEnergy.com

November 13, 2017

U.S. EPA, Region VIII
Air & Radiation Program (8P-AR)
Attn: Colin Schwartz, Part 71 Permit Lead
1595 Wynkoop Street
Denver, CO 80202

Re: Comments on Draft Part 71 Permit V-UO-000002-2013.00

Dear Colin Schwartz:

The purpose of this correspondence is to submit comments on the draft Part 71 permit for Dominion Energy Questar Pipeline, LLC's Fidlar Compressor Station on the Uintah & Ouray Indian Reservation in Uintah County, Utah.

Dominion Energy appreciates the opportunity to comment on the proposed permit for Fidlar Station and respectfully requests that you consider the following:

Comment 1: Please note that the Statement of Basis erroneously states that 40 CFR Part 63 Subpart ZZZZ does not apply to Unit FS02 (spark ignition RICE). Unit FS02 predates NSPS Subpart JJJJ and is subject to the Subpart ZZZZ NESHAP regulation as a remotely located, four-stroke, rich burn, RICE greater than 500 horsepower.

Comment 2: Please note that the Responsible Official has changed from Vice President, EH&S to Vice President, Western Pipeline Operations.

Comment 3: Condition II.B.4.d.(ii) Performance Test Requirements. The Permittee shall measure carbon monoxide (CO) emissions from the 1,061 hp 4SRB engine simultaneously with all performance tests for NOx emissions. CO emissions shall be measured using a portable analyzer and protocol approved in writing by the EPA.

It is understood that this condition comes directly from the minor new source review (MNSR) permit for Unit FS02; however, while it might be assumed that the CEMs equipment used for the NOx Reference Method performance test also qualifies as a "portable analyzer", it would be helpful to clarify that CO must be measured simultaneously using <u>any</u> EPA approved method.

Comment 4: Condition IV.E. Recordkeeping Requirements [40 CFR 60.4245(a)-(b)] The Permittee, as the owner or operator of the SI ICE must:

1. Comply with this subpart and all documentation supporting any notification;

Okay

2. Notify the EPA describing any maintenance conducted on the engine;

There are no notification requirements for conducting maintenance on engines subject to NSPS Subpart JJJJ. It is understood that records must be kept of maintenance activities. Please clarify if EPA wants to be notified for oil/filter changes, spark plug replacement, air filters, and other routine maintenance conducted on Unit FS07.

3. Follow regulations informing the EPA if FS07 is a certified engine or non-certified engine and following applicable certification, documentation, and emission standards; and;

Again, it is understood that there are recordkeeping requirements for these items. Notifications (i.e., informing EPA) are covered in the condition that follows (F.) including the initial notifications under 60.7 and the detailed information on each engine required in 60.4245(c). Suggest adding "Keep records of...insert condition stated above".

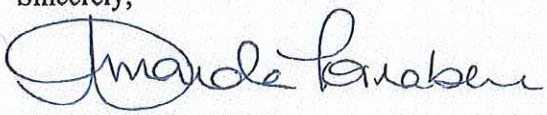
4. Notify the EPA if FS07 does not meet the standards applicable to non-emergency engines, records of the hours of operation of the engine that is recorded through the non-resettable hour meter.

This condition needs to be clarified and the two issues separated. Suggest specifically referring to recordkeeping requirements for meeting emission standards for non-certified engines greater than 500 horsepower (i.e., standards for non-emergency engines) and keeping records of required notifications. Also, suggest putting the recordkeeping requirement for logging operating hours on a separate line.

Comment 5: Condition **VI.D. Alternative Operating Scenario – Turbine Replacement/Overhaul** and Condition **VI.E. Alternative Operating Scenario – Engine Replacement/Overhaul** from the current Part 71 Permit are notably absent from the draft. These conditions correlate directly with current condition **VII.Q. Off Permit Changes** and provide needed clarity for routine replacement of turbine engines that are overhauled at an off-site, manufacturer-owned facility (i.e., like-kind exchange program). This is the established maintenance arrangement for industrial and aircraft turbines. In order to streamline documentation of periodic turbine overhauls, we highly recommend retaining the current permit language (see attached excerpt).

Thank you for your time and attention in considering our comments. Questions regarding this letter should be referred to Scott Bassett at (801) 324-3820 or via email: scott.bassett@dominionenergy.com.

Sincerely,



Amanda B. Tornabene
Director, Environmental Services (Air Program & Gas Infrastructure Group)

Attachment

ATTACHMENT I

VI.C. Stratospheric Ozone and Climate Protection [40 CFR part 82]

The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR part 82, subpart F.

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166(i). ("MVAC-like appliance" as defined at 40 CFR 82.152)

VI.D. Alternative Operating Scenarios - Turbine Replacement/Overhaul [40 CFR 71.6(a)(9)]

1. Replacement of a permitted turbine with a turbine of the same make, model, heat input capacity rating, and configured to operate in the same manner as the turbine being replaced, shall be an allowed alternative operating scenario provided the replacement activity satisfies all of the provisions for Off Permit Changes under this permit including the provisions specific to turbine replacement.

2. Any emission standards, requirements, or provisions in this permit that apply to the permitted turbines shall also apply to the replacement turbines, including the initial compliance test required by 40 CFR 60.8 and subject to all other requirements of 40 CFR part 60, subpart GG.

3. Replacement of a permitted turbine with a turbine subject to 40 CFR part 60, subpart KKKK is not allowed under this alternative operating scenario.

4. Replacement of a permitted turbine with a turbine subject to 40 CFR part 63, subpart YYYY is not allowed under this alternative operating scenario.

VI.E. Alternative Operating Scenario – Engine Replacement/Overhaul [40 CFR 71.6(a)(9)]

1. Replacement of an existing permitted engine with an engine of the same make, model, horsepower rating, and configured to operate in the same manner as the engine being replaced, and which satisfies all the provisions for off permit changes under this permit, including the provisions specific to engine replacement, shall be considered an allowed alternative operating scenario under this permit.

2. Any emission limits, requirements, control technologies, testing or other provisions that apply to engines that are replaced under this Alternative Operating Scenarios section shall also apply to the replacement engines.

3. Replacement of an existing permitted engine that is not subject to 40 CFR part 60, subpart JJJJ with an engine that is subject to 40 CFR part 60, subpart JJJJ is not an allowed alternative operating scenario.

4. Replacement of an existing permitted engine that is not subject to 40 CFR part 63, subpart ZZZZ with an engine that is subject to 40 CFR part 63, subpart ZZZZ is not an allowed alternative operating scenario.

[Explanatory Note: This section was included to allow for off permit replacement of engines that may have existing federally enforceable limits. For replacement engines which trigger new applicable requirements (i.e., NSPS, NESHAP, etc.), the minor permit modification shall be utilized to maintain the permitted emission limits of the replaced engine and incorporate the new applicable requirements.]

VI.F. Permit Shield [40 CFR 71.6(f)(3)]

Nothing in this permit shall alter or affect the following:

1. The liability of a permittee for any violation of applicable requirements prior to or at the time of permit issuance;

2. The ability of EPA to obtain information under Section 114 of the CAA; or

3. The provisions of Section 303 of the CAA (emergency orders), including the authority of Administrator under that section.

Public Notice: Request For Comments

Draft Air Quality Permit to Operate for Federal Clean Air Act Title V to Control Air Pollutant Emissions from Fidlar Compressor Station on the Uintah and Ouray Indian Reservation

Public notice issued:
October 18, 2017

Written comments due:

5 p.m., November 17, 2017

Where is the facility located?

Fidlar Compressor Station:
Uintah and Ouray Indian Reservation
Uintah County, Utah
SW/NW Sec. 16, NW/NW Sec. 32, NE/NE Sec. 3, T9S, R22E
Latitude 40.039722 N
Longitude -109.456944W

What is being proposed?

EPA proposes to renew a Clean Air Act (CAA), Title V Permit to Operate in accordance with 40 Code of Federal Register, Part 71, for the Fidlar Compressor Station on Indian country lands within the Uintah and Ouray Indian Reservation.

EPA issues CAA Title V operating permits in Indian country where EPA has not approved a tribe to implement the Title V operating permit program. The Ute Indian Tribe does not have an approved Title V operating permit program.

Air pollutant emissions come from the compressor station and associated equipment. The draft operating permit includes requirements for air pollutant emissions control.

Permit number:
V-UO-000002-2013.00

How can I review documents?

You can review the draft CAA Title V Operating Permit, the application, and Statement of Basis at:

Uintah County Clerk Office
147 E Main St #6,
Vernal, UT 84078

Ute Indian Tribe Energy and Minerals Department Office
988 South 7500 East, Annex Building 910
Fort Duchesne, UT, 84026

U.S. EPA Region 8
Air Program Office (8P-AR)
1595 Wynkoop St.
Denver, CO 80202
Phone: 303-312-6043

All documents will be available for review at the U.S. EPA Region 8 office Monday through Friday from 8:00 am to 4:00 pm (excluding Federal holidays).

Electronic copies of the draft Title V permit, Statement of Basis and all supporting materials may also be viewed at: http://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8

What are EPA's responsibilities?

The U.S. EPA Region 8 Air Program is the regulatory agency that helps protect and preserve air quality on the Uintah and Ouray Indian Reservation.

One way EPA does this is by issuing CAA Title V operating permits for major air emission sources that require air pollutant emissions control and monitoring. The purpose of this notice is to invite you to submit written comments on this proposed permit through the process detailed in this notice.

What happens next?

EPA will review and consider all comments received during the comment period.

Following this review, EPA may issue the permit, issue with revisions, or deny the permit.

Public Comment Period:
The EPA will accept written comments on this draft Title V Operating Permit beginning:

TBD, 2017
through
5 p.m. TBD, 2017.

Where can I send written comments?

EPA accepts comments by mail and e-mail.

How can I make comments by e-mail?

To make comments via e-mail, click on the name of the contact person at the website below.

U.S. EPA
Region 8 Air Program
8P-AR
Tribal Permit Program
1595 Wynkoop Street
Denver CO 80202
Phone: 800.227.8917

http://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
http://www.epa.gov/region8

OCT 11 2017

Ref: 8P-AR

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Scott Bassett
Senior Environmental Coordinator
Dominion Energy Questar Pipeline, LLC
P.O. Box 45360
Salt Lake City, Utah 84145-0360

Re: Draft Part 71 Operating Permit, Permit #V-UO-000002-2013.00, Dominion Energy Questar Pipeline, LLC, Fidlar Compressor Station

Dear Mr. Bassett:

The Environmental Protection Agency, Region 8, has completed its review of Dominion Energy Questar Pipeline, LLC's (Dominion's) application for the Fidlar Compressor Station to obtain a renewed Clean Air Act Title V operating permit pursuant to the Title V Operating Permit Program at 40 CFR part 71(Part 71). The EPA received the application on June 7, 2013.

Enclosed you will find the draft Part 71 operating permit and the corresponding Statement of Basis. The regulations at 40 CFR 71.11(d) require that an applicant, the public and affected states have the opportunity to submit written comments on any draft Part 71 operating permit. All written comments submitted within 30 calendar days after the public notice is published will be considered by the agency in making its final permit decision. The public comment period will end on Friday, November 17, 2017.

The conditions contained in the permit will become effective and enforceable by the agency if the permit is issued final. If you are unable to accept any term or condition of the draft permit, please submit your written comments, along with the reason(s) for non-acceptance to:

Part 71 Permitting Lead
U.S. EPA, Region 8
Air Program (8P-AR)
1595 Wynkoop Street
Denver, Colorado 80202

If you have any questions concerning the enclosed draft permit or Statement of Basis, please contact Colin Schwartz of my staff at (303) 312-6043.

Sincerely,

Monica S. Morales
Director, Air Program
Office of Partnerships & Regulatory Assistance

Enclosures (2)

cc: Minnie Grant, Air Coordinator, Energy, Minerals and Air, Ute Indian Tribe
Bruce Pargeets, Director, Energy, Minerals and Air, Ute Indian Tribe (w/o enclosures)

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

Air Pollution Control Permit to Operate
Title V Operating Permit Program at 40 CFR Part 71

In accordance with the provisions of Title V of the Clean Air Act (CAA) and the Title V Operating Permit Program at 40 CFR part 71 (Part 71) and applicable rules and regulations,

Dominion Energy Questar Pipeline, LLC
Fidlar Compressor Station

is authorized to operate air emission units and to conduct other air pollutant emitting activities in accordance with the permit conditions listed in this permit.

This source is authorized to operate at the following location:

Uintah and Ouray Indian Reservation
SW ¼, NW ¼, Section 16, T9S, R22E, Uintah County, Utah

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations. All terms and conditions of the permit are enforceable by the EPA and citizens under the CAA.

Monica S. Morales,
Director, Air Program
Office of Partnerships & Regulatory Assistance

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Air Pollution Control Permit to Operate
Title V Operating Permit Program at 40 CFR Part 71

Dominion Energy Questar Pipeline, LLC
Fidlar Compressor Station

Permit Number: V-UO-000002-2013.00
Replaces Permit No.: V-UO-0002-05.01

Issue Date: TBD
Effective Date: TBD
Expiration Date: TBD

The permit number cited above should be referenced in future correspondence regarding this facility.

Table 1. Part 71 Permitting History

Date of Action	Permit Number	Type of Action	Description of Action
October 20, 2000	V-UO-0002-00.00	Initial Permit	N/A
July 3, 2008	V-UO-0002-05.00	1st Permit Renewal	N/A
July 15, 2011	V-UO-0002-05.01	Significant Modification	Added new sections for NSPS JJJJ and MACT ZZZZ requirements. Added new sections for applicant-requested enforceable restrictions to engine FS07. Created and renumbered sections that followed.
TBD	V-UO-000002-2013.001	2nd Permit Renewal	

Table of Contents

I. Facility Information and Emission Unit Identification

A. Facility Information

Operator Name:	Dominion Energy Questar Pipeline, LLC
Plant Name:	Fidlar Compressor Station
Plant Location:	SW ¼, NW ¼, Section 16, T9S, R22E Latitude 40.039722 N, Longitude -109.456944 W
Region:	8
State:	Utah
County:	Uintah
Reservation:	Uintah & Ouray
Tribe:	Ute
Responsible Official:	Vice President, Environment, Health, and Safety
SIC Code:	4922

Description:

The Fidlar Compressor Station (Fidlar) is an integral part of Dominion Energy Questar Pipeline, LLC (Dominion) interstate-pipeline transmission system. The facility provides critical transportation compression needs of the natural gas shippers on Dominion's southern transmission system. Fidlar receives natural gas from and delivers it to any one of Dominion's main lines that transport natural gas east, west and north to existing markets and interconnecting points with other interstate pipelines.

There are currently four compressors operating at Fidlar. Natural gas-fired turbines drive three compressors, and a natural gas-fired internal combustion engine drives the other compressor. The facility is also equipped with a natural gas-fired reciprocating internal combustion engine used to drive a standby emergency generator. The generator provides electric power to the compressor station during power outages only. All equipment at the Fidlar burns pipeline quality natural gas as its only fuel source.

Natural gas enters the station then passes through separator tanks. The tanks allow any entrained liquids to drop out of the natural gas. Liquids and sludge are temporarily stored on-site and then removed by truck. The natural gas then passes through scrubbers consisting of cloth type filters to remove impurities. Impurities are occasionally blown to the pressurized storage vessel or sludge tank. Natural gas pressure is then boosted by the compressor units. After compression, the natural gas is cooled by cooling fans which draw ambient air over the pipes to cool the natural gas. There is no contact between the cooling air and natural gas. There are numerous shutdown and relief valves associated with the facility. A

natural gas-fired boiler provides heat to the buildings. A natural gas-fired line heater is used to prevent the station fuel gas line from freezing.

B. Facility Emission Points

Table 2 – Emission Units and Emission Generating Activities

Emission Unit ID	Description	Control Equipment
FS01 FS03	11.16 MMBtu/hr (1,019 hp), natural gas-fired turbines for natural gas compression. Solar Saturn T-1001S-205: Serial Number: 21035 Installed: 6/20/2016 Serial Number: 20950 Installed: 3/20/2016	None
FS05	37.05 MMBtu/hr (4,028 hp), natural gas-fired turbine for natural gas compression. Solar Centaur T4700S: Serial Number: OHA16-CO314 Installed: 3/28/2016	None
FS02	10.79 MMBtu/hr (1,061 hp) natural gas-fired internal combustion engine for natural gas compression. White Superior 12G-825, 4 stroke rich burn: Serial Number: 299499 Installed: 12/3/1983	AFR (Air-Fuel Ratio) & NSCR (Non-Selective Catalytic Reduction installed 9/1995
FS07	6.54 MMBtu/hr (643 hp), natural gas-fired stand by internal combustion engine for emergency power generator. Cummins GTA28 CC, rich burn: Serial Number: 25352466 Installed: 11/18/2010	AFR & NSCR
QPC Tank	400 bbl condensate sludge storage tank, 42,000 gal/year throughput: Serial Number: unknown Installed: pre-1991	None
QPC Truck Loadout	42,000 gal/year tank truck loading unit: Serial Number: unknown Installed: pre-1991	None
FS08	Fugitive emissions from valves, seals, pumps, etc.	None

*hp = horsepower; MMBtu/hr = million British thermal units per hour.

II. Requirements for Engine Unit FS02

A. Synthetic Minor New Source Review Permit Requirements

This source is subject to the requirements of the synthetic Minor New Source Review (MNSR) permit SMNSR-UO-000002-2013.001, issued by the EPA on November 1, 2016, in accordance with the requirements at 40 CFR 49.158. The MNSR permit requirements established enforceable restrictions on the emissions of nitrogen oxides (NO_X) from engine FS02. Notwithstanding conditions in this permit, the permittee shall comply with all applicable requirements of the MNSR permit.

B. Requirements for Engine Unit FS02

1. Construction and Operational Limits

(a) The Permittee shall install, operate and maintain emission controls as specified in the MNSR permit on one (1) reciprocating internal combustion engine used for compression, meeting the following specifications:

(i) Operated as a 4-stroke rich-burn (4SRB) engine;
(ii) Fired with natural gas; and
(iii) Limited to a maximum site rating of 1,061 site rated (hp).

(b) Only the engine that is operated and controlled as specified in the MNSR permit is approved for installation under the MNSR permit.

2. Emission Limits

(a) NO_X emissions from the 1,061 hp 4SRB engine shall not exceed:

(i) 4.68 pounds per hour (lb/hr); and
(ii) 2.0 grams per horsepower-hour (g/hp-hr).

(b) Emission limits specified in the MNSR permit shall apply at all times unless otherwise specified in the MNSR permit.

3. Control and Operational Requirements

(a) The Permittee shall ensure that the 1,061 hp 4SRB engine is equipped with an air-to-fuel ratio (AFR) control system and a non-selective catalytic reduction (NSCR) system capable of reducing uncontrolled NO_X emissions to meet the emission limits specified in the MNSR permit.

(b) The Permittee shall replace the oxygen (O_2) sensor on the AFR controller on the 1,061 hp 4SRB engine within every 2,190 hours of engine run time.

(c) The Permittee shall install, operate and maintain a temperature-sensing device (i.e., thermocouple or resistance temperature detectors) before the NSCR control system to continuously monitor the exhaust temperature at the inlet of the NSCR control system. The temperature-sensing device shall be calibrated and operated by the Permittee according to manufacturer specifications or equivalent specifications developed by the Permittee or vendor. The temperature-sensing device shall be accurate to within 0.75% of span.

(d) Except during startups, which shall not exceed 30 minutes, the engine exhaust temperature at the inlet to the NSCR control system shall be maintained and at all times the engine operated in accordance with the NSCR manufacturer's specifications for optimum performance.

(e) During operation, the pressure drop across the NSCR control system on the 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 across the NSCR control system shall be determined at 100% ± 10% of the engine load measured during the most recent performance test.

(f) The Permittee shall only fire the engine with natural gas. The natural gas shall be pipeline quality in all respects except that the carbon dioxide (CO_2) concentration in the gas is not required to be within pipeline quality.

(g) The Permittee shall follow, for the engine and respective NSCR control system, the manufacturer recommended maintenance schedule and procedures, or equivalent maintenance schedule and procedures developed by the Permittee or vendor, to ensure optimum performance of the engine and its respective catalytic control system.

(h) The Permittee may rebuild 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 engine that are replaced shall also apply to the rebuilt or replacement engine.

(i) The Permittee may resume operation without the NSCR control system during an engine break-in period, not to exceed 200 operating hours, for rebuilt and replacement engines.

4. Performance Testing Requirements

(a) Performance tests shall be conducted on the 1,061 hp 4SRB engine for measuring NO_X emissions to demonstrate compliance with each emission limitation in the MNSR permit. The performance tests shall be conducted in accordance with appropriate reference methods specified in 40 CFR part 60, appendix A and 40 CFR part 63, appendix A or an EPA-approved American Society for Testing and Materials (ASTM) method. 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) An initial performance test shall be conducted within 45 calendar days of the effective date of the MNSR permit.
(ii) Subsequent performance tests shall be conducted within 12 consecutive months after the most recent performance test.
(iii) Performance tests shall be conducted within 45 calendar days of startup of the engine after cleaning or replacement of the NSCR control system catalyst.
(iv) Performance tests shall be conducted within 45 calendar days of startup of each rebuilt or replaced engine.

(b) The Permittee shall not perform engine tuning or make any adjustments to engine settings, NSCR 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 test requirements is not considered engine tuning or adjustments.

(c) The Permittee shall not abort any engine tests that demonstrate non-compliance with any NO_X emission limits in the MNSR permit.

(d) Performance tests conducted on the 1,061 hp 4SRB engine for measuring NO_X emissions shall meet the following requirements:

(i) The pressure drop across the NSCR control system and the inlet temperature to the NSCR control system shall be measured and recorded at least once per test during all performance tests.

(ii) The Permittee shall measure carbon monoxide (CO) emissions from the 1,061 hp 4SRB engine simultaneously with all performance tests for NO_X emissions. CO emissions shall be measured using a portable analyzer and protocol approved in writing by the EPA. *[Note to Permittee: Although the MNSR permit does not contain CO emission limits for this engine, CO measurement requirements have been included as an indicator to ensure compliance with Condition C.4(b) of the MNSR permit (Section II.B in this permit).]*

(iii) All performance tests shall be conducted at 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.

(iv) During each test run, data shall be collected on all parameters necessary to document how emissions were measured and calculated (such as test run length, minimum sample volume, volumetric flow rate, moisture and oxygen corrections, etc.).

(v) 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 in the MNSR permit.

(vi) A performance test plan shall be submitted to the EPA for approval within 30 calendar days of the effective date of the MNSR permit.

(vii) Performance test plans that have already been approved by the EPA for the emission unit approved in the MNSR 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 plans for EPA approval at any time.

(viii) The test plans shall include and address the following elements:

(A) Purpose of the test;
(B) Engine and NSCR control system to be tested;
(C) Expected engine operating rate 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 a scheduled performance testing. The Permittee shall notify the EPA at least 1 week prior to a scheduled performance testing if the testing cannot be performed.

(f) If the results of a complete and valid performance test of the emissions from the permitted engine demonstrate noncompliance with the emission limits in the MNSR 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 the MNSR permit. If the retest shows that the emissions continue to exceed the limits in the MNSR 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 the MNSR 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 performance test requirements apply when the facility begins operating again.

5. Monitoring Requirements

(a) The Permittee shall continuously measure the engine exhaust temperature at the inlet to the NSCR control system at all times the engine operates.

(b) Except during startups, which shall not exceed 30 minutes, if the engine's exhaust temperature at the inlet to the NSCR control system deviates from the acceptable range specified by the manufacturer 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 the NO_X emission limits in the MNSR permit.

(i) Within 24 hours of determining a deviation of the engine exhaust temperature at the inlet to the NSCR control system, the Permittee shall investigate. The investigation shall include testing the temperature sensing device, inspecting the engine for performance problems and assessing the NSCR control system for possible damage that could affect NSCR control 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 NSCR control system can be corrected by following the engine manufacturer recommended procedures or equivalent procedures developed by the Permittee or vendor and the NSCR control system has not been damaged, then the Permittee shall correct the engine exhaust temperature at the inlet to the NSCR control system within 24 hours of inspecting the engine and NSCR control system.

(iii) If the engine exhaust temperature at the inlet to the NSCR control system cannot be corrected using the engine manufacturer recommended procedures or equivalent procedures developed by the Permittee or vendor, or the NSCR 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 NSCR control system is measured and found to be within the acceptable temperature range for that engine; and

(B) The NSCR control system has been repaired or replaced, if necessary.

(c) The Permittee shall monitor the pressure drop across the NSCR control system on the engine at least once every hour that the engine operates, beginning with the effective date of the MNSR permit, using pressure sensing devices before and after the NSCR control system 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 NSCR control system are fouling, blocked or blown out and thus require cleaning or replacement.]

(d) 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 the MNSR permit:

(i) Within 24 hours of determining a deviation of the pressure drop across the NSCR control system, the Permittee shall investigate. The investigation shall include testing the pressure transducers and assessing the NSCR 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 NSCR control system can be corrected by following the NSCR control system manufacturer recommended procedures or equivalent procedures developed by the Permittee or vendor, and the NSCR control system has not been damaged, then the Permittee shall correct the problem within 24 hours of inspecting the NSCR control system.

(iii) If the pressure drop across the NSCR control system cannot be corrected using the NSCR control system manufacturer recommended procedures or equivalent procedures developed by the Permittee or vendor, or the NSCR control system is damaged, then the Permittee shall do one of the following:

(A) Conduct a performance test within 45 calendar days, as specified in the MNSR permit, to ensure that the emission limits are being met and to re-establish the pressure drop across the NSCR control system. The Permittee shall perform a portable analyzer test for CO and NO_X to establish a new temporary pressure drop baseline until a performance test can be scheduled and completed; 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.

(e) The Permittee shall monitor NO_X and CO emissions from the exhaust of the NSCR control system on the engine at least quarterly to demonstrate compliance with the engines NO_X emission limits in the MNSR permit. To meet this requirement, the Permittee shall:

(i) Measure NO_X and CO emissions at the normal operating load using a portable analyzer and a monitoring protocol approved by the EPA or conduct a performance test as specified in the MNSR permit;
(ii) Measure the NO_X and CO emissions simultaneously; and
(iii) Commence monitoring for NO_X and CO emissions within 45 calendar days of the Permittee's submittal of the initial performance test results for NO_X emissions, as appropriate, to the EPA.

(f) The Permittee shall not perform engine tuning or make any adjustments to engine settings, NSCR control system settings, processes or operational parameters the day of or during measurements. Any such tuning or adjustments may result in a determination by the EPA that the result is invalid. Artificially increasing an engine load to meet monitoring requirements is not considered engine tuning or adjustments.

(g) If the results of 2 consecutive quarterly portable analyzer measurements demonstrate compliance with NO_X emission limits, the required monitoring frequency may change from quarterly to semi-annually.

(h) If the results of any semi-annual portable analyzer measurement demonstrates non-compliance with the NO_X emission limits, the required test frequency shall revert back to quarterly.

(i) The Permittee shall submit portable analyzer specifications and NO_X and CO monitoring protocols to the EPA at the following address for approval at least 45 calendar days prior to the date of initial portable analyzer monitoring:

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

(j) Portable analyzer specifications and monitoring protocols that have already been approved by the EPA for the emission units approved in the MNSR permit may be used in lieu of new protocols unless the EPA determines it is necessary to require the submittal and approval of a new protocol. The Permittee may submit a new protocol for EPA approval at any time.

(k) The Permittee is not required to conduct emissions monitoring and parametric monitoring of exhaust temperature and NSCR control system differential pressure on the engine if it has not operated during the monitoring period. The Permittee shall certify that the engine did not operate during the monitoring period in the annual report specified in Condition I.E.1 of the MNSR permit.

6. Recordkeeping Requirements

(a) Records shall be kept of manufacturer and/or vendor specifications and maintenance requirements developed by the manufacturer, vendor or Permittee for the engine, AFR control system, NSCR control system, temperature-sensing device and pressure-measuring devices.

(b) Records shall be kept of all calibration and maintenance conducted for the engine, catalytic control system, temperature-sensing device and pressure-measuring device.

(c) Records shall be kept that are sufficient to demonstrate that the fuel for the engine is pipeline quality natural gas in all respects, with the exception of CO_2 concentrations.

(d) Records shall be kept of all temperature measurements required in the MNSR permit, as well as a description of any corrective actions taken pursuant to the MNSR permit.

(e) Records shall be kept of all pressure drop measurements required in the MNSR permit, as well as a description of any corrective actions taken pursuant to the MNSR permit.

(f) Records shall be kept of all required testing and monitoring in the MNSR permit. The records shall include the following:

(i) The date, place, and time of sampling or measurements;
(ii) The dates 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 NSCR control system catalyst replacements or repairs, AFR control system replacements, engine rebuilds and replacements.

(h) Records shall be kept of each rebuilt or replacement engine break-in period, pursuant to the requirements of the MNSR permit, where an existing engine that has been rebuilt or replaced resumes operation without the NSCR control system, for a period not to exceed 200 hours.

(i) Records shall be kept of each time the engine is shut down due to a deviation in the inlet temperature to the NSCR control system or pressure drop across a NSCR control system. 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.

C. Requirements for Records Retention

1. The Permittee shall retain all records required by the MNSR permit for a period of at least 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.

D. Requirements for Reporting

1. Annual Emission Reports

(a) The Permittee shall submit a written annual report of the actual annual emissions from the 1,061 hp 4SRB engine each year no later than April 1st. The annual report shall cover the period for the previous calendar year. All reports shall be certified to truth and accuracy by the responsible official.

(b) The report shall include NO_X 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 the MNSR 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 via electronic mail to R8AirReportEnforcement@epa.gov.

3. The Permittee shall promptly submit to the EPA a written report of any deviations of emission or operational limits specified in the MNSR permit and a description of 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 a deviation that would cause the Permittee to exceed the emission limits or operational limits if left uncorrected 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 Regional Office within 60 days after completing the tests.

5. The Permittee shall submit any record or report required by the MNSR permit upon EPA request.

III. Standards of Performance for Stationary Gas Turbines - 40 CFR Part 60, Subpart GG

A. Applicability

40 CFR part 60, subpart GG applies to the following emission units:

1. Solar Saturn T-1001S-205 engine identified as FS01 in Table 2 of this permit;

2. Solar Saturn T-1001S-205 engine identified as FS03 in Table 2 of this permit;

3. Solar Centaur T4700S engine identified as FS05 in Table 2 of this permit.

B. Requirements for Engines FS01, FS03 and FS05

1. The Permittee must meet the requirements for 40 CFR part 60, subpart GG by meeting the following requirements for all applicable emission units:

   (a) Follow nitrogen oxides fuel emissions standards listed as specified in §60.332(a)(2);

(b) Follow sulfur dioxide fuel emission standards as specified in §60.333(a) and §60.333(b). However, the permittee can and has opted to demonstrate compliance with the sulfur dioxide limit specified in §60.333 by continually verifying that the fuel used meets the definition of natural gas to avoid sulfur monitoring. Should the permittee use fuel that does not meet the definition of natural gas, the operator will revert immediately back to applicable requirements listed in §60.333(b).

[40 CFR 60.332, 40 CFR 60.333]

2. Emission units FS01, FS03, and FS05 shall be exempt from the NO_X emission standard when being fired with an emergency fuel. For the purpose of this requirement, the term "emergency fuel" means "a fuel fired by a gas turbine only during circumstances, such as natural gas curtailment or breakdown of delivery system, that makes it impossible to fire natural gas in the gas turbine."

[40 CFR 60.331(r), 40 CFR 60.332(k)]

C. Testing and Initial Compliance Requirements

1. Initial performance testing is required for off permit replacement units for affected turbines. The permittee shall comply with the initial performance test requirements of 40 CFR 60.8(a)-(f) for measuring NO_X emissions from replaced units FS01, FS03, and FS05 within 60 days after achieving the maximum production rate at which the turbines will be operated, but not later than 180 days after the initial startup of the turbines.

2. The permittee shall comply with the test methods and procedures of 40 CFR 60.335(a), (b), and (c) when conducting the initial performance test for NO_X for affected emission units.

D. Monitoring Requirements

1. The permittee shall comply with the requirements of 40 CFR 60.334(h) for monitoring of sulfur content and nitrogen content of the fuel being burned in the affected emission units.

2. The permittee shall demonstrate that gaseous fuel burned in the affected turbine engines meets the definition of natural gas pursuant to §60.331(u).

3. The permittee shall demonstrate the gas quality characteristics in a current, valid purchase contract, tariff sheet, or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less.

4. The permittee shall measure NO_X from the affected emission units at least once every quarter to show compliance with the requirements of 40 CFR 60.332(a)(2). To meet this requirement, the permittee shall measure NO_X emission from each turbine using a portable analyzer and the monitoring protocol approved by the EPA, or by using a Mobile Test Van (MTV) and the monitoring protocols approved by the EPA.

5. Monitoring shall begin in the first calendar quarter following the EPA notification to the applicant of the approval of the monitoring protocol.

6. If an emission unit is inoperable for 1,500 hours or more in any calendar quarter, the permittee is exempt from conducting NO_X monitoring for the emissions unit for that quarter only.

[40 CFR 60.331, 60.332, 60.334]

E. Notifications, Reports and Records

1. The permittee must maintain records as specified in §60.7 and §71.6.

2. The permittee must follow the recordkeeping requirements when firing an emergency fuel as specified in 60.331.

3. The permittee must monitor operations as specified in §60.334.

4. The permittee must submit reports as specified in §60.7, §60.8, and §71.6.

[40 CFR 60.331, 60.334]

IV. Standards of Performance for Stationary Spark Ignition Internal Combustion Engines - 40 CFR Part 60, Subpart JJJJ

A. Applicability

CFR part 60, subpart JJJJ applies to the following engine:

1. Cummins GTA28 CC engine identified as FS07 in Table 2 of this permit.

[40 CFR 60.4230]

B. Emission Standards for Owners and Operators

The Permittee, as an owner or operator of a 2010 model year non-emergency SI ICE must comply with the emission standards set in 40 CFR part 60, subpart JJJJ Table 1.

[40 CFR 60.4233(e)]

C. Compliance Requirements for Owners and Operators

The Permittee, as the owner or operator of the SI ICE, must:

1. Comply with the emission standards;

2. Operate and maintain the stationary SI ICE and control device according to the manufacturer's emission-related written instructions;

3. Only change those settings that are permitted by the manufacturer;

4. Meet the requirements of 40 CFR parts 90 or 1054, as they apply; and

5. Install a non-resettable hour meter as required in §60.4237(a).

[40 CFR 60.4243, 60.4237]

D. Testing Requirements for Owners and Operators

1. Follow procedures in outlined §60.4244(a)-(f) for conducting performance tests;

2. Reference method performance tests shall be conducted, according to 40 CFR 60.4244, upon startup and for all replacement engines for FS07 that are non-certified to measure NO_X, CO, and VOC emissions to demonstrate compliance with the emission limits. In addition, the permittee must conduct subsequent performance tests on non-certified engines every 8,760 hours of operation or 3 years, whichever comes first as specified in §60.4243(b)(2)(ii);

3. The performance tests for NO_X, CO, and VOC shall be conducted in accordance with the test methods specified in Table 2 of 40 CFR 60, subpart JJJJ.

[40 CFR 60.4244, 60.4243]

E. Recordkeeping Requirements

The Permittee, as the owner or operator of the SI ICE, must:

1. Comply with this subpart and all documentation supporting any notification;

2. Notify the EPA describing any maintenance conducted on the engine;

3. Follow regulations informing the EPA if FS07 is a certified engine or non-certified engine and following applicable certifications, documentation, and emission standards; and;

4. Notify the EPA if FS07 does not meet the standards applicable to non-emergency engines, records of the hours of operation of the engine that is recorded through the non-resettable hour meter.

[40 CFR 60.4245(a)-(b)]

F. Notifications and Reporting Requirements

1. The permittee must, for engines that have not been certified by an engine manufacturer to meet the emissions standards in §60.4231, submit an initial notification as required in §60.7(a)(1). The notification must include all information as specified in §60.4245(c).

2. The permittee must submit a copy of each performance test as required by §60.4244 and this section within 60 days after the test has been completed.

[40 CFR 60.4244, 60.4245]

V. National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines - 40 CFR Part 63, Subpart ZZZZ

A. Applicability

40 CFR part 63, subpart ZZZZ applies to the following emission unit(s):

1. Cummins GTA28 CC engine identified as FS07 in Table 2 of this permit.

[40 CFR 63.6585]

This engine is an affected source that meets a criteria in §63.6590(c)(1)-(7) and must meet the requirements of 40 CFR part 63, subpart ZZZZ by meeting the requirements of 40 CFR part 60, subpart JJJJ, for spark ignition engines. No further requirements apply for this engine under 40 CFR part 63.

[40 CFR 63.6590(c)]

VI. Facility-Wide Requirements [40 CFR 71.6(a)(1)]

Conditions in this section of this permit apply to all emissions units located at the source, including any units not specifically listed in Table 2 of the Facility Emission Points section of this permit.

A. Recordkeeping Requirements [40 CFR 71.6(a)(3)(ii)]

The Permittee shall comply with the following generally applicable recordkeeping requirements:

1. If the Permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants (HAPs) is not subject to a relevant standard or other requirement established under 40 CFR Part 63, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source). [40 CFR 63.10(b)(3)]

2. Records shall be kept of off permit changes, as required by the Off Permit Changes section of this permit.

B. Reporting Requirements [40 CFR 71.6(a)(3)(iii)]

1. The Permittee shall submit to the EPA all reports of any required monitoring under this permit semiannually. The first report shall cover the period from the effective date of this permit through December 31, 2017. Thereafter, the report shall be submitted semi-annually, by April 1st and October 1st of each year. The report due on April 1st shall cover the 6 month period ending on the last day of December before the report is due. The report due on October 1st shall cover the 6-month period ending on the last day of June before the report is due. All instances of deviations from permit requirements shall be clearly identified in such reports. All required reports shall be certified by a responsible official consistent with the Submissions section of this permit.

To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a form "SIXMON" for 6 month monitoring reports. The form may be found on the EPA's website at: https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits]

2. "Deviation" means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in accordance with §71.6(a)(3)(i) and (a)(3)(ii). For a situation lasting more than 24 hours which constitutes a deviation, each 24 hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

   (a) A situation where emissions exceed an emission limitation or standard;

   (b) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met; or

   (c) A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.

3. The Permittee shall promptly report to the EPA deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" is defined as follows:

   (a) Any definition of "prompt" or a specific time frame for reporting deviations provided in an underlying applicable requirement as identified in this permit.

(b) Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:

(i) For emissions of a HAP or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(ii) For emissions of any regulated air pollutant, excluding a HAP or a toxic air pollutant that continues for more than two (2) hours in excess of permit requirements, the report must be made within 48 hours.

(iii) For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report.

(c) If any of the conditions in (i) or (ii) of paragraph (b) above are met, the Permittee must notify the EPA by telephone (1-800-227-6312), facsimile (303-312-6409), or by email to r8airreportenforcement@epa.gov based on the timetables listed above. *[Notification must specify that this notification is a deviation report for a Part 71 permit].* A written notice, certified consistent with the Submissions section of this permit must be submitted within ten working days of the occurrence. All deviations reported under this section must also be identified in the 6-month report required under Condition 1 in this section of this permit.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a form "PDR" for prompt deviation reporting. The form may be found on the EPA's website at: https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits]

VII. General Provisions

A. Annual Fee Payment [40 CFR 71.9]

1. The Permittee shall pay an annual permit fee in accordance with the procedures outlined below.

2. The Permittee shall pay the annual permit fee each year no later than April 1st. The fee shall cover the previous calendar year.

3. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the U.S. Environmental Protection Agency.

4. The Permittee shall send fee payment and a completed fee filing form to:

For regular U.S. Postal Service mail (FedEx, Airborne, DHL, and UPS)	**For non-U.S. Postal Service express mail**
U.S. Environmental Protection Agency FOIA and Miscellaneous Payments Cincinnati Finance Center P.O. Box 979078 St. Louis, MO 63197-9000	U.S. Bank Government Lockbox 979078 U.S. EPA FOIA & Misc. Payments 1005 Convention Plaza SL-MO-C2-GL St. Louis, MO 63101

5. The Permittee shall send an updated fee calculation worksheet form and a photocopy of each fee payment check (or other confirmation of actual fee paid) submitted annually by the same deadline as required for fee payment to the address listed in the Submissions section of this permit.

[Explanatory note: The fee filing form "FF" and the fee calculation worksheet form "FEE" may be found on the EPA's website at: https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits*]*

6. Basis for calculating annual fee:

   (a) The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all "regulated pollutants (for fee calculation)" emitted from the source by the presumptive emissions fee (in dollars per ton) in effect at the time of calculation.

      (i) "Actual emissions" means the actual rate of emissions in tpy of any regulated pollutant (for fee calculation) emitted from a Part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit's actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year.
      (ii) Actual emissions shall be computed using methods required by the permit for determining compliance, such as monitoring or source testing data.
      (iii) If actual emissions cannot be determined using the compliance methods in the permit, the Permittee shall use other federally recognized procedures.

   [Explanatory note: The presumptive fee amount is revised each calendar year to account for inflation, and it is available from the EPA prior to the start of each calendar year.]

   (b) The annual emissions fee shall be increased by a GHG fee adjustment for any source that has initiated an activity listed in table at §71.9(c)(8) since the fee was last paid. The GHG fee adjustment shall be equal to the set fee provided in the table at §71.9(c)(8) for each activity that has been initiated since the fee was last paid.

   (c) The Permittee shall exclude the following emissions from the calculation of fees:

(i) The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tpy;

(ii) Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation; and

(iii) The quantity of actual emissions (for fee calculation) of insignificant activities [defined in 40 CFR 71.5(c)(11)(i)] or of insignificant emissions levels from emissions at the source identified in the Permittee's application pursuant to 40 CFR 71.5(c)(11)(ii).

7. Fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official.

[Explanatory note: The fee calculation worksheet form already incorporates a section to help you meet this responsibility.]

8. The Permittee shall retain fee calculation worksheets and other emissions-related data used to determine fee payment for 5 years following submittal of fee payment. [Emission-related data include, for example, emissions-related forms provided by the EPA and used by the Permittee for fee calculation purposes, emissions-related spreadsheets, and emissions-related data, such as records of emissions monitoring data and related support information required to be kept in accordance with 40 CFR 71.6(a)(3)(ii).]

9. Failure of the Permittee to pay fees in a timely manner shall subject the Permittee to assessment of penalties and interest in accordance with 40 CFR 71.9(l).

10. When notified by the EPA of underpayment of fees, the Permittee shall remit full payment within 30 days of receipt of notification.

11. A Permittee who thinks an EPA-assessed fee is in error and who wishes to challenge such fee, shall provide a written explanation of the alleged error to the EPA along with full payment of the EPA assessed fee.

B. Annual Emissions Inventory [40 CFR 71.9(h)(1)and (2)]

1. The Permittee shall submit an annual emissions report of its actual emissions for both criteria pollutants and regulated HAPs for this source for the preceding calendar year for fee assessment purposes. The annual emissions report shall be certified by a responsible official and shall be submitted each year to the EPA by April 1st.

2. The annual emissions report shall be submitted to the EPA at the address listed in the Submissions section of this permit.

[Explanatory note: An annual emissions report, required at the same time as the fee calculation worksheet by 40 CFR 71.9(h), has been incorporated into the fee calculation worksheet form as a convenience.]

C. Compliance Requirements [40 CFR 71.6(a)(6), Section 113(a) and 113(e)(1) of the CAA, and

40 CFR 51.212, 52.12, 52.33, 60.11(g), 61.12]

1. Compliance with the Permit

   (a) The Permittee must comply with all conditions of this Part 71 permit. Any permit noncompliance constitutes a violation of the CAA and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

   (b) It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

   (c) For the purpose of submitting compliance certifications in accordance with §71.6(c)(5), or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

2. Compliance Schedule [40 CFR 71.5(c)(8)(iii)]

   (a) For applicable requirements with which the source is in compliance, the source will continue to comply with such requirements.

   (b) For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis.

3. Compliance Certifications [40 CFR 71.6(c)(5)]

   (a) The Permittee shall submit to the EPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices annually by April 1st, and shall cover the same 12-month period as the two consecutive semi-annual monitoring reports.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a reporting form for annual compliance certifications. The form may be found on the EPA's website at: https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits *]*

   (b) The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with 40 CFR 71.5(d).

   (c) The certification shall include the following:

      (i) Identification of each permit term or condition that is the basis of the certification;
      (ii) The identification of the method(s) or other means used for determining the compliance status of each term and condition during the certification period, and

whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required in this permit. If necessary, the Permittee also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA, which prohibits knowingly making a false certification or omitting material information;

(iii) The status of compliance with each term and condition of the permit for the period covered by the certification based on the method or means designated in (ii) above. The certification shall identify each deviation and take it into account in the compliance certification;

(iv) Such other facts as the EPA may require to determine the compliance status of the source; and

(v) Whether compliance with each permit term was continuous or intermittent.

D. Duty to Provide and Supplement Information [40 CFR 71.6(a)(6)(v), 71.5(a)(3), and 71.5(b)]

1. 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 modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the EPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. Information claimed to be confidential must be accompanied by a claim of confidentiality according to the provisions of 40 CFR part 2, subpart B.

2. The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. In addition, a Permittee shall provide additional information as necessary to address any requirements that become applicable after the date a complete application is filed, but prior to release of a draft permit.

E. Submissions [40 CFR 71.5(d), 71.6(c)(1) and 71.9(h)(2)]

1. Any document (application form, report, compliance certification, etc.) required to be submitted under this permit shall be certified by a responsible official as to truth, accuracy, and completeness. Such certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[Explanatory note: the EPA has developed a reporting form "CTAC" for certifying truth, accuracy and completeness of Part 71 submissions. The form may be found on the EPA's website at: https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits*]*

All fee calculation worksheets and applications for renewals and permit modifications shall be submitted to:

Part 71 Permit Contact, Air Program, 8P-AR
U.S. Environmental Protection Agency,
1595 Wynkoop Street
Denver, Colorado 80202

2. Except where otherwise specified, all reports, test data, monitoring data, notifications, and compliance certifications shall be submitted to:

Director, Air Toxics and Technical Enforcement Program, 8ENF-AT
U.S. Environmental Protection Agency,
1595 Wynkoop Street
Denver, Colorado 80202

F. Severability Clause [40 CFR 71.6(a)(5)]

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.

G. Permit Actions [40 CFR 71.6(a)(6)(iii)]

This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

H. Administrative Permit Amendments [40 CFR 71.7(d)]

The Permittee may request the use of administrative permit amendment procedures for a permit revision that:

1. Corrects typographical errors;

2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;

3. Requires more frequent monitoring or reporting by the Permittee;

4. Allows for a change in ownership or operational control of a source where the EPA determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA;

5. Incorporates into the Part 71 permit the requirements from preconstruction review permits authorized under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of 40 CFR 71.7 and 71.8 that would be

applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in 40 CFR 71.6; or

6. Incorporates any other type of change which the EPA has determined to be similar to those listed in (1) through (5) above.

[Note to Permittee: If 1 through 5 above do not apply, please contact the EPA for a determination of similarity prior to submitting your request for an administrative permit amendment under this provision.]

I. Minor Permit Modifications [40 CFR 71.7(e)(1)]

1. The Permittee may request the use of minor permit modification procedures only for those modifications that:

   (a) Do not violate any applicable requirement;

   (b) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

   (c) Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

   (d) Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

      (i) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I; and
      (ii) An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA;

   (e) Are not modifications under any provision of Title I of the CAA; and

   (f) Are not required to be processed as a significant modification.

2. Notwithstanding the list of changes ineligible for minor permit modification procedures in 1 above, minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in an applicable implementation plan or in applicable requirements promulgated by the EPA.

3. An application requesting the use of minor permit modification procedures shall meet the requirements of 40 CFR 71.5(c) and shall include the following:

   (a) A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

   (b) The source's suggested draft permit;

   (c) Certification by a responsible official, consistent with 40 CFR 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

   (d) Completed forms for the permitting authority to use to notify affected states as required under 40 CFR 71.8.

4. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions authorized by 40 CFR 71.7(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

5. The permit shield under 40 CFR 71.6(f) may not extend to minor permit modifications.

J. Significant Permit Modifications [40 CFR 71.7(e)(3), 71.8(d), and 71.5(a)(2)]

1. The Permittee must request the use of significant permit modification procedures for those modifications that:

   (a) Do not qualify as minor permit modifications or as administrative amendments;

   (b) Are significant changes in existing monitoring permit terms or conditions; or

   (c) Are relaxations of reporting or recordkeeping permit terms or conditions.

2. Nothing herein shall be construed to preclude the Permittee from making changes consistent with Part 71 that would render existing permit compliance terms and conditions irrelevant.

3. Permittees must meet all requirements of Part 71 for applications, public participation, and review by affected states and tribes for significant permit modifications. For the application to be determined complete, the Permittee must supply all information that is required by 40 CFR 71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change.

K. Reopening for Cause [40 CFR 71.7(f)]

The permit may be reopened and revised prior to expiration under any of the following circumstances:

1. Additional applicable requirements under the CAA become applicable to a major Part 71 source with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 71.7(c)(3);

2. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;

3. The EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

4. The EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

L. Property Rights [40 CFR 71.6(a)(6)(iv)]

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

M. Inspection and Entry [40 CFR 71.6(c)(2)]

1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the EPA or an authorized representative to perform the following:

2. Enter upon the Permittee's premises where a Part 71 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

3. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

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

5. As authorized by the CAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

N. Transfer of Ownership or Operation [40 CFR 71.7(d)(1)(iv)]

A change in ownership or operational control of this source may be treated as an administrative permit amendment if the EPA determines no other change in this permit is necessary and provided that a

written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA.

O. Off Permit Changes [40 CFR 71.6(a)(12) and 40 CFR 71.6(a)(3)(ii)]

The Permittee is allowed to make certain changes without a permit revision, provided that the following requirements are met, and that all records required by this section are kept for a period of 5 years:

1. Each change is not addressed or prohibited by this permit;

2. Each change shall meet with all applicable requirements and shall not violate any existing permit term or condition;

3. Changes under this provision may not include changes subject to any requirement of 40 CFR parts 72 through 78 or modifications under any provision of Title I of the CAA;

4. The Permittee must provide contemporaneous written notice to the EPA of each change, except for changes that qualify as insignificant activities under 40 CFR 71.5(c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;

5. The permit shield does not apply to changes made under this provision;

6. The Permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes;

7. The notice shall be kept on site and made available to the EPA on request, in accordance with the general recordkeeping provision of this permit; and

8. Submittal of the written notice required above shall not constitute a waiver, exemption, or shield from applicability of any applicable standard or PSD permitting requirements under 40 CFR 52.21 that would be triggered by the change.

P. Permit Expiration and Renewal [40 CFR 71.5(a)(1)(iii), 71.5(a)(2), 71.5(c)(5), 71.6(a)(11), 71.7(b), 71.7(c)(1), and 71.7(c)(3)]

1. This permit shall expire upon the earlier occurrence of the following events:

   (a) Five (5) years elapse from the date of issuance; or

   (b) The source is issued a Part 70 or Part 71 permit under an EPA-approved or delegated permit program.

2. Expiration of this permit terminates the Permittee's right to operate unless a timely and complete permit renewal application has been submitted at least 6 months but not more than 18 months prior to the date of expiration of this permit.

3. If the Permittee submits a timely and complete permit application for renewal, consistent with 40 CFR 71.5(a)(2), but the EPA has failed to issue or deny the renewal permit, then all the terms and conditions of the permit, including any permit shield granted pursuant to 40 CFR 71.6(f) shall remain in effect until the renewal permit has been issued or denied.

4. The Permittee's failure to have a Part 71 permit is not a violation of this part until the EPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by the EPA.

5. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation, affected state, and tribal review.

6. The application for renewal shall include the current permit number, description of permit revisions and off permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.

Air Pollution Control
Federal Clean Air Act (CAA) Title V Permit to Operate
Statement of Basis for Draft Permit No. V-UO-000002-2013.00

Dominion Energy Questar Pipeline, LLC
Fidlar Compressor Station
Uintah and Ouray Reservation
Uintah County, Utah

I. Facility Information

A. Location

Dominion Energy Questar Pipeline, LLC's (Dominion) Fidlar Compressor Station (Fidlar) is located on Indian country lands within the Uintah & Ouray Indian Reservation, in the northeastern part of the state of Utah, in Uintah County. Fidlar is located in the SW 1/4, NW 1/4, Section 16, T9S, R22E. The facility mailing address is:

Dominion Energy Questar Pipeline, LLC
1140 West 200 South, P.O. Box 45360
Salt Lake City, UT 84145-0360

B. Contact

Facility Contact:
Scott Bassett, Sr., Environmental Coordinator
Dominion Energy Questar Pipeline, LLC
1140 West 200 South, P.O. Box 45360
Salt Lake City, UT 84145-0360
801-324-3820

Responsible Official:
Ron S. Jorgensen, Vice President, Western Pipeline Operations
Dominion Energy Questar Pipeline, LLC
1140 West 200 South, P.O. Box 45360
Salt Lake City, UT 84145-0360
801-324-5061

Tribal Contact:
Minnie Grant, Air Coordinator, Energy, Minerals, and Air
Ute Indian Tribe
P.O. Box 70
Fort Duchesne, UT 84026
435-725-4950

C. Description of Operations

Fidlar is an integral part of Dominion's interstate-pipeline transmission system. The facility provides critical transportation compression needs of the natural gas shippers on Dominion's southern

transmission system. Fidlar receives natural gas from and delivers it to any one of Dominion's main lines that transport natural gas east, west and north to existing markets and interconnecting points with other interstate pipelines.

There are currently four compressors operating at Fidlar. Natural gas-fired turbines drive three compressors, and a natural gas-fired internal combustion engine drives the other compressor. The facility is also equipped with one natural gas-fired reciprocating internal combustion engine used to drive a standby emergency generator. The generator provides electric power to the station during power outages only. All equipment at Fidlar burns pipeline quality natural gas as its only fuel source.

Natural gas enters the station then passes through separator tanks. The tanks allow any entrained liquids to drop out of the natural gas. Liquids and sludge are temporarily stored on site and then removed by truck. The natural gas then passes through scrubbers consisting of cloth type filters to remove natural gas laden impurities. Impurities are occasionally blown to the pressurized storage vessel or sludge tank. Natural gas pressure is then boosted by the compressor units. After compression, the natural gas is cooled by cooling fans which draw ambient air over the pipes to cool the natural gas. There is no contact between the cooling air and natural gas. There are numerous shutdown and relief valves associated with the facility. A natural gas-fired boiler provides heat to the buildings. A natural gas-fired line heater is used to prevent the station fuel natural gas line from freezing.

D. Emission Points

Table 1 lists emission units and emission generating activities, including any air pollution control devices. The Title V Operating Permit Program at 40 CFR part 71 (Part 71) allows the Permittee to separately list in the permit application units or activities that qualify as "insignificant" based on potential emissions below 2 tons per year (tpy) for all regulated pollutants that are not listed as hazardous air pollutants (HAP) under section 112(b) and below 1,000 lbs/year or the de minimis level established under section 112(g), whichever is lower, for HAPs. However, the application may not omit information needed to determine the applicability of, or to impose, any applicable requirement. Units and activities that qualify as "insignificant" for the purposes of the Part 71 application are in no way exempt from applicable requirements or any requirements of the Part 71 permit.

Table 1 – Emission Units and Emission Generating Activities

Emission Unit ID	Description	Control Equipment
FS01 FS03	11.16 MMBtu/hr (1,019 hp), natural gas-fired turbines for natural gas compression. Solar Saturn T-1001S-205: Serial Number: 21035 Installed: 6/20/2016 Serial Number: 20950 Installed: 3/20/2016	None
FS05	37.05 MMBtu/hr (4,028 hp), natural gas-fired turbine for natural gas compression. Solar Centaur T4700S: Serial Number: OHA16-CO314 Installed: 3/28/2016	None
FS02	10.79 MMBtu/hr (1,061 hp), natural gas-fired internal combustion engine for natural gas compression. White Superior 12G-825, 4 stroke rich burn: Serial Number: 299499 Installed: 12/3/1983	AFR (Air-Fuel Ratio) & NSCR (Non-Selective Catalytic Reduction) installed 9/1995

FS07	6.54 MMBtu/hr (643 hp), natural gas-fired stand by internal combustion engine for emergency power generator. Cummins GTA28 CC, rich burn: Serial Number: 25352466 Installed: 11/18/2010	AFR & NSCR
QPC Tank	400 bbl condensate sludge storage tank, 42,000 gal/year throughput: Serial Number: unknown Installed: pre-1991	None
QPC Truck Loadout	42,000 gal/year tank truck loading unit: Serial Number: unknown Installed: pre-1991	None
FS08	Fugitive emissions from valves, seals, pumps, etc.	None

*hp = horsepower; MMBtu/hr = million British thermal units per hour.

E. Potential to Emit

Pursuant to 40 CFR 52.21, potential to emit (PTE) is defined as the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation, or the effect it would have on emissions, is federally enforceable. Independently enforceable applicable requirements are considered enforceable to the extent that the source is in compliance with the standard. In addition, beneficial reductions in non-targeted pollutants resulting from compliance with an independently enforceable applicable requirement may be counted towards PTE provided the emission reduction of the non-targeted pollutant is enforceable as a practical matter and compliance is being met. See the 1995 guidance memo signed by John Seitz, Director of the Office of Air Quality Planning and Standards titled, "Options for Limiting Potential to Emit of a Stationary Source under Section 112 and Title V of the Clean Air Act."

Dominion reported the emission unit-specific PTE in their Part 71 permit application. The White Superior 12G-825 compressor engine at Fidlar (FS02) is equipped with an AFR and a NSCR, three-way catalytic converter emissions control device. The compressor engine is subject to a federally enforceable permit requiring the use of the control system to reduce emissions of nitrogen oxides (NO_X).

Certain emission units at Fidlar are subject to New Source Performance Standards (NSPS) at 40 CFR part 60 (Part 60) and National Emissions Standards for HAP (NESHAP) at 40 CFR part 63 (Part 63), also known as Maximum Available Control Technology (MACT) requirements. The emergency generator FS07 is subject to the requirements of NSPS subpart JJJJ and MACT subpart ZZZZ as discussed in Section II, Applicable Requirements Review of this statement of basis, and contained in the corresponding draft permit. The natural gas-fired turbines FS01, FS03, and FS05 are all subject to the requirements of NSPS subpart GG which is also discussed in Section II, Applicable Requirements Review of this statement of basis, and contained in the corresponding draft permit.

This facility is also subject to the requirements of permit number SMNSR-OU-000002-2013.001, issued on November 1, 2016, pursuant to the Federal Minor New Source Review (MNSR) Program in Indian Country at 40 CFR part 49 (MNSR Permit Program). The MNSR permit requirements established enforceable restrictions on the PTE of NO_X from engine FS02.

The PTE in Table 2 are based on the applicable legally and practically enforceable requirements outlined in the draft permit.

Table 2 – Potential-to-Emit with Legally and Practically Enforceable Controls

Emission Unit Id.	Regulated Air Pollutants										
	NO_X* (tons/ yr)	VOC (tons/ yr)	SO_2 (tons/ yr)	PM_{10} (tons/ yr)	CO (tons/yr)	Lead (tons/ yr)	CO_2 (tons/yr)	CH_4 (tons/yr)	N_2O (Tons/yr)	CO_2e (tons/yr)	HAP (tons/yr)
FS01	29.22	0.11	0.07	0.34	47.43	0	5183.32	0.10	0.01	5188	0.04
FS02	20.49	10.25	0.07	0.97	20.49	0	5011.47	0.09	0.01	5016	1.42
FS03	29.22	0.11	0.07	0.34	47.43	0	5183.32	0.10	0.01	5188	0.04
FS05	24.67	0.36	0.23	1.13	19.80	0	17208.07	0.32	0.03	17225	0.12
FS07	0.71	0.36	<0.01	0.03	1.42	0	173.38	0.00	0.00	174	0.05
FS08	0	4.24	0	0	0	0	NA	NA	NA	NA	0.02
QPC Tank	0	3.45	0	0	0	0	NA	NA	NA	NA	0.12
QPC Loadout	0	0.08	0	0	0	0	NA	NA	NA	NA	0.01
Insignificant Emission Units	1.07	0.07	<0.01	0.08	0.90	0	NA	NA	NA	NA	<0.01
TOTAL	105.38	19.02	0.45	2.90	137.46	0	32759.56	0.61	0.05	32792	1.82

*NO_X = nitrogen oxide; VOC = volatile organic compound; SO_2 = sulfur dioxide; PM_{10} = particulate matter less than 10 microns in diameter; CO = carbon monoxide; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent; HAP = hazardous air pollutant.

II. Applicable Requirements Review

The following sections discuss the information provided by Dominion in their Part 71 renewal application, certified to be true and accurate by the Responsible Official of this facility.

A. 40 CFR 52.21 - Prevention of Significant Deterioration

The Prevention of Significant Deterioration (PSD) Permit Program at 40 CFR part 52 (Part 52) is a preconstruction review requirement of the CAA that applies to proposed projects that are sufficiently large (in terms of emissions) to be a "major" stationary source or "major" modification of an existing stationary source. Source size is defined in terms of PTE, which is its capability at maximum design capacity to emit a pollutant, except as constrained by existing legally and practically enforceable conditions applicable to the source. A new stationary source or a modification to an existing minor stationary source is major if the proposed project has the PTE for any pollutant regulated under the Part 52 requirements in amounts equal to or exceeding specified major source thresholds, which are 100 tpy for 28 listed industrial source categories and 250 tpy for all other sources. The PSD Permit Program also applies to modifications at existing major sources that cause a "significant net emissions increase" at that source. Significance levels for each pollutant are defined in the PSD regulations at 40 CFR 52.21.

According to information provided by Dominion in the Part 71 renewal application, and historical permit applications in the EPA's records, this facility became a major PSD source for NO_X in 1983 when adding compressor engine unit FS02. The modification project was a minor modification (PTE of all criteria pollutants less than 250 tpy), and therefore, did not trigger the requirement for PSD review

and permitting. However, the major source status meant that any future increases in emissions from a modification would need to be evaluated against the PSD significance levels (lower than PSD major source thresholds). In September 1995, Dominion voluntarily installed and began operating an AFR and NSCR control system on the engine to control NO_X emissions. However, the control system did not become federally enforceable until the effective date of a significant modification Part 71 permit on July 15, 2011 (permit number V-UO-0002-05.01, effective on July 25, 2011), which established enforceable emissions limitations requiring installation and operation of the controls. Therefore, as of July 25, 2011, Fidlar was no longer considered a major PSD source. Any analysis of criteria pollutant emissions increases from future modifications at the facility may be evaluated against the major source emissions threshold of 250 tpy.

B. 40 CFR Part 49, Subpart C: General Federal Implementation Plan Provisions – Federal Minor New Source Review Program in Indian Country

The MNSR Permit Program is a preconstruction review requirement of the CAA that applies to proposed projects that have PTE for any pollutant regulated under 40 CFR part 49 (Part 49) below the major source thresholds in the PSD Permit Program or the Nonattainment New Source Review Permit Program at 40 CFR part 49, subpart C, and above the minor source thresholds in Part 49 (differs depending on the pollutant). The MNSR Permit Program also provides the EPA authority to establish enforceable restrictions for an otherwise major source to establish that source as a synthetic minor source.

Dominion currently holds a synthetic MNSR permit issued by the EPA on November 1, 2016. The permit contains emission limits originally established by the EPA in a July 12, 2011 Part 71 permit. The creation of emission limits in Part 71 permits was a temporary, gap-filling measure for those sources operating in Indian country that did not at the time have the ability to obtain these limits through pre-construction permitting programs, such as existed in state jurisdictions. Upon promulgation of the MNSR Permit Program, it became necessary to transfer those limits to an appropriate MNSR permit under the provisions of 40 CFR 49.158. The MNSR permit issued to Fidlar contains enforceable limits on NO_X emissions for one of the 4SRB compressor engines.

C. 40 CFR Part 60, Subpart A: General Provisions.

This subpart applies to the owner or operator of any stationary source which contains an affected facility, the construction or modification of which is commenced after the date of publication of any standard in Part 60. The general provisions under subpart A apply to sources that are subject to the specific subparts of Part 60.

As explained below, the turbines operating at Fidlar are subject to subpart GG of Part 60 and the generator engine is subject to subpart JJJJ of Part 60; therefore, the General Provisions of Part 60 apply.

D. 40 CFR Part 60, Subpart GG: Standards of Performance for Stationary Gas Turbines.

This rule applies to stationary gas turbines, with a heat input at peak load equal to or greater than 10.7 gigajoules per hour (10 MMBtu/hr), that commenced construction, modification, or reconstruction after October 3, 1977.

Based on the information provided by Dominion in their Part 71 renewal application, turbine units FS01, FS03, (11.17 MMBtu/hr each) and FS05 (37.05 MMBtu/hr) are affected facilities, and therefore, are

subject to this subpart.

E. 40 CFR Part 60, Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

This subpart establishes emission standards and compliance requirements for the control of emissions from stationary spark ignition (SI) internal combustion engines (ICE) that commenced construction, modification or reconstruction after June 12, 2006, where the SI ICE are manufactured on or after specified manufacture trigger dates. The manufacture trigger dates are based on the engine type, fuel used, and maximum engine horsepower.

Based on the information provided by Dominion in their Part 71 renewal application, emergency generator engine unit FS07 was constructed after June 12, 2006, and manufactured after the applicability date for natural gas-fired SI ICE greater than 500 hp. Therefore, this subpart applies to this engine.

F. 40 CFR Part 60, Subpart KKKK: Standards of Performance for Stationary Combustion Turbines.

This subpart establishes emission standards and compliance schedules for the control of emissions from stationary combustion turbines that commenced construction, modification or reconstruction after February 18, 2005. The rule applies to stationary combustion turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour.

According to Dominion, turbine units FS01 and FS03 operating at Fidlar initially commenced construction, modification or reconstruction prior to February 18, 2005. FS05 was replaced in November of 2005, after the trigger date of this subpart. However, Dominion provided evidence in its renewal applications dated May 27, 2005, April 4, 2007, and November 23, 2007, that the turbine was installed previously at the Blind Canyon Compressor Station and a continuous program of construction commenced prior to the subpart KKKK applicability date. The EPA has no other evidence that indicates that the turbines have been replaced with new units or have been modified or reconstructed after February 18, 2005. Therefore, based on the information provided by Dominion, this rule does not apply to any turbines operated at the facility.

G. 40 CFR Part 60, Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas production, Transmission, and Distribution

This subpart establishes emission standards for the control of VOC and SO_2 emissions from affected facilities that commence construction, modification, or reconstruction after August 23, 2011. Affected facilities include, but are not limited to well completions, centrifugal compressors, reciprocating compressors, pneumatic controllers, storage vessels, and sweetening units.

Based on the information provided by Dominion in their Part 71 application, the current equipment at Fidlar predates the applicability date for this subpart. Therefore, this facility is not subject to this subpart.

H. 40 CFR Part 60, Subpart OOOOa: Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015

This subpart establishes emission standards for the control of VOC and SO_2 emissions from affected facilities that commence construction, modification, or reconstruction after September 18, 2015. Affected facilities include, but are not limited to well completions, centrifugal compressors, reciprocating compressors, pneumatic controllers, storage vessels, and sweetening units.

Based on the information provided by Dominion in their Part 71 application, the current equipment at Fidlar predates the applicability date for this subpart. Therefore, this facility is not subject to this subpart.

I. 40 CFR Part 63, Subpart A: National Emission Standards for Hazardous Air Pollutants for Source Categories, General Provisions.

The requirements of subpart A of Part 63 apply to sources that are subject to the specific subparts of Part 63.

Subpart A does not apply because Fidlar is only subject to MACT subpart ZZZZ for RICE at area sources, which refers to NSPS JJJJ and no further requirements apply, including subpart A.

J. 40 CFR Part 63, Subpart HH: National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities.

This subpart establishes emission standards for the control of HAP emissions from affected units located at natural gas production facilities that process, upgrade, or store natural gas prior to the point of custody transfer, or that process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. The affected units are glycol dehydration units, storage vessels with the potential for flash emissions (as defined in the rule) and the group of ancillary equipment and compressors intended to operate in volatile HAP service which are located at natural gas processing plants.

Based on the information provided by Dominion in their Part 71 renewal application and our review of that information, Fidlar does not operate any affected units, including storage vessels with the potential for flash emissions (as defined in the rule) or triethylene glycol dehydration units. Therefore, this facility is not subject to this subpart.

K. 40 CFR Part 63, Subpart YYYY - National Emission Standards for Hazardous Air Pollutants from Stationary Combustion Turbines.

This rule establishes national emission limitations and work practice standards for HAPs emitted from Stationary Combustion Turbines. The affected source includes the stationary combustion turbine located at a major source of HAP emissions.

According to Dominion, Fidlar is not subject to this subpart because it is not a major source of HAP as determined from the applicability criteria of this rule.

L. 40 CFR Part 63, Subpart ZZZZ (MACT ZZZZ): National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

This rule establishes national emission limitations and operating limitations for HAP emitted from stationary SI and compression ignition (CI) reciprocating internal combustion engines (RICE).

According to the information provided by Dominion, Fidlar is currently a minor source of HAP emissions. Therefore, only the portions of the rule that apply to engines operating at area sources may potentially apply. FS02 is an existing spark ignition engine constructed before June 12, 2006. Therefore, this rule does not apply to FS02. Emergency engine FS07 was constructed after June 12, 2006. Therefore, this rule does apply to FS07. For applicable requirements to FS07, the MACT ZZZZ standard refers to NSPS JJJJ. No further requirements apply under Part 63, including subpart A.

M. 40 CFR Part 64: Compliance Assurance Monitoring

Pursuant to requirements concerning enhanced monitoring and compliance certification under the CAA, the EPA promulgated regulations to implement compliance assurance monitoring (CAM) for major stationary sources of air pollution, for purposes of Title V permitting that are required to obtain operating permits under Part 71. The rule requires owners or operators of such sources to conduct monitoring that provides a reasonable assurance of compliance with applicable requirements under the CAA. The effective date of this rule is November 21, 1997.

1. CAM Applicability

According to 40 CFR 64.2(a), CAM applies to <u>each</u> pollutant specific emission unit (PSEU) located at a major source which is required to obtain a Part 71 permit if the unit satisfies all of the following criteria:

(a) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant other than an emissions limitation or standard that is exempt under 40 CFR 64.2(b)(1);

(b) The unit uses a control device to achieve compliance with any such limit or standard; and

(c) The unit has pre-control device emissions of the applicable regulated pollutant that are equal to or greater than 100 percent of the amount, in tpy, required for a source to be classified as a major Title V source.

2. CAM Plan Submittal Deadlines

(a) <u>Large PSEUs</u>. A CAM plan submittal for all PSEUs with the PTE (taking into account control devices) of any one regulated air pollutant in an amount equal to or greater than 100 percent of the amount, in tpy, required for a source to be classified as a major source, is due at the following times:

(i) On or after April 20, 1998, if by that date, a Part 71 application has either:

(A) Not been filed; or
(B) Not yet been determined to be complete.

(ii) On or after April 20, 1998, if a Part 71 permit application for a significant modification is submitted with respect to those PSEUs for which the requested permit revision is applicable; or

(iii) Upon application for a renewed Part 71 permit and a CAM plan has not yet been submitted with an initial or a significant modification application, as specified above.

(b) Other PSEUs. A CAM Plan must be submitted for all PSEUs that are not large PSEUs, but are subject to this rule, upon application for a Part 71 renewal permit.

The turbines at Fidlar (FS01, FS03, and FS05) are PSEUs subject to an emission limit, but none of these turbines use add-on control devices to achieve compliance. Therefore, none of the turbines are subject to the CAM requirements.

The EPA has determined that the short-term lbs/hr and g/hp-hr NO_X emission MNSR limits applicable to engine FS02 make the unit subject to the CAM rule. However, the work practice, operational, testing, monitoring, recordkeeping, and reporting requirements already in the MNSR permit associated with those limits satisfy the requirements of the CAM rule at 40 CFR 64.6(c) and the EPA determined that no additional monitoring requirements were necessary in the draft Part 71 permit to assure compliance. Specifically, the MNSR permit requires the temperature of the natural gas at the inlet to the NSCR and the pressure drop across the catalyst, both indicators of the catalyst's proper operation, to be maintained within an optimum range specified by the manufacturer of the control equipment. The MNSR permit requires initial and subsequent annual performance testing of the compressor engine to demonstrate compliance with the NO_X emission limits, as well as performance testing of the engine each time the catalyst is changed out. The MNSR permit also requires monitoring of CO emissions using a portable analyzer and EPA-approved portable monitoring protocol simultaneously with any performance test for NO_X emissions to ensure there is no engine tuning immediately prior to or during the performance tests and the engine is being tested at normal operating conditions. Additionally, the MNSR permit requires hourly monitoring of the temperature and pressure drop parametric indicators. The MNSR permit requires immediate corrective action to be taken if the parametric measurements deviate from the optimum ranges specified in the permit. The MNSR permit also requires monitoring of the NO_X and CO emissions from the engine using a portable analyzer and EPA-approved portable monitoring protocol at least quarterly. The draft Part 71 permit requires the permittee to record and report to the EPA semi-annually the results of all the required work practice, operational, testing and monitoring.

N. 40 CFR Part 68: Chemical Accident Prevention Provisions

This rule applies to stationary sources that manufacture, process, use, store, or otherwise handle more than the threshold quantity of a regulated substance in a process. Regulated substances include 77 toxic and 63 flammable substances which are potentially present in the natural gas stream entering the facility and in the storage vessels located at the facility. The quantity of a regulated substance in a process is determined according to the procedures presented under 40 CFR 68.115. 40 CFR 68.115(b)(l) and (2)(i) which indicate that toxic and flammable substances in a mixture do not need to be considered when

determining whether more than a threshold quantity is present at a stationary source if the concentration of the substance is below one percent by weight of the mixture.

40 CFR 68.115(b)(2)(iii) indicates that prior to entry into a natural gas processing plant, regulated substances in naturally occurring hydrocarbon mixtures need not be considered when determining whether more than a threshold quantity is present at a stationary source. Naturally occurring hydrocarbon mixtures include condensate, field gas, and produced water.

Based on the information provided in Dominion's Part 71 renewal application, Fidlar does not have regulated substances above the threshold quantities in this rule and therefore is not subject to the requirement to develop and submit a risk management plan.

O. 40 CFR Part 71: Emergency Provisions

In this draft Part 71 renewal permit, the EPA is proposing to not include the "Emergency Provisions" located in permit condition III.O. in the current effective Part 71 permit. These provisions were modeled on the "Emergency provision" contained in the regulations in 40 CFR part 71 applicable to federal operating permit programs. Specifically, in the regulations discussing the contents of Title V operating permits issued under the federal operating permits program, 40 CFR 71.6(g) provides that certain "emergency" events can constitute "an affirmative defense in an action brought for non-compliance" with certain emission limits contained in the permit, when certain conditions are met. However, nothing in the CAA or 40 CFR part 71 requires that these types of emergency provisions be included as conditions in operating permits issued by the EPA, and for the reasons discussed below, we are exercising our discretion not to include them in this draft Part 71 renewal permit.

In 2014, a federal court ruled that the CAA does not authorize the EPA to create affirmative defense provisions applicable to certain enforcement actions. *See NRDC v. EPA,* 749 F.3d 1055 (D.C. Cir. 2014). The court ruled that Sections 113 and 304 of the CAA preclude the EPA from creating affirmative defense provisions in the Agency's regulations imposing HAP emission limits on sources. The court concluded that those affirmative defense provisions purported to alter the jurisdiction of federal courts generally provided in the CAA to assess liability and impose penalties for violations of emission limits in private civil enforcement cases, and that the CAA did not provide authority for the EPA to do so. Consistent with the reasoning in the *NRDC v. EPA* court decision, the EPA has determined that it is also not appropriate under the CAA to alter the jurisdiction of the federal courts through affirmative defenses provisions in its Title V regulations, such as those contained in the emergency provisions of 40 CFR 71.6(g), and that such provisions are inconsistent with the CAA. In light of the above-described D.C. Circuit Court decision and the EPA's obligation to issue Title V permits consistent with the applicable requirements of the Act, it is no longer appropriate to propose to include permit conditions modeled on affirmative defenses such as those contained in the emergency provisions of 40 CFR 71.6(g) in operating permits issued by the EPA.

Although the EPA views the Part 71 emergency provisions as discretionary (i.e., neither the statute nor the regulations mandate their inclusion in Part 71 permits), the EPA is considering whether to make changes to the Part 71 Permit Program regulations in order to ensure the EPA's regulations are consistent with the recent D.C. Circuit decisions; and if so, how best to make those changes. Until that time, as part of the normal permitting process, it is appropriate for the EPA permitting authorities to rely on the discretionary nature of the existing emergency provisions to choose not to continue to include permit terms modeled on those provisions in Part 71 permits that we are issuing in the first instance or renewing. By doing so, we are not only fulfilling the EPA's obligation to issue Title V permits

consistent with the applicable requirements of the Act, but we will also help ensure that permittee's do not continue to rely on permit provisions that have been found legally invalid.

Accordingly, in this draft Part 71 renewal permit, the EPA is exercising its discretion to not include the "Emergency Provisions" located in permit condition III.O. in the existing effective Part 71 permit, in order to ensure the Part 71 permit is in compliance with the applicable requirements of the Act.

III. EPA Authority

Title V of the CAA requires that the EPA promulgate, administer, and enforce a federal operating permit program when a state does not submit an approvable program within the time frame set by Title V or does not adequately administer and enforce its EPA approved program. On July 1, 1996 (61 FR 34202), the EPA adopted regulations codified at 40 CFR part 71 setting forth the procedures and terms under which the agency would administer a federal operating permit program. These regulations were updated on February 19, 1999 (64 FR 8247) to incorporate the EPA's approach for issuing federal operating permits to stationary sources in Indian country.

As described in 40 CFR 71.4(a), the EPA will implement a Part 71 program in areas where a state, local, or tribal agency has not developed an approved Part 70 program. Unlike states, tribes are not required to develop operating permits programs, though the EPA encourages tribes to do so. See, e.g., Indian Tribes: Air Quality Planning and Management (63 FR 7253, February 12, 1998) (also known as the "Tribal Authority Rule"). Therefore, within Indian country, the EPA will administer and enforce a Part 71 federal operating permit program for stationary sources until a tribe receives approval to administer their own operating permit program.

IV. Use of All Credible Evidence

Determinations of deviations, continuous or intermittent compliance status, or violations of the permit are not limited to the testing or monitoring methods required by the underlying regulations or this permit; other credible evidence (including any evidence admissible under the Federal Rules of Evidence) must be considered by the Permittee and the EPA in such determinations.

V. Public Participation

A. Public Notice

As described in 40 CFR 71.11(a)(5), all Part 71 draft operating permits shall be publicly noticed and made available for public comment. The public notice of permit actions and public comment period is described in 40 CFR 71(d).

There will be a 30-day public comment period for actions pertaining to a draft permit. Notification will be given for this draft permit by mailing a copy of the notice to the permit applicant, the affected state, tribal and local air pollution control agencies, the city and county executives, and the state and federal land managers which have jurisdiction over the area where the source is located. A notification will be provided to all persons who have submitted a request to be included on the mailing list.

If you would like to be added to our mailing list to be informed of future actions on these or other CAA permits issued in Indian country, please send an email using the link for the Region 8 CAA public comment opportunities provided at https://www.epa.gov/caa-permitting/caa-permit-public-comment-

opportunities-region-8, or send your name and address to the contact listed below:

Part 71 Permitting Lead
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street (8P-AR)
Denver, Colorado 80202-1129

Public notice will be provided at https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8 giving opportunity for public comment on the draft permit and the opportunity to request a public hearing.

B. Opportunity to Comment

Members of the public are given an opportunity to review a copy of the draft permit prepared by the EPA, the application, this Statement of Basis for the draft permit and all supporting materials for the draft permit. Copies of these documents are available at:

Uintah County Clerk's Office
147 East Main St #6
Vernal, UT 84078

and

Ute Indian Tribe Energy and Minerals Department Office
988 South 7500 East, Annex Building
Fort Duchesne, Utah 84026
Contact: Minnie Grant, Air Coordinator, at (435) 725-4900 or minnieg@utetribe.com

and

U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street (8P-AR)
Denver, Colorado 80202-1129
Contact: Colin Schwartz, Environmental Scientist, at 303-312-6043 or schwartz.colin@epa.gov

All documents are available for review at the Region 8 office Monday through Friday from 8:00 a.m. to 4:00 p.m. (excluding federal holidays). Electronic copies of the draft permit, Statement of Basis and supporting permit record may also be viewed at: https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8.

Any interested person may submit written comments on the draft Part 71 operating permit during the public comment period to the Part 71 Permitting Lead at the address listed in Section A above, or by email using the instructions on the public comment opportunities web site address listed above. All comments will be considered and answered by the EPA in making the final decision on the permit. The EPA keeps a record of the commenters and of the issues raised during the public participation process.

Anyone, including the applicant, who believes any condition of the draft permit is inappropriate should raise all reasonable ascertainable issues and submit all arguments supporting their position by the close of the public comment period. Any supporting materials submitted must be included in full and may not

be incorporated by reference, unless the material has already been submitted as part of the administrative record in the same proceeding or consists of state or federal statutes and regulations, EPA documents of general applicability or other generally available reference material.

The final permit will be a public record that can be obtained upon request. A statement of reasons for changes made to the draft permit and responses to comments received will be sent to all persons who comment on the draft permit. The final permit and response to comments document will also be available online at: https://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-8. Anyone may request a copy of the final permit at any time by contacting the Tribal Air Permit Program at (800) 227–8917 or by sending an email to r8airpermitting@epa.gov.

C. Opportunity to Request a Hearing

A person may submit a written request for a public hearing to the Part 71 Permitting Lead, U.S. EPA Region 8, by stating the nature of the issues to be raised at the public hearing. Based on the number of hearing requests received, the EPA will hold a public hearing whenever it finds there is a significant degree of public interest in a draft operating permit. The EPA will provide public notice of the public hearing. If a public hearing is held, any person may submit oral or written statements and data concerning the draft permit.

D. Appeal of Permits

Within 30 days after the issuance of a final permit decision, any person who filed comments on the draft permit or participated in the public hearing may petition to the Environmental Appeals Board (EAB) to review any condition of the permit decision. Any person who failed to file comments or participate in the public hearing may petition for administrative review, only if the changes from the draft to the final permit decision or other new grounds were not reasonably foreseeable during the public comment period. The 30-day period to appeal a permit begins with the EPA's service of the notice of the final permit decision.

The petition to appeal a permit must include a statement of the reasons supporting the review, a demonstration that any issues were raised during the public comment period, a demonstration that it was impracticable to raise the objections within the public comment period, or that the grounds for such objections arose after such a period. When appropriate, the petition may include a showing that the condition in question is based on a finding of fact or conclusion of law which is clearly erroneous; or, an exercise of discretion, or an important policy consideration that the EAB should review.

The EAB will issue an order either granting or denying the petition for review, within a reasonable time following the filing of the petition. Public notice of the grant of review will establish a briefing schedule for the appeal and state that any interested person may file an amicus brief. Notice of denial of review will be sent only to the permit applicant and to the person requesting the review. To the extent review is denied, the conditions of the final permit decision become final agency action.

A motion to reconsider a final order shall be filed within ten days after the service of the final order. Every motion must set forth the matters claimed to have been erroneously decided and the nature of the alleged errors. Motions for reconsideration shall be directed to the Administrator rather than the EAB. A motion for reconsideration shall not stay the effective date of the final order unless it is specifically ordered by the EAB.

E. Petition to Reopen a Permit for Cause

Any interested person may petition the EPA to reopen a permit for cause, and the EPA may commence a permit reopening on its own initiative.

The EPA will only revise, revoke and reissue, or terminate a permit for the reasons specified in 40 CFR 71.7(f) or 71.6(a)(6)(i). All requests must be in writing and must contain facts or reasons supporting the request. If the EPA decides the request is not justified, it will send the requester a brief written response giving a reason for the decision. Denial of these requests is not subject to public notice, comment, or hearings. Denials can be informally appealed to the EAB by a letter briefly setting forth the relevant facts.

Schwartz, Colin

From: Schwartz, Colin
Sent: Tuesday, October 17, 2017 4:29 PM
Subject: Notice of Public Comment Period – Draft Title V Operating Permit on the Uintah and Ouray Indian Reservation

In accordance with 40 CFR 71.8 and 71.11(d)(2), the U.S. Environmental Protection Agency Region 8 is hereby providing notification to all affected states and tribes of the issuance of the draft title V federal operating permit for the following source located on the Uintah and Ouray Indian Reservation:

Dominion Energy Questar Pipeline, LLC – Fidlar Compressor Station

Part 71 Permit Contact – Colin Schwartz, (303)-312-6043

A copy of the draft permit and Statement of Basis may be obtained by contacting the Part 71 Permit Contact. The permit application and other supporting information pertinent to the permit decision are available for review at the following locations:

U.S. EPA Region 8
Air Program (8P-AR)
1595 Wynkoop St
Denver, CO 80202

Ute Indian Tribe
Energy and Minerals Department
988 South 7500 East, Annex Building 910
Fort Duchesne, UT 84026

Uintah County Clerk Office
147 East Main St. #6
Vernal, UT 84078

Electronic copies of the draft permit and Statement of Basis may also be viewed online at: http://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8.

In accordance with §71.11(d)(2), EPA Region 8 is providing a 30-day period from October 18, 2017 to November 17, 2017, for public comment on this draft permit. Comments must be received by November 17, 2017, to be considered in the issuance of the final permit. If a public hearing is held regarding this permit, you will be sent a copy of the public hearing notice at least 30 days in advance of the hearing date.

Please submit any written recommendations you may have concerning the terms and conditions of this permit to me at the address listed above.

Sincerely,

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

Schwartz, Colin

From: Schwartz, Colin
Sent: Tuesday, October 17, 2017 4:29 PM
To: 'Scott R Bassett'
Cc: Fallon, Gail; minnieg@utetribe.com; 'bpargeets@utetribe.com'
Subject: Draft Title V Operating Permit for Fidlar Compressor Station
Attachments: Questar Cover Letter.pdf; Questar Fidlar Bulletin.pdf; DRAFT Questar Fidlar Permit V-UO-000002-2013.00.pdf; DRAFT Questar Title V SOB V-UO-000002.2013.00.pdf

Mr. Bassett,

I have attached the requested draft permit, the accompanying Statement of Basis, and the public notice for the Fidlar Compressor Station. We will also be posting the application, public notice, draft permit, Statement of Basis, and other supporting information in PDF format on our website at: https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8 by the start of the public comment period.

In accordance with the regulations at 40 CFR 71.11(d), we are providing a 30-day period from October 18, 2017 to November 17, 2017 for public comment on this draft permit. Comments must be received by 5:00pm MDT November 17, 2017, to be considered in the issuance of the final permit.

Please submit any written comments you may have concerning the terms and conditions of this permit. You can send them directly to me at schwartz.colin@epa.gov, or to r8airpermitting@epa.gov. Should the EPA not accept any or all of these comments, you will be notified in writing and will be provided with the reasons for not accepting them.

Thank you,

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

Table 6: Summary of Results, Runs 10-12
(Unit 1, 92 % NGP)
Operational Data, Concentrations, Exhaust Flow Rates, Mass Emission Rates

Company: Questar Pipeline
Location: Blind Canyon Compressor Station
Source: Solar Centaur 40 (Unit 1)
Technicians: RS/WM

Test Number	*10*	*11*	*12*	
Load Condition	92%	92%	92%	
Date	4/05/06	4/05/06	4/05/06	
Start Time	3:18 PM	3:43 PM	4:09 PM	
Stop Time	3:38 PM	4:03 PM	4:29 PM	
Turbine/Compressor Operation				
Power Turbine Speed (%)	67.3	67.4	67.4	
Gas Producer Speed (%)	92.0	92.0	92.0	
Compressor Suction Pressure (psig)	663.0	663.0	663.0	
Compressor Discharge Pressure (psig)	807.0	805.0	806.0	
T-5 Average Temperature (°F)	1168	1168	1168	
Air Inlet Temperature (T1) (°F)	39.0	39.0	39.0	
Measured BSFC (Btu/hp-hr)	10132	10169	10228	
Engine Compressor Discharge, PCD (psig)	81.0	81.0	81.0	
Horsepower (from compressor dynamometer)	3120	3118	3100	
Fuel Data				
Fuel Heating Value (Gross Btu/scf)	1028	1028	1028	
Fuel O2 F-Factor (DSCFH/MMBTU)	8635	8635	8635	
Fuel Flow Rate (lb/hr)	1354.0	1358.0	1358.0	
Fuel Flow Rate (SCFH)	30743.6	30834.5	30834.5	
Ambient Conditions				
Atmospheric Pressure (in. Hg)	25.10	25.10	25.10	
Temperature (°F dry)	40	40	41	
Temperature (°F wet)	36	36	36	
Humidity (lbs/lb of air)	0.0043	0.0043	0.0041	
Measured Emissions (dry) (corrected for instrument drift)				
NOx (ppmv)	15.28	15.42	15.58	
CO (ppmv)	7.80	7.69	7.15	
O2 (%)	16.75	16.73	16.75	
CO2 (%)	2.36	2.35	2.36	
Calculated Emissions Concentrations				***Average***
NOx (ppmv @ 15% O2)	21.7	21.8	22.1	**21.88**
NOx (ppmv @15% O2, ISO Day) (NSPS Limit = 167)	**24.2**	**24.3**	**24.5**	**24.29**
CO (ppmv @ 15% O2)	11.08	10.86	10.16	**10.70**
CO (ppmv @ 15% O2, ISO Day)	**12.3**	**12.1**	**11.2**	**11.88**
Fo Factor	1.76	1.77	1.76	**1.76**
Exhaust Flow Rates				
via EPA Methods 1-4 (SCFH, dry)			1.38E+06	**1.38E+06**
via EPA Method 19 (SCFH, dry)	1.37E+06	1.37E+06	1.38E+06	**1.37E+06**
Mass Emission Rates (Based on Method 19)				
NOx (lbs/hr) (Limit = 5.18)	2.51	2.52	2.56	**2.53**
CO (lbs/hr) (Limit = 4.15)	0.78	0.76	0.72	**0.75**
NOx (tons/yr)	10.97	11.06	11.23	**11.09**
CO (tons/yr)	3.41	3.35	3.13	**3.30**

Testing by TRC - Cubix, Albuquerque, New Mexico

UNIT FS07

MANUFACTURER'S & PERFORMANCE TEST DATA

Gaseous Fuel Generator Set
GTA28 CC Engine Series

Specification Sheet
Model GFGA EPA SI NSPS Compliant Capable

NPower

KW(KVA) @ 0.8 P.F.	
Compression Ratio	60 HZ-1800 RPM Standby
8:5:1(note 1)	450 (562)
8.5:1(note 2)	280 (350)

Notes:
1) 54°C (130°F) or lower water temperature to the aftercooler
2) PROPANE RATING 54°C (130°F) or lower water temperature to the aftercooler
(per EPA SI NSPS this engine cannot operate for more than 100 hors annually on propane fuel as back up fuel to natural gas)

NOTE: This engine is EPA SI NSPS Compliant Capable

Fuel Application Guide	
Compression Ratio	8:5:1
Dry Processed Natural Gas	Yes
Propane (HD-5)	Yes
All gases such as field gas, digester, and sewage gas will require an analysis of the specified gas and pre-approval from CNGE. Consult your Cummins Distributor for details.	

Description

The Cummins NPower GF-series commercial generator set is a fully integrated power generation system providing optimum performance, reliability, and versatility for stationary standby or prime power applications.

A primary feature of the GF GenSet is strong motor-starting capability and fast recovery from transient load changes. The torque-matched system includes a heavy-duty Cummins 4-cycle spark ignited engine, an AC alternator with high motor-starting kVA capacity, and an electronic voltage regulator with three phase sensing for precise regulation under steady-state or transient loads. The GF GenSet accepts 100% of the nameplate standby rating in one step. *

The standard PowerCommand® digital electronic control is an integrated system that combines engine and alternator controls for high reliability and optimum GenSet performance.

Optional weather-protective housings and coolant heaters shield the generator set from extreme operating conditions. Environmental concerns are addressed by low exhaust emission engines, sound-attenuated housings, and exhaust silencers. A wide range of options, accessories, and services are available, allowing configuration to your specific power generation needs.

Every production unit is factory tested at rated load and power factor. This testing includes demonstration of rated power and single-step rated load pickup. Cummins NPower manufacturing facilities include quality standards, emphasizing our commitment to high quality in the design, manufacture, and support of our products. The generator is CSA certified. The PowerCommand control is UL508 Listed.

All Cummins NPower generator sets are backed by a comprehensive warranty program and supported by a worldwide network of 170 distributors and service branches to assist with warranty, service, parts, and planned maintenance support.

Features

Cummins Heavy-Duty Engine - Rugged 4-cycle industrial spark ignited engine delivers reliable power, low emissions, and fast response to load changes.

Alternator - Several alternator sizes offer selectable motor-starting capability with low reactance 2/3 pitch windings, low waveform distortion with non-linear loads, fault-clearing short-circuit capability, and class H insulation. The alternator electrical insulation system is UL1446 Recognized.

Control Systems - The PowerCommand electronic control is standard equipment and provides total genset system integration, including automatic remote starting/stopping, precise voltage regulation, alarm and status message display, AmpSentry™ protection, output metering, auto-shutdown at fault detection, and NFPA 110 compliance. PowerCommand control is Listed to UL508.

Cooling System - Standard cooling package provides reliable running at the rated power level, at up to 100°F ambient temperature.

Housings - Optional weather-protective housings are available.

Certifications - Generators are designed, manufactured, tested, and certified to relevant UL, NFPA, ISO, IEC, and CSA standards.

Warranty and Service - Backed by a comprehensive warranty and worldwide distributor service network.

*Adequate fuel pressure and volume must be provided. Engines must be equipped with a functioning jacket water heater.

NPower

Generator Set

The general specifications provide representative configuration details. Consult the outline drawing for installation design.

Specifications – General

See outline drawing for installation design specifications.

Unit Width, in (mm)	95" (2413)	Open Set
Unit Height, in (mm)	98" (2489)	Open Set
Unit Length, in (mm)	168" (4267)	Open Set
Unit Dry Weight, lb (kg)	14758 (6915)	
Rated Speed, rpm	1800	
Voltage Regulation, No Load to Full Load	±1.0%	
Random Voltage Variation	±1.0%	
Frequency Regulation	5%	
Random Frequency Variation	±0.5%	
Radio Frequency Interference	Optional PMG excitation operates in compliance with BS800 and VDE level G and N. Addition of RFI protection kit allows operation per MIL-STD-461 and VDE level K.	

Rating Definitions

Standby Rating based on: Applicable for supplying emergency power for the duration of normal power interruption. No sustained overload capability is available for this rating. (Equivalent to Fuel Stop Power in accordance with ISO3046, AS2789, DIN6271 and BS5514). Nominally rated.

Site Derating Factors

Engine power available up to 3000' (m) at ambient temperatures up to 100°F. Above 3000' (m)derate at 4% per 1000 ft (305 m), and 1% per 10°F (2% per 11°C) above 100°F.

1) Data represents gross engine performance capabilities obtained and corrected in accordance with SAEJ1349 conditions of 29.61 in. Hg.(100KPa) barometric pressure [300 ft. (91m) altitude], 77°F (25°C) inlet air temperature, and 0.30 in Hg.(100KPa) water vapor pressure using dry processed natural gas fuel with 905 BTU per standard cubic foot (33.72 kM) lower heating value. Deration may be required due to altitude, temperature or type of fuel. Consult your local Cummins Distributor for details.

2) FUEL SYSTEM

Standard Carburetor – IMPCO Make
Low Pressure Dry Processed Natural Gas – (905 BTU/ft.³ L.H.V.)
Running Pressure to Carburetor (After Regulation) – in. H_20 (mm H_20) ..... 5 ~ 7 (127~177)
Running Pressure to Engine Mounted Regulator ~ in. H_20 (mm H_20) ..... 10 ~ 20 (254 ~ 508)
Minimum Gas Supply Pipe Size @ Engine – in. (mm) 2.0 (50.8)
Gas Supply Filter Pressure Rating – PSI (kPa) 100 (690)

The preceding pipe sizes are only suggestions and piping may vary with temperatures, distance from fuel supply and application of local codes. Gas must be available at adequate volume and pressure for engine at the regulator.

NPower

Engine

Cummins heavy-duty spark ignited engines use advanced combustion technology for reliable and stable power, low emissions, and fast response to sudden load changes.

Electronic governing is standard for applications requiring constant (isochronous) frequency regulation such as Uninterruptible Power Supply (UPS) systems, non-linear loads, or sensitive electronic loads. Optional coolant heaters are recommended for all emergency standby installations or for any application requiring fast load acceptance after start-up.

Specifications – Engine

Base Engine	Cummins Model GTA28 CC
Displacement in^3 (L)	1710 (28)
Overspeed Limit, rpm	2100
Regenerative Power, kW	-
Cylinder Block Configuration	Cast iron with replaceable wet cylinder liners
Cranking Current	550 amps at ambient temperature of 32°F (0°C)
Battery Charging Alternator	37 amps
Starting Voltage	24-volt, negative ground
Lube Oil Filter Types	Single spin-on canister-combination full flow with bypass
Standard Cooling System	100°F ambient radiator

Fuel		**STANDBY**		
Fuel Consumption	Load	1/2	3/4	Full
(Approximate)	kW	225	337	450
	CFH	3490	4707	5890
Cooling				
Heat Rejection to Coolant*	27354 BTU/min	481 kW		
Heat Rejection to Room	3088 BTU/min	54 kw		
Coolant Capacity (with radiator)	45 USG	170 L		
Coolant Flow Rate	214 Gal/min	810 L/min		
Maximum Coolant Friction Head	5 psi	34 kPa		
Maximum Coolant Static Head	60 ft	18 m		
Radiator Fan Load	52.5 hp	52.5 kW		
Air				
Combustion Air	1769 cfm	835 L.sec		
Maximum Air Cleaner Restriction	15 in H2O	381 mm H2O		
Alternator Cooling Air	1770 cfm	50.1 cu m/min		
Radiator Cooling Air	74000 cfm	38443 L/sec		
Maximum Restriction at Radiator Discharge (static)	0.5 in H2O	13 mm Hg		
Exhaust				
Gas Flow (Full Load)	4778 Cfm	2258 L/sec		
Gas Temperature	1350 deg F	732 deg.C		
Maximum Back Pressure	2 in Hg	50 mm Hg		
Engine				
Gross Engine Power Output	693 bhp	517 kWm		
BMEP	190 psi	1315 kPa		
Piston Speed	1800 ft/min	9.14 m/s		

* Jacket water only. Contact factory for aftercooler heat rejections and coolant flows

NPower

Alternator

Several alternators are available for application flexibility based on the required motor-starting kVA and other requirements. Larger alternator sizes have lower temperature rise for longer life of the alternator insulation system. In addition, larger alternator sizes can provide a cost-effective use of engine power in across-the-line motor-starting applications and can be used to minimize voltage waveform distortion caused by non-linear loads.

Single-bearing alternators couple directly to the engine flywheel with flexible discs for drivetrain reliability and durability. No gear reducers or speed changers are used. Two-thirds pitch windings eliminate third-order harmonic content of the AC voltage waveform and provide the standardization desired for paralleling of generator sets. The standard excitation system is a self (shunt) excited system with the voltage regulator powered directly from the generator set output.

Alternator Application Notes

Separately Excited Permanent Magnet Generator (PMG) System - This option uses an integral PMG to supply power to the voltage regulator. A PMG system generally has better motor-starting performance, lower voltage dip upon load application, and better immunity from problems with harmonics in the main alternator output induced by non-linear loads. This option is recommended for use in applications that have large transient loads, sensitive electronic loads (especially UPS applications), harmonic content, or that require sustained short-circuit current (sustained 3-phase short circuit current at approximately 3 times rated for 10 seconds).

Alternator Sizes - On any given model, various alternator sizes are available to meet individual application needs. Alternator sizes are differentiated by maximum winding temperature rise, at the generator set standby or prime rating, when operated in a 40°C ambient environment. Available temperature rises range from 80°C to 150°C. Not all temperature rise selections are available on all models. Lower temperature rise is accomplished using larger alternators at lower current density. Lower temperature rise alternators have higher motor-starting kVA, lower voltage dip upon load application, and they are generally recommended to limit voltage distortion and heating due to harmonics induced by non-linear loads.

Alternator Space Heater - is recommended to inhibit condensation.

Available Output Voltages

Three Phase Reconnectable

[ ] 120/208
[ ] 127/220
[ ] 139/240
[ ] 120/240
[ ] 240/416
[ ] 254/440
[ ] 277/480

Single Phase Non-Reconnectable

[ ] 120/240

Three Phase Non-Reconnectable

[ ] 220/380
[ ] 347/600

NPower

Specifications – Alternator

Design	Brushless, 4-pole, drip-proof revolving field
Stator	2/3 pitch
Rotor	Direct-coupled by flexible disc
Insulation System	Class H per NEMA MG1-1.65
Standard Temperature Rise	125°C standby
Exciter Type	PMG
Phase Rotation	A (U), B (V), C (W)
Alternator Cooling	Direct-drive centrifugal blower
AC Waveform Total Harmonic Distortion	<5% total no load to full linear load <3% for any single harmonic
Telephone Influence Factor (TIF)	<50 per NEMA MG1-22.43.
Telephone Harmonic Factor (THF)	<3

	80°C Alternator		105°C Alternator		125°C Alternator			
Voltage Ranges The broad range alternator can supply single phase output up to 2/3 of the set rated 3-phase KW at 1.0 power factor	110/190 thru 139/240 220/380 Thru 277/480 120/240*	347/600	110/190 thru 139/240 220/380 Thru 277/480 120/240	347/600	110/190 Thru 139/240 220/380 Thru 277/480 120/240*	120/208 Thru 139/240 240/416 Thru 277/480 120/240*	277/480	347/600
Motor Starting Maximum kVA (90% Sustained Voltage)	Broad Range: 2429	600 V: 2208	Broad Range: 2208	600V: 1749	Broad Range: 2208	480V: 1896	600V: 1749	1749
Alternator Data Sheet Numbers	308b	307b	307b	305b	307b	306b	305b	305b
Full Load Current (Amps @ Standby Rating)	120/208: 1561	127/220: 1476	139/240: 1352	220/380: 855	240/416: 780	254/440: 738	277/480: 676	347/600: 541

Notes:
1. The broad range alternators can supply single phase output up to 2/3 set rated 3-phase kW at 1.0 power factor.
2. The extended stack (full single phase output) and 4 lead alternators can supply single phase output up to full set rated 3-phase kW at 1.0 power factor.

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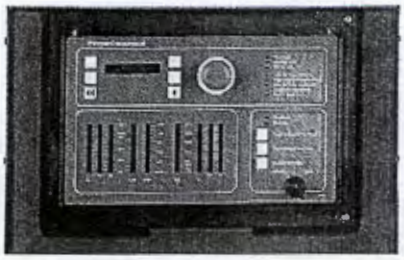
Control System



PowerCommand Control with AmpSentry™ Protection

- The PowerCommand Control is an integrated generator set control system providing governing, voltage regulation, engine protection, and operator interface functions.
- PowerCommand Controls include integral AmpSentry protection. AmpSentry provides a full range of alternator protection functions that are matched to the alternator provided.
- Controls provided include Battery monitoring and testing features, and Smart-Starting control system.
- InPower PC-based service tool available for detailed diagnostics.
- Available with Echelon LonWorks™ network interface.
- NEMA 3R enclosure.
- Suitable for operation in ambient temperatures from -40C to +70C, and altitudes to 13,000 feet (5000 meters).
- Prototype tested; UL, CSA, and CE compliant.

AmpSentry AC Protection	Engine Protection	Operator Interface
• Overcurrent and short circuit shutdown • Overcurrent warning • Single & 3-phase fault regulation • Over and under voltage shutdown • Over and under frequency shutdown • Overload warning with alarm contact • Reverse power and reverse Var shutdown • Excitation fault	• Overspeed shutdown • Low oil pressure warning and shutdown • High coolant temperature warning and shutdown • High oil temperature warning (optional) • Low coolant level warning or shutdown • Low coolant temperature warning • High and low battery voltage warning • Weak battery warning • Dead battery shutdown • Fail to start (overcrank) shutdown • Fail to crank shutdown • Redundant start disconnect • Cranking lockout • Sensor failure indication	• OFF/MANUAL/AUTO mode switch • MANUAL RUN/STOP switch • Panel lamp test switch • Emergency Stop switch • Alpha-numeric display with pushbutton access, for viewing engine and alternator data and providing setup, controls, and adjustments • LED lamps indicating genset running, not in auto, common warning, common shutdown • (5) configurable LED lamps • LED Bargraph AC data display (optional)
Alternator Data	**Engine Data**	**Other Data**
• Line-to-line and line-to-neutral AC volts • 3-phase AC current • Frequency • Total and individual phase kW and kVA	• DC voltage • Lube oil pressure • Coolant temperature • Lube oil temperature (optional)	• Genset model data • Start attempts, starts, running hours • KW hours (total and since reset) • Fault history • Load profile (hours less than 30% and hours more than 90% load) • System data display (optional with network and other PowerCommand gensets or transfer switches
	Voltage Regulation	**Control Functions**
	• Integrated digital electronic voltage regulator • 3-phase line to neutral sensing • PMG (Optional) • Single and three phase fault regulation • Configurable torque matching	• Data logging on faults • Fault simulation (requires InPower) • Time delay start and cooldown • Cycle cranking • (4) Configurable customer inputs • (4) Configurable customer outputs • (8) Configurable network inputs and (16) outputs (with optional network)

Options

[ ] Power Transfer Control [ ] Analog AC Meter Display [ ] Thermostatically Controlled Space Heater	[ ] Key-type mode switch [ ] Ground fault module [ ] Engine oil temperature [ ] Auxiliary Relays (3)	[ ] Echelon LonWorks interface [ ] Digital input and output module(s) (loose) [ ] Remote annunciator (loose)

Generator Set Options

NPower

Engine
[ ] 120/240 V, W coolant heaters
[ ] 120/240 V, W lube oil heater
[ ] Electronic governor

Cooling System
[ ] Heat exchanger cooling
[ ] Remote radiator cooling

Fuel System
[ ] Flexible fuel connector
[ ] Fuel strainer
[ ] Dual fuel systems

Alternator
[ ] 105°C rise alternator
[ ] 125°C rise alternator
[ ] 120/240 V, 100 W anti-condensation heater
[ ] Single phase

Exhaust System
[ ] GenSet mounted muffler
[ ] Heavy duty exhaust elbow
[ ] Slip on exhaust connection

Generator Set
[ ] AC entrance box
[ ] Batteries
[ ] Battery charger
[ ] Export box packaging
[ ] Main line circuit breaker
[ ] PowerCommand Network Communication Module (NCM)
[ ] Stage 1 housing w/silencer
[ ] Stage II housing w/silencer
[ ] Remote annunciator panel
[ ] Spring isolators
[ ] Weather protective enclosure with silencer
[ ] 2 year standby warranty
[ ] 5 year basic power warranty

Available Products and Services

A wide range of products and services is available to match your power generation system requirements. Cummins Power Generation products and services include:

- Diesel and Spark-Ignited Generator Sets
- Transfer Switches
- Bypass Switches
- Parallel Load Transfer Equipment
- Digital Paralleling Switchgear
- PowerCommand Network and Software
- Distributor Application Support
- Planned Maintenance Agreements

CNP-GFGA CC (06/09)

Cummins NPower

Warranty

All components and subsystems are covered by an express limited one-year warranty. Other optional and extended factory warranties and local distributor maintenance agreements are available. Contact your distributor/dealer for more information.

Certifications

CSA - The generator is CSA certified to product class 4215-01.

PTS - The Prototype Test Support (PTS) program verifies the performance integrity of the generator set design. Products bearing the PTS symbol have been subjected to demanding tests in accordance to NFPA 110 to verify the design integrity and performance under both normal and abnormal operating conditions including short circuit, endurance, temperature rise, torsional vibration, and transient response, including full load pickup.

See your distributor for more information

NPower

Cummins NPower LLC
875 Lawrence Drive
DePere, WI 54115
920.337.9750
Fax: 920.337.9746
www.cumminsnpower.com

Important: Backfeed to a utility system can cause electrocution and/or property damage. Do not connect generator sets to any building electrical system except through an approved device or after building main switch is open.

CNP-GFGA CC (06/09)

NPower

Fidlar Standby Generator

$\frac{1020}{1080} = 0.9444$

Cummins GTA28 CC S/n: 25352466

450 kW

Fuel = 5890 cf/hr @ 1080 btu/scf = 6.36 mm BTU/HR (92.8%)

HP = 693 (92.8% of fuel rating) = 643 bhp = 5.90 mm Btu/hr

Derate = 4% per 1000 feet above 3000'

Fidlar elevation = 4800' asl 1.8 x 4% = 7.2% derate

NSPS Limits = NOx / CO / VOC
2.0 / 4.0 / 1.0 g/hp-hr or 160 / 540 / 86 ppm @ 15%

$NO_x = (643\ bhp)\left(\frac{2.0\ g\ NO_x}{bhp-hr}\right)\left(\frac{500\ hrs}{yr}\right)\left(\frac{1\ lb}{453.6\ g}\right) = 1417.5\ lb/yr = 0.71\ tpy$

$CO = (643\ bhp)\left(\frac{4.0\ g\ CO}{bhp-hr}\right)\left(\frac{500\ hrs}{yr}\right)\left(\frac{1\ lb}{453.6\ g}\right) = 2835.1\ lb/yr = 1.42\ tpy$

$VOC = (643\ bhp)\left(\frac{1.0\ g\ VOC}{bhp-hr}\right)\left(\frac{500\ hrs}{yr}\right)\left(\frac{1\ lb}{453.6\ g}\right) = 708.8\ lb/yr = 0.35\ tpy$

$PM = \left(\frac{5.9\ mm\ Btu}{hr}\right)\left(\frac{2.06 \times 10^{-2}\ lb\ PM}{mm\ Btu}\right)\left(\frac{500\ hrs}{yr}\right) = 60.8\ lb/yr = 0.03\ tpy$

$SO_2 = \left(\frac{5.9\ mm\ Btu}{hr}\right)\left(\frac{1.45 \times 10^{-3}\ SO_2}{mm\ Btu}\right)\left(\frac{500\ hrs}{yr}\right) = 4.3\ lb/yr = 0.002\ tpy$

June 21, 2011

Mr. Scott Bassett
Questar Corporation
PO Box 45360
Salt Lake City, UT 84145

Dear Mr. Bassett:

Re: Subpart JJJJ Engine Emission Testing For QPL, Fidlar Standby Genset Facility, Permit V-OU-0002-05.00.

Oasis Emission Consultants, Inc. was requested to perform an engine emission test on a Cummins GTA28CC rich burn engine (Permit V-OU-0002-05.00), to satisfy the requirements of EPA 40 CFR 60, Subpart JJJJ.

Emission Levels

The average recorded levels, expressed in units of PPM @ 15% O2 were found to comply with emission levels stipulated by Subpart JJJJ.

Average emission levels for all three test runs are summarized below.

Emission Unit	Avg NOx	NOx EPA Limit	Avg CO	CO EPA Limit	*Avg NMHC	VOC EPA Limit
PPM @ 15% O2	54.42	160	37.28	540	6.65	86

* Please note: VOC levels are reported as NMHC through the use of a Methane Cutter as previously described in the testing protocol.

Catalyst Parameters (Averaged Over 3 Test Runs)

Inlet Temp (deg F)	DP (in H2O)
NA	NA

Testing Protocol

The attached report was generated using standard CEMS equipment and methodologies as required by EPA 40 CFR 60(A) Methods 3, 7E, 10 & 25A.

UNIT QPC TANK

E&P TANKS RUN

```
**********************************************************************************************
*     Project Setup Information                                                              *
**********************************************************************************************
Project File               : H:\API\E&P TANK Version 2.0\Fidlar.ept
Flowsheet Selection        : Oil Tank with Separator
Calculation Method         : AP42
Control Efficiency         : 100.0%
Known Separator Stream     : Low Pressure Oil
Entering Air Composition   : No

Filed Name                 : Ouray-Chapita
Well Name                  : Fidlar Compressor Station
Permit Number              : V-UO-0002-05.01
Date                       : 2012.03.29


**********************************************************************************************
*     Data Input                                                                             *
**********************************************************************************************

Separator Pressure         : 300.00[psig]
Separator Temperature      : 54.27[F]
Ambient Pressure           : 14.70[psia]
Ambient Temperature        : 54.27[F]
C10+ SG                    : 0.7455
C10+ MW                    : 160.52

-- Low Pressure Oil ------------------------------------------------------------------------
   No.     Component             mol %
   1       H2S                    0.0000
   2       O2                     0.0000
   3       CO2                    0.4253
   4       N2                     0.0120
   5       C1                    23.6256
   6       C2                     5.8169
   7       C3                     5.2798
   8       i-C4                   2.1717
   9       n-C4                   3.6596
   10      i-C5                   2.9526
   11      n-C5                   2.8641
   12      C6                     3.4078
   13      C7                    13.2877
   14      C8                     4.0281
   15      C9                     3.1164
   16      C10+                  22.6134
   17      Benzene                0.7109
   18      Toluene                1.3767
   19      E-Benzene              0.1451
   20      Xylenes                1.3316
   21      n-C6                   2.7293
   22      224Trimethylp          0.4454

-- Sales Oil -------------------------------------------------------------------------------
Production Rate            : 1.1[bbl/day]
Days of Annual Operation   : 365 [days/year]
API Gravity                : 58.5
Reid Vapor Pressure        : 6.30[psia]
Bulk Temperature           : 54.27[F]

-- Tank and Shell Data ---------------------------------------------------------------------
Diameter                   : 12.00[ft]
Shell Height               : 20.00[ft]
Cone Roof Slope            : 0.06
Average Liquid Height      : 10.00[ft]
Vent Pressure Range        : 0.06[psi]
Solar Absorbance           : 0.68
```

-- Meteorological Data ----------

City : Salt Lake City, UT
Ambient Pressure : 14.70[psia]
Ambient Temperature : 54.27[F]
Min Ambient Temperature : 39.30[F]
Max Ambient Temperature : 64.00[F]
Total Solar Insolation : 1603.00[Btu/ft^2*day]

****
* Calculation Results *
****

-- Emission Summary ----------

Item	Uncontrolled [ton/yr]	Uncontrolled [lb/hr]
Total HAPs	0.120	0.027
Total HC	7.176	1.638
VOCs, C2+	4.574	1.044
VOCs, C3+	3.448	0.787

Uncontrolled Recovery Info.

Vapor	547.5400 x1E-3	[MSCFD]
HC Vapor	541.4700 x1E-3	[MSCFD]
GOR	497.76	[SCF/bbl]

-- Emission Composition ----------

No	Component	Uncontrolled [ton/yr]	Uncontrolled [lb/hr]
1	H2S	0.000	0.000
2	O2	0.000	0.000
3	CO2	0.125	0.029
4	N2	0.002	0.000
5	C1	2.602	0.594
6	C2	1.126	0.257
7	C3	1.222	0.279
8	i-C4	0.473	0.108
9	n-C4	0.673	0.154
10	i-C5	0.362	0.083
11	n-C5	0.272	0.062
12	C6	0.127	0.029
13	C7	0.177	0.040
14	C8	0.017	0.004
15	C9	0.005	0.001
16	C10+	0.004	0.001
17	Benzene	0.018	0.004
18	Toluene	0.011	0.003
19	E-Benzene	0.000	0.000
20	Xylenes	0.003	0.001
21	n-C6	0.080	0.018
22	224Trimethylp	0.006	0.001
	Total	7.305	1.668

-- Stream Data ----------

No.	Component	MW	LP Oil mol %	Flash Oil mol %	Sale Oil mol %	Flash Gas mol %	W&S Gas mol %	Total Emissions mol %
1	H2S	34.80	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
2	O2	32.00	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
3	CO2	44.01	0.4253	0.0250	0.0000	1.1005	0.0001	1.0783
4	N2	28.01	0.0120	0.0001	0.0000	0.0321	0.0001	0.0315
5	C1	16.04	23.6256	0.4127	0.0000	62.7799	0.0001	61.5114
6	C2	30.07	5.8169	0.6717	0.0000	14.4956	0.0001	14.2027
7	C3	44.10	5.2798	2.0560	0.0052	10.7176	0.4208	10.5096
8	i-C4	58.12	2.1717	1.6852	0.2563	2.9923	7.7572	3.0886
9	n-C4	58.12	3.6596	3.4278	0.9956	4.0507	20.7676	4.3885
10	i-C5	72.15	2.9526	3.8086	2.7772	1.5087	20.9142	1.9008
11	n-C5	72.15	2.8641	3.9173	3.3017	1.0876	18.0377	1.4301

12	C6	86.16	3.4078	5.1950	5.7460	0.3933	9.2280	0.5718
13	C7	100.20	13.2877	20.8997	25.0224	0.4481	12.5022	0.6917
14	C8	114.23	4.0281	6.3945	7.8523	0.0366	1.1539	0.0591
15	C9	128.28	3.1164	4.9590	6.1333	0.0083	0.2913	0.0141
16	C10+	160.52	22.6134	36.0167	44.6820	0.0054	0.2160	0.0097
17	Benzene	78.11	0.7109	1.0971	1.2520	0.0596	1.4613	0.0879
18	Toluene	92.13	1.3767	2.1765	2.6427	0.0277	0.8022	0.0433
19	E-Benzene	106.17	0.1451	0.2306	0.2843	0.0008	0.0266	0.0013
20	Xylenes	106.17	1.3316	2.1172	2.6124	0.0064	0.2099	0.0105
21	n-C6	86.18	2.7293	4.2069	4.7800	0.2369	5.8784	0.3509
22	224Trimethylp	114.24	0.4454	0.7025	0.8475	0.0118	0.3325	0.0183
	MW		82.36	115.34	122.17	26.74	74.31	27.70
	Stream Mole Ratio		1.0000	0.6278	0.6201	0.3722	0.0077	0.3799
	Heating Value	[BTU/SCF]				1555.41	4085.75	1606.53
	Gas Gravity	[Gas/Air]				0.92	2.57	0.96
	Bubble Pt. @ 100F	[psia]	867.37	26.54	3.10			
	RVP @ 100F	[psia]	1232.45	87.44	20.56			
	Spec. Gravity @ 100F		0.631	0.682	0.688			

UNIT QPC LOADOUT

GRI HAPCALC RUN

GRI-HAPCalc® 3.0
Truck Loading Report

Facility ID:	**FIDLAR**
Operation Type:	**COMPRESSOR STATION**
Facility Name:	**FIDLAR STATION**
User Name:	**S. Bassett**
Units of Measure:	**U.S. STANDARD**

Notes:

Note: Emissions less than 5.00E-09 tons (or tonnes) per year are considered insignificant and are treated as zero. These emissions are indicated on the report with a "0". Emissions between 5.00E-09 and 5.00E-05 tons (or tonnes) per year are represented on the report with "0.0000".

Truck Loading Unit

Unit Name: LOADOUT

Annual Throughput:	400.00 bbl/yr	**Control Efficiency:**	0.00 %
Ambient Temperature:	54.00 °F		
Loading Factor:	1		
Type of Loading:	1.0 - Loading in vapor balance service		
Is Truck Required to Pass Annual Inspection?:	YES		
Are Vapors Routed to Control Device?:	NO		

User Concentration Inputs

Chemical Name	Feed Wt %
Ethane	0.0000
Propane	0.0000
Butane	7.6300
Pentane	48.6000
C6+	43.7700
n-Hexane	42.1400
Benzene	0.6200
Toluene	0.6600
Ethylbenzene	0.1000
Xylenes(m,p,o)	0.2500
2,2,4-Trimethylpentane	0.0000

Calculated Emissions (ton/yr)

	Chemical Name	Emissions
HAPs		
	Benzene	0.0001
	Toluene	0.0000
	Ethylbenzene	0.0000
	Xylenes(m,p,o)	0.0000
	n-Hexane	0.0107
Total		0.0108

Criteria Pollutants

NMHC	0.0841
NMEHC	0.0841

Other Pollutants

Butane	0.0276
Pentane	0.0454
C6+	0.0111

FIDLAR STATION

GAS ANALYSIS

QUESTAR APPLIED TECHNOLOGY

1210 D. Street, Rock Springs, Wyoming 82901

(307) 352-7292

LIMS ID:	N/A		Description:	Fidlar ML 59 Suction
Analysis Date/Time:	4/22/2010	2:28 PM	Field:	Fidlar
Analyst Initials:	AST		ML#:	QPC
Instrument ID:	Instrument 1		GC Method:	Quesbtex
Data File:	QPC44.D			
Date Sampled:	4/16/2010			

Component	Mol%	Wt%	LV%
Methane	90.3300	80.1748	85.8066
Ethane	5.5796	9.2823	8.3853
Propane	2.0398	4.9763	3.1518
Isobutane	0.3320	1.0675	0.6090
n-Butane	0.3811	1.2256	0.6738
Neopentane	0.0037	0.0146	0.0079
Isopentane	0.0903	0.3604	0.1853
n-Pentane	0.0583	0.2329	0.1185
2,2-Dimethylbutane	0.0017	0.0079	0.0039
2,3-Dimethylbutane	0.0035	0.0169	0.0081
2-Methylpentane	0.0088	0.0417	0.0204
3-Methylpentane	0.0044	0.0210	0.0101
n-Hexane	0.0083	0.0397	0.0192
Heptanes	0.0105	0.0521	0.0219
Octanes	0.0002	0.0014	0.0006
Nonanes	0.0000	0.0000	0.0000
Decanes plus	0.0002	0.0016	0.0007
Nitrogen	0.3513	0.5444	0.2159
Carbon Dioxide	0.7963	1.9389	0.7610
Oxygen	0.0000	0.0000	0.0000
Hydrogen Sulfide	0.0000	0.0000	0.0000
Total	100.0000	100.0000	100.0000

Global Properties		Units
Gross BTU/Real CF	1098.9	BTU/SCF at 60°F and14.73 psia
Sat.Gross BTU/Real CF	1081.0	BTU/SCF at 60°F and14.73 psia
Gas Compressibility (Z)	0.9975	
Specific Gravity	0.6255	air=1
Avg Molecular Weight	18.075	gm/mole
Propane GPM	0.559033	gal/MCF
Butane GPM	0.228205	gal/MCF
Gasoline GPM	0.070196	gal/MCF
26# Gasoline GPM	0.190035	gal/MCF
Total GPM	0.857434	gal/MCF
Base Mol%	100.295	%v/v

Sample Temperature:	50	°F
Sample Pressure:	800	psig

Reviewed By: A. Tomb

Component	Mol%	Wt%	LV%
Benzene	0.0014	0.0060	0.0022
Toluene	0.0004	0.0019	0.0007
Ethylbenzene	0.0000	0.0000	0.0000
M&P Xylene	0.0000	0.0000	0.0000
O-Xylene	0.0000	0.0000	0.0000
2,2,4-Trimethylpentane	0.0002	0.0015	0.0007
Cyclopentane	0.0000	0.0000	0.0000
Cyclohexane	0.0025	0.0117	0.0048
Methylcyclohexane	0.0013	0.0070	0.0029
Description:	Fidlar ML 59 Suction		

GRI GlyCalc Information

Component	Mol%	Wt%	LV%
Carbon Dioxide	0.7963	1.9389	0.7610
Hydrogen Sulfide	0.0000	0.0000	0.0000
Nitrogen	0.3513	0.5444	0.2159
Methane	90.3300	80.1748	85.8066
Ethane	5.5796	9.2823	8.3853
Propane	2.0398	4.9763	3.1518
Isobutane	0.3320	1.0675	0.6090
n-Butane	0.3811	1.2256	0.6738
Isopentane	0.0940	0.3750	0.1932
n-Pentane	0.0583	0.2329	0.1185
Cyclopentane	0.0000	0.0000	0.0000
n-Hexane	0.0083	0.0397	0.0192
Cyclohexane	0.0025	0.0117	0.0048
Other Hexanes	0.0184	0.0875	0.0425
Heptanes	0.0047	0.0240	0.0106
Methylcyclohexane	0.0013	0.0070	0.0029
2,2,4 Trimethylpentane	0.0002	0.0015	0.0007
Benzene	0.0014	0.0060	0.0022
Toluene	0.0004	0.0019	0.0007
Ethylbenzene	0.0000	0.0000	0.0000
Xylenes	0.0000	0.0000	0.0000
C8+ Heavies	0.0004	0.0030	0.0013
Subtotal	100.0000	100.0000	100.0000
Oxygen	0.0000	0.0000	0.0000
Total	100.0000	100.0000	100.0000

INSIGNIFICANT UNITS

EMISSION DOCUMENTATION

Emission Calculation for External Combustion Sources

Burner Data

Source	Burner Rating (MMBtu/Hr)	Equipment	Annual Op Time (hours)	Fuel Type	Fuel Htg Value[1] (Btu/scf)	Fraction of VOC
H1	0.750	Heater	8760	NG	1020	0.08
H2	1.700	Boiler	8760	NG	1020	0.08

Emission Factors

Source	Burner Rating (MMBtu/Hr)	Emission Factors NOx (Lb/MMFt^3)	CO (Lb/MMFt^3)	SO_2 (Lb/MMFt^3)	PM (Lb/MMFt^3)	TOC [2] (Lb/MMFt^3)	VOC [3] (Lb/MMFt^3)
H1	0.750	100.0	84.0	0.6	7.6	11.0	0.9
H2	1.700	100.0	84.0	0.6	7.6	11.0	0.9
	EF Source	AP-42	AP-42	AP-42	AP-42	AP-42	Estimate

2- Total Organic Compunds (TOC)

3 - VOC emission factor determined by taking TOC factor times fraction of fuel gas that was VOC.

Emissions (Lb/Hr) = E.F. (Lb/MMft^3) * FHV/1000 * Burner Rating (MMbtu/Hr) * 1/FHV (btu/scf) * 1 MMft^3/1x10^6 ft^3 * 1x10^6 Btu/MMbtu

Emissions (TPY) = Emissions (Lb/Hr) * Annual Operating Time (Hr/Yr) * 1 ton/2,000 Lb

Source Emissions

Source	NOx (Lb/Hr)	NOx (TPY)	CO (Lb/Hr)	CO (TPY)	SO_2 (Lb/Hr)	SO_2 (TPY)	PM (Lb/Hr)	PM (TPY)	VOC (Lb/Hr)	VOC (TPY)
H1	0.08	0.33	0.06	0.28	0.00	0.00	0.01	0.02	0.00	0.00
H2	0.17	0.74	0.14	0.63	0.00	0.00	0.01	0.06	0.00	0.01
Total	**0.25**	**1.07**	**0.21**	**0.90**	**0.00**	**0.01**	**0.02**	**0.08**	**0.00**	**0.01**

NOTES : For Estimating Emissions, Using Emission Factors from EPA AP-42, Table 1.4-1 and Table 1.4-2

Insignificant Emission Sources (Storage Tanks)

Description	Material Stored	Material Vapor Pressure (psia)	Capacity (gallons)	Diameter (inches)	Height (inches)	Annual Throughput (gallons)	Turnovers per year	PTE (tpy)
Diesel Storage tank	Diesel Fuel	0.00648@60°F[1]	500	45	73	50	1	--[3]
Lubrication oil tank	Lube oil	0.00648@60°F[1]	500	50	60	88	1	--[3]
Lubrication oil tank	Lube oil	0.00648@60°F[1]	500	54	48	1,500	3	--[3]
Ambitrol storage tank	Ambitrol	0.019@237°F[2]	678	30	222	15	1	--[3]
Glycol tank (used)	Triethylene glycol	0.019@237°F	6,300	116	144	250	1	--[3]
Glycol tank (new)	Triethylene glycol	0.019@237°F	3,755	96	120	3,000	1	--[3]
Methanol Storage tank	Methanol							

1. Vapor pressure of Distillate fuel oil No. 2, *Emission Factor Documentation for AP-42 Section 7.1* , U.S. EPA, Emission Factor and Inventory Group, September 1977.
2. Vapor pressure of Triethylene glycol.
3. Emissions are insignificant due to low vapor pressure of material stored and low turnover per year.

Fidlar Station Blowdown Calculations

5 year average volume (2008-2012) = 32.58333 mcf/yr
= 32,583.33 scf/yr

Non-VOC

		Pounds
Methane	= (32,583.33 scf)(1 mol / 379.5 scf)(16.043 lb / 16-mol)(0.90033 mol)	= 1244.21
Ethane	= (")(1 mol / 379.5 scf)(30.070 lb / lb-mol)(0.055796 mol)	= 144.05

VOC

Propane	= (32,583.33 scf)(1 mol / 379.5 scf)(44.097 lb / lb-mol)(0.020398)	= 77.23
Butanes	= (")(1 mol / 379.5 scf)(58.123 lb / lb-mol)(0.007131)	= 35.58
Pentanes	= (")(1 mol / 379.5 scf)(72.15 lb / lb-mol)(0.001523)	= 9.43
*n-hexane	= (")(1 mol / 379.5 scf)(86.177 lb / lb-mol)(0.000083)	= 0.61
Hexanes (other)	= (")(1 mol / 379.5 scf)(100.204 lb / lb-mol)(0.000222)	= 1.91
Heptanes	= (")(1 mol / 379.5 scf)(100.204 lb / lb-mol)(0.000047)	= 0.40
Octanes	= (")(1 mol / 379.5 scf)(114.231 lb / lb-mol)(0.000004)	= <0.01
2,2,4-Trimethylpentane	= (")(1 mol / 379.5 scf)(177.54 lb / lb-mol)(0.000002)	= 0.03
*Benzene	= (")(1 mol / 379.5 scf)(78.114 lb / lb-mol)(0.000014)	= 0.09
*Toluene	= (")(1 mol / 379.5 scf)(92.141 lb / lb-mol)(0.000007)	= 0.03
*Ethyl Benzene	= (")(1 mol / 379.5 scf)(106.167 lb / lb-mol)(0)	= 0
*Xylenes	= (")(1 mol / 379.5 scf)(106.167 lb / lb-mol)(0)	= 0

HAP Constituents

Total VOC = 125.31 lbs
= 0.06 tons

HAPs = 0.76 lbs
= <0.01 tons


Fidlar Station Aerial Plot
FS05
FS07
FS02
FS01
FS03
Condensate Tank
and Load-out

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COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [signature]

☐ Agent
☐ Address

B. Received by (*Printed Name*) SOHIZ

C. Date of Delive 7/15/13

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☒ No

+B JUL 12 2013

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☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

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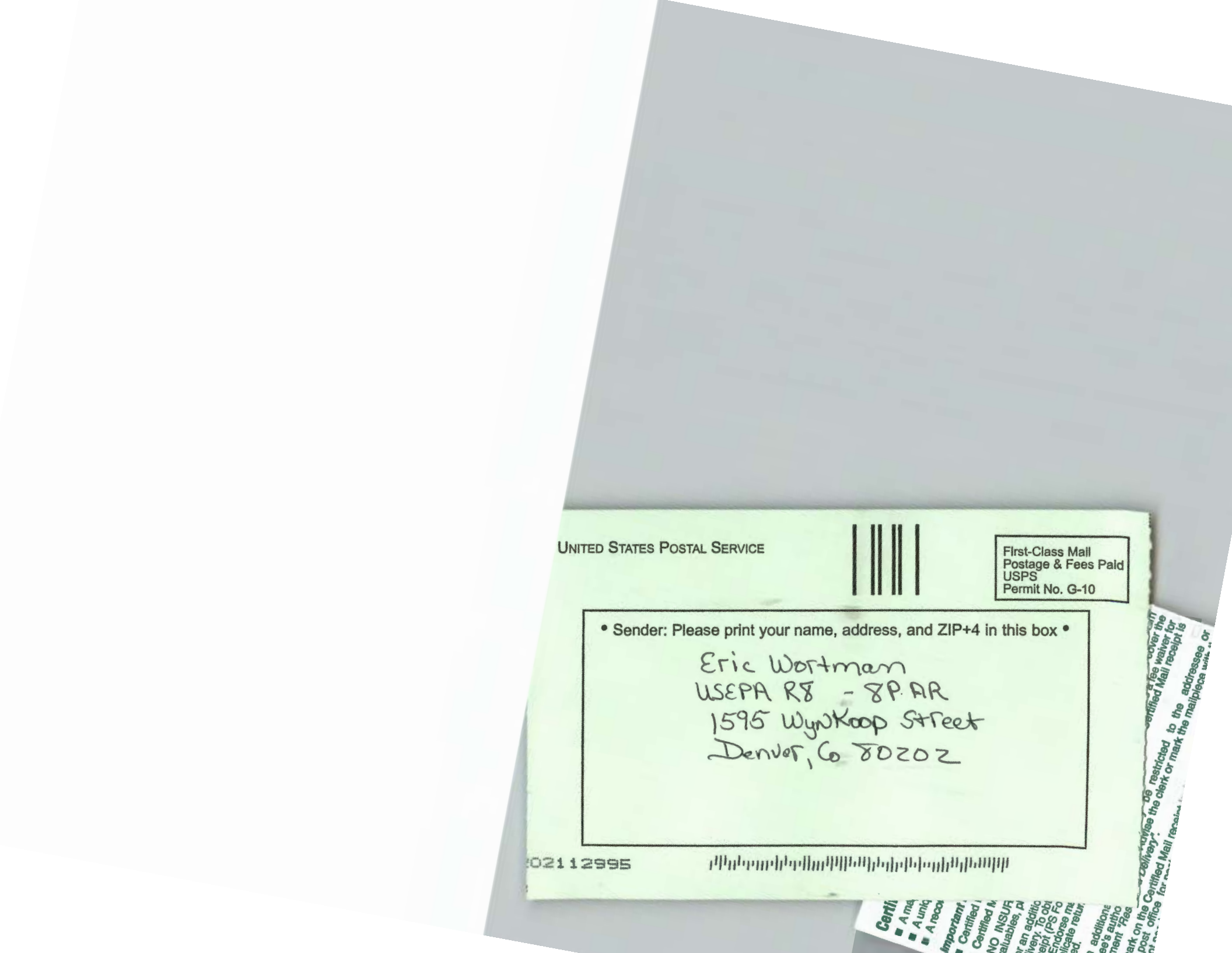
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REGION 8
1595 Wynkoop Street
Denver, Colorado 80202
Phone 800-227-8917
http://www.epa.gov/region08

Ref: 8P-AR

JUL 1 1 2013

Mr. Scott R. Bassett
Sr. Environmental Coordinator
Questar Pipeline Company
P.O. Box 45360
Salt Lake City, Utah 84145-0360

Re: Title V Permit Renewal
V-UO-000002-2013.00
Questar Pipeline Company
Fidlar Compressor Station

Dear Mr. Bassett:

The U.S. Environmental Protection Agency (EPA) has completed its review of Questar Pipeline Company's (QPC's) application for a renewal Title V Permit to Operate (Part 71 Permit) for the Fidlar Compressor Station located on the Uintah and Ouray Indian Reservation in Uintah County, Utah. The application was received by the EPA on June 7, 2013.

The EPA is sending QPC this letter to document the agency's completeness determination, and remind QPC of its continuing obligation to correct any misinformation and provide updated information to the EPA, as well as its continuing obligation to comply with all applicable EPA permitting and regulatory requirements. The EPA is also requesting additional information at this time and requiring QPC to submit a Part 49 application for the facility.

Completeness Determination: Pursuant to 40 CFR 71.5(a)(2), we have determined that the information submitted is administratively complete and sufficient to evaluate the Fidlar Compressor Station and its Part 71 permit renewal application. Therefore, the application is deemed administratively complete as of June 13, 2013.

Regulatory Requirements: Please be aware that this completeness determination does not mean we have already approved the requested permit, nor does it mean that we have determined whether Title V, Prevention of Significant Deterioration (PSD), National Emission Standards for Hazardous Air Pollutants (NESHAP), or New Source Performance Standard (NSPS) compliance concerns have been adequately addressed.

Duty to Correct/Update Application: If you find that you have omitted any relevant facts, or submitted incorrect information, you must promptly file corrections to your application with our office. In addition, if regulations become applicable before the draft operating permit for this facility is made

available for public comment, you must provide additional information to us addressing the new applicable requirements (See 40 CFR 71.5(b)).

Duty to Provide Additional Information: Please be advised that this application completeness determination does not constitute a thorough evaluation of the merits of the application. If we determine that additional information is necessary to evaluate the application or to take final action on it, we may request such information in writing and set a reasonable deadline for a response (See 40 CFR 71.5(a)(2)).

At this time we are requesting the following information and are asking that QPC provide the information by November 1, 2013:

1. The application identified one 400 bbl condensate tank as emission unit QPC Tank and provided the supporting EPA Tanks 4.0 model calculations. EPA Tanks 4.0 does not account for flash emissions and is only an acceptable method for calculating working and breathing losses. Please provide flash emissions estimates for unit QPC Tank using simulation software based on known properties of hydrocarbon liquid and vapors and accepted chemical equations of state. Some common and appropriate flashing model software programs include API E&P Tank V2, Prosim, Hysim, Hysys, ProMax and KFlash. Every hydrocarbon stream entering the vessel should have a separate flash emissions calculation and separate liquids lab analyses, including any liquid dropout points from interstage cooling between compression. The most recent laboratory analyses of liquid samples and any other supporting documentation should be provided with the emission calculations.

2. Please provide your review of all applicable and potentially applicable requirements as they may or may not apply to your facility now. For requirements that do not apply, state why. Requirements that apply or potentially apply to this facility include, but may not be limited to:

    - 40 CFR 52 - PSD
    - 40 CFR 60 – NSPS
        - Subpart Db – Industrial, Commercial, Institutional Steam Generating Units
        - Subpart Dc – Small Industrial, Commercial, Institutional Steam Generating Units
        - Subpart K - Petroleum Liquid Storage Vessels
        - Subpart Ka - Petroleum Liquid Storage Vessels
        - Subpart Kb – VOC (including petroleum liquid) Storage Vessels
        - Subpart GG – Stationary Gas Turbines
        - Subpart IIII- Stationary Compression Ignition Internal Combustion Engines
        - Subpart JJJJ- Stationary Spark Ignition Internal Combustion Engines
        - Subpart KKKK – Stationary Combustion Turbines
        - Subpart OOOO – Oil and Gas Sector
    - 40 CFR 61 – National Emission Standards for Hazardous Air Pollutants
        - Subpart V – Equipment Leaks (Fugitive Emission Sources)
    - 40 CFR 63 – NESHAP
        - Subpart HH – Oil and Natural Gas Production
        - Subpart HHH – Oil and Natural Gas Transmission, Storage and Distribution
        - Subpart IIII- Stationary Compression Ignition Internal Combustion Engines
        - Subpart JJJJ- Stationary Spark Ignition Internal Combustion Engines
        - Subpart ZZZZ – Reciprocating Internal Combustion Engines (RICE)
        - Subpart EEEE – Organic Liquids Distribution (non-gasoline)
        - Subpart DDDDD – Major Source Boiler MACT

        - Subpart JJJJJJ- Area Source Boiler MACT
        - Subpart YYYY – Stationary Combustion Turbines
    - 40 CFR 64 – Compliance Assurance Monitoring (CAM)
    - 40 CFR 68 – Chemical Accident Prevention
    - 40 CFR 82 – Stratospheric Ozone and Climate Protection

3. On February 6, 2012, the EPA finalized a Settlement Agreement for Environmental Appeals Board Case No. CAA 10-04. A copy of the Settlement Agreement can be accessed on the EPA's website at http://www2.epa.gov/sites/production/files/documents/BP-FloridaRiver-Settlement-Agreement.pdf. The settlement agreement requires the EPA to develop and implement an Oil and Gas Part 71 Source Determination "pilot" program as outlined in Exhibit A of the Settlement Agreement. The renewal Part 71 permit application for the Fidlar Compressor Station is subject to the pilot program because it is a renewal application for a Title V permit for which Region 8 is the permitting authority. Thus, we are asking QPC to submit the additional information requested in Attachment A of this letter regarding the source determination pilot program. Based on the information received, we will determine whether additional analysis is necessary.

Part 49 Application: On July 15, 2011, the EPA issued a significant modification to the Part 71 permit for Fidlar Compressor Station (Permit # V-UO-0002-05.01) to establish federally enforceable emission limitations that recognize the beneficial emission reduction from the control equipment on the four stroke rich burn compressor engine operating at the facility. The creation of the legally and practically enforceable limits in a Part 71 permit was a temporary, gap-filling measure for those sources operating in Indian country that did not have the ability to obtain these limits through other programs, such as exists in state jurisdictions. The Federal Tribal Minor New Source Review Program in Indian Country (TMNSR), effective August 30, 2011, created a permanent mechanism for establishing legally and practically enforceable requirements in a preconstruction permit. Sections 49.153(a)(3)(iv) and 49.158(c)(2)(iii) of the TMNSR rule provide the EPA with the authority to transfer such limits that were previously established in a Part 71 permit to a TMNSR permit. Therefore, we are requiring QPC to submit an application for a synthetic minor source TMNSR permit for the Fidlar Compressor Station.

At this time we are requesting that QPC submit a TMNSR synthetic minor permit application for the Fidlar Compressor Station by November 1, 2013.

Please remember this completeness determination does not affect your obligation to obtain pre-construction permits for any activity which may be subject to PSD permitting requirements at 40 CFR 52.21, nor any obligation you may have for complying with NESHAP at 40 CFR Part 63 or NSPS at 40 CFR Part 60. Where Federal NESHAP and NSPS regulations do apply to the Fidlar Compressor station, QPC has an ongoing obligation to comply with the standards and requirements in those regulations regardless of Part 71 Permit issuance. Furthermore, future changes at the facility, whether considered major or minor for construction permitting purposes, may necessitate updating your Part 71 Permit application.

Pursuant to 40 CFR Part 2, Subpart B, QPC is entitled to assert a business confidentiality claim covering any part of the submitted information. Attachment B specifies the assertion and substantiation requirements for business confidentiality claims. Failure to assert such a claim makes the submitted information subject to public disclosure upon request and without further notice to you, pursuant to the Freedom of Information Act, 5 USC Section 552. Information subject to a business confidentiality claim may only be made available to the public in accordance with 40 CFR Part 2, Subpart B.

If portions of your submittal have business confidentiality claims, then please provide a redacted version that would remove any confidential business information.

This permit action has been assigned to Mr. Eric Wortman and has been given permit number V-UO-000002-2013.00. If you have any questions, please contact him at 303-312-6649. We look forward to working with your company in preparing the renewal Part 71 Permit.

Sincerely,

Carl Daly, Director
Air Program

Enclosure

Attachment A

EPA Region 8 Oil and Gas Part 71 Source Determination Screening Information Request

1. Please respond to the following questions, as applicable, in regards to operations at the facility under consideration for an initial or renewed Clean Air Act (CAA) Title V Operating Permit under 40 CFR Part 71.

    a. Does the facility to be permitted receive and/or dispatch oil and/or natural gas from/to other oil and/or natural gas production components, owned or operated by the applicant, such as well sites, compressor stations, tank batteries, gas plants, etc.? If yes, please explain.
    b. Does the facility to be permitted receive and/or dispatch oil and/or natural gas from/to other oil and/or natural gas production components, owned and/or operated by third parties, such as well sites, compressor stations, tank batteries, gas plants, etc.? If yes, please explain.
    c. What components owned and/or operated by the applicant are capable of operating independently from other components owned and/or operated by the applicant? If any, please explain.
    d. In regard to any pipeline system(s) utilized by the facility to be permitted, is it (are they) owned and operated exclusively by the applicant?
    e. If the pipeline system(s) is <u>not</u> exclusively owned and/or operated by the applicant, is it (are they) a shared resource(s) with third party companies? Please identify any third party companies and describe the nature of interactions.

2. Please submit the following information for oil and/or natural gas components operating in the same system as the facility to be permitted:

    a. A system map identifying;
        i. Components owned and/or operated by the applicant that receive or dispatch oil and/or natural gas from/to the facility to be permitted;
        ii. Pipelines utilized by the facility to be permitted that are owned and/or operated by the applicant; and
        iii. Pipelines utilized by the facility to be permitted that are shared with third party companies.
    b. The SIC codes for each component.
    c. A description of activities for each component.
    d. The Latitude/ Longitude for each component.
    e. The proximity of the component to facility to be permitted.
    f. A description of the siting factors for new and existing components owned and/or operated by the applicant (such as surface owner agreements, spacing orders, leases, NEPA requirements, terrain, and proximity to existing structures.).
    g. A flow diagram of the oil and/or natural gas flow among the components that are owned and/or operated by the applicant and utilized by the facility to be permitted.

h. A general description of system redundancy, if present. (i.e., What happens if a component in the system owned and/or operated by the applicant and utilized by the facility to be permitted goes offline? What emissions sources, if any, are capable of operating independently from other components?)
i. A general description of factors influencing the percentage of oil and/or natural gas flow to downstream compression and processing facilities such as, pressure, contractual obligations, gas custody, etc.

Attachment B

Confidential Business Information (CBI)
Assertion and Substantiation Requirements

1. Assertion Requirements

You may assert a business confidentiality claim covering all or part of the information requested in the attached letter, as provided in 40 CFR §2.203(b). If portions of a document have CBI claims, then please provide a redacted version that would remove any CBI information. To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document over which you make a claim of confidentiality should be marked by placing on or attaching to the information, at the time it is submitted to United States Environmental Protection Agency (U.S. EPA), a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret" or "proprietary" or "company confidential" and a date if any when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by the U.S. EPA only to the extent permitted and by means of the procedures set forth by Section 114(c) of the Clean Air Act (the Act), and 40 CFR Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. U.S. EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

Please segregate personnel, medical and similar files from your responses and include that information on separate sheet(s) marked as "Personal Privacy Information" given that disclosure of such information to the general public may constitute an invasion of privacy.

2. Substantiation Requirements

All confidentiality claims are subject to U.S. EPA verification and must be made in accordance with 40 CFR §2.208 which provides in part that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; and that the information is not and has not been reasonably obtainable by legitimate means without your consent.

As explained above, if you assert a CBI claim in responding to the attached letter, please specify which portions of the information you consider confidential. **You must be specific by page, paragraph, and sentence when identifying the information subject to your claim**. Any information not specifically identified as subject to confidentiality claim may be disclosed to the public and a requestor without further notice to you. For each item or class of information that you identify as being subject to CBI, please answer the following questions, giving as much detail as possible:

a. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will create the need for confidentiality, please specify that event.

b. Information submitted to U.S. EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?

c. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound

by an agreement not to disclose the information further? If so, why should the information still be considered confidential?

d. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

e. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

f. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

g. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to U.S. EPA of similar information in the future.

h. Any other issue you deem relevant (including, if pertinent reasons why you believe that the information you claim to be CBI is not emission or effluent data.)

Please note that emission data, provided under Section 114 of the Act, 42 USC § 7414, is not entitled to confidential treatment under 40 CFR Part 2. "Emission data" means, with reference to any source of emission of any substance into the air.

Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

a. Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

b. A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source). 40 CFR §§ 2.30 l(a)(2)(i)(A), (B) and (C).

Emission data includes, but is not limited to, service records stating the amount of refrigerant added to a unit or reclaimed from a unit.

You bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), U.S. EPA requires that you to bracket all text so claimed and mark it "CBI". Information so designated will be disclosed by U.S.

EPA only to the extent allowed by, and by means of the procedures set forth in, 40 CFR Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

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Ref: 8P-AR

Mr. Scott R. Basse
Sr. Environmental
Questar Pipeline Company
P.O. Box 45360
Salt Lake City, Utah 84145-0360

Re: Title V Permit Renewal
V-UO-000002-2013.00
Questar Pipeline Company
Fidlar Compressor Station

Dear Mr. Bassett:

The U.S. Environmental Protection Agency (EPA) has completed its review of Questar Pipeline Company's (QPC's) application for a renewal Title V Permit to Operate (Part 71 Permit) for the Fidlar Compressor Station located on the Uintah and Ouray Indian Reservation in Uintah County, Utah. The application was received by the EPA on June 7, 2013.

The EPA is sending QPC this letter to document the agency's completeness determination, and remind QPC of its continuing obligation to correct any misinformation and provide updated information to the EPA, as well as its continuing obligation to comply with all applicable EPA permitting and regulatory requirements. The EPA is also requesting additional information at this time and requiring QPC to submit a Part 49 application for the facility.

Completeness Determination: Pursuant to 40 CFR 71.5(a)(2), we have determined that the information submitted is administratively complete and sufficient to evaluate the Fidlar Compressor Station and its Part 71 permit renewal application. Therefore, the application is deemed administratively complete as of June 13, 2013.

Regulatory Requirements: Please be aware that this completeness determination does not mean we have already approved the requested permit, nor does it mean that we have determined whether Title V. Prevention of Significant Deterioration (PSD), National Emission Standards for Hazardous Air Pollutants (NESHAP), or New Source Performance Standard (NSPS) compliance concerns have been adequately addressed.

Duty to Correct/Update Application: If you find that you have omitted any relevant facts, or submitted incorrect information, you must promptly file corrections to your application with our office. In addition, if regulations become applicable before the draft operating permit for this facility is made

available for public comment, you must provide additional information to us addressing the new applicable requirements (See 40 CFR 71.5(b)).

Duty to Provide Additional Information: Please be advised that this application completeness determination does not constitute a thorough evaluation of the merits of the application. If we determine that additional information is necessary to evaluate the application or to take final action on it, we may request such information in writing and set a reasonable deadline for a response (See 40 CFR 71.5(a)(2)).

At this time we are requesting the following information and are asking that QPC provide the information by November 1, 2013:

1. The application identified one 400 bbl condensate tank as emission unit QPC Tank and provided the supporting EPA Tanks 4.0 model calculations. EPA Tanks 4.0 does not account for flash emissions and is only an acceptable method for calculating working and breathing losses. Please provide flash emissions estimates for unit QPC Tank using simulation software based on known properties of hydrocarbon liquid and vapors and accepted chemical equations of state. Some common and appropriate flashing model software programs include API E&P Tank V2, Prosim, Hysim, Hysys, ProMax and KFlash. Every hydrocarbon stream entering the vessel should have a separate flash emissions calculation and separate liquids lab analyses, including any liquid dropout points from interstage cooling between compression. The most recent laboratory analyses of liquid samples and any other supporting documentation should be provided with the emission calculations.

2. Please provide your review of all applicable and potentially applicable requirements as they may or may not apply to your facility now. For requirements that do not apply, state why. Requirements that apply or potentially apply to this facility include, but may not be limited to:

    - 40 CFR 52 - PSD
    - 40 CFR 60 – NSPS
        - Subpart Db – Industrial, Commercial, Institutional Steam Generating Units
        - Subpart Dc – Small Industrial, Commercial, Institutional Steam Generating Units
        - Subpart K - Petroleum Liquid Storage Vessels
        - Subpart Ka - Petroleum Liquid Storage Vessels
        - Subpart Kb – VOC (including petroleum liquid) Storage Vessels
        - Subpart GG – Stationary Gas Turbines
        - Subpart IIII- Stationary Compression Ignition Internal Combustion Engines
        - Subpart JJJJ- Stationary Spark Ignition Internal Combustion Engines
        - Subpart KKKK – Stationary Combustion Turbines
        - Subpart OOOO – Oil and Gas Sector
    - 40 CFR 61 – National Emission Standards for Hazardous Air Pollutants
        - Subpart V – Equipment Leaks (Fugitive Emission Sources)
    - 40 CFR 63 – NESHAP
        - Subpart HH – Oil and Natural Gas Production
        - Subpart HHH – Oil and Natural Gas Transmission, Storage and Distribution
        - Subpart IIII- Stationary Compression Ignition Internal Combustion Engines
        - Subpart JJJJ- Stationary Spark Ignition Internal Combustion Engines
        - Subpart ZZZZ – Reciprocating Internal Combustion Engines (RICE)
        - Subpart EEEE – Organic Liquids Distribution (non-gasoline)
        - Subpart DDDDD – Major Source Boiler MACT

- Subpart JJJJJJ- Area Source Boiler MACT
- Subpart YYYY – Stationary Combustion Turbines

- 40 CFR 64 – Compliance Assurance Monitoring (CAM)
- 40 CFR 68 – Chemical Accident Prevention
- 40 CFR 82 – Stratospheric Ozone and Climate Protection

3. On February 6, 2012, the EPA finalized a Settlement Agreement for Environmental Appeals Board Case No. CAA 10-04. A copy of the Settlement Agreement can be accessed on the EPA's website at http://www2.epa.gov/sites/production/files/documents/BP-FloridaRiver-Settlement-Agreement.pdf. The settlement agreement requires the EPA to develop and implement an Oil and Gas Part 71 Source Determination "pilot" program as outlined in Exhibit A of the Settlement Agreement. The renewal Part 71 permit application for the Fidlar Compressor Station is subject to the pilot program because it is a renewal application for a Title V permit for which Region 8 is the permitting authority. Thus, we are asking QPC to submit the additional information requested in Attachment A of this letter regarding the source determination pilot program. Based on the information received, we will determine whether additional analysis is necessary.

Part 49 Application: On July 15, 2011, the EPA issued a significant modification to the Part 71 permit for Fidlar Compressor Station (Permit # V-UO-0002-05.01) to establish federally enforceable emission limitations that recognize the beneficial emission reduction from the control equipment on the four stroke rich burn compressor engine operating at the facility. The creation of the legally and practically enforceable limits in a Part 71 permit was a temporary, gap-filling measure for those sources operating in Indian country that did not have the ability to obtain these limits through other programs, such as exists in state jurisdictions. The Federal Tribal Minor New Source Review Program in Indian Country (TMNSR), effective August 30, 2011, created a permanent mechanism for establishing legally and practically enforceable requirements in a preconstruction permit. Sections 49.153(a)(3)(iv) and 49.158(c)(2)(iii) of the TMNSR rule provide the EPA with the authority to transfer such limits that were previously established in a Part 71 permit to a TMNSR permit. Therefore, we are requiring QPC to submit an application for a synthetic minor source TMNSR permit for the Fidlar Compressor Station.

At this time we are requesting that QPC submit a TMNSR synthetic minor permit application for the Fidlar Compressor Station by November 1, 2013.

Please remember this completeness determination does not affect your obligation to obtain pre-construction permits for any activity which may be subject to PSD permitting requirements at 40 CFR 52.21, nor any obligation you may have for complying with NESHAP at 40 CFR Part 63 or NSPS at 40 CFR Part 60. Where Federal NESHAP and NSPS regulations do apply to the Fidlar Compressor station, QPC has an ongoing obligation to comply with the standards and requirements in those regulations regardless of Part 71 Permit issuance. Furthermore, future changes at the facility, whether considered major or minor for construction permitting purposes, may necessitate updating your Part 71 Permit application.

Pursuant to 40 CFR Part 2, Subpart B, QPC is entitled to assert a business confidentiality claim covering any part of the submitted information. Attachment B specifies the assertion and substantiation requirements for business confidentiality claims. Failure to assert such a claim makes the submitted information subject to public disclosure upon request and without further notice to you, pursuant to the Freedom of Information Act, 5 USC Section 552. Information subject to a business confidentiality claim may only be made available to the public in accordance with 40 CFR Part 2, Subpart B.

If portions of your submittal have business confidentiality claims, then please provide a redacted version that would remove any confidential business information.

This permit action has been assigned to Mr. Eric Wortman and has been given permit number V-UO-000002-2013.00. If you have any questions, please contact him at 303-312-6649. We look forward to working with your company in preparing the renewal Part 71 Permit.

Sincerely,

Carl Daly

Carl Daly, Director
Air Program

Enclosure

Attachment A

EPA Region 8 Oil and Gas Part 71 Source Determination Screening Information Request

1. Please respond to the following questions, as applicable, in regards to operations at the facility under consideration for an initial or renewed Clean Air Act (CAA) Title V Operating Permit under 40 CFR Part 71.

    a. Does the facility to be permitted receive and/or dispatch oil and/or natural gas from/to other oil and/or natural gas production components, owned or operated by the applicant, such as well sites, compressor stations, tank batteries, gas plants, etc.? If yes, please explain.
    b. Does the facility to be permitted receive and/or dispatch oil and/or natural gas from/to other oil and or natural gas production components, owned and/or operated by third parties, such as well sites, compressor stations, tank batteries, gas plants, etc.? If yes, please explain.
    c. What components owned and/or operated by the applicant are capable of operating independently from other components owned and/or operated by the applicant? If any, please explain.
    d. In regard to any pipeline system(s) utilized by the facility to be permitted, is it (are they) owned and operated exclusively by the applicant?
    e. If the pipeline system(s) is <u>not</u> exclusively owned and/or operated by the applicant, is it (are they) a shared resource(s) with third party companies? Please identify any third party companies and describe the nature of interactions.

2. Please submit the following information for oil and/or natural gas components operating in the same system as the facility to be permitted:

    a. A system map identifying;
        i. Components owned and/or operated by the applicant that receive or dispatch oil and/or natural gas from/to the facility to be permitted;
        ii. Pipelines utilized by the facility to be permitted that are owned and/or operated by the applicant; and
        iii. Pipelines utilized by the facility to be permitted that are shared with third party companies.
    b. The SIC codes for each component.
    c. A description of activities for each component.
    d. The Latitude/ Longitude for each component.
    e. The proximity of the component to facility to be permitted.
    f. A description of the siting factors for new and existing components owned and/or operated by the applicant (such as surface owner agreements, spacing orders, leases, NEPA requirements, terrain, and proximity to existing structures.).
    g. A flow diagram of the oil and/or natural gas flow among the components that are owned and/or operated by the applicant and utilized by the facility to be permitted.

h. A general description of system redundancy, if present. (i.e., What happens if a component in the system owned and/or operated by the applicant and utilized by the facility to be permitted goes offline? What emissions sources, if any, are capable of operating independently from other components?)

i. A general description of factors influencing the percentage of oil and/or natural gas flow to downstream compression and processing facilities such as, pressure, contractual obligations, gas custody, etc.

Attachment B

Confidential Business Information (CBI)
Assertion and Substantiation Requirements

1. Assertion Requirements

You may assert a business confidentiality claim covering all or part of the information requested in the attached letter, as provided in 40 CFR §2.203(b). If portions of a document have CBI claims, then please provide a redacted version that would remove any CBI information. To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document over which you make a claim of confidentiality should be marked by placing on or attaching to the information, at the time it is submitted to United States Environmental Protection Agency (U.S. EPA), a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret" or "proprietary" or "company confidential" and a date if any when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by the U.S. EPA only to the extent permitted and by means of the procedures set forth by Section 114(c) of the Clean Air Act (the Act), and 40 CFR Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. U.S. EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

Please segregate personnel, medical and similar files from your responses and include that information on separate sheet(s) marked as "Personal Privacy Information" given that disclosure of such information to the general public may constitute an invasion of privacy.

2. Substantiation Requirements

All confidentiality claims are subject to U.S. EPA verification and must be made in accordance with 40 CFR §2.208 which provides in part that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; and that the information is not and has not been reasonably obtainable by legitimate means without your consent.

As explained above, if you assert a CBI claim in responding to the attached letter, please specify which portions of the information you consider confidential. **You must be specific by page, paragraph, and sentence when identifying the information subject to your claim**. Any information not specifically identified as subject to confidentiality claim may be disclosed to the public and a requestor without further notice to you. For each item or class of information that you identify as being subject to CBI, please answer the following questions, giving as much detail as possible:

a. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will create the need for confidentiality, please specify that event.

b. Information submitted to U.S. EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?

c. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound

by an agreement not to disclose the information further? If so, why should the information still be considered confidential?

d. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

e. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

f. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

g. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to U.S. EPA of similar information in the future.

h. Any other issue you deem relevant (including, if pertinent reasons why you believe that the information you claim to be CBI is not emission or effluent data.)

Please note that emission data, provided under Section 114 of the Act, 42 USC § 7414, is not entitled to confidential treatment under 40 CFR Part 2. "Emission data" means, with reference to any source of emission of any substance into the air.

Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

a. Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

b. A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source). 40 CFR §§ 2.30 I(a)(2)(i)(A), (B) and (C).

Emission data includes, but is not limited to, service records stating the amount of refrigerant added to a unit or reclaimed from a unit.

You bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), U.S. EPA requires that you to bracket all text so claimed and mark it "CBI". Information so designated will be disclosed by U.S.

EPA only to the extent allowed by, and by means of the procedures set forth in, 40 CFR Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

United States Environmental Protection Agency
Region VIII, Office of Air and Radiation

Federal Operating Permit Application Completeness Checklist

To be completed by review engineer within 60 days of receipt of the application. Criteria derived from 40 CFR Part 71 and the Part 71 application forms. To be deemed complete, an application must provide all information required pursuant to 40 CFR 71.5(c).

Source Name: Questar Pipeline Co. - Fidlar Compressor Station
Date Application Received: 6/7/2013

[✓] **Complete** (administratively)

[ ] **Complete but needs additional information for drafting a permit** (see comments below)

Reviewer's Name Eric Wortman **Date Application Complete:**

Check if complete

[✓] **Source Identification** [40 CFR 71.5(c)(1) & Application Form GIS parts A, B, C, & D]
- ✓ Facility's official name (not a colloquial name) provided
- ✓ Facility's complete mailing address provided
- ✓ Facility's location provided
- ✓ Owner information provided
- ✓ Operator information provided

Comments:
STR Range provided, Lat/Long in current permit

[✓] **Application Information** [Application Form GIS part E]
- ✓ Information on the type of permit being requested complete and understandable
- NA Date operations commenced provided (for initial permits)
- ✓ Expiration date of existing permit (for permit renewal) provided
- ✓ Description of proposed change (for modifications) provided. Are dates for the addition of units or the modification provided where needed?

Comments:

[✓] **Summary Source Information** [40 CFR 71.5(c)(2) & Application Form GIS parts F, G, H, I J, K, L, & M]
- ✓ Applicable requirement summary complete
- ✓ Process description provided
- ✓ Emission unit identification and description provided
- ✓ Facility emissions summary provided
- ✓ Existing federally enforceable permits listed
- NA Emission units covered by general permits listed
- ✓ Cross-referenced information (e.g, – Do you have access to the information?)

Comments:

[✓] **Emission Unit Descriptions for Combustion Sources** [40 CFR 71.5(c)(2) - (7) & Application Form EUD-1 parts A-F]

- ✓ General information (ID, description, SIC and SCC Codes, Control device IDs) for each unit provided. Does the unit ID coincide with Form GIS? The SIC code may be different than that listed in section G of Form GIS. The SCC code is not mandatory, but is useful because it identifies a specific process, the pollutants from that process, and related emissions factors.
- ✓ Unit description in its entirety completed (including installation dates)
- ✓ Fuel data provided
- ✓ Fuel usage rates provided
- – Control equipment descriptions provided (Does it include an ID for the control equipment?)
- ✓ Ambient impact assessment provided (for temporary sources only)
- ✓ Additional attachments, if needed, to provide information to the permitting authority that is not specified on the form provided - mfr specs

Comments:

Will need to request site-rate hp and max MMBtu/hr heat input accordingly if mfr. spec sheets are not specific

[✓] **Emission Unit Description of VOC Emitting Sources** [40 CFR 71.5(c)(2) - (7) & Application Form EUD-2 parts A - E]

- ✓ General information (ID, description, SIC and SCC Codes, Control device IDs) for each unit provided. Does the unit ID coincide with Form GIS? The SIC code may be different than that listed in section G of Form GIS. The SCC code is not mandatory, but is useful because it identifies a specific process, the pollutants from that process, and related emissions factors.
- ✓ Unit descriptions in its entirety provided (Including dates of installation)
- – Control equipment descriptions provided (Does in include an ID for the control equipment?)
- – Ambient impact assessment provided (for temporary sources only)
- ✓ Identification of VOC and HAP emitting substances complete
- ✓ Additional attachments, if needed, to provide information to the permitting authority that is not specified on the form provided - ~~tank~~ calcs

Comments:

[NA] **Emission Unit Description for Process Sources** [40 CFR 71.5(c)(2) - (7) & Application Form EUD-3 parts A - F] This form should provide technical information, including operational characteristics, applicable requirements, compliance terms, and emissions for each emissions unit. There should be one form for each unit.

- – General information (ID, description, SIC and SCC Codes, Control device IDs) for each unit provided. Does the unit ID coincide with Form GIS? The SIC code may be different than that listed in section G of Form GIS. The SCC code is not mandatory, but is useful because it identifies a specific process, the pollutants from that process, and related emissions factors.
- – Unit description in its entirety provided (including dates of installation)
- – Activity or production rates provided
- – Control equipment descriptions provided (Does in include an ID for the control equipment?)
- – Ambient impact assessment provided (for temporary sources only)
- – Additional attachments, if needed, to provide information to the permitting authority that is not specified on the form provided

Comments:

[✓]

Insignificant Emission Activities or Units [40 CFR 71.5(c)(11) & Application Form IE]

- ✓ Listing of insignificant activities and emissions levels exempted because of size or production rate pursuant to 71.5(c)(11)(ii) provided
- ✓ Information provided sufficient to show that the exemption applies
- ~~–~~ Information concerning equipment, activities, or emissions units that are exempted from an otherwise applicable requirements provided (e.g, emissions units grandfathered from requirements of a NSPS)

Comments: backup calcs included for IEUs

[✓]
OK

Emission Calculations for Each Unit [40 CFR 71.5(c)(2) - (7) & Application Form EMISS parts A & B]

- ✓ Emission unit identification provided (does the unit ID coincide with Form GIS?)
- O Actual emission rates for each pollutant provided
- ✓ Potential emission rates for each pollutant provided
- O CAS Number for each pollutant provided
- – Example calculations illustrating the methodology used (formulas used, emission factors used, assumptions made, source of formulas or assumptions) provided

Comments:
backup calcs provided
- No actual emission rates provided
- NO CAS # provided

[✓]

Potential to Emit Summary [40 CFR 71.5(c)(3) & Application Form PTE]

- ✓ Are all emission units identified? (does the unit ID coincide with Form GIS?)
- NA If the source is a major source for pollutants not listed is an attachment stipulating major source status or the calculations for that air pollutant provided?

This form is used to calculate the total PTE for each air pollutant at the facility for purposes of determining major source applicability. See the application instructions and definitions for major source at 40 CFR 71.2 to further determine completeness and accuracy of this section.

Comments:

[✓]

Fee Calculations [40 CFR 71.5(c)(3), 71.9, & Application Form FEE parts A - F]

- – General information completed
- – Source information completed
- – Certification of truth, accuracy and completeness signed and dated
- – Annual non-HAP emissions report provided
- – Annual HAP emission report for fee calculation purposes provided
- – attached example calculations used to determine emission values provided

Comments:

Not req'd for renewal, source is current on fees ?EI

[✓]

Fee Filing [Application Form FF parts A - C]

– Facility's official or legal name provided
– Complete mailing address & telephone numbers of all contact persons provided
– Total amount of fee remitted in US dollars provided
– Photocopy of the fee payment check or other confirmation of actual fees paid provided

Comments:

Renewal

[✓]

Fee Submittal Confirmed

– Has a confirmation been received by 8P-AR that fees and the fee filing form were deposited in the Region 8 Lockbox? Confirmation will come from Finance.

Comments

Renewal

[✓]

Compliance Status [40 CFR 71.5(c)(8) & Application Form I-Comp parts A, B, & C]

- Has each individual applicable requirement been identified and described in detail
- Has a citation for each applicable requirement been provided
- Has each emission unit subject to the applicable requirement been identified. Do the emission unit IDs correspond to the IDs defined on Form GIS
- Has the compliance status for each applicable requirement been identified
- Have the methods for determining compliance with each applicable requirement been provided
– Indication of compliance status with respect to each applicable requirements provided
– Indication that the source will comply with all applicable requirements that take effect during the permit term
- Indication that the source will meet all future requirements

Renewal
No I-comp req'd

Comments:

[NA]

Compliance Plans and Schedules [40 CFR 71.5(c)(8) & Application Form I-Comp parts D&E]

– For any applicable requirement for which the facility will not be compliance at time of issuance, is there a description of how the source will achieve compliance
– If needed, is there a compliance schedule containing a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance?
– Is the date of final compliance in the schedule?

Comments:

[NA]

Compliance Certification [Application Form I-Comp parts F, G, & H]

- Is there a schedule for submitting progress reports (where necessary)
– Schedule for submittal of certification provided
– Statement of compliance with enhanced monitoring and compliance certification requirements provided

Comments:

[✓]

Certification of Truth, Accuracy, & Completeness [40 CFR 71.5(d) & Form CTAC parts A & B]

✓ Responsible official information complete

✓ Signature by responsible official provided

Comments:

[N/A]

Confidential Information [40 CFR 71.5(a)(3) & 40 CFR Part 2, subpart B]

- Confidentiality claim substantiated pursuant to 40 CFR Part 2 (This is not required for determining the application complete. However, it is necessary to determine that the claim is valid. ORC can help with this.)

None

Note to Application Reviewer:

In general, applications should be found complete if they contain enough information for you to begin to process the application. A determination of completeness is important for sources because the submittal of a timely and complete application shields the source from enforcement action for operating without a permit. Completeness in general means that all questions in the application have been addressed and are truthful and accurate.

Sources, however, are also required to submit enough information for you to be able to draft a comprehensive, enforceable permit. The level of detail required in the application to meet this requirement is usually much higher than that required for purposes of the completeness determination. If while processing an application that has been determined complete you find that additional information is needed, you may request such information in writing.

Please note in the space provided any additional information required. Note also the date of the request made to the source and the deadline for submittal provided to the source.

Comments:

- All required forms & documentation necessary to start processing application seem to be present. Add'l info may need to be requested during permit drafting process. - Eric 6/13/13

- ~~[illegible]~~ (EW) ok included

- needs flash emissions for Tank

Wortman, Eric

From: Wortman, Eric
Sent: Monday, July 15, 2013 2:04 PM
To: 'Scott Bassett'
Subject: RE: Fidlar Part 70 Permit V-UO-0002-05.01

Thanks Scott,

You are correct, sorry about the error regarding the tank calculations. For some reason my quick review noted EPA Tanks was used and not E&P Tanks. There is no need to resubmit, just refer to the original application in your response.

Let me know if you have any other questions,

Eric

Eric Wortman
EPA Region 8 Air Program
(303) 312-6649

From: Scott Bassett [mailto:Scott.Bassett@questar.com]
Sent: Monday, July 15, 2013 12:52 PM
To: Wortman, Eric
Subject: Fidlar Part 70 Permit V-UO-0002-05.01

Eric,

Just received the notification and information request for Fidlar Station. Thank you for your timely review and determination of administrative completeness. The deadlines for submittal of additional information are very reasonable and I see no difficulty in responding sooner. Please note for the condensate tank unit "QPC Tank" that emissions were estimated using API E&P Tanks 2.0 and results of that calculation included flashing losses. Although the tank has not shipped out any condensate for over 10 years, throughput was conservatively modeled at one turnover per year or 400 barrels (1.1 bbl/day input for sales liquid). Unless I receive differing guidance from you, my follow up submittal will use that same approach and will not differ from the documentation found in Appendix B of the renewal application binder.

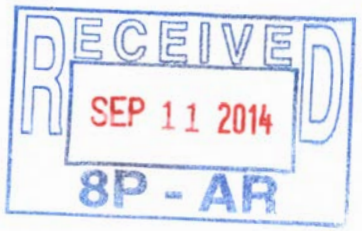
Thanks again for reviewing the application prior to permit expiration. I look forward to working with you through reissuance of the permit. Best Regards, Scott

Scott R. Bassett
Sr. Environmental Coordinator
Questar Corporation
Desk: 801-324-3820
Cell: 801-668-0162

QUESTAR

Questar Pipeline Company
1140 West 200 South
P.O. Box 45360
Salt Lake City, UT 84145-0360
Tel 801 324 5555

QUESTAR



September 4, 2014

U.S. EPA, Region VIII
Attn: Eric Wortman, Part 71 Permit Contact
Air and Radiation Program (8P-AR)
1595 Wynkoop Street
Denver, CO 80202

Re: Notification of Off Permit Change – Permit No. V-UO-0002-05.01

Dear Eric Wortman,

The purpose of this correspondence is to notify the Agency that Questar Pipeline Company is making a facility change that meets the requirements of Permit Section VII.Q. Off Permit Changes [40 CFR §71.6(a)(12) and 40 CFR §71.6(a)(3)(ii)] at the Fidlar Compressor Station located on the Uintah and Ouray Indian Reservation in Uintah County, Utah.

Unit FS05 (station unit #4), a Solar Centaur 40-4700 turbine compressor engine, has accumulated sufficient operating hours that a routine overhaul is necessary. It is standard practice in the combustion turbine industry to overhaul turbines at a central maintenance facility and replace units via like-kind exchange. The facility change is scheduled for September 16 – 18, 2014. There is no change in emissions at the facility due to this change. No new requirements will apply. The following additional information is hereby submitted to satisfy permit condition VII.Q.7.

7.(a) – The current unit FS05 is a dry low NOx turbine employing Solar Turbines SoLoNOx combustion system. The overhauled unit will employ the same low NOx technology.

7.(b) – There is no increase in emissions due the proposed change, therefore, the change does not constitute a major modification or new major source under the federal PSD program.

7.(c) – There are no new requirements associated with the change. Unit FS02 will continue to be subject to New Source Performance Standard 40 CFR Part 60, Subpart GG.

7.(d)(i) – The replacement turbine engine is a Solar Turbines, Centaur 40-4700, bearing overhaul serial number OHH14-C1327. The heat rate of the replacement is identical to the original turbine producing 37.05 MMBtu/hour at site elevation. The turbine will be configured as before, driving a centrifugal compressor on the original compressor skid within the same enclosure.

7.(d)(ii) – The manufacture date of the FS05 compressor package is February 23, 2005; however, it was constructed (ordered) on August 5, 2004, prior to the NSPS Subpart KKKK applicability date. Installation of the overhauled replacement turbine is scheduled for September 16, 2014 and is scheduled to be complete by September 18, 2014. A notification of startup and performance testing will be submitted.

7.(d)(iii) – Cost estimates for both a new compressor set (approximately $3 million) and the proposed overhaul (budget = $423,600.00) are attached. The cost of the overhaul is less than 50% of a comparable new facility and, therefore, the turbine is not considered "reconstructed".

7.(d)(iv) – The FS05 turbine compressor package was not constructed after February 18, 2005 and is not subject to 40 CFR 60, Subpart KKKK. There is no increase in emissions associated with the proposed overhaul and, therefore, Unit FS05 has not been "modified". As documented in 7.(d)(iii) above, the turbine has not been "reconstructed". As such, unit FS05 remains subject to NSPS Subpart GG and is not an affected facility under NSPS Subpart KKKK.

7.(d)(v) – Fidlar compressor station is not a major source of hazardous air pollutants (PTE = 1.82 ton/year total HAP). Therefore, Unit FS05 is not subject to 40 CFR Part 63, Subpart YYYY. Additionally, there are currently no area source requirements under Subpart YYYY (rule has been stayed indefinitely).

7.(d)(vi)(A) – The replacement of components of unit FS05 constitutes a "physical change", therefore, PSD applicability will be evaluated below.

7.(d)(vi)(B)(1) – Neither Unit FS05 nor Fidlar Compressor Station are major stationary sources under PSD.

7.(d)(vi)(B)(2) – The overhaul replacement of turbine unit FS05 will not cause an increase in regulated pollutants. The PTE for the overhauled turbine is identical to the existing turbine: NOx = 24.67 tons per year (tpy), CO = 47.43 tpy, VOC = 0.36 tpy, SO_2, = <0.01 tpy, PM_{10} = 1.13 tpy. As such, the proposed replacement is not a new major source or major modification.

Questions regarding this analysis or the attached documentation should be referred to me at (801) 324-3820 or via email: scott.bassett@questar.com. Since the turbine engine serial number will change from 5109C to OHH14-C1327 it is requested that the pending Part 71 permit renewal application be updated with this information. Finally, EPA Form CTAC certified by the corporate responsible official is attached to this letter.

Sincerely,

Scott R. Bassett
Sr. Environmental Coordinator

Attachments

ATTACHMENT I

SOLAR TURBINES LETTER OF SUPPORT

Solar Turbines

A Caterpillar Company

Solar Turbines Incorporated

9330 Sky Park Court
San Diego, CA 92123
Tel: (858) 694-1616

September 4, 2014

Attn: Scott Bassett
Questar

Subject: Fidlar Compressor Station
Centaur 40 - Routine Maintenance Engine Exchange

The Centaur 40 package at the above facility will undergo a routine maintenance engine exchange ('overhaul') using Solar's engine exchange program. During this exchange, Solar will provide a thermodynamically equivalent engine core (gas producer and power turbine) with the same guarantees on performance and emissions as the original equipment being replaced.

Per 40 CFR 60 Subpart GG and KKKK rule language, an overhaul does not trigger the definition of "modification" because it is a like-for-like exchange with the same performance and emissions as the original equipment. In addition, the exchange is not "reconstruction" as the cost of a routine overhaul is well less than 50% of the cost of a new comparable unit.

Routine overhaul exchange of the turbine components does not signify a new affected facility per either the GG or KKKK definitions. Per the Subpart GG definition of "affected facility," the Centaur 40 package at Fidlar "commenced construction" in 2004, as evidenced by the purchase order dated August 5, 2004 between Solar and Questar.

Because routine overhaul exchange of turbine components on an existing facility does not trigger the definitions of "new", "modification" or "reconstruction", Subpart GG should remain the applicable New Source Performance Standard.

Please call me at 858.505.8554 if you have any questions.

Sincerely,

Anthony Pocengal
Solar Turbines Incorporated

cc: Tony Mitchell, Solar Turbines Incorporated

Purchase Order

Questar Pipeline Company

Purchasing Department
90 South 1000 West
PO Box 45360
Salt Lake City UT 84145-0360
USA

Dispatch via Print

Purchase Order	Date	Revision	Page
09A-0000010160	08/05/2004		1
Payment Terms	**Freight Terms**		**Ship Via**
Net 30	Origination Point		BEST WAY
Buyer	**Phone**		**Currency**
Lois Long	801 324-3315		USD

Vendor: 0000006651
Solar Turbines Incorporated
6965 Union Park Center
Suite 460
Midvale UT 84047
USA
Fax: 801 352 5151

Ship To: See Below
USA

Bill To: 180 East 100 South / P.O. Box 45360
Salt Lake City UT 84145-0360
USA

Tax Exempt? N **Tax Exempt** **Replenishment Option:** Standard

Line-Sch	Item/Description	Mfg ID	Quantity UOM	PO Price	Extended Amt	Due Date
1- 1	CENTAUR 40-4700S ENGINE DRIVING A C4042 CENTRIFUGAL COMPRESSOR WITH B2F B1R STAGING. COMPLETE PACKAGE AND TOTAL EQUIPMENT SCOPE OF SUPPLY TO MEET REQUIREMENTS OF QUESTAR SPECIFICATION DATED 8/2/04 AND SOLAR ACS'S INQUIRY #SL03-0020, CONFIGS A AND B		2.00 JOB	2,590,553.00000	5,181,106.00	06/17/2005

Schedule Total 5,181,106.00

Contract ID: 00000000000000000000001094 Contract Line: 1 Release: 2
PER TERMS AND CONDITIONS OF ALLIANCE AGREEMENT DATED 6/1/04

Item Total 5,181,106.00

REQ = 25615
R. MARK BETTOLO/JOHN HRUSKA/CHARLES P. ENDRES/RANDY ZOBELL/ALAN ALLRED

BLIND CANYON COMPRESSOR

Total PO Amount 5,181,106.00

Authorized Signature Lois P. Long

ATTACHMENT II

DOCUMENTATION OF COST

Scott Bassett

From: Tony A. Mitchell <MITCHELL_TONY_A@solarturbines.com>
Sent: Thursday, July 17, 2014 1:04 PM
To: Scott Bassett
Cc: Albert Bertagnolli; Cory Gale; Mark Bettolo; Mark Stewart; Neil Wilcken
Subject: Re: Fidlar #4 Trubine Exchange - Project 09/01043272

Scott;

You're looking at around $3M for a Centar 40, T4700 / C306 refurbished unit.

Thank You.

Tony Mitchell

Account Manager, Customer Services
Solar Turbines Incorporated
Salt Lake City & Anchorage

Mobile: 801-652-1286
E-mail: tonymitchell@solarturbines.com

Solar Turbines
A Caterpillar Company

1990 South Milestone Dr.
The Alder Building Units C & D
Salt Lake City, UT 84104
Office: 801-908-1700

July 14, 2014

Questar Pipeline Co.
1140 West 200 South
Salt Lake City, UT 84104

Attn: Lois Long

SUBJECT: Gas Turbine Overhaul – Fidlar #4, Budgetary Exchange Pricing.

Reference Inquiry: CS-SL14-00037

Solar appreciates the opportunity to provide factory overhaul pricing for the Centaur 40, Unit # 4, at Fidlar Station. Pricing is based on 2014 pricing for equipment in running condition, and previously overhauled by Solar Turbines.

A Solar Turbines factory overhaul is a complete renewal of an assembly that is designed to restore mechanical integrity, performance, and a Time Between Overhaul (TBO) equal to the original TBO expectation when purchased new. A factory overhaul includes:

- Core Disassembly
- Remanufacture
- Assembly
- Test
- Engine Condition Report (ECR) – Evaluation of original core engine.
- Certified Test Report

Gas Turbine Overhaul Pricing:

Centaur 40, T4702S.	Core S/N: 5109C
Power Turbine:	Core S/N: TUB05-80110
Accessory Drive:	Core S/N: OAK07-43542

Pricing details attached.

Budgetary Price $423,600.00

Pricing excludes sales, use, excise, value added, or royalty taxes. Field support services not included. Pricing is based on estimated fired-hours and will be adjusted at time of engine exchange for actual hours.

Validity

Pricing is valid for 60 days after date of proposal.

Solar Turbines
A Caterpillar Company

1990 South Milestone Dr.
The Alder Building Units C & D
Salt Lake City, UT 84104
Office: 801-908-1700

Terms and Conditions

Questar Pipeline / Solar Agreed Contract Terms & Conditions Apply.

Delivery

Ex-Works, Seller's facility (INCOTERMS 2010), after Seller's acceptance of Buyer's purchase order.

Should you have any further questions please do not hesitate to call me for clarification.

Best regards,

Tony Mitchell
Account Manager, Customer Service Sales
Solar Turbines Incorporated
Cell: 801-652-1286
tonymitchell@solarturbines.com

Solar Turbines
A Caterpillar Company

1990 South Milestone Dr.
The Alder Building Units C & D
Salt Lake City, UT 84104
Office: 801-908-1700

Pricing Details

Questar Fidlar #4, T4702S - 2014 Pricing 1/6/2014

PSN: DCC0189; GP SN: 5109C ; Emissions XXppm NOx; XXppm CO; XXppm UHC

Unit Fired Hours - Total: 30,000
TBO: 30,000
Hours > TBO 0 **Annual Discount:** 5.00%

	2014 Pricing Letter		Discounted Rates				
	<TBO	>TBO	PPH <= TBO	Cost <= TBO	PPH > TBO	Cost > TBO	*Fired Hour Cost*
T4702S Gas Producer	$12.96	$9.72	$12.31	$369,300.00	$9.23	$0.00	$369,300.00
Power Turbine	$1.54	$1.15	$1.46	$43,800.00	$1.09	$0.00	$43,800.00
Accessory Drive	$0.37	$0.28	$0.35	$10,500.00	$0.27	$0.00	$10,500.00
					Total Price		**$423,600.00**

ATTACHMENT III

EPA FORM CTAC

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Jepperson (First) Thomas (MI) C

Title Executive Vice President & General Counsel

Street or P.O. Box P.O. Box 45360

City Salt Lake City State UT ZIP 84145 - 0360

Telephone (801) 324 - 2648 Ext. _____ Facsimile (801) 324 - 3883

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete. BMS

Name (signed) Thomas C. Jepperson

Name (typed) Thomas C. Jepperson Date: 9 / 8 / 2014

INSTRUCTIONS FOR CTAC
CERTIFICATION OF TRUTH, ACURACY, and COMPLETENESS

This form is for the responsible official to certify that submitted documents (i.e., permit applications, updates to application, reports, and any other information required to be submitted as a condition of a permit) are true, accurate, and complete.

This form should be completed and submitted with each set of documents sent to the permitting authority. It may be used at time of initial application, at each step of a phased application submittal, for application updates, as well as to accompany routine submittals required as a term or condition of a permit.

Section A - Title V permit applications must be signed by a responsible official. The definition of responsible official can be found at ' 70.2.

Section B - The responsible official must sign and date the certification of truth, accuracy and completeness. This should be done after all application forms are complete and the responsible official has reviewed the information. Normally this would be the last form completed before the package of forms is mailed to the permitting authority.

Questar Pipeline Company
1140 West 200 South
P.O. Box 45360
Salt Lake City, UT 84145-0360

Enviornmental & Safety Services

April 21, 2014

U.S. EPA, Region VIII
Office of Air & Radiation
Attn: Eric Wortman (Mailcode 8P-AR)
1595 Wynkoop Street
Denver, CO 80202-1129

Re: Responsible Official Designation for Part 71 Permit #V-UO-0002-05.01

Dear Mr. Wortman:

The purpose of this correspondence is to notify the EPA that the responsible official for Questar Pipeline Company's Fidlar Compresor Station has changed from Kim Heimsath, Vice President, Environmental, Health, and Safety to Thomas C. Jepperson, Executive Vice President and General Counsel (phone: 801-324-2648).

Questions regarding this notification should be directed to Scott Bassett, Sr. Environmental Coordinator, at (801) 324-3820.

I hereby certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

T C Jepperson

Thomas C. Jepperson
Executive V.P. & General Counsel
Questar Corporation

QUESTAR

Questar Gas Company
1140 West 200 South
P.O. Box 45360
Salt Lake City, UT 84145-0360

04/28/2014

Hasler
04/25/2014
US POSTAGE
FIRST-CLASS MAIL
AUTO
$00.38[illegible]

ZIP 84104
[illegible]

Address Service Requested

U.S. EPA, Region VIII
Office of Air & Radiation
Attn: Eric Wortman (Mailcode: 8P-AR)
1595 Wynkoop Street
Denver, CO 80202-1129

CAUPS5B 80202

QUESTAR FIDLAR COMPRESSOR STATION U/O UTAH

NEARBY UNITS on MAP

0421 - Chipeta Processing Rep

0821 - Chipeta Processing Del

0370 - Red Wash Fidlar

green

Questar Pipeline Co

Okubo, Noreen

From: Smith, Claudia
Sent: Monday, March 10, 2014 12:51 PM
To: Paser, Kathleen; Wortman, Eric; Laumann, Sara; Rothery, Deirdre
Cc: Okubo, Noreen
Subject: RE: Pilot program status update

Good point. Okay, so that means that letters have not yet gone out for the following applications, according to the spreadsheet:

EOG Chapita Wells Unit 1502-25D Facility (UO-000184)
EOG West Clark's Creek CPF (TAT-000006)

Contrary to the conversation in our team meeting today, a letter WAS sent to Questar Pipeline for Fidlar in July 2013, and a response was received in November 2013.

Claudia

From: Paser, Kathleen
Sent: Monday, March 10, 2014 12:39 PM
To: Smith, Claudia; Wortman, Eric; Laumann, Sara; Rothery, Deirdre
Cc: Okubo, Noreen
Subject: RE: Pilot program status update

Oops.....I guess I should read more carefully. I don't think we should do the one that is going to fall out of Part 71.

Jeez....my brain on Day Light Savings!

Kathy Paser
Region 8 Air Program
1595 Wynkoop, 8P-AR
Denver, Colorado 80202
paser.kathleen@epa.gov
303-312-6526

From: Smith, Claudia
Sent: Monday, March 10, 2014 12:36 PM
To: Paser, Kathleen; Wortman, Eric; Laumann, Sara; Rothery, Deirdre
Cc: Okubo, Noreen
Subject: RE: Pilot program status update

Okay, well UO-000827 came in before TAT-000006, so I'll update the spreadsheet with UO-000827 as the 6th application.

From: Paser, Kathleen
Sent: Monday, March 10, 2014 12:29 PM
To: Smith, Claudia; Wortman, Eric; Laumann, Sara; Rothery, Deirdre
Cc: Okubo, Noreen; Paser, Kathleen
Subject: RE: Pilot program status update

In my opinion, I think we should stick to the agreement and do the sixth one that came in…..EOG, TAT-000006. Even if we think Jeremy might like something different. It is what it is…..an agreement.

Kathy Paser
Region 8 Air Program
1595 Wynkoop, 8P-AR
Denver, Colorado 80202
paser.kathleen@epa.gov
303-312-6526

From: Smith, Claudia
Sent: Monday, March 10, 2014 11:40 AM
To: Wortman, Eric; Laumann, Sara; Paser, Kathleen; Rothery, Deirdre
Cc: Okubo, Noreen
Subject: RE: Pilot program status update

Dee,

I never saw a response to Eric's question on which EOG application should be the 6th pilot program application. I thought originally, WEG might prefer to have analyses conducted on different reservations from the same company, figuring that would lead to a wider body of information for his own analyses, but thinking about it, WEG may actually prefer analyses from two sources of the same operator on the same reservation to see the direction of our determination based on the information we receive. Do you or Sara have a preference?

Claudia

From: Wortman, Eric
Sent: Friday, February 28, 2014 10:52 AM
To: Laumann, Sara; Smith, Claudia; Paser, Kathleen; Rothery, Deirdre
Cc: Okubo, Noreen
Subject: Pilot program status update

I received responses from EOG today regarding which applications to process and which ones to withdraw and have updated the attached pilot program tracking spreadsheet accordingly. EOG indicated that facility TAT-000006 and UO-000827 should both be processed. Since both of these applications were received before the HRC Operating application for TAT-000395, I propose we not include the HRC facility as part of the title V program (letter hasn't been drafted or sent yet) and include one of these EOG facilities as the 6th permit action for the pilot program.

EOG stated that UO-000827 will fall out of Title V once the tank requirements of NSPS OOOO become enforceable. The compliance date for Group 1 storage vessels in OOOO is 4/15/15 and the 18 month permit issuance deadline for this source is 3/20/15. UO-000827 was received prior to TAT-000006 (making it subject to pilot program as the 6th app received) but it would be easier to include TAT-000006 as part of the program because we are already processing an EOG pilot program app for a Ft. Berthold source. On the other hand, WEG would likely prefer an analysis conducted on another reservation (U&O for UO-000827).

Which source should be lucky #6?

Eric

Both T5 files are in the lateral file in my cube.

Okubo, Noreen

From: Smith, Claudia
Sent: Friday, March 07, 2014 12:51 PM
To: Paser, Kathleen; Rothery, Deirdre; Wortman, Eric; Langenfeld, Matthew; Okubo, Noreen
Subject: FW: 40 CFR 49.155(a)(7)(ii)

Bringing you all into the loop on a discussion Mike and I had with OAQPS on Friday.

From: Montanez, Jessica
Sent: Friday, March 07, 2014 12:20 PM
To: Smith, Claudia; Nizich, Greg
Cc: Gupta, Kaushal; Owens, Mike
Subject: RE: 40 CFR 49.155(a)(7)(ii)

To clarify, the provision was included in the rule to ensure that permitted sources would not cause a violation of the NAAQS or PSD increments. With that said, we also recognize it is hard to enforce if modeling is not required by the rule. Based on your comments below, I will say that this "condition of the rule [was] written to assume that any violation of the permitted emission limits could be construed as contributing to a NAAQS violation or PSD increment violation." However, how to enforce that or how to model that is up to the discretion of each permitting authority.

Jessica

Jessica Montañez
Office of Air Quality Planning and Standards
Air Quality Policy Division
New Source Review Group
109 TW Alexander Drive MD: C504-03 RTP, NC 27711
Phone: 919-541-3407, Fax: 919-541-5509
Note: Positions or views expressed here do not represent official EPA policy.

Looking for a speaker for your school or community event? http://www.epa.gov/rtpspeakers/

From: Smith, Claudia
Sent: Friday, March 07, 2014 2:15 PM
To: Nizich, Greg
Cc: Gupta, Kaushal; Owens, Mike; Montanez, Jessica
Subject: RE: 40 CFR 49.155(a)(7)(ii)

I forgot to add that it there is not a similar provision in the PSD regs at 40 CFR 52.21.

From: Nizich, Greg
Sent: Friday, March 07, 2014 12:12 PM
To: Smith, Claudia
Cc: Gupta, Kaushal; Owens, Mike; Montanez, Jessica
Subject: RE: 40 CFR 49.155(a)(7)(ii)

Hi Claudia,

Yes, I am the current rule lead. I discussed this with Jessica. She said that the clause cited by Mike was something that OGC wanted in the rule. It's more of a CYA kind of thing though, that doesn't really have any practical way of being

enforced. We think that provision CFR 49.155(a)(7)(i) that addresses complying with the permit limits would be the critical (and enforceable) condition.

Thanks, Greg.

From: Smith, Claudia
Sent: Friday, March 07, 2014 1:23 PM
To: Nizich, Greg
Cc: Gupta, Kaushal; Owens, Mike
Subject: 40 CFR 49.155(a)(7)(ii)

Greg,

Are you still the Tribal NSR rule lead at OAQPS? Mike Owens has pointed out a provision in the Tribal NSR Rule that does not appear to be enforceable.

(7) *Additional provisions.* The permit must also contain provisions stating the requirements in paragraphs (a)(7)(i) through (vii) of this section.

(i) You, as the permittee, must comply with all conditions of your permit, including emission limitations that apply to the affected emissions units at your source. Noncompliance with any permit term or condition is a violation of the permit and may constitute a violation of the Act and is grounds for enforcement action and for a permit termination or revocation.

(ii) Your permitted source must not cause or contribute to a NAAQS violation or in an attainment area, must not cause or contribute to a PSD increment violation.

The permitting authority is required to determine whether or not a proposed source would contribute to a violation, and only issue a permit if the answer is no. How would we determine, let alone enforce whether an already permitted source is contributing to a NAAQS violation or PSD increment violation? Was this condition of the rule written to assume that any violation of the permitted emission limits could be construed as contributing to a NAAQS violation or PSD increment violation?

Claudia Young Smith
Environmental Scientist
US EPA Region 8 Air Program
Phone: (303) 312-6520
Fax: (303) 312-6064
http://www2.epa.gov/region8/air-permitting

****
US EPA Region 8
1595 Wynkoop Street
Mail Code 8P-AR
Denver, Colorado 80202
****

Okubo, Noreen

From: Wortman, Eric
Sent: Friday, February 28, 2014 10:52 AM
To: Laumann, Sara; Smith, Claudia; Paser, Kathleen; Rothery, Deirdre
Cc: Okubo, Noreen
Subject: Pilot program status update
Attachments: Pilot Program Permit Status for P71 Applications Received 1-29-14.xlsx

I received responses from EOG today regarding which applications to process and which ones to withdraw and have updated the attached pilot program tracking spreadsheet accordingly. EOG indicated that facility TAT-000006 and UO-000827 should both be processed. Since both of these applications were received before the HRC Operating application for TAT-000395, I propose we not include the HRC facility as part of the title V program (letter hasn't been drafted or sent yet) and include one of these EOG facilities as the 6th permit action for the pilot program.

EOG stated that UO-000827 will fall out of Title V once the tank requirements of NSPS OOOO become enforceable. The compliance date for Group 1 storage vessels in OOOO is 4/15/15 and the 18 month permit issuance deadline for this source is 3/20/15. UO-000827 was received prior to TAT-000006 (making it subject to pilot program as the 6th app received) but it would be easier to include TAT-000006 as part of the program because we are already processing an EOG pilot program app for a Ft. Berthold source. On the other hand, WEG would likely prefer an analysis conducted on another reservation (U&O for UO-000827).

Which source should be lucky #6?

Eric

Both T5 files are in the lateral file in my cube.

Eric Wortman
Environmental Scientist
Air Permitting, Monitoring, & Modeling Unit
Office of Partnerships & Regulatory Assistance
EPA Region 8
1595 Wynkoop Street (8P-AR)
Denver, Colorado 80202

wortman.eric@epa.gov
(303) 312-6649

Wortman, Eric

From: Wortman, Eric
Sent: Wednesday, January 08, 2014 12:34 PM
To: Scott Bassett
Subject: RE: Questar Pipeline Fidlar Station Unit FS02

Thanks Scott,

I got your vm and appreciate the update. We'll keep processing the application. Noreen Okubo is the permit engineer assigned to the title V action, so she will likely contact you at some point.

Thanks,

Eric

Eric Wortman
Region 8 Air Program
(303) 312-6649

From: Scott Bassett [mailto:Scott.Bassett@questar.com]
Sent: Wednesday, January 08, 2014 11:35 AM
To: Paser, Kathleen; Wortman, Eric
Subject: Questar Pipeline Fidlar Station Unit FS02

Kathy/Eric,

Follow up to voicemail: Sorry for the confusion about retiring the FS02 White-Superior compressor engine at Fidlar. Apparently retiring that unit is not feasible without replacing that horsepower with something else. As such, we can continue forward with the Indian Country Permit for Unit FS02 and the Part 71 renewal for Fidlar Station. If any information is lacking in order to complete those permit actions please let me know. Best Regards, Scott

Scott R. Bassett
Sr. Environmental Coordinator
Questar Corporation
Desk: 801-324-3820
Cell: 801-668-0162

QUESTAR

Okubo, Noreen

From: Paser, Kathleen
Sent: Monday, December 30, 2013 7:56 AM
To: Okubo, Noreen
Subject: FW: Questar Pipeline - Fidlar Unit FS02

FYI

Week can talk about this when I return if you need to.

Kathy Paser
EPA Region 8 Air Program
1595 Wynkoop, 8P-AR
303-312-6526
paser.kathleen@epa.gov

From: Scott Bassett [mailto:Scott.Bassett@questar.com]
Sent: Friday, December 20, 2013 10:36 AM
To: Paser, Kathleen
Cc: Wortman, Eric
Subject: Questar Pipeline - Fidlar Unit FS02

Got your return voicemail Kathleen. Thank you. While the intent is to retire the FS02 White-Superior reciprocating compressor engine at Fidlar, there may be some contractual issues to clear up. I believe that will be worked out within the next couple of weeks. Also, it will take a little bit of time to modify the Title V application and I am out from 12/21 – 12/29. As such, if a final decision is made on the future of the engine, I will send the cancellation letter along with the updated renewal application just after New Year's. I just didn't want you guys to forge ahead if the engine is going to be retired. Have a great Holidays and look for something in early January. Regards, Scott

Scott R. Bassett
Sr. Environmental Coordinator
Questar Corporation
Desk: 801-324-3820
Cell: 801-668-0162

QUESTAR

QUESTAR

Questar Pipeline Company
1140 West 200 South
P.O. Box 45360
Salt Lake City, UT 84145-0360
Tel 801 324 5555

October 30, 2013

U.S. EPA, Region VIII
Attn: Eric Wortman, Part 71 Permit Contact
Air & Radiation Program (8P-AR)
1595 Wynkoop Street
Denver, CO 80202-1129

Re: Follow Up for Title V Permit Renewal V-UO-000002-2013.00

Dear Eric Wortman:

The purpose of this correspondence is to provide additional information for the Fidlar Compressor Station (FCS) as requested in your completeness determination letter dated July 11, 2013.

1. As discussed via email after receipt of your letter, Questar did indeed calculate flashing losses from emission unit QPC Tank with API E&P Tanks 2.0. Unit QPC Tank does not typically receive pipeline liquids and therefore throughput was conservatively modeled at one turnover per year (400 bbls). Working and breathing losses were also accounted for in the potential-to-emit calculations.

2. Here is an applicability review of the federal regulations listed in bullet #2 of your letter:

    - **40 CFR 52 – PSD** – The potential-to-emit for all criteria pollutants and greenhouse gases from the FCS is below the respective regulatory thresholds for the federal Prevention of Significant Deterioration program (see table 3-1 located in section 3 of the renewal application binder). **Not applicable.**
    - **40 CFR 60 – NSPS Subpart Db – Industrial, Commercial, Institutional Steam Generating Units** – The Fidlar Compressor Station (FCS) does not contain any steam generating units with a heat input of greater than 100 million Btu per hour. **Not applicable.**
    - **40 CFR 60 – NSPS Subpart Dc – Small Industrial, Commercial, Institutional Steam Generating Units** - The FCS does not contain any steam generating units with a heat input of greater than 10 million Btu per hour, but less than 100 million Btu per hour. **Not applicable.**
    - **40 CFR 60 – NSPS Subparts K, Ka, Kb – Petroleum Liquid Storage Vessels (VOC)** – The FCS does not contain any petroleum liquids or VOC storage vessels with capacity in excess of 75 cubic meters. **Not applicable.**

- **40 CFR 60 – NSPS Subpart GG – Stationary Gas Turbines** – FCS units FS01, FS03, and FS05 are all stationary gas turbines with applicable requirements under subpart GG. **Regulation is applicable.**
- **40 CFR 60 – NSPS Subpart IIII – Stationary Compression Ignition Combustion Engines** – The FCS does not contain any compression ignition reciprocating engines. **Not applicable.**
- **40 CFR 60 – NSPS Subpart JJJJ – Stationary Spark Ignition Combustion Engines** – FCS units FS02 and FS07 are spark ignition engines. Unit FS02 was constructed prior to June 12, 2006 and has not been modified or reconstructed. Unit FS07 is subject to NSPS JJJJ as an emergency engine. **Regulation is applicable for Unit FS07.**
- **40 CFR 60 – NSPS Subpart KKKK – Stationary Combustion Turbines** – The FCS does not contain any combustion turbines that commenced construction, reconstruction, or modification after February 18, 2005. **Not applicable.**
- **40 CFR 60 – NSPS Subpart OOOO – Oil and Gas Sector** – The FCS operates in the gas transmission sector (SIC Code 4922) and does not contain any condensate tanks constructed, reconstructed, or modified after August 23, 2011 with VOC emissions greater than or equal to 6 tons per year. **Not applicable.**
- **40 CFR 61 – NESHAPS Subpart V- Equipment Leaks** – The FCS is not a listed source of the hazardous air pollutants listed in 61.01. **Not applicable.**
- **40 CFR 63 – NESHAP – Subpart HH – Oil and Natural Gas Production** – The FCS is not a production sector facility. **Not applicable.**
- **40 CFR 63 – NESHAP – Subpart HHH – Oil and Natural Gas Transmission, Storage, and Distribution** – The FCS is not a major source of HAP emissions and does not contain any of the affected equipment listed under subpart HHH. **Not applicable.**
- **40 CFR 63 – NESHAP Subpart IIII – Surface Coating of Automobiles and Light Duty Trucks – Listed by mistake - See Subpart ZZZZ.**
- **40 CFR 63 – NESHAP Subpart JJJJ – Paper and other Web Coating – Listed by mistake. See Subpart ZZZZ.**
- **40 CFR 63 – NESHAP Subpart ZZZZ – Reciprocating Internal Combustion Engines** – The FCS contains two (2) RICE engines (units FS02 and FS07) that are subject to area source requirements under Subpart ZZZZ. **Regulation is applicable.**
- **40 CFR 63 – NESHAP Subpart EEEE – Organic Liquids Distribution (non-gasoline)** – The FCS is a natural gas transmission and storage facility as defined in Subpart HHH and, therefore, is not an OLD facility as specified in 63.2334 (c)(2). **Not applicable.**
- **40 CFR 63 – NESHAP Subpart DDDDD – Major Source Boiler MACT** – The FCS is not a major source of HAPs. **Not applicable.**
- **40 CFR 63 – NESHAP Subpart JJJJJJ – Area Source Boiler MACT** – The 1.7 MMBtu/hour boiler at the FCS is fired solely by natural gas and is not subject to Subpart JJJJJJ as stated in 63.11195(e). **Not applicable.**

- **40 CFR 63 – NESHAP Subpart YYYY – Stationary Combustion Turbines** – The FCS is not a major source of HAP emissions. Furthermore, the requirements for gas-fired turbines have been stayed indefinitely – **Not applicable.**
- **40 CFR 64 – Compliance Assurance Monitoring (CAM)** – Unit FS02 at the FCS has uncontrolled emissions of NOx greater than 100 tons/year and is controlled by add-on equipment, therefore, CAM applies. **Regulation is applicable.**
- **40 CFR 68 – Chemical Accident Prevention** – The FCS is a natural gas transmission facility regulated by the U.S. Department of Transportation under 49 CFR Part 192 and therefore does not meet the definition of a CAA Section 112(r) *stationary source* under 68.3. **Not applicable.**
- **40 CFR 82 – Stratospheric Ozone and Climate Protection** – The FCS contains small appliances and MVAC equipment subject to regulation under Part 82. **Regulation is applicable.**

Questar submitted a Tribal Minor New Source Review synthetic minor permit application for Unit FS02 on October 30, 2013 (see attachment I).

Questar prepared a response to Attachment A of your letter – EPA Region 8 Oil and Gas Part 71 Source Determination Screening Information Request. Our response is attached as Attachment II.

Finally, a Form CTAC is attached, certifying the information contained in this submittal.

Questions or requests for additional information should be directed to me at (801) 324-3820 or via electronic mail: scott.bassett@questar.com.

Sincerely,

Scott R. Bassett
Sr. Environmental Coordinator

Attachments

ATTACHMENT I

Questar Pipeline Company
1140 West 200 South
P.O. Box 45360
Salt Lake City, UT 84145-0360
Tel 801 324 5555

October 30, 2013

U.S. EPA, Region VIII
Attn: Federal Minor NSR Permit Coordinator
Air & Radiation Program (8P-AR)
1595 Wynkoop Street
Denver, CO 80202-1129

Re: Tribal Minor New Source Review Permit Application

Dear Sir or Madam:

Please find attached an application for a synthetic minor permit for equipment located in Indian Country. Questar Pipeline Company (QPC) is requesting enforceable limits for NOx on an existing reciprocating engine (Unit FS02) at the Fidlar Compressor Station on the Uintah and Ouray Indian Reservation in Utah. Fidlar currently operates under Part 71 Permit number V-UO-0002-05.01.

QPC has prepared an application consisting of Form NEW, Form SYNMIN, and supporting documentation. In addition, a signed form CTAC is enclosed since the existing unit operates at a Part 71 source.

Questions or requests for additional information should be directed to me at (801) 324-3820 or via electronic mail: scott.bassett@questar.com.

Sincerely,

Scott R. Bassett
Sr. Environmental Coordinator

Attachments

cc: Ute Tribe Environmental Contact

ATTACHMENT II

Questar Pipeline Company
Fidlar Compressor Station
Part 71 Permit #V-UO-0002-05.01

Response to:

EPA Region 8 Oil and Gas Part 71 Source Determination Screening Information Request

1. Please respond to the following questions, as applicable, in regards to operations at the facility under consideration for an initial or renewed Clean Air Act (CAA) Title V Operating Permit under 40 CFR Part 71.

    a. Does the facility to be permitted receive and/or dispatch oil and/or natural gas from/to other oil and/or other natural gas production components, owned or operated by the applicant, such as well sites, compressor stations, tank batteries, gas plants, etc. If yes, please explain.

    The Fidlar Compressor Station (FCS) is a main line gas transmission facility (SIC Code 4922). Questar Pipeline Company (QPC) does not own or operate any natural gas production components.

    b. Does the facility to be permitted receive and/or dispatch oil and/or natural gas from/to other oil and/or other natural gas production components, owned or operated by third parties, such as well sites, compressor stations, tank batteries, gas plants, etc. If yes, please explain.

    The FCS can deliver/receive gas to/from the Chapeta Processing, LLC gas plant located approximately 2 miles from Fidlar Station. The FCS can receive processed gas from QEP Resources Stagecoach/Ironhorse gas processing complex located approximately 0.25 miles from Fidlar Station.

    c. What components owned and/or operated by the applicant are capable of operating independently from other components owned and/or operated by the applicant? If any please explain.

    QPC does not own any natural gas production components. All gas transmission pipelines and stations owned by QPC are capable of operating independently.

    d. In regard to any pipeline system(s) utilized by the facility to be permitted, is it (are they) owned and operated exclusively by the applicant?

    Four (4) FERC jurisdictional pipelines (main lines 40, 80, 103, & 104) owned and operated by QPC interconnect at FCS and are capable of bi-directional flow. Two (2) third party pipelines interconnect FCS with the Chapeta Processing, LLC plant. One (1) pipeline owned and operated by QEP Resources delivers processed gas to FCS for transportation.

e. If the pipeline system(s) is not exclusively owned and/or operated by the applicant, is it (are they) a shared resource(s) with third party companies? Please identify any third party companies and describe the nature of the interactions.

The gas processing interconnects mentioned above are not shared resources. They are owned and operated exclusively by third parties. Questar Pipeline Company is a FERC/DOT regulated natural gas transmission company with myriad receipt points along its pipelines. Some of QPC's transportation customers also contract with third parties to process their gas. Two (2) third party gas processing plants are located near the FCS: 1) Chapeta Processing, LLC, and 2) QEP Resources Stagecoach/Ironhorse. QPC can receive gas for transportation from both processing plants either through the FCS or directly into the main lines without passing through the compressor station.

2. Please submit the following information for oil and/or natural gas components operating in the same system as the facility to be permitted:

Please note that QPC does not own, operate, or partner on any natural gas production or processing assets in the Uinta Basin. QPC's southern transmission system stretches from Rifle, Colorado to a pipeline interconnect with Kern River Gas Transmission near Goshen, Utah. The nearest gas transmission facilities owned and operated by QPC in proximity to Fidlar Station are: 1) Greasewood Compressor Station approximately 70 miles east in Colorado (UTM 12S 739492.03 E, 4420853.42 N), 2) Kastler Compressor Station approximately 70 miles north in Utah (UTM 12T 650409.15 E, 4539429.76 N), and 3) Blind Canyon Compressor Station approximately 40 miles west in Utah (UTM 12S 567943.24 E, 4411220.85 N). A general system map for QPC is included with this submittal. The attached system map along with the descriptions above should be sufficient in answering the remaining questions below should they be relevant. Please contact us if additional information is needed to make a source determination.

a. A system map identifying the following:
    i. Components owned and/or operated by the applicant that receive or dispatch oil and/or natural gas from/to the facility to be permitted;
    ii. Pipelines utilized by the facility to be permitted that are owned and/or operated by the applicant; and
    iii. Pipelines utilized by the facility to be permitted that are shared with third party companies.
b. The SIC codes for each component.
c. A description of the activities for each component.
d. The Latitude/Longitude for each component.
e. The proximity of the component to facility to be permitted.
f. A description of the siting factors for new and existing components owned and/or operated by the applicant (such as surface owner agreements, spacing orders, leases, NEPA requirements, terrain, and proximity to existing structures.).
g. A flow diagram of the oil and/or natural gas flow among the components that are owned and/or operated by the applicant and utilized by the facility to be permitted.

h. A general description of system redundancy, if present (i.e., What happens if a component in the system owned and/or operated by the applicant and utilized by the facility to be permitted goes offline? What emissions sources, if any, are capable of operating independently from other components?).
i. A general description of the factors influencing the percentage of oil and/or natural gas flow to downstream compression and processing facilities such as, pressure, contractual obligations, gas custody, etc.

ATTACHMENT III

ATTACHMENT IV

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Heimsath (First) Kim (MI) ___

Title Vice President, Environment, Health, and Safety

Street or P.O. Box P.O. Box 45360

City Salt Lake City State UT ZIP 84145 - 0360

Telephone (801) 324 - 3412 Ext. _____ Facsimile (801) 324 - 3883

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) Kim Heimsath

Name (typed) Ms. Kim Heimsath Date: 10 / 30 / 2013

Schwartz, Colin

From: Scott R Bassett <scott.bassett@dominionenergy.com>
Sent: Tuesday, August 08, 2017 11:30 AM
To: Schwartz, Colin
Subject: RE: Message from "PRT0888"

Yes, I work for a corporate group and not directly for the pipeline company. We are simply adding Dominion Energy in front of all the existing company names. So Dominion Energy Questar Pipeline, LLC is the correct name. Thanks, Scott

-----Original Message-----
From: Schwartz, Colin [mailto:Schwartz.Colin@epa.gov]
Sent: Tuesday, August 08, 2017 9:36 AM
To: Scott R Bassett (Services - 6)
Subject: [External] RE: Message from "PRT0888"

Hey Scott,

I am working on these new documents currently. I noticed that the letterhead you send has Dominion Energy Questar Corporation listed from the Environmental, Health, and Safety office however the name change is for Dominion Energy Questar Pipeline, LLC. I am checking with you to make sure that the name change is in fact for Dominion Energy Questar Pipeline, LLC.

Thank you,

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

-----Original Message-----
From: Scott R Bassett [mailto:scott.bassett@dominionenergy.com]
Sent: Thursday, August 03, 2017 9:30 AM
To: Schwartz, Colin <Schwartz.Colin@epa.gov>; Smith, Claudia <Smith.Claudia@epa.gov>
Subject: FW: Message from "PRT0888"

FYI - Advance copy of name change notification and form GIS update going out to Colin via 2-day FedEx delivery. Colin you will also get a cc: of the recent Quad J test performed on unit FS07. Official submittal went to Alex North in Enforcement. Alex has scheduled a compliance inspection at Fidlar Station on August 15. Let me know if you need anything further. Regards, Scott

-----Original Message-----
From: safety@questar.com [mailto:safety@questar.com]
Sent: Thursday, August 03, 2017 8:55 AM
To: Scott R Bassett (Services - 6)
Subject: Message from "PRT0888"

This E-mail was sent from "PRT0888" (Aficio MP C4501).

Scan Date: 08.03.2017 08:25:28 (-0600)
Queries to: safety@questar.com

CONFIDENTIALITY NOTICE: This electronic message contains information which may be legally confidential and or privileged and does not in any case represent a firm ENERGY COMMODITY bid or offer relating thereto which binds the sender without an additional express written confirmation to that effect. The information is intended solely for the individual or entity named above and access by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, distribution, or use of the contents of this information is prohibited and may be unlawful. If you have received this electronic transmission in error, please reply immediately to the sender that you have received the message in error, and delete it. Thank you.

Dominion Questar

Dominion Questar Corporation
1140 West 200 South
P.O. Box 45360
Salt Lake City, UT 84145-0360
Tel 801-324-3820 • Fax 801-324-3883

Environment, Health, and Safety

RECEIVED MAY 16 2017

May 12, 2017

U.S. EPA, Region VIII
Attn: Colin Schwartz, Part 71 Permit Contact
Air and Radiation Program (8P-AR)
1595 Wynkoop Street
Denver, CO 80202

Re: Correction of Turbine FS01 Startup Date – Permit No. V-UO-0002-05.01

Dear Colin Schwartz,

The purpose of this correspondence is to correct an error that was recognized during internal review of documentation submitted to EPA in June, 2016.

Questar Pipeline replaced turbine FS01 with a like kind unit via the Alternative Operating Scenario (AOS) provisions of permit V-UO-0002-05.01 on June 20, 2016 (see attached). A notification of actual startup date was submitted on June 23, 2016, but erroneously identified **March** 22, 2016 as the start date instead of **June** 22, 2016. The error could cause a misinterpretation that the unit was installed and started in March 2016 rather than June 2016 (i.e., prior to the June 17, 2016 off permit notification letter).

Correction of the actual startup date does not affect the installation date of June 20, 2016 or the unit serial number (21035) that should be noted in the revised equipment list in the Part 71 permit renewal that is pending.

Questions regarding this notification should be referred to me at (801) 324-3820 or via email: scott.bassett@questar.com.

Sincerely,

Scott R. Bassett
Lead Environmental Coordinator

Attachment

QUESTAR

Questar Pipeline Company
1140 West 200 South
P.O. Box 45360
Salt Lake City, UT 84145-0360
Tel 801 324 5555

June 17, 2016

U.S. EPA, Region VIII
Attn: Part 71 Permit Contact
Air and Radiation Program (8P-AR)
1595 Wynkoop Street
Denver, CO 80202

Re: Notification of Off Permit Change – Permit No. V-UO-0002-05.01

Dear Sir or Madam,

The purpose of this correspondence is to notify the Agency that Questar Pipeline Company is making a facility change that meets the requirements of Permit Section VII.Q. Off Permit Changes [40 CFR §71.6(a)(12) and 40 CFR §71.6(a)(3)(ii)] at the Fidlar Compressor Station located on the Uintah and Ouray Indian Reservation in Uintah County, Utah.

Unit FS01, a Solar Saturn T1001S turbine compressor engine, has accumulated sufficient operating hours that routine replacement is warranted. It is standard practice in the combustion turbine industry to overhaul turbines at a central maintenance facility and replace units via like-kind exchange. In this case, Questar proposes to replace the current turbine engine with an identical, low hour, turbine engine from its inventory of retired units. The facility change is scheduled for June 20-24, 2016. There is no change in emissions at the facility due to this change and no new requirements will apply. The following additional information is hereby submitted to satisfy permit condition VII.Q.7.

7.(a) – The current unit FS01 is a Saturn T1001S, standard NOx, diffusion flame turbine manufactured by Solar Turbines. The proposed replacement is identical with the same standard NOx emissions profile (verified by previous performance testing).

7.(b) – There is no increase in emissions at the facility due the proposed change, therefore, the change does not constitute a major modification or new major source under the federal PSD program. Performance test results from a prior installation indicate that the unit meets the applicable NOx emissions standards.

7.(c) – There are no new requirements associated with the change. Unit FS01 will continue to be subject to New Source Performance Standard 40 CFR Part 60, Subpart GG.

7.(d)(i) – The existing Unit FS01 is a Solar Turbines, Saturn T1001S, bearing serial number 30283, rated at 11.16 MMBtu/hr at site elevation. The replacement turbine engine is a Solar Turbines, Saturn T1001S, bearing serial number 21035 (overhauled by UNC Metcalf, 9/18/98). The heat rate of the replacement is identical to the original turbine producing 11.16 MMBtu/hour at site elevation. The turbine will be configured as before, driving the same centrifugal compressor on the original compressor skid within the existing enclosure.

7.(d)(ii) – The original manufacture date of the replacement compressor engine is 1971; however, it was last overhauled on September 18, 1998 by UNC Metcalf. Installation of the replacement turbine is scheduled for June 20-24, 2016. Installation will be completed within a few days of commencement. A notification of startup and performance testing will be submitted to the Agency.

7.(d)(iii) – Cost estimates for both a new compressor set (approximately $2.2 million) and the proposed replacement (budget = $50,000.00) were obtained. In addition, the cost of a Saturn turbine overhaul rebuild from the manufacturer has been documented as costing $123,680.00. As such, the cost of the overhaul/replacement is less than 50% of a comparable new facility and the replacement turbine is not considered "reconstructed".

7.(d)(iv) – The FS01 turbine compressor engine was not constructed or reconstructed after February 18, 2005 and is not subject to 40 CFR 60, Subpart KKKK. There is no increase in emissions associated with the proposed replacement and, therefore, Unit FS01 has not been "modified". As documented in 7.(d)(iii) above, the turbine has not been "reconstructed". As such, unit FS03 remains subject to NSPS Subpart GG and is not an affected facility under NSPS Subpart KKKK.

7.(d)(v) – Fidlar compressor station is not a major source of hazardous air pollutants (PTE = 1.82 ton/year total HAP). Therefore, Unit FS01 is not subject to 40 CFR Part 63, Subpart YYYY. Additionally, there are currently no area source requirements under Subpart YYYY (rule has been stayed indefinitely).

7.(d)(vi)(A) – The replacement of the engine and gearbox of compressor turbine FS01 constitutes a "physical change", therefore, PSD applicability will be evaluated below.

7.(d)(vi)(B)(1) – Neither Unit FS01 nor Fidlar Compressor Station are major stationary sources under PSD.

7.(d)(vi)(B)(2) – The overhaul replacement of turbine unit FS01 will not cause an increase in regulated pollutants. The PTE for the replacement turbine is identical to the existing turbine: NOx = 29.22 tons per year (tpy), CO = 47.43 tpy, VOC = 0.11 tpy, SO_2, = 0.07 tpy, PM_{10} = 0.34 tpy. As such, the proposed replacement is not a new major source or major modification.

Questions regarding this notification should be referred to me at (801) 324-3820 or via email: scott.bassett@questar.com. Since the turbine engine serial number will change from 30283 to 21035 it is requested that the pending Part 71 permit renewal application be updated with this information. Finally, EPA Form CTAC certified by the corporate responsible official is attached to this letter.

Sincerely,

Scott R. Bassett
Lead Environmental Coordinator

Attachment

QUESTAR

Questar Pipeline Company
1140 West 200 South
P.O. Box 45360
Salt Lake City, UT 84145-0360
Tel 801 324 5555

March 23, 2016

U.S. EPA, Region VIII
Attn: Part 71 Permit Contact
Air and Radiation Program (8P-AR)
1595 Wynkoop Street
Denver, CO 80202

Re: Notification of Startup Unit FS03 – Permit No. V-UO-0002-05.01

Dear Sir or Madam,

The purpose of this correspondence is to notify the Agency that Unit FS03 was replaced as indicated in the February 10, 2016 off permit notification letter submitted to EPA (see attached). While the engine exchange was tentatively scheduled for May, 2016, it became operationally necessary to replace the unit over the weekend of March 19 - 20, 2016. The replacement turbine (Unit FS03, s/n 20950) started up on March 20, 2016. A performance test in accordance with 40 CFR 60, Subpart GG will be scheduled in the next 180 days. A confirmation of the test date and a test protocol will be submitted at least 30 days in advance.

Questions regarding this notification should be referred to me at (801) 324-3820 or via email: scott.bassett@questar.com.

Sincerely,

Scott R. Bassett
Lead Environmental Coordinator

Attachment

QUESTAR

Questar Pipeline Company
1140 West 200 South
P.O. Box 45360
Salt Lake City, UT 84145-0360
Tel 801 324 5555

February 10, 2016

U.S. EPA, Region VIII
Attn: Part 71 Permit Contact
Air and Radiation Program (8P-AR)
1595 Wynkoop Street
Denver, CO 80202

Re: Notification of Off Permit Change – Permit No. V-UO-0002-05.01

Dear Sir or Madam,

The purpose of this correspondence is to notify the Agency that Questar Pipeline Company is making a facility change that meets the requirements of Permit Section VII.Q. Off Permit Changes [40 CFR §71.6(a)(12) and 40 CFR §71.6(a)(3)(ii)] at the Fidlar Compressor Station located on the Uintah and Ouray Indian Reservation in Uintah County, Utah.

Unit FS03, a Solar Saturn T1001S turbine compressor engine, has accumulated sufficient operating hours that routine replacement is warranted. It is standard practice in the combustion turbine industry to overhaul turbines at a central maintenance facility and replace units via like-kind exchange. In this case, Questar proposes to replace the current turbine engine with an identical, low hour, turbine engine from its inventory of retired units. The facility change is scheduled for May, 2016. There is no change in emissions at the facility due to this change and no new requirements will apply. The following additional information is hereby submitted to satisfy permit condition VII.Q.7.

7.(a) – The current unit FS03 is a Saturn T1001S, standard NOx, diffusion flame turbine manufactured by Solar Turbines. The proposed replacement is identical with the same standard NOx emissions profile (verified by previous performance testing).

7.(b) – There is no increase in emissions at the facility due the proposed change, therefore, the change does not constitute a major modification or new major source under the federal PSD program. Performance test results from a prior installation indicate that the unit meets the applicable NOx emissions standards.

7.(c) – There are no new requirements associated with the change. Unit FS03 will continue to be subject to New Source Performance Standard 40 CFR Part 60, Subpart GG.

7.(d)(i) – The existing Unit FS03 is a Solar Turbines, Saturn T1001S, bearing serial number 20487, rated at 11.16 MMBtu/hr at site elevation. The replacement turbine engine is a Solar Turbines, Saturn T1001S, bearing serial number 20950 (overhauled by UNC Metcalf, 9/18/98). The heat rate of the replacement is identical to the original turbine producing 11.16 MMBtu/hour at site elevation. The turbine will be configured as before, driving the same centrifugal compressor on the original compressor skid (s/n: S401440) within the existing enclosure.

7.(d)(ii) – The original manufacture date of the replacement compressor engine is 1971; however, it was last overhauled on September 18, 1998 by UNC Metcalf. Installation of the replacement turbine is scheduled for May, 2016. Installation will be completed within a few days of commencement. A notification of startup and performance testing will be submitted to the Agency.

7.(d)(iii) – Cost estimates for both a new compressor set (approximately $2.2 million) and the proposed replacement (budget = $50,000.00) were obtained. In addition, the cost of a Saturn turbine overhaul rebuild from the manufacturer has been documented as costing $123,680.00. As such, the cost of the overhaul/replacement is less than 50% of a comparable new facility and the replacement turbine is not considered "reconstructed".

7.(d)(iv) – The FS03 turbine compressor engine was not constructed or reconstructed after February 18, 2005 and is not subject to 40 CFR 60, Subpart KKKK. There is no increase in emissions associated with the proposed replacement and, therefore, Unit FS03 has not been "modified". As documented in 7.(d)(iii) above, the turbine has not been "reconstructed". As such, unit FS03 remains subject to NSPS Subpart GG and is not an affected facility under NSPS Subpart KKKK.

7.(d)(v) – Fidlar compressor station is not a major source of hazardous air pollutants (PTE = 1.82 ton/year total HAP). Therefore, Unit FS03 is not subject to 40 CFR Part 63, Subpart YYYY. Additionally, there are currently no area source requirements under Subpart YYYY (rule has been stayed indefinitely).

7.(d)(vi)(A) – The replacement of the engine and gearbox of compressor turbine FS03 constitutes a "physical change", therefore, PSD applicability will be evaluated below.

7.(d)(vi)(B)(1) – Neither Unit FS03 nor Fidlar Compressor Station are major stationary sources under PSD.

7.(d)(vi)(B)(2) – The overhaul replacement of turbine unit FS03 will not cause an increase in regulated pollutants. The PTE for the replacement turbine is identical to the existing turbine: NOx = 29.22 tons per year (tpy), CO = 47.43 tpy, VOC = 0.11 tpy, SO_2, = 0.07 tpy, PM_{10} = 0.34 tpy. As such, the proposed replacement is not a new major source or major modification.

Questions regarding this notification should be referred to me at (801) 324-3820 or via email: scott.bassett@questar.com. Since the turbine engine serial number will change from 20487 to 20950 it is requested that the pending Part 71 permit renewal application be updated with this information. Finally, EPA Form CTAC certified by the corporate responsible official is attached to this letter.

Sincerely,

Scott R. Bassett
Lead Environmental Coordinator

Attachment

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Teuscher (First) Patrick (MI) D

Title Vice President Audit & Chief Risk Officer

Street or P.O. Box P.O. Box 45360

City Salt Lake City State UT ZIP 84145 - 0360

Telephone (801) 324 - 1915 Ext. _____ Facsimile (801) 324 - 3883

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) Patrick D. Teuscher

Name (typed) Patrick D. Teuscher Date: 02 / 10 / 2016

QUESTAR

Questar Pipeline Company
1140 West 200 South
P.O. Box 45360
Salt Lake City, UT 84145-0360
Tel 801 324 5555

February 10, 2016

U.S. EPA, Region VIII
Attn: Part 71 Permit Contact
Air and Radiation Program (8P-AR)
1595 Wynkoop Street
Denver, CO 80202

Re: Notification of Off Permit Change – Permit No. V-UO-0002-05.01

Dear Sir or Madam,

The purpose of this correspondence is to notify the Agency that Questar Pipeline Company is making a facility change that meets the requirements of Permit Section VII.Q. Off Permit Changes [40 CFR §71.6(a)(12) and 40 CFR §71.6(a)(3)(ii)] at the Fidlar Compressor Station located on the Uintah and Ouray Indian Reservation in Uintah County, Utah.

Unit FS03, a Solar Saturn T1001S turbine compressor engine, has accumulated sufficient operating hours that routine replacement is warranted. It is standard practice in the combustion turbine industry to overhaul turbines at a central maintenance facility and replace units via like-kind exchange. In this case, Questar proposes to replace the current turbine engine with an identical, low hour, turbine engine from its inventory of retired units. The facility change is scheduled for May, 2016. There is no change in emissions at the facility due to this change and no new requirements will apply. The following additional information is hereby submitted to satisfy permit condition VII.Q.7.

7.(a) – The current unit FS03 is a Saturn T1001S, standard NOx, diffusion flame turbine manufactured by Solar Turbines. The proposed replacement is identical with the same standard NOx emissions profile (verified by previous performance testing).

7.(b) – There is no increase in emissions at the facility due the proposed change, therefore, the change does not constitute a major modification or new major source under the federal PSD program. Performance test results from a prior installation indicate that the unit meets the applicable NOx emissions standards.

7.(c) – There are no new requirements associated with the change. Unit FS03 will continue to be subject to New Source Performance Standard 40 CFR Part 60, Subpart GG.

7.(d)(i) – The existing Unit FS03 is a Solar Turbines, Saturn T1001S, bearing serial number 20487, rated at 11.16 MMBtu/hr at site elevation. The replacement turbine engine is a Solar Turbines, Saturn T1001S, bearing serial number 20950 (overhauled by UNC Metcalf, 9/18/98). The heat rate of the replacement is identical to the original turbine producing 11.16 MMBtu/hour at site elevation. The turbine will be configured as before, driving the same centrifugal compressor on the original compressor skid (s/n: S401440) within the existing enclosure.

7.(d)(ii) – The original manufacture date of the replacement compressor engine is 1971; however, it was last overhauled on September 18, 1998 by UNC Metcalf. Installation of the replacement turbine is scheduled for May, 2016. Installation will be completed within a few days of commencement. A notification of startup and performance testing will be submitted to the Agency.

7.(d)(iii) – Cost estimates for both a new compressor set (approximately $2.2 million) and the proposed replacement (budget = $50,000.00) were obtained. In addition, the cost of a Saturn turbine overhaul rebuild from the manufacturer has been documented as costing $123,680.00. As such, the cost of the overhaul/replacement is less than 50% of a comparable new facility and the replacement turbine is not considered "reconstructed".

7.(d)(iv) – The FS03 turbine compressor engine was not constructed or reconstructed after February 18, 2005 and is not subject to 40 CFR 60, Subpart KKKK. There is no increase in emissions associated with the proposed replacement and, therefore, Unit FS03 has not been "modified". As documented in 7.(d)(iii) above, the turbine has not been "reconstructed". As such, unit FS03 remains subject to NSPS Subpart GG and is not an affected facility under NSPS Subpart KKKK.

7.(d)(v) – Fidlar compressor station is not a major source of hazardous air pollutants (PTE = 1.82 ton/year total HAP). Therefore, Unit FS03 is not subject to 40 CFR Part 63, Subpart YYYY. Additionally, there are currently no area source requirements under Subpart YYYY (rule has been stayed indefinitely).

7.(d)(vi)(A) – The replacement of the engine and gearbox of compressor turbine FS03 constitutes a "physical change", therefore, PSD applicability will be evaluated below.

7.(d)(vi)(B)(1) – Neither Unit FS03 nor Fidlar Compressor Station are major stationary sources under PSD.

7.(d)(vi)(B)(2) – The overhaul replacement of turbine unit FS03 will not cause an increase in regulated pollutants. The PTE for the replacement turbine is identical to the existing turbine: NOx = 29.22 tons per year (tpy), CO = 47.43 tpy, VOC = 0.11 tpy, SO_2, = 0.07 tpy, PM_{10} = 0.34 tpy. As such, the proposed replacement is not a new major source or major modification.

Questions regarding this notification should be referred to me at (801) 324-3820 or via email: scott.bassett@questar.com. Since the turbine engine serial number will change from 20487 to 20950 it is requested that the pending Part 71 permit renewal application be updated with this information. Finally, EPA Form CTAC certified by the corporate responsible official is attached to this letter.

Sincerely,

Scott R. Bassett
Lead Environmental Coordinator

Attachment

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Teuscher (First) Patrick (MI) D

Title Vice President Audit & Chief Risk Officer

Street or P.O. Box P.O. Box 45360

City Salt Lake City State UT ZIP 84145 - 0360

Telephone (801) 324 - 1915 Ext. _____ Facsimile (801) 324 - 3883

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) Patrick D. Teuscher

Name (typed) Patrick D. Teuscher Date: 02 / 10 / 2016

QUESTAR

Questar Pipeline Company
1140 West 200 South
P.O. Box 45360
Salt Lake City, UT 84145-0360
Tel 801 324 5555

March 24, 2016

U.S. EPA, Region VIII
Attn: Part 71 Permit Contact
Air and Radiation Program (8P-AR)
1595 Wynkoop Street
Denver, CO 80202

Re: Notification of Off Permit Change – Permit No. V-UO-0002-05.01

Dear Sir or Madam,

The purpose of this correspondence is to notify the Agency that Questar Pipeline Company is making a facility change that meets the requirements of Permit Section VII.Q. Off Permit Changes [40 CFR §71.6(a)(12) and 40 CFR §71.6(a)(3)(ii)] at the Fidlar Compressor Station located on the Uintah and Ouray Indian Reservation in Uintah County, Utah.

Unit FS05 (station unit #4), a Solar Centaur 40-4700 turbine compressor engine, had a catastrophic failure and engine fire on March 22, 2016. As such, it will be replaced with an identical turbine from Solar Turbines overhaul fleet. It is standard practice in the combustion turbine industry to overhaul turbines at a central maintenance facility and replace units via like-kind exchange. Unit FS05 will be replaced as if it had accumulated 30,000 hours and was due for overhaul. The facility change is scheduled for March 28 – 30, 2016. There is no change in emissions at the facility due to this change. No new requirements will apply. The following additional information is hereby submitted to satisfy permit condition VII.Q.7.

7.(a) – The current unit FS05 is a dry low NOx turbine employing Solar Turbines SoLoNOx combustion system. The replacement unit will employ the same low NOx technology.

7.(b) – There is no increase in emissions due the proposed change, therefore, the change does not constitute a major modification or new major source under the federal PSD program.

7.(c) – There are no new requirements associated with the change. Unit FS05 will continue to be subject to New Source Performance Standard 40 CFR Part 60, Subpart GG.

7.(d)(i) – The replacement turbine engine is a Solar Turbines, Centaur 40-4700, bearing overhaul serial number OHA16-C0314. The heat rate of the replacement is identical to the original turbine producing 37.05 MMBtu/hour at site elevation. The turbine will be configured as before, driving a centrifugal compressor on the original compressor skid within the same enclosure.

7.(d)(ii) – The FS05 compressor package was constructed on August 5, 2004, prior to the NSPS Subpart KKKK applicability date. Installation of the replacement turbine is scheduled for March 28, 2016 and should be completed by March 30, 2016. A notification of startup and performance testing will be submitted thereafter.

7.(d)(iii) – Cost estimates for both a new compressor set (approximately $3 million) and the proposed replacement (budget = $145,569.50) were obtained. The cost of the replacement unit is less than 50% of a comparable new facility and, therefore, the turbine is not considered "reconstructed".

7.(d)(iv) – The FS05 turbine compressor package was not constructed after February 18, 2005 and is not subject to 40 CFR 60, Subpart KKKK. There is no increase in emissions associated with the proposed replacement and, therefore, Unit FS05 has not been "modified". As documented in 7.(d)(iii) above, the turbine has not been "reconstructed". As such, unit FS05 remains subject to NSPS Subpart GG and is not an affected facility under NSPS Subpart KKKK.

7.(d)(v) – Fidlar compressor station is not a major source of hazardous air pollutants (PTE = 1.82 ton/year total HAP). Therefore, Unit FS05 is not subject to 40 CFR Part 63, Subpart YYYY. Additionally, there are currently no area source requirements under Subpart YYYY (rule has been stayed indefinitely).

7.(d)(vi)(A) – The replacement of components of unit FS05 constitutes a "physical change", therefore, PSD applicability will be evaluated below.

7.(d)(vi)(B)(1) – Neither Unit FS05 nor Fidlar Compressor Station are major stationary sources under PSD.

7.(d)(vi)(B)(2) – The like-kind replacement of turbine unit FS05 will not cause an increase in regulated pollutants. The PTE for the overhauled turbine is identical to the existing turbine: NOx = 24.67 tons per year (tpy), CO = 47.43 tpy, VOC = 0.36 tpy, SO_2, = <0.01 tpy, PM_{10} = 1.13 tpy. As such, the proposed replacement is not a new major source or major modification.

Questions regarding this notification should be referred to me at (801) 324-3820 or via email: scott.bassett@questar.com. Since the turbine engine serial number will change from OHH14-C1327 to OHA16-C0314 it is requested that the pending Part 71 permit renewal application be updated with this information. Finally, EPA Form CTAC certified by the corporate responsible official is attached to this letter.

Sincerely,

Scott R. Bassett
Lead Environmental Coordinator

Attachment

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Teuscher (First) Patrick (MI) D

Title Vice President Audit & Chief Risk Officer

Street or P.O. Box P.O. Box 45360

City Salt Lake City State UT ZIP 84145 - 0360

Telephone (801) 324 - 1915 Ext. _____ Facsimile (801) 324 - 3883

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) Patrick D. Teuscher

Name (typed) Patrick D. Teuscher Date: 3 / 24 / 2016

Scott Bassett

From: trackingupdates@fedex.com
Sent: Friday, March 25, 2016 10:25 AM
To: Scott Bassett
Subject: FedEx Shipment 775951176103 Delivered

Your package has been delivered

Tracking # 775951176103

Ship date:
Thu, 3/24/2016

Debbie Stidham
QUESTAR GAS
SALT LAKE CITY, UT 84104
US

Delivery date:
Fri, 3/25/2016 10:22 am

Attn: Part 71 Permit Contract
US EPA Region VIII
1595 WYNKOOP ST Air & Radiation Program (8P-AR)
DENVER, CO 80202
US

Shipment Facts

Our records indicate that the following package has been delivered.

Tracking number:	775951176103
Status:	Delivered: 03/25/2016 10:22 AM Signed for By: M.THOMAS
Department number:	1566
Invoice number:	218104
Purchase order number:	Debbie Stidham
Reference:	S Bassett/Part 71 Permit
Signed for by:	M.THOMAS
Delivery location:	DENVER, CO
Delivered to:	Guard/Security Station
Service type:	FedEx Standard Overnight
Packaging type:	FedEx Box
Number of pieces:	1
Weight:	1.00 lb.
Special handling/Services:	Deliver Weekday

QUESTAR

Questar Pipeline Company
1140 West 200 South
P.O. Box 45360
Salt Lake City, UT 84145-0360
Tel 801 324 5555

May 4, 2016

U.S. EPA, Region VIII
Attn: Part 71 Permit Contact
Air and Radiation Program (8P-AR)
1595 Wynkoop Street
Denver, CO 80202

Re: Notification of Startup Unit FS05 – Permit No. V-UO-0002-05.01

Dear Sir or Madam,

The purpose of this correspondence is to notify the Agency that Unit FS05 at Fidlar Compressor Station was replaced as indicated in the March 24, 2016 off permit notification letter submitted to EPA. The replacement was operational on April 1, 2016. A performance test in accordance with 40 CFR 60, Subpart GG, is scheduled for June 7 – 9, 2016 as stated in the test notification and protocol sent under separate cover.

Questions regarding this notification should be referred to me at (801) 324-3820 or via email: scott.bassett@questar.com.

Sincerely,

Scott R. Bassett
Lead Environmental Coordinator

Scott Bassett

From: trackingupdates@fedex.com
Sent: Friday, May 06, 2016 9:29 AM
To: Scott Bassett
Subject: FedEx Shipment 776265764511 Delivered

Your package has been delivered

Tracking # 776265764511

Ship date:
Wed, 5/4/2016

Debbie Stidham
QUESTAR GAS
SALT LAKE CITY, UT 84104
US

Delivery date:
Fri, 5/6/2016 9:25 am

Part 71 Permit Contact
US EPA Region VIII
1595 WYNKOOP ST
DENVER, CO 80202
US

Shipment Facts

Our records indicate that the following package has been delivered.

Tracking number:	776265764511
Status:	Delivered: 05/06/2016 09:25 AM Signed for By: R.HERNANDEZ
Department number:	1566
Invoice number:	242323
Purchase order number:	Brooks
Reference:	Scott Bassett
Signed for by:	R.HERNANDEZ
Delivery location:	DENVER, CO
Delivered to:	Guard/Security Station
Service type:	FedEx 2Day
Packaging type:	FedEx Box
Number of pieces:	1
Weight:	1.00 lb.
Special handling/Services:	Deliver Weekday

Schwartz, Colin

From: Scott Bassett (Questar - 6) <Scott.Bassett@questar.com>
Sent: Tuesday, May 16, 2017 10:23 AM
To: Schwartz, Colin
Subject: RE: [External] RE: [External] RE: [External] Correction of Turbine FS01 Startup Date
Attachments: Fidlar FS05 Off Permit Change Letter Mar 2016.pdf; FS05 Exchange 2016 startup.pdf

Please note the following updates:

FS01 – Up to date after off permit change in 2016

FS03 – Change as noted in last email. Serial number: 20950 Installed: 3/19/2016

FS05 - Change as noted here. Serial number: OHA16-C0314 Installed: 3/28/2016

There have been no other changes to the equipment list. I have attached the FS05 Off Permit Notifications so you have all three. I have used install date versus actual startup date which can be days to weeks later.

Let me know if you need anything else. Thanks, Scott

From: Schwartz, Colin [mailto:Schwartz.Colin@epa.gov]
Sent: Tuesday, May 16, 2017 10:05 AM
To: Scott Bassett (Questar - 6)
Subject: [External] RE: [External] RE: [External] Correction of Turbine FS01 Startup Date

Thanks, I will print those up and update FS03. Can you double check the emission sources and associated descriptions?

If there have been any changes you can note them in an email response only and I will put this correspondence into the files.

Thanks again for your help.

Emission Unit ID	Description	Control Equipment
FS01 FS03	11.16 MMBtu/hr (1,019 hp), natural gas-fired turbines for natural gas compression. Solar Saturn T-1001S-205: Serial Number: 21035 Installed: 6/20/2016 Serial Number: 20487 Installed: 6/12/2004	None
FS05	37.05 MMBtu/hr (4,028 hp), natural gas-fired turbine for natural gas compression. Solar Centaur T4700S: Serial Number: 5109C Installed: 1/21/2008	None
FS02	10.79 MMBtu/hr (1,061 hp), natural gas-fired internal combustion engine for natural gas compression. White Superior 12G-825, 4 stroke rich burn: Serial Number: 299499 Installed: 12/3/1983	AFR (Air-Fuel Ratio) & NSCR (Non-Selective Catalytic Reduction) installed 9/1995

FS07	6.54 MMBtu/hr (643 hp), natural gas-fired stand by internal combustion engine for emergency power generator. Cummins GTA28 CC, rich burn: Serial Number: 25352466 Installed: 11/18/2010	AFR & NSCR
QPC Tank	400 bbl condensate sludge storage tank, 42,000 gal/year throughput: Serial Number: unknown Installed: pre-1991	None
QPC Truck Loadout	42,000 gal/year tank truck loading unit: Serial Number: unknown Installed: pre-1991	None
FS08	Fugitive emissions from valves, seals, pumps, etc.	None

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

From: Scott Bassett (Questar - 6) [mailto:Scott.Bassett@questar.com]
Sent: Tuesday, May 16, 2017 9:58 AM
To: Schwartz, Colin <Schwartz.Colin@epa.gov>
Subject: RE: [External] RE: [External] Correction of Turbine FS01 Startup Date

Sorry, realized I didn't completely answer the question about FS03. It was also replaced in 2016 (prior to FS01 – that's where the error propagated from). You should have the attached Off Permit Change notification for FS03 in your files somewhere. Current FS03 is s/n 20950, replaced March 19, 2016 and started up on March 20, 2016. Let me know if you have further questions. Note: Unit FS05 was also replaced in 2016. Let me know if you want copies of the notifications. SB

From: Schwartz, Colin [mailto:Schwartz.Colin@epa.gov]
Sent: Tuesday, May 16, 2017 9:47 AM
To: Scott Bassett (Questar - 6)
Subject: [External] RE: [External] Correction of Turbine FS01 Startup Date

Just to check: is FS03 S/N: 20487 and was Installed: 6/12/2004?

It is in for reviews now. We have had a busy spring time and I am hoping management can sign off on it soon but I do not have a specific timeframe for you other than that unfortunately.

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

From: Scott Bassett (Questar - 6) [mailto:Scott.Bassett@questar.com]
Sent: Tuesday, May 16, 2017 9:39 AM

To: Schwartz, Colin <Schwartz.Colin@epa.gov>
Subject: RE: [External] Correction of Turbine FS01 Startup Date

Yes, it is a mistake from using the same template for both FS01 and FS03 that were overhauled via like-kind exchange in 2016. In that off permit change notification dated 6/17/16 there should only have been references to FS01. I'll check the FS03 letter for similar mistakes. FYI – We have some new staff members here and have just implemented a rigorous peer review to catch these kind off errors. A different set of eyes on them really helps.

Just out of curiosity I wonder if you have a schedule at all for reissuance of the Part 71 permit for Fidlar? I believe you indicated that you are working on that file.

Regards,

Scott

From: Schwartz, Colin [mailto:Schwartz.Colin@epa.gov]
Sent: Tuesday, May 16, 2017 9:30 AM
To: Scott Bassett (Questar - 6)
Subject: [External] Correction of Turbine FS01 Startup Date

Hey Scott,

I have an administrative question on the correction for FS01 I received today, send May 12, 2017.

On the attached notification, dated June 17, 2016, 7.(d)(iv), the last sentence states: "As such, unit FS03 remains subject to NSPS Subpart GG and is not an affected facility under NSPS Subpart KKKK."

Is the mention of FS03 a typo and instead should read FS01, or has there been a change to FS03 as well?

Thank you,

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

Schwartz, Colin

From: Scott Bassett (Questar - 6) <Scott.Bassett@questar.com>
Sent: Tuesday, May 16, 2017 10:34 AM
To: Schwartz, Colin
Subject: Portable Generator at Fidlar Station

Hi Colin,

On another note I wanted to be sure you received the email I sent on May 4, 2016 regarding the standby generator (Unit FS07). Unit FS07 was scheduled for a 3-year emission test under Subpart JJJJ, but was unable to be tested due to a mechanical failure (turbochargers).

I mentioned in the email that was copied to Enforcement (A. North/ S. Patefield) that a smaller, temporary generator would be brought on site. The temporary generator is a trailer mounted 85 kW (versus 450 kW for unit FS07) that is also natural gas fired. It is EPA certified to meet the same emissions as the permanent unit: 2.0 g/hp-hr NOx, 4.0 g/hp-hr CO, and 1.0 g/hp-hr.

Since the 85 kW unit is portable and temporary (estimated at 60 days) is there anything else required besides a courtesy notification?

Scott R. Bassett, CHMM
Lead Environmental Coordinator
Dominion Questar Corporation
Desk: 801-324-3820
Cell: 801-668-0162

Dominion Questar

Dominion Questar Corporation
1140 West 200 South
P.O. Box 45360
Salt Lake City, UT 84145-0360
Tel 801-324-3820 • Fax 801-324-3883

Environment, Health, and Safety

cc: Claudia Smith

January 5, 2017

U.S. EPA, Region VIII
Attn: Colin Schwartz
Air and Radiation Program (8P-AR)
1595 Wynkoop Street
Denver, CO 80202

RECEIVED JAN 17 2017

Re: Notification of Name Change for Fidlar Station – Permit #V-UO-0002-05.01

Dear Colin Schwartz:

The purpose of this correspondence is to notify the Agency that due to the acquisition of Questar Corporation by Dominion Resources on September 16, 2016, Questar Pipeline Company has changed its name to Questar Pipeline, LLC. In addition, Questar Pipeline, LLC became a wholly owned subsidiary of Dominion Midstream Partners, LP, effective December 1, 2016.

As such, an administrative permit amendment to change the permittee name is requested for Part 71 Permit V-UO-0002-05.01 (currently pending renewal). It is also requested that minor source permit number SMNSR-UO-000002-2013.001 be updated to reflect the name change from Questar Pipeline Company to Questar Pipeline, LLC.

Changes Occurring at Questar Corporation

On September 16, 2016 Dominion Resources, Inc. merged with Questar Corporation through the purchase of 100% of Questar Corporation's stock only (no assets). As a result of the merger, the name of Questar Corporation changed to Dominion Questar Corporation. Dominion Questar Corporation became a subsidiary of Dominion Resources, Inc., but otherwise Questar Corporation remained the same. Dominion Questar Corporation is the parent company to Questar Pipeline Company.

Changes Occurring at Questar Pipeline

On August 25, 2016, Questar Pipeline Company was converted to a limited liability company (LLC) and is now called Questar Pipeline, LLC. Based on Utah law, conversion from a corporation to an LLC does not qualify as a change in ownership because the entity remains the same. Utah Code Ann. § 48-3a-1046. The management and officers of Questar Pipeline are the same, and no assets have been sold or transferred. Questar Pipeline, LLC now is a wholly-owned subsidiary of Questar Pipeline Holding Company, which is a wholly-owned subsidiary of Dominion Questar Corporation. Questar Pipeline, LLC is still a separate legal entity and the permit holder.

In addition, on December 1, 2016, Questar Pipeline, LLC became a subsidiary of Dominion Midstream Partners, LP. Because the ownership and operational control of Questar Pipeline, LLC will not be changed by the transfer to Dominion Midstream, no other action should be needed for permits where Questar Pipeline Company is the permittee.

Since the local operating company, now Questar Pipeline, LLC, remains as before with local management retained, the Responsible Official is the same company officer both before and after the corporate merger. Mr. Ron S. Jorgensen oversees Questar Pipeline, LLC and will continue to do so as the assets of the company are moved into Dominion Midstream Partners, LP. Mr. Jorgensen has assumed duties as Responsible Official for Questar Pipeline, LLC's sole Part 71 source, Fidlar Compressor Station. The Agency was notified of this role in a prior notification.

Please contact me at (801) 324-3820 or via electronic mail: scott.bassett@questar.com with any questions you may have regarding this notification.

Sincerely,

Scott R. Bassett
Lead Environmental Coordinator

cc: Claudia Smith, Tribal Minor New Source Review (8P-AR)

Renewal #2 Title V Permit
V-UO-000002-2013.00

QUESTAR

Questar Pipeline Company
1140 West 200 South
P.O. Box 45360
Salt Lake City, UT 84145-0360

Enviornmental & Safety Services

June 6, 2013

U.S. EPA, Region VIII
Attn: Eric Wortman, Part 71 Permit Contact
Air & Radiation Program (8P-AR)
1595 Wynkoop Street
Denver, CO 80202-1129

Re: Part 71 Permit Renewal Application for Fidlar Station

Dear Eric Wortman:

Please find enclosed three (3) copies of the renewal application for Questar Pipeline Company's Fidlar Compressor Station on the Uintah and Ouray Indian Reservation in Utah. Fidlar currently operates under Part 71 Permit number V-UO-0002-05.01.

Questar realizes that it can take considerable time to review and process the information submitted herein. Notwithstanding, we respectfully request that you and your staff assist us in ensuring the application is deemed complete prior to the permit expiration date of August 12, 2013.

Questions or requests for additional information should be directed to me at (801) 324-3820 or via electronic mail: scott.bassett@questar.com.

Sincerely,

Scott R. Bassett
Sr. Environmental Coordinator

Enclosures (3 copies)

From: (801) 324-3810
Debbie Stidham
QUESTAR GAS
1140 West 200 South

SALT LAKE CITY, UT 84104

Origin ID: SLCA

FedEx Express

J13111302120326

Ship Date: 06JUN13
ActWgt: 7.0 LB
CAD: 2649407/INET3370

Delivery Address Bar Code

Ref # SCOTT BASSETT
Invoice # 231874
PO # BRALEY
Dept # 1566

SHIP TO: (801) 324-3820 BILL SENDER

ATTN: ERIC WORTMAN, PART 71 PERMIT
U.S. EPA REGION 8
1595 WYNKOOP ST
AIR&RADIATION PROGRAM(8P-AR)
DENVER, CO 80202

FRI - 07 JUN 3:00P
STANDARD OVERNIGHT

TRK# 7999 4284 6547
0201

80202
CO-US
DEN

XH TEXA

518G1/D777/93AB

After printing this label:
1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com.FedEx will not be responsible for any claim in excess of $100 per package, whether the result of loss, damage, delay, non-delivery,misdelivery,or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim.Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental,consequential, or special is limited to the greater of $100 or the authorized declared value. Recovery cannot exceed actual documented loss.Maximum for items of extraordinary value is $1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

Phase II acid rain application submitted? ___YES _X_NO If yes, Permitting authority _____

G. Source-Wide PTE Restrictions and Generic Applicable Requirements

Cite and describe any emissions-limiting requirements and/or facility-wide "generic" applicable requirements.

Permit condition II.B.2 [40 CFR 60.332 and 60.333] Units FS01, FS03, and FS05 are subject to NSPS Subpart GG emission limits for NOx.
Permit condition II.C.1 [40 CFR 60.4233(e)] Unit FS07 is subject to NSPS Subpart JJJJ emission limits for NOx, CO, and VOC.
Permit condition V.B. establishes NOx emission limits of 2.0 grams/hp-hr and 4.68 lb/hr for unit FS02.

H. Process Description

List processes, products, and SIC codes for the facility.

Process	Products	SIC
Natural Gas Transmission	**Pipeline Quality Natural Gas**	**4922**

I. Emission Unit Identification

Assign an emissions unit ID and describe each emissions unit at the facility. Control equipment and/or alternative operating scenarios associated with emissions units should by listed on a separate line. Applicants may exclude from this list any insignificant emissions units or activities.

Emissions Unit ID	Description of Unit
FS01	**Solar Saturn T1001S-205 Gas Turbine**
FS02	**White Superior, 12G-825, Reciprocating Gas Engine** **Control Equipment: 3-Way NSCR and Air/Fuel Ratio Controller**
FS03	**Solar Saturn T1001S-210 Gas Turbine**
FS05	**Solar Centaur 40-T4700S Gas Turbine**
FS07	**Cummins GTA28CC Emergency Power Generator** **Control Equipment: 3-Way NSCR and Air/Fuel Ratio Controller**
FS08	**Fugitive Emissions from valves, seals, etc.**
QPC Tank	**400-bbl Condensate Storage Tank**
QPC Tank Load Out	**Condensate Load Out Piping, Valves, and Equipment**

INSTRUCTIONS FOR EUD-1
EMISSIONS UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES

Use this form is to describe emissions units that combust solid or liquid fuels, such as boilers, steam generators, electric generators and the like.

Section A – The emissions unit ID should be consistent with the one used in section I of form **GIS**. Enter the four-digit SIC code for the unit, which may be different from that used to describe the facility as a whole. Enter the source classification code (SCC), if known or readily available (not mandatory).

Section B - There may be other information that the permitting authority will need to know that is not specifically requested on the forms and that should be included on attachments. Such information would be critical to identifying the emissions unit and its applicable requirements.

Section C - Describe the primary fuel type is that used during the majority of its operating hours. Your fuel supplier should be able to provide the information requested here. If the supplier provides a range of values, use the highest or worst-case value. Identify and describe any associated air pollution control device. If data provided by the vendor, attach documentation (if available); if other basis, indicate how determined (e.g., AP-42).

Section D - Actual fuel usage will be used to calculate actual emissions for purposes of calculating fees. Maximum usage will be used to calculate PTE. If your fuel is a combination of several fuel types, indicate the average percentage of each fuel on an hourly and yearly basis in the appropriate column or on an attachment. The basis of this fuels usage data must be explained on an attachment. For example, actual fuel consumption could be established from purchase records or records of fuel consumption over the preceding calendar year or for sources that have not yet operated for a full year, from estimations of actual usage.

Section E - Identify and describe any associated air pollution control device for the unit described above. For control efficiency, you may need to contact the vendor, if so, attach copies of correspondence from the vendor documenting these values, if available, or indicate how these values were otherwise determined.

Section F - Complete this section only if ambient impact assessment is an applicable requirement or the facility is a temporary source. This is not common.

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID **FS02** Description **White-Superior Reciprocating Gas Engine**

SIC Code (4-digit) **4922** SCC Code **20300201**

B. Emissions Unit Description

Primary use **Natural Gas Compression** Temporary Source ___Yes **X** No

Manufacturer **White-Superior** Model No. **12G-825**

Serial Number **299499** Installation Date **12 / 3 / 1983**

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input _____MM BTU/hr Max. Design Heat Input _____MM BTU/hr

C. Fuel Data

Primary fuel type(s) **Natural Gas** Standby fuel type(s)_____

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural Gas	**<1.7 E-3**	**0**	**1055**

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas	**varies**	**9.99×10^3**	**87.5×10^6**

E. Associated Air Pollution Control Equipment

Emissions unit ID **FS02** Device type **3-way NSCR**

Air pollutant(s) Controlled **NOx, CO, and VOC** Manufacturer **Powerhouse/Waukesha-Pearce**

Model No. **3WC-531-12 / PE-530** Serial No. **26033**

Installation date **9** / _____ / **95 (new element June 2010)** Control efficiency (%) **90%**

Efficiency estimation method **Manufacturer**

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) **23** Inside stack diameter (ft) **1.0**

Stack temp(°F) **962** Design stack flow rate (ACFM) _____.____

Actual stack flow rate (ACFM) **5606** Velocity (ft/sec) **119**

INSTRUCTIONS FOR EUD-1
EMISSIONS UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES

Use this form is to describe emissions units that combust solid or liquid fuels, such as boilers, steam generators, electric generators and the like.

Section A – The emissions unit ID should be consistent with the one used in section I of form **GIS**. Enter the four-digit SIC code for the unit, which may be different from that used to describe the facility as a whole. Enter the source classification code (SCC), if known or readily available (not mandatory).

Section B - There may be other information that the permitting authority will need to know that is not specifically requested on the forms and that should be included on attachments. Such information would be critical to identifying the emissions unit and its applicable requirements.

Section C - Describe the primary fuel type is that used during the majority of its operating hours. Your fuel supplier should be able to provide the information requested here. If the supplier provides a range of values use the highest or worst-case value. Identify and describe any associated air pollution control device. If data provided by the vendor, attach documentation (if available); if other basis, indicate how determined (e.g., AP-42).

Section D - Actual fuel usage will be used to calculate actual emissions for purposes of calculating fees. Maximum usage will be used to calculate PTE. If your fuel is a combination of several fuel types, indicate the average percentage of each fuel on an hourly and yearly basis in the appropriate column or on an attachment. The basis of this fuels usage data must be explained on an attachment. For example, actual fuel consumption could be established from purchase records or records of fuel consumption over the preceding calendar year or for sources that have not yet operated for a full year, from estimations of actual usage.

Section E - Identify and describe any associated air pollution control device for the unit described above. For control efficiency, you may need to contact the vendor, if so, attach copies of correspondence from the vendor documenting these values, if available, or indicate how these values were otherwise determined.

Section F - Complete this section only if ambient impact assessment is an applicable requirement or the facility is a temporary source. This is not common.

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID **FS03** Description **Saturn T1001S-210 Gas Turbine**

SIC Code (4-digit) **4922** SCC Code **20200201**

B. Emissions Unit Description

Primary use **Natural Gas Compression** Temporary Source ___Yes **X** No

Manufacturer **Solar Turbines** Model No. **Saturn T1001S-210**

Serial Number **20487** Installation Date **6 / 12 / 2004**

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) **Combustion turbine (1019 hp)**

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input _____MM BTU/hr Max. Design Heat Input _____MM BTU/hr

C. Fuel Data

Primary fuel type(s) **Natural Gas** Standby fuel type(s)_____

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural Gas	**<1.7E-3**	**0**	**1055**

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas	**varies**	**34.3 x 10^3 c.f.**	**300.5 x 10^6 c.f.**

E. Associated Air Pollution Control Equipment

Emissions unit ID_____ Device type_____

Air pollutant(s) Controlled_____ Manufacturer_____

Model No._____ Serial No._____

Installation date_____/_____/_____ Control efficiency (%) _____

Efficiency estimation method_____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) **28** Inside stack diameter (ft) **2.8**

Stack temp(°F) **1170** Design stack flow rate (ACFM) **unknown**

Actual stack flow rate (ACFM) **74,646** Velocity (ft/sec) ***110***

INSTRUCTIONS FOR EUD-1
EMISSIONS UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES

Use this form is to describe emissions units that combust solid or liquid fuels, such as boilers, steam generators, electric generators and the like.

Section A – The emissions unit ID should be consistent with the one used in section I of form **GIS**. Enter the four-digit SIC code for the unit, which may be different from that used to describe the facility as a whole. Enter the source classification code (SCC), if known or readily available (not mandatory).

Section B - There may be other information that the permitting authority will need to know that is not specifically requested on the forms and that should be included on attachments. Such information would be critical to identifying the emissions unit and its applicable requirements.

Section C - Describe the primary fuel type is that used during the majority of its operating hours. Your fuel supplier should be able to provide the information requested here. If the supplier provides a range of values, use the highest or worst-case value. Identify and describe any associated air pollution control device. If data provided by the vendor, attach documentation (if available); if other basis, indicate how determined (e.g., AP-42).

Section D - Actual fuel usage will be used to calculate actual emissions for purposes of calculating fees. Maximum usage will be used to calculate PTE. If your fuel is a combination of several fuel types, indicate the average percentage of each fuel on an hourly and yearly basis in the appropriate column or on an attachment. The basis of this fuels usage data must be explained on an attachment. For example, actual fuel consumption could be established from purchase records or records of fuel consumption over the preceding calendar year or for sources that have not yet operated for a full year, from estimations of actual usage.

Section E - Identify and describe any associated air pollution control device for the unit described above. For control efficiency, you may need to contact the vendor, if so, attach copies of correspondence from the vendor documenting these values, if available, or indicate how these values were otherwise determined.

Section F - Complete this section only if ambient impact assessment is an applicable requirement or the facility is a temporary source. This is not common.

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Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID **FS07** Description **Standby Generator Reciprocating Gas Engine**

SIC Code (4-digit) **4922** SCC Code **20300202**

B. Emissions Unit Description

Primary use **Standby Generator** Temporary Source ___Yes **X** No

Manufacturer **Cummins** Model No. **GTA28 CC**

Serial Number **25352466** Installation Date **3 / 17 / 2011**

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input _____MM BTU/hr Max. Design Heat Input _____MM BTU/hr

C. Fuel Data

Primary fuel type(s) **Natural Gas** Standby fuel type(s)_____

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural Gas	**<1.7 E-3**	**0**	**1055**

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas	**varies**	**9.99 X 10^3**	**87.5 X 10^6**

E. Associated Air Pollution Control Equipment

Emissions unit ID **FS02** Device type **3-way NSCR**

Air pollutant(s) Controlled **NOx, CO, and VOC** Manufacturer **Powerhouse/Waukesha-Pearce**

Model No. **3WC-531-12 / PE-530** Serial No. **26033**

Installation date **9** / _____ / **95 (new element June 2010)** Control efficiency (%) **90%**

Efficiency estimation method **Manufacturer**

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) **23** Inside stack diameter (ft) **1.0**

Stack temp(°F) **962** Design stack flow rate (ACFM) _____.____

Actual stack flow rate (ACFM) **5606** Velocity (ft/sec) **119**

INSTRUCTIONS FOR EUD-1
EMISSIONS UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES

Use this form is to describe emissions units that combust solid or liquid fuels, such as boilers, steam generators, electric generators and the like.

Section A – The emissions unit ID should be consistent with the one used in section I of form **GIS**. Enter the four-digit SIC code for the unit, which may be different from that used to describe the facility as a whole. Enter the source classification code (SCC), if known or readily available (not mandatory).

Section B - There may be other information that the permitting authority will need to know that is not specifically requested on the forms and that should be included on attachments. Such information would be critical to identifying the emissions unit and its applicable requirements.

Section C - Describe the primary fuel type is that used during the majority of its operating hours. Your fuel supplier should be able to provide the information requested here. If the supplier provides a range of values, use the highest or worst-case value. Identify and describe any associated air pollution control device. If data provided by the vendor, attach documentation (if available); if other basis, indicate how determined (e.g., AP-42).

Section D - Actual fuel usage will be used to calculate actual emissions for purposes of calculating fees. Maximum usage will be used to calculate PTE. If your fuel is a combination of several fuel types, indicate the average percentage of each fuel on an hourly and yearly basis in the appropriate column or on an attachment. The basis of this fuels usage data must be explained on an attachment. For example, actual fuel consumption could be established from purchase records or records of fuel consumption over the preceding calendar year or for sources that have not yet operated for a full year, from estimations of actual usage.

Section E - Identify and describe any associated air pollution control device for the unit described above. For control efficiency, you may need to contact the vendor, if so, attach copies of correspondence from the vendor documenting these values, if available, or indicate how these values were otherwise determined.

Section F - Complete this section only if ambient impact assessment is an applicable requirement or the facility is a temporary source. This is not common.

E. VOC-containing Substance Data

List each VOC-containing substance consumed, processed or produced at the emissions unit that is emitted into the air. In the name column, if providing a brand name, include the name of the manufacture; if the substance contains HAP, list the constituent HAP.

Substance Name (Chemical, Brand Name)	CAS No.	Substance Type	Actual Usage (gal/yr)	Max Usage (gal/day)	Max Usage (gal/year)	VOC Content (lb/gal)
Pipeline Quality Natural Gas						
Natural Gas Condensate						

EPA United States Environmental Protection Agency

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EMISSIONS UNIT DESCRIPTION FOR VOC EMITTING SOURCES (EUD-2)

A. General Information

Emissions unit ID **QPC Tank** Description **400-bbl Condensate Storage Tank**

SIC Code (4-digit) **4922** SCC Code **40400311**

B. Emissions Unit Description

Equipment type **Vertical Storage Tank** Temporary source: ___Yes **X** No

Manufacturer **IFI** Model No. **12F - 400 barrel capacity**

Serial No. **0301** Installation date ____/ **pre** / **1991**

Articles being coated or degreased _____

Application method _____

Overspray (surface coating) (%) _____ Drying method _____

No. of dryers _____ Tank capacity (degreasers) (gal) _____

C. Associated Air Pollution Control Equipment

Emissions unit ID _____ Device Type _____

Manufacturer _____ Model No _____

Serial No. _____ Installation date ____/____/_____

Control efficiency (%) _____.___ Capture efficiency (%) _____.___

Air pollutant(s) controlled _____ Efficiency estimation method _____

D. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____.____ Inside stack diameter (ft) _____.____

Stack temp (F) _____.___ Design stack flow rate (ACFM) _____.____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____.____

E. VOC-containing Substance Data

List each VOC-containing substance consumed, processed or produced at the emissions unit that is emitted into the air. In the name column, if providing a brand name, include the name of the manufacture; if the substance contains HAP, list the constituent HAP.

Substance Name (Chemical , Brand Name)	CAS No.	Substance Type	Actual Usage (gal/yr)	Max Usage (gal/day)	Max Usage (gal/year)	VOC Content (lb/gal)
Natural Gas Condensate	**68919-39-1**	**Petroleum**	**NA**	**NA**	**16,800**	**5.52**

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Federal Operating Permit Program (40 CFR Part 71)

EMISSIONS UNIT DESCRIPTION FOR VOC EMITTING SOURCES (EUD-2)

A. General Information

Emissions unit ID **QPC Tank Load Out** Description **Condensate Tank Load Out**

SIC Code (4-digit) **4922** SCC Code **Unknown**

B. Emissions Unit Description

Equipment type **Load Out Piping** Temporary source: ___Yes **X** No

Manufacturer_____ Model No. _____

Serial No. _____ Installation date____/ **pre** /**1991**

Articles being coated or degreased _____

Application method _____

Overspray (surface coating) (%) _____ Drying method_____

No. of dryers _____ Tank capacity (degreasers) (gal) _____

C. Associated Air Pollution Control Equipment

Emissions unit ID _____ Device Type_____

Manufacturer _____ Model No_____

Serial No. _____ Installation date ____/____/_____

Control efficiency (%) _____.___ Capture efficiency (%) _____.___

Air pollutant(s) controlled_____ Efficiency estimation method _____

D. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____._____ Inside stack diameter (ft) _____._____

Stack temp (F) _____._____ Design stack flow rate (ACFM) _____._____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____._____

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID FS03

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
PM_{10}		**0.08**	**0.34**	
SO_2		**0.02**	**0.07**	
NOx		**6.67**	**29.22**	
CO		**10.83**	**47.43**	
VOC		**0.02**	**0.11**	
HAPs		**0.01**	**0.04**	

Note: Annual emissions determined by more precise emission factors represented in Appendix A calculation spreadsheets. Hourly values represented here are rounded and may produce a slightly different result in tons/yr.

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID FS05

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
PM_{10}		**0.26**	**1.13**	
SO_2		**0.05**	**0.23**	
NOx		**5.63**	**24.67**	
CO		**4.52**	**19.80**	
VOC		**0.08**	**0.36**	
HAPs		**0.03**	**0.12**	

Note: Annual emissions determined by more precise emission factors represented in Appendix A calculation spreadsheets. Hourly values represented here are rounded and may produce a slightly different result in tons/yr.

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID FS07

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
PM_{10}		**0.13**	**0.03**	
SO_2		**<0.01**	**<0.01**	
NOx		**2.84**	**0.71**	
CO		**5.67**	**1.42**	
VOC		**1.42**	**0.36**	
HAPs		**0.20**	**0.05**	

Note: Annual emissions determined by more precise emission factors represented in Appendix A calculation spreadsheets. Hourly values represented here are rounded and may produce a slightly different result in tons/yr.

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID FS08

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
PM_{10}		0.00	0.00	
SO_2		0.00	0.00	
NOx		0.00	0.00	
CO		0.00	0.00	
VOC		0.97	4.24	
HAPs		<0.01	0.02	

Note: Annual emissions determined by more precise emission factors represented in Appendix A calculation spreadsheets. Hourly values represented here are rounded and may produce a slightly different result in tons/yr.

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID *QPC Tank*

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
PM_{10}		0.00	0.00	
SO_2		0.00	0.00	
NOx		0.00	0.00	
CO		0.00	0.00	
VOC		0.79	3.45	
HAPs		0.03	0.12	

Note: Annual emissions determined by more precise emission factors represented in Appendix A calculation spreadsheets. Hourly values represented here are rounded and may produce a slightly different result in tons/yr.

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID QPC Loadout

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
PM_{10}		0.00	0.00	
SO_2		0.00	0.00	
NOx		0.00	0.00	
CO		0.00	0.00	
VOC		0.02	0.08	
HAPs		<0.01	0.0.1	

Note: Annual emissions determined by more precise emission factors represented in Appendix A calculation spreadsheets. Hourly values represented here are rounded and may produce a slightly different result in tons/yr.

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POTENTIAL TO EMIT (PTE)

For each unit with emissions that count towards applicability, list the emissions unit ID and the PTE for the air pollutants listed below and sum them up to show totals for the facility. You may find it helpful to complete form **EMISS** before completing this form. Show other pollutants not listed that are present in major amounts at the facility on attachment in a similar fashion. You may round values to the nearest tenth of a ton. Also report facility totals in section **J** of form **GIS**.

Emissions Unit ID	Regulated Air Pollutants and Pollutants for which the Source is Major (tons/yr)						
	NOx	VOC	SO2	PM10	CO	Lead	HAP
FS01	**29.22**	**0.11**	**0.07**	**0.34**	**47.43**	**0.00**	**0.04**
FS02	**20.49**	**10.25**	**0.07**	**0.97**	**20.49**	**0.00**	**1.42**
FS03	**29.22**	**0.11**	**0.07**	**0.34**	**47.43**	**0.00**	**0.04**
FS05	**24.67**	**0.36**	**0.23**	**1.13**	**19.80**	**0.00**	**0.12**
FS07	**0.71**	**0.36**	**<0.01**	**0.03**	**1.42**	**0.00**	**0.05**
FS08	**0.00**	**4.24**	**0.00**	**0.00**	**0.00**	**0.00**	**0.02**
QPC Tank	**0.00**	**3.45**	**0.00**	**0.00**	**0.00**	**0.00**	**0.12**
QPC Loadout	**0.00**	**0.08**	**0.00**	**0.00**	**0.00**	**0.00**	**0.01**
Insignificant Sources	**1.07**	**0.07**	**<0.01**	**0.08**	**0.90**	**0.00**	**<0.01**
FACILTY TOTALS	**105.38**	**19.02**	**0.45**	**2.90**	**137.46**	**0.00**	**1.82**

INSTRUCTIONS FOR PTE
POTENTIAL TO EMIT

Calculate the total PTE for each air pollutant at the facility for purposes of determining major source applicability.

On each line (row) in the table provided, enter the emissions unit ID and the quantity of each air pollutant identified on the form. If form **EMISS** was prepared previously, simply copy the emission values (or stipulations to major source status) contained on those forms to this form. You may round to the nearest ton.

Applicants may stipulate to major source status for an air pollutant and, thereby, avoid detailed PTE calculations. If a unit emits in major amounts, enter "MU" in the column for that air pollutant. If the facility is a major source for a pollutant but the emissions unit in question does not trigger major source status, enter "MS" in the space provided. If a listed pollutant is emitted at a unit but PTE cannot be calculated based on readily available information, enter "UN" (for "unknown") in the space provided. If the source is a major source for air pollutants not represented by columns on this form, please provide an attachment stipulating major source status or the calculation of the total for that air pollutant. The column for lead is for elemental lead regulated by a NAAQS, while compounds of lead are HAP.

The total line is provided at the bottom of each column to enter the total facility-wide PTE for applicability purposes (or stipulations to major source status) for each air pollutant reported above. Enter these totals, as well as the total PTE and the name of the HAP emitted in the greatest amount, in section J of form **GIS**.

Only include emissions or emissions units on form **PTE** that count toward major source applicability. Some of the emissions units for which form **EMISS** may have been prepared may not have emissions that count towards major source applicability or may have been included in order to calculate fees. In particular, fugitive emissions are not always included in major source applicability determinations for non-HAP. However, for major source determinations for HAP, all fugitive HAP must be included.

END

10. FORM CTAC – CERTIFICATION OF TRUTH, ACCURACY, & COMPLETENESS

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Heimsath (First) Kim (MI) ___

Title Vice President, Environment, Health, and Safety

Street or P.O. Box P.O. Box 45360

City Salt Lake City State UT ZIP 84145 - 0360

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B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) Kim Heimsath

Name (typed) Ms. Kim Heimsath Date: 6 / 6 / 2013

APPENDIX A. EMISSION CALCULATIONS

Table A -1. Potential Emissions Summary

Unit ID	Unit Description	ne	Xylene (tpy)	Naphthalene (tpy)	n-Hexane (tpy)	2,2,4 Trimethylpentane (tpy)
FS01	Solar Saturn T1001S-205 Gas Turbine		3.23E-18	1.90E-22	--	--
FS02	White Superior 12G-825 Reciprocating Gas Engine		9.76E-03	4.86E-03	--	--
FS03	Solar Saturn T-1001S-210 Gas Turbine		3.23E-18	1.90E-22	--	--
FS05	Solar Centaur 40-T4700S Gas Turbine		3.92E-16	7.67E-20	--	--
FS07	Cummins GTA28CC Stand-By Engine		3.38E-04	1.68E-04	--	--
FS08	Component Fugitives		--	--	0.02	5.59E-04
QPC Tank	Condensate Sludge Storage Tank		--	--	0.08	0.01
QPC Loadout	Condensate Sludge Storage Tank Loadout		1.00E-04	--	0.01	--
Insig. Sources	Insignificant Sources		--	--	--	--
	Total Emissions		**0.01**	**5.03E-03**	**0.11**	**0.01**

Table A-2(a). Gas Turbine Emission Factors

Emission Unit ID	Source Description	Turbine Rating (hp) *THP*[1]	Maximum Annual Operating Hours (hr/yr) *AOP*	oluene MMBtu) *EF*[5]	Ethyl Benzene (lb/MMBtu) *EF*[5]	Xylene (lb/MMBtu) *EF*[5]	Naphthalene (lb/MMBtu) *EF*[5]
FS01	Solar Saturn T1001S-205 Gas Turbine	1,019	8,760	38E-04	3.39E-05	6.78E-05	1.38E-06
FS03	Solar Saturn T-1001S-210 Gas Turbine	1,019	8,760	38E-04	3.39E-05	6.78E-05	1.38E-06
FS05	Solar Centaur 40-T4700S Gas Turbine	4,028	8,760	38E-04	3.39E-05	6.78E-05	1.38E-06

[1] Maximum site rated horsepower (relative humidity: 60%, temperature: 40 °F) excepting stack test da

[2] PM_{10} and VOC emission factors are taken from AP-42, Fifth Edition, Volume 1, Table 3.1-2a (April

[3] SO_2 emission factor based on maximum sulfur in fuel (FERC Tariff). Assumes all sulfur converted t

[4] NO_x and CO emission factor taken from manufacturer's (Solar Turbines) data.

[5] HAP emission factors taken from AP-42, Fifth Edition, Volume 1, Table 3.1-3 (April 2000). Emissi

Table A-2(b). Potential Criteria Pollutant Emissions from Gas Turbines

Emission Unit ID	Source Description	Turbine Rating (hp) *THP*	Maximum Annual Operating Hours (hr/yr) *AOP*
FS01	Solar Saturn T1001S-205 Gas Turbine	1,019	8,760
FS03	Solar Saturn T-1001S-210 Gas Turbine	1,019	8,760
FS05	Solar Centaur 40-T4700S Gas Turbine	4,028	8,760

Table A-2(c). Potential Hazardous Air Pollutant (HAP) Emissions from Gas T

				ıual Potential Emissions				
Emission Unit ID	Source Description	Turbine Rating (hp) *THP*	Maximum Annual Operating Hours (hr/yr) *AOP*	enzene (tpy) *AER*	Toluene (tpy) *AER*	Ethyl Benzene (tpy) *AER*	Xylene (tpy) *AER*	Naphthalene (tpy) *AER*
FS01	Solar Saturn T1001S-205 Gas Turbine	1,019	8,760	28E-10	4.27E-13	1.24E-15	3.23E-18	1.90E-22
FS03	Solar Saturn T-1001S-210 Gas Turbine	1,019	8,760	28E-10	4.27E-13	1.24E-15	3.23E-18	1.90E-22
FS05	Solar Centaur 40-T4700S Gas Turbine	4,028	8,760	20E-08	1.56E-11	1.50E-13	3.92E-16	7.67E-20

Table A-3(a). Reciprocating Engines Emission Factors

Emission Unit ID	Source Description	Engine Rating (hp) *EHP*[1]	N ( )	Ethyl Benzene (lb/MMBtu) *EF*[8]	Xylene (lb/MMBtu) *EF*[8]	Naphthalene (lb/MMBtu) *EF*[8]
FS02	White Superior, 12G-825, Reciprocating Gas Engine	1,061		2.63E-05	2.06E-04	1.03E-04
FS07	Cummins GTA28CC Stand-By Engine	643		2.63E-05	2.06E-04	1.03E-04

[1] Engine rating based on equipment design. Cummins GTA28CC derated 7.2% for elevation based on manu
[2] Annual operating hours assumed to be 8,760 hours per year except for stand-by units, which are assumed
[3] Load factor based on operator estimate.
[4] Equivalent hourly heat input calculated based on the engine rating in hp, AP-42 hp to Btu/hr conversion fa
[5] PM_{10} and VOC (for FS07 only) emission factors are taken from AP-42, Table 3.2-3 (July 2000). PM_{10} en
[6] SO_2 emission factor is determined based on maximum sulfur in fuel (FERC Tariff), assuming all sulfur is
[7] NO_X, CO, and VOC emission factors to be used for enforceable permit limits for FS02 requested by Ques
[8] HAP emission factors are taken from AP-42 Table 3.2-3 (July 2000). Emission factors adjusted for natura

Table A-3(b). Potential Criteria Pollutant Emissions from Reciprocating Engines

Emission Unit ID	Source Description	Engine Rating (hp) *EHP*	N ( )
FS02	White Superior, 12G-825, Reciprocating Gas Engine	1,061	
FS07	Cummins GTA28CC Stand-By Engine	643	

Table A-3(c). Potential Hazardous Air Pollutant (HAP) Emissions from Reciproc

Emission Unit ID	Source Description	Engine Rating (hp) *EHP*	N ( )	Annual Potential Emissions: Benzene (tpy) *AER*	Toluene (tpy) *AER*	Ethyl Benzene (tpy) *AER*	Xylene (tpy) *AER*	Naphthalene (tpy) *AER*
FS02	White Superior, 12G-825, Reciprocating Gas Engine	1,061		7.91E-02	2.79E-02	1.24E-03	9.76E-03	4.86E-03
FS07	Cummins GTA28CC Stand-By Engine	643		2.74E-03	9.66E-04	4.29E-05	3.38E-04	1.68E-04

Example Calculations for Unit ID FS02

Hourly Heat Input (HHI):

1. HHI = (EHP)(C.F.)(1/fuel eff)(1 MMBtu/10^6 Btu) =

EHP = Engine
C.F. = Conver
fuel eff = Fuel

SO_2 Emission Factor:

2. EF = (S)(MW)(lb mol/385.1 scf)(1 scf/1000 Btu)(10^6 Btu/MMBtu) =

S = Sulfur in F
MW = Molecu

PM_{10} Hourly Emission Rates (HER):

3. $HER_{lbs/hr}$ = (EF)(HHI)(LF/100) =

EF = Emissior
HHI = Hourly
LF = Load Fac

NO_X Hourly Emission Rates (HER):

4. $HER_{lbs/hr}$ = (EF)(THP)(1 lb/453.5924 g)(LF/100) =

EF = Emissior
THP = Turbin
LF = Load Fac

PM_{10} Annual Emission Rates (AER):

5. AER_{tpy} = (HER)(AOP)(1 ton/2000 lbs) =

HER = Hourly
AOP = Annua

Fidlar Compressor Station

Permit No. V-UO-0002-05.01

Unit FS08 - Fugitive Emissions from Equipment Leaks

Table A-4(a). Fugitive Emission Calculations - Gas Service

Estimation Method - EPA 453/R-95-017

ton/yr-component type = EF_type (lb/component-hr) * number of components/component type * 8760 hr/yr * %VOC_gas stream * 1/2000 (lb/ton)

Emission Factors (EF_type) lb/component-hr

Valves	0.0099	Flanges	0.00086
Others	0.0194	Pump Seals	0.00529
Open-ended Lines	0.0044	Connectors	0.00044

Current Number of Components in Gas Service

Valves	649	Flanges	537	
Others	15	Pump Seals	0	
Open-ended Lines	25	Connectors	1375	
		Total # of Components	2601	**Gas/Vapor Stream**

% VOC in Gas Stream (based on 4/22/10 gas analysis)

8.0596%

Emission Calculations for Components in Gas Service

	TPY
Valves	2.27
Others	0.10
Open-ended Lines	0.04
Flanges	0.16
Pump Seals	0.00
Connectors	0.21
Vapor Total	**2.79**

New VOC Emissions	
Vapor	2.79
Liquid	1.45
tons/yr	**4.24**

Fidlar Compressor Station

Permit No. V-UO-0002-05.01

Unit FS08 - Fugitive Emissions from Equipment Leaks

Table A-4(b). Fugitive Emission Calculations - Liquid Service

Estimation Method - EPA 453/R-95-017

ton/yr-component type = EF_type (lb/component-hr) * number of components/component type * 8760 hr/yr * %VOC_gas stream * 1/2000 (lb/ton)

Emission Factors (EF_type) lb/component-hr

Valves	0.00551	Flanges	0.000242
Others	0.0165	Pump Seals	0.0287
Open-ended Lines	0.00309	Connectors	0.000463

Current Number of Components in Liquid Service

Valves	28	Flanges	27	
Others	0	Pump Seals	4	
Open-ended Lines	1	Connectors	114	
		Total # of Components	174	**Light Liquid Stream**

% VOC in Liquids Stream

100%

Emission Calculations for Components in Light Liquid Service

	TPY
Valves	0.68
Others	0.00
Open-ended Lines	0.01
Flanges	0.03
Pump Seals	0.50
Connectors	0.23
Liquid Total	**1.45**

New VOC Emissions	
Vapor	2.79
Liquid	1.45
tons/yr	**4.24**

CO_2E Emissions Estimate

Facility Name: Fidlar Compressor Station
State: Utah (Uintah & Ouray)

PTE

Combustion Sources:

Sources[1]	Average Operating or Maximum Rated Horsepower (hp)	Brake Specific Fuel Consumption (Btu/hp-hr)	Hourly Average Operating or Maximum Rated Capacity (mmBtu/hr)	Maximum Annual Operating (hrs/yr)	Annual Average Operating or Maximum Rated Capacity (mmBtu/yr)[2]	CO_2 Emissions (metric tons/yr)[3]	CH_4 Emissions (metric tons/yr)[3]	N_2O Emissions (metric tons/yr)[3]	CO_2e Emissions (metric tons/yr)[4]
FS01	1,019	10,952	11.16	8760	97761.60	5183.32	0.10	0.01	5,188
FS02	1,061	10,170	10.79	8760	94520.40	5011.47	0.09	0.01	5,016
FS03	1,019	10,952	11.16	8760	97761.60	5183.32	0.10	0.01	5,188
FS05	4,028	9,198	37.05	8760	324558.00	17208.07	0.32	0.03	17,225
FS07	643	10,171	6.54	500	3270.00	173.38	0.00	0.00	174
					0.00	0.00	0.00	0.00	0
					0.00	0.00	0.00	0.00	0
					0.00	0.00	0.00	0.00	0
					0.00	0.00	0.00	0.00	0
					0.00	0.00	0.00	0.00	0
					0.00	0.00	0.00	0.00	0
					0.00	0.00	0.00	0.00	0
					0.00	0.00	0.00	0.00	0
					0.00	0.00	0.00	0.00	0
								Total	**32,792**

[1] Refer to Subpart C 98.30(a) for sources included in source category; per 98.30(b), this source category does not include:
(1) Portable equipment, as defined in §98.6.
(2) Emergency generators and emergency equipment, as defined in §98.6.
(3) Irrigation pumps at agricultural operations.
(4) Flares, unless otherwise required by provisions of another subpart of 40 CFR part 98 to use methodologies in this subpart.

[2] Calculating source specific heat input (mmBtu)

Engine/Turbines

hp = average operating horsepower or maximum rated
Btu/hp-hr = BSFC, manufacturer specified or assumed conservative estimate
hrs = operating hours per year; actual or max 8760

$$mmBtu = \frac{hp \mid \frac{Btu}{hp\text{-}hr} \mid hrs}{}$$

Heater/Boilers

mmBtu/hr = rated capacity of equipment
hrs = operating hours per year; actual or max 8760

$$mmBtu = \frac{\frac{mmBtu}{hr} \mid hrs}{}$$

[3] Calculating mass emissions (metric tons) of GHGs using source specific heat input (mmBtu)

Tier 1 Methodology

$$tonne\ GHG = 1 \times 10\text{-}3 \times EF_{GHG} \times mmBtu$$

0.001	tonne/kg	Conversion factor from kilograms to metric tons.
53.02	kg CO2 / mmBtu	Default CO2 emission factor (EF); [Table C-1] - fuel type: natural gas
1.00E-03	kg CH4 / mmBtu	Default CH4 emission factor (EF); [Table C-2] - fuel type: natural gas
1.00E-04	kg N2O / mmBtu	Default N2O emission factor (EF); [Table C-2] - fuel type: natural gas
110	CO2 lb/mmbtu	AP-42 Table 3.1-2a - turbines
0.003	N2O lb/mmbtu	AP-42 Table 3.1-2a - turbines

[4] Calculating Carbon Dioxide Equivalent for each GHG

$$tonne\ CO2e_{GHG} = tonne\ GHG \times GWP_{GHG}$$

From Table A-1 of Subpart A - Global Warming Potential (100 year time Horizon)

1	GWP_{CO2}
21	GWP_{CH4}
310	GWP_{N20}

APPENDIX B. SUPPORTING DOCUMENTATION

UNITS FS01 & FS03

MANUFACTURER'S & PERFORMANCE TEST DATA

SOLAR TURBINES INCORPORATED
ENGINE PERFORMANCE CODE REV. 3.27
CUSTOMER: Questar
JOB ID: 4-29-05

DATE RUN: 29-Apr-05
RUN BY: James E Finney

NEW EQUIPMENT PREDICTED EMISSION PERFORMANCE
DATA FOR POINT NUMBER 1

Fuel: SD NATURAL GAS
Water Injection: NO
Number of Engines Tested: 5
Model: SATURN 10-1200 CS/MD STANDARD GAS
Emissions Data: REV. 0.0

Customer: Questar
Inquiry Number:

The following predicted emissions performance is based on the following specific single point: (see attached)

Hp= 1019, %Full Load= 100.0, Elev= 4780 ft, %RH= 60.0, Temperature= 40.0 F

NOX		CO		UHC		
NOM	MAX	NOM	MAX	NOM	MAX	
56.67	150.00	106.46	400.00	28.72	100.00	PPMvd at 15% O2
11.04	29.22	12.63	47.44	1.95	6.79	ton/yr
0.226	0.598	0.258	0.971	0.040	0.139	lbm/MMBtu (Fuel LHV)
3.32	8.78	3.80	14.26	0.59	2.04	lbm/(MW-hr) (gas turbine shaft pwr)
2.52	6.67	2.88	10.83	0.45	1.55	lbm/hr

IMPORTANT NOTES

1. For short-term emission limits such as lbs/hr., Solar recommends using "worst case" anticipated operating conditions specific to the application and the site conditions. Worst case for one pollutant is not necessarily the same for another. The emission values on this form are only predicted emissions at the specific operating conditions listed.
2. Solar's typical SoLoNOx warranty is for greater than 0 deg F, and between 50% and 100% load for gas fuel, and between 80% and 100% load for liquid fuel. An emission warranty for non-SoLoNOx equipment is for greater than 0 deg F and between 80% and 100% load.
3. Fuel must meet Solar standard fuel specification ES 9-98. Predicted emissions are based on the attached fuel composition, or, San Diego natural gas or equivalent.
4. If needed, Solar can provide generic documents to address turbine operation outside typical warranty ranges, as well as non-warranted emissions of SO2, PM10/2.5, VOC, and formaldehyde.
5. Solar can optionally provide factory testing in San Diego to ensure the actual unit(s) meet the above values within the tolerances quoted. Pricing and schedule impact will be provided upon request.

Table 3: Summary of Results, Runs 1-3 (Unit 1)

Operational Data, Concentrations, Exhaust Flow Rates, Mass Emission Rates

Company: Questar
Location: Fidlar Compressor Station
Source: Solar Saturn 10 SN: 30283
Turbine Rated: 914 HP @ 22300 RPM
Technician: CS

Test Run Number	**1**	**2**	**3**	
Unit Number	**1**	**1**	**1**	
Load	**93%**	**93%**	**93%**	
Date	12/7/04	12/7/04	12/7/04	
Start Time	8:32	8:55	9:16	
Stop Time	8:50	9:11	9:32	
Engine/Compressor Operation				
Gas Producer Speed (%)	93.0	93.0	93.0	
Horsepower (Hp)	850	850	850	
Power Turbine Speed (%)	80.4	80.6	80.6	
Engine Compressor Discharge (PCD)	58	58	58	
Compressor Suction Pressure (psig)	613	613	613	
Compressor Discharge Pressure (psig)	838	831	827	
Compressor Suction Temperature (°F)	43	44	44	
Compressor Discharge Temperature (°F)	104	104	103	
Air Inlet Temperature (T1) (°F)	24	23	24	
Average Exhaust Temperature (T5) (°F)	958	956	956	
Fuel Pressure (psig)	167	167	167	
Fuel Data				
Fuel Consumption (MSCFD per flow meter)	303	301	296	
Fuel Consumption (SCFH)	12625	12542	12333	
O2 F-Factor (DSCF/MMBtu, HHV basis)	8654	8654	8654	
Fuel Heating Value (Btu/SCF, HHV basis)	1089	1089	1089	
BHp Specific Fuel Rate (Btu/Hp-hr, HHV basis)	11000	11000	11000	
Fuel VOC Content (non-methane)	15.32%	15.32%	15.32%	
Ambient Conditions				
Pressure Altitude (MSL)	4630	4630	4630	
Atmospheric Pressure ("Hg)	25.27	25.27	25.27	
Dry Bulb Temperature (°F)	25.9	26.4	26.2	
Wet Bulb Temperature (°F)	22.8	23	23.3	
Humidity (lb/lb air)	0.0023	0.0023	0.0024	
Measured Exhaust Emissions (Corrected)				**Average**
NOx (ppmv)	26.23	26.29	26.44	**26.32**
NOx (ppmv @ 15% O2)	49.92	50.04	48.74	**49.57**
NOx (ppmv @15% O2, ISO Day) **{Permit Limit = 150}**	55.69	55.69	54.43	**55.27**
O2 (vol %)	17.80	17.80	17.70	**17.77**
CO2 (vol %)	1.85	1.85	1.80	**1.84**
Fo (Natural Gas = 1.6 - 1.836)	1.67	1.67	1.77	**1.71**

Testing by Cubix Corporation, Albuquerque, New Mexico

Table 4: Summary of Results, Runs 4-6 (Unit 1)

Operational Data, Concentrations, Exhaust Flow Rates, Mass Emission Rates

Company: Questar
Location: Fidlar Compressor Station
Source: Solar Saturn 10 SN: 30283
Turbine Rated: 914 HP @ 22300 RPM
Technician: CS

Test Run Number	**4**	**5**	**6**	
Unit Number	**1**	**1**	**1**	
Load	**95%**	**95%**	**95%**	
Date	12/7/04	12/7/04	12/7/04	
Start Time	9:37	9:58	10:19	
Stop Time	9:53	10:14	10:35	
Engine/Compressor Operation				
Gas Producer Speed (%)	95.1	95.1	95.1	
Horsepower (Hp)	869	869	869	
Power Turbine Speed (%)	83.9	84.1	84.3	
Engine Compressor Discharge (PCD)	62	62	62	
Compressor Suction Pressure (psig)	611	614	612	
Compressor Discharge Pressure (psig)	818	795	792	
Compressor Suction Temperature (°F)	45	48	48	
Compressor Discharge Temperature (°F)	105	105	106	
Air Inlet Temperature (T1) (°F)	23	26	25	
Average Exhaust Temperature (T5) (°F)	1013	1008	1007	
Fuel Pressure (psig)	167	166	166	
Fuel Data				
O2 F-Factor (DSCF/MMBtu, HHV basis)	8654	8654	8654	
Fuel Heating Value (Btu/SCF, HHV basis)	1089	1089	1089	
BHp Specific Fuel Rate (Btu/Hp-hr, HHV basis)	11000	11000	11000	
Fuel VOC Content (non-methane)	15.32%	15.32%	15.32%	
Ambient Conditions				
Pressure Altitude (MSL)	4620	4620	4610	
Atmospheric Pressure ("Hg)	25.28	25.28	25.29	
Dry Bulb Temperature (°F)	30.4	30.5	31	
Wet Bulb Temperature (°F)	26.1	26.5	26.7	
Humidity (lb/lb air)	0.0025	0.0026	0.0026	
Measured Exhaust Emissions (Corrected)				**Average**
NOx (ppmv)	28.72	29.06	29.50	**29.09**
NOx (ppmv @ 15% O2)	51.35	52.63	53.43	**52.47**
NOx (ppmv @15% O2, ISO Day) **{Permit Limit = 150}**	56.65	58.19	58.92	**57.92**
O2 (vol %)	17.60	17.64	17.64	**17.63**
CO2 (vol %)	1.90	1.88	1.90	**1.89**
Fo (Natural Gas = 1.6 - 1.836)	1.74	1.74	1.72	**1.73**

Table 5: Summary of Results, Runs 7-9 (Unit 1)

Operational Data, Concentrations, Exhaust Flow Rates, Mass Emission Rates

Company: Questar
Location: Fidlar Compressor Station
Source: Solar Saturn 10 SN: 30283
Turbine Rated: 914 HP @ 22300 RPM
Technician: CS

Test Run Number	**7**	**8**	**9**	
Unit Number	**1**	**1**	**1**	
Load	**97%**	**97%**	**97%**	
Date	12/7/04	12/7/04	12/7/04	
Start Time	10:40	11:01	11:22	
Stop Time	10:56	11:17	11:38	
Engine/Compressor Operation				
Gas Producer Speed (%)	97.1	97.1	97.1	
Horsepower (Hp)	887	887	887	
Power Turbine Speed (%)	87.0	86.6	86.6	
Engine Compressor Discharge (PCD)	65	64	64	
Compressor Suction Pressure (psig)	612	612	613	
Compressor Discharge Pressure (psig)	793	790	787	
Compressor Suction Temperature (°F)	48	47	48	
Compressor Discharge Temperature (°F)	107	109	108	
Air Inlet Temperature (T1) (°F)	25	28	29	
Average Exhaust Temperature (T5) (°F)	1065	1072	1075	
Fuel Pressure (psig)	166	166	166	
Fuel Data				
O2 F-Factor (DSCF/MMBtu, HHV basis)	8654	8654	8654	
Fuel Heating Value (Btu/SCF, HHV basis)	1089	1089	1089	
BHp Specific Fuel Rate (Btu/Hp-hr, HHV basis)	11000	11000	11000	
Fuel VOC Content (non-methane)	15.32%	15.32%	15.32%	
Ambient Conditions				
Pressure Altitude (MSL)	4610	4620	4620	
Atmospheric Pressure ("Hg)	25.29	25.28	25.28	
Dry Bulb Temperature (°F)	29.9	31.5	32.6	
Wet Bulb Temperature (°F)	25.8	26.8	27.6	
Humidity (lb/lb air)	0.0025	0.0025	0.0026	
Measured Exhaust Emissions (Corrected)				**Average**
NOx (ppmv)	32.13	32.45	33.24	**32.61**
NOx (ppmv @ 15% O2)	56.32	53.54	54.22	**54.70**
NOx (ppmv @15% O2, ISO Day) **{Permit Limit = 150}**	62.23	58.89	59.49	**60.20**
O2 (vol %)	17.53	17.32	17.28	**17.38**
CO2 (vol %)	2.00	2.00	1.97	**1.99**
Fo (Natural Gas = 1.6 - 1.836)	1.69	1.79	1.84	**1.77**

Table 6: Summary of Results, Runs 10-12 (Unit 1)

Operational Data, Concentrations, Exhaust Flow Rates, Mass Emission Rates

Company: Questar
Location: Fidlar Compressor Station
Source: Solar Saturn 10 SN: 30283
Turbine Rated: 914 HP @ 22300 RPM
Technician: CS

Test Run Number	**10**	**11**	**12**	
Unit Number	**1**	**1**	**1**	
Load	**100%**	**100%**	**100%**	
Date	12/7/04	12/7/04	12/7/04	
Start Time	11:43	12:04	12:25	
Stop Time	11:59	12:20	12:41	
Engine/Compressor Operation				
Gas Producer Speed (%)	100.0	100.0	100.0	
Horsepower (Hp)	914	914	914	
Power Turbine Speed (%)	89.7	89.9	89.6	
Engine Compressor Discharge (PCD)	68	67	67	
Compressor Suction Pressure (psig)	612	611	613	
Compressor Discharge Pressure (psig)	792	790	786	
Compressor Suction Temperature (°F)	46	47	47	
Compressor Discharge Temperature (°F)	109	112	111	
Air Inlet Temperature (T1) (°F)	29	31	32	
Average Exhaust Temperature (T5) (°F)	1132	1131	1133	
Fuel Pressure (psig)	166	166	166	
Fuel Data				
O2 F-Factor (DSCF/MMBtu, HHV basis)	8654	8654	8654	
Fuel Heating Value (Btu/SCF, HHV basis)	1089	1089	1089	
BHp Specific Fuel Rate (Btu/Hp-hr, HHV basis)	11000	11000	11000	
Fuel VOC Content (non-methane)	15.32%	15.32%	15.32%	
Ambient Conditions				
Pressure Altitude (MSL)	4630	4650	4660	
Atmospheric Pressure ("Hg)	25.27	25.25	25.24	
Dry Bulb Temperature (°F)	34.9	34.9	34.2	
Wet Bulb Temperature (°F)	29.2	29.5	29.8	
Humidity (lb/lb air)	0.0027	0.0028	0.0031	
Measured Exhaust Emissions (Corrected)				**Average**
NOx (ppmv)	37.09	36.49	37.20	**36.93**
NOx (ppmv @ 15% O2)	55.84	55.07	56.27	**55.73**
NOx (ppmv @15% O2, ISO Day) **{Permit Limit = 150}**	60.95	60.27	62.06	**61.09**
O2 (vol %)	16.98	16.99	17.00	**16.99**
CO2 (vol %)	2.17	2.17	2.17	**2.17**
Fo (Natural Gas = 1.6 - 1.836)	1.81	1.80	1.80	**1.80**

UNIT FS02

MANUFACTURER'S & PERFORMANCE TEST DATA

CA11426

DEAN B. KNIGHT #FT-1089
MOUNTAIN FUEL GAS SUPPLY CO., VERNAL, DAGGETT, UTAH
COOPER ENERGY SERVICES, SUPERIOR OPERATIONS
REGISTER NUMBER 29943

ENGINE/COMPRESSOR SET
12G-825/MW62, S.N. 299499/299430
DESIGN: 995 CHP @ 900 RPM
OPERATING SPEED RANGE: 900 TO 450 OR MIN. SPEED

GAS: NATURAL
SP.GR.: .6493, K @ 40°F=1.3055
BAROMETER = 12.3 PSIA
SUCTION TEMPERATURE = 40°

CYLINDER DATA
TWO-10.00" DIAMETER CYLINDERS #104CD
WITH FIXED VOLUME POCKETS
HCØ = 19.20% HC1 = 36.7%
CC = 17.69% WP = 1200 PSIG
* $\triangle$P = 425 PSI TO AVOID EXCESSIVE ROD LOAD.

OPERATING STEPS FOR CURVES CA11427, CA11428, & CA11429

STEP	ACTIVE ENDS HE	ACTIVE ENDS CE	FIXED VOLUME POCKETS OPEN
8	2	2	0
7	2	2	1
6	2	2	2
5	2	1	0
4	2	1	1
3	2	1	2
2	2	0	0
1	2	0	1
0	2	0	2

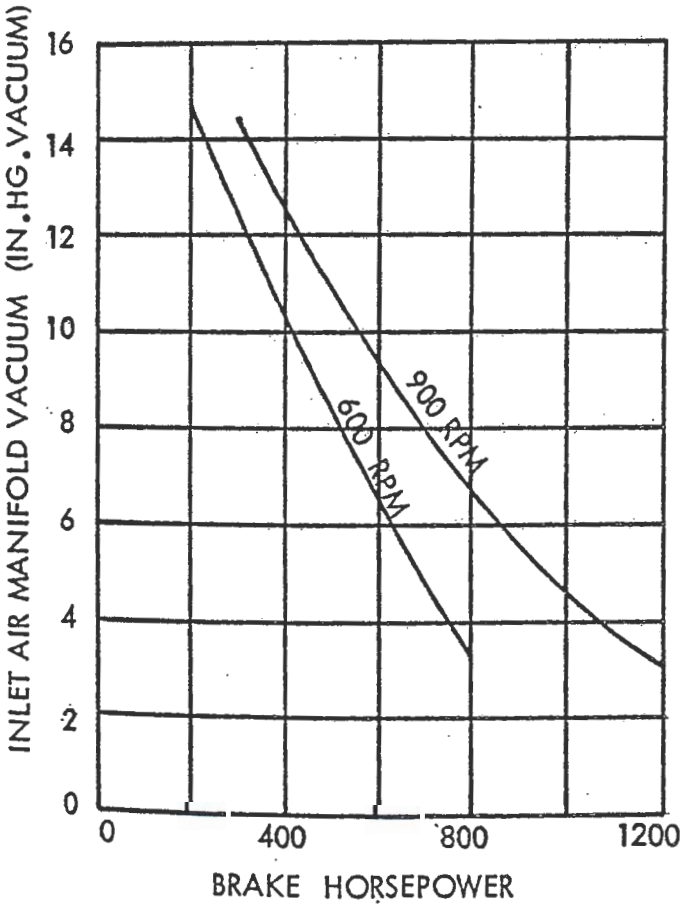
REV.
DATE: 1-12-84

CURVE NO. CA11426

This curve is to serve as a guide to prevent overloading the engine. The inlet air manifold vacuum should not be permitted to go below the value shown on the curve. Adjustments to the engine should be made as outlined in the operating instruction section. Adjustment to the observed air manifold vacuum should be made for the individual engine location and condition as noted below.

CURVES BASED ON:

1. BAROMETRIC PRESSURE = 29. IN.HG.
2. ALTITUDE = 1000 FT. ABOVE SEA LEVEL.
3. INLET AIR TEMPERATURE = 90°F.
4. IGNITION TIMING SET @ 35°BTC.
5. IMPCO 600D CARBURETOR A-019-791 SET @ MAX. MANIFOLD VACUUM PLUS 1/2 TURN LEAN.
6. INLET AIR MANIFOLDS YE-026-656.
7. FUEL/AIR LINKAGE SET PER INSTRUCTION BOOK.



NECESSARY CURVE ADJUSTMENTS:

1. REDUCE MANIFOLD VACUUM 1 IN.HG. FOR EVERY 1000 FT. INCREASE IN ALTITUDE ABOVE 1000 FT.

   (i.e. - 4 IN.HG. MANIFOLD VACUUM @ 1000 FT. WOULD BE EQUIVALENT TO 3 IN.HG. MANIFOLD VACUUM @ 2000 FT.)

Table 2: Summary of Results, Runs 1-3
(Unit FS02, Test Summary)
Operational Data, Concentrations, Exhaust Flow Rates, Mass Emission Rates

Client: Questar Pipeline
Plant Name: Fidlar Compressor Station
Source: Superior 12G-825 (FS02)
Date: 06/30/11
Technicians: WM & JC

Test Number	*1*	*2*	*3*	
Date	6/30/11	6/30/11	6/30/11	
Start Time	10:05 AM	12:18 PM	1:58 PM	
Stop Time	11:13 AM	1:45 PM	3:06 PM	
Engine/Generator Operation				
Engine Speed (rpm)	902	905	901	
Timing (° BTDC)	35	35	35	
Manifold Temperature (°F, L/R)	72 / 71	61 / 59	64 / 63	
Manifold Pressure (psi, L/R)	298 / 293	305 / 300	304 / 301	
Catalyst pressure differential (psi)	0.4	0.5	0.5	
Catalyst inlet temp (°F)	1191	1198	1198	
Catalyst outlet temp (°F)	1237	1236	1248	
Measured BSFC (Btu/hp-hr)	8416	8353	8511	
Horsepower (hp)	1008	1075	1058	
Fuel Data				
Fuel Heating Value (Gross Btu/scf)	1040	1040	1040	
Fuel O2 F-Factor (DSCFH/MMBTU)	8710	8710	8710	
Fuel Flow Rate (scfh/hr)	8157.0	8634.0	8658.0	
Ambient Conditions				
Atmospheric Pressure (in. Hg)	25.16	25.16	25.16	
Temperature (°F dry)	73.0	68.0	61.0	
Temperature (°F wet)	56.0	59.0	53.0	
Humidity (lbs/lb of air)	0.0073	0.0104	0.0082	
Measured Emissions (dry) (corrected for instrument drift)				**Averages**
NOx (ppmv)	182.2	243.0	238.7	**221.3**
O2 (%)	0.00	0.00	0.00	**0.00**
CO2 (%)	11.97	12.06	11.98	**12.00**
Fo Factor	1.75	1.73	1.74	**1.74**
Exhaust Flow Rates				
via EPA Methods 1-4 (SCFH, dry)	8.27E+04	8.92E+04	8.14E+04	**8.45E+04**
via EPA Method 19 (SCFH, dry)	7.39E+04	7.82E+04	7.84E+04	**7.68E+04**
Mass Emission Rates (Based on Methods 1-4)				
NOx (lbs/hr) {Limit = 4.68}	1.80	2.59	2.32	**2.24**
NOx (g/hp-hr) {Limit = 2.0}	0.81	1.17	1.05	**1.01**
NOx (tons/yr)	7.88	11.34	10.17	**9.80**

Testing by TRC, Albuquerque, New Mexico

Table 3: Summary of Results, Runs 1-3
(Unit 1, 98% NGP)
Operational Data, Concentrations, Exhaust Flow Rates,
Mass Emission Rates

Company: Questar Pipeline
Location: Blind Canyon Compressor Station
Source: Solar Centaur 40 (Unit 1) – moved to Fidler
Technicians: RS/WM

Test Number	*1*	*2*	*3*	
Load Condition	98%	98%	98%	
Date	4/05/06	4/05/06	4/05/06	
Start Time	10:55 AM	11:29 AM	12:00 PM	
Stop Time	11:15 AM	11:49 AM	12:20 PM	
Turbine/Compressor Operation				
Power Turbine Speed (%)	75.3	74.8	74.6	
Gas Producer Speed (%)	98.0	97.9	97.8	
Compressor Suction Pressure (psig)	666.0	661.0	657.0	
Compressor Discharge Pressure (psig)	837.0	841.0	839.0	
T-5 Average Temperature (°F)	1189	1190	1190	
Air Inlet Temperature (T1) (°F)	49.0	52.0	52.0	
Measured BSFC (Btu/hp-hr)	8306	8364	8352	
Engine Compressor Discharge, PCD (psig)	100.0	98.0	98.0	
Horsepower (from compressor dynamometer)	4346	4285	4280	
Fuel Data				
Fuel Heating Value (Gross Btu/scf)	1028	1028	1028	
Fuel O2 F-Factor (DSCFH/MMBTU)	8635	8635	8635	
Fuel Flow Rate (lb/hr)	1546.0	1535.0	1531.0	
Fuel Flow Rate (SCFH) (XX SCF / lb N.G.)	35103.1	34853.4	34762.6	
Ambient Conditions				
Atmospheric Pressure (in. Hg)	25.10	25.10	25.10	
Temperature (°F dry)	46	49	49	
Temperature (°F wet)	36	36	36	
Humidity (lbs/lb of air)	0.0030	0.0023	0.0023	
Measured Emissions (dry) (corrected for instrument drift)				
NOx (ppmv)	13.21	12.77	12.73	
CO (ppmv)	2.29	3.74	2.39	
O2 (%)	16.47	16.48	16.45	
CO2 (%)	2.50	2.53	2.51	
Calculated Emissions Concentrations				***Average***
NOx (ppmv @ 15% O2)	17.6	17.0	16.9	**17.17**
NOx (ppmv @15% O2, ISO Day) (NSPS Limit = 167)	**18.7**	**17.8**	**17.6**	**18.02**
CO (ppmv @ 15% O2)	3.05	4.99	3.17	**3.73**
CO (ppmv @ 15% O2, ISO Day)	**3.2**	**5.2**	**3.3**	**3.91**
Fo Factor	1.77	1.75	1.77	**1.76**
Exhaust Flow Rates				
via EPA Methods 1-4 (SCFH, dry)			1.45E+06	**1.45E+06**
via EPA Method 19 (SCFH, dry)	1.47E+06	1.46E+06	1.45E+06	**1.46E+06**
Mass Emission Rates (Based on Method 19)				
NOx (lbs/hr) (Limit = 5.18)	2.32	2.23	2.20	**2.25**
CO (lbs/hr) (Limit = 4.15)	0.24	0.40	0.25	**0.30**
NOx (tons/yr)	10.15	9.77	9.66	**9.86**
CO (tons/yr)	1.07	1.74	1.10	**1.30**

Table 4: Summary of Results, Runs 4-6
(Unit 1, 96% NGP)
Operational Data, Concentrations, Exhaust Flow Rates,
Mass Emission Rates

Company: Questar Pipeline
Location: Blind Canyon Compressor Station
Source: Solar Centaur 40 (Unit 1)
Technicians: RS/WM

Test Number	*4*	*5*	*6*	
Load Condition	96%	96%	96%	
Date	4/05/06	4/05/06	4/05/06	
Start Time	12:27 PM	12:54 PM	1:25 PM	
Stop Time	12:47 PM	1:14 PM	1:45 PM	
Turbine/Compressor Operation				
Power Turbine Speed (%)	73.0	3.3	73.3	
Gas Producer Speed (%)	96	96.0	96.0	
Compressor Suction Pressure (psig)	659.0	658.0	653.0	
Compressor Discharge Pressure (psig)	833.0	831.0	830.0	
T-5 Average Temperature (°F)	1144	1140	1140	
Air Inlet Temperature (T1) (°F)	47.0	44.0	41.0	
Measured BSFC (Btu/hp-hr)	8582	8631	8618	
Engine Compressor Discharge, PCD (psig)	95.0	96.0	96.0	
Horsepower (from compressor dynamometer)	3912	3944	3969	
Fuel Data				
Fuel Heating Value (Gross Btu/scf)	1028	1028	1028	
Fuel O2 F-Factor (DSCFH/MMBTU)	8635	8635	8635	
Fuel Flow Rate (lb/hr)	1438.0	1458.0	1465.0	
Fuel Flow Rate (SCFH)	32650.9	33105.0	33264.0	
Ambient Conditions				
Atmospheric Pressure (in. Hg)	25.10	25.10	25.10	
Temperature (°F dry)	46	42	39	
Temperature (°F wet)	34	34	35	
Humidity (lbs/lb of air)	0.0021	0.0030	0.0041	
Measured Emissions (dry) (corrected for instrument drift)				
NOx (ppmv)	7.57	7.42	7.55	
CO (ppmv)	12.83	14.11	14.79	
O2 (%)	16.66	16.67	16.67	
CO2 (%)	2.42	2.44	2.44	
Calculated Emissions Concentrations				**Average**
NOx (ppmv @ 15% O2)	10.5	10.4	10.5	**10.48**
NOx (ppmv @15% O2, ISO Day) (NSPS Limit = 167)	**11.0**	**11.2**	**11.7**	**11.31**
CO (ppmv @ 15% O2)	17.86	19.70	20.62	**19.39**
CO (ppmv @ 15% O2, ISO Day)	**18.7**	**21.2**	**22.9**	**20.96**
Fo Factor	1.75	1.73	1.74	**1.74**
Exhaust Flow Rates				
via EPA Methods 1-4 (SCFH, dry)			1.44E+06	**1.44E+06**
via EPA Method 19 (SCFH, dry)	1.43E+06	1.45E+06	1.46E+06	**1.45E+06**
Mass Emission Rates (Based on Method 19)				
NOx (lbs/hr) (Limit = 5.18)	1.29	1.29	1.32	**1.30**
CO (lbs/hr) (Limit = 4.15)	1.33	1.49	1.57	**1.46**
NOx (tons/yr)	5.66	5.64	5.76	**5.69**
CO (tons/yr)	5.83	6.52	6.86	**6.40**

Table 5: Summary of Results, Runs 7-9
(Unit 1, 94% NGP)
Operational Data, Concentrations, Exhaust Flow Rates, Mass Emission Rates

Company: Questar Pipeline
Location: Blind Canyon Compressor Station
Source: Solar Centaur 40 (Unit 1)
Technicians: RS/WM

Test Number	*7*	*8*	*9*	
Load Condition	94%	94%	94%	
Date	4/05/06	4/05/06	4/05/06	
Start Time	1:59 PM	2:28 PM	2:55 PM	
Stop Time	2:19 PM	2:48 PM	3:15 PM	
Turbine/Compressor Operation				
Power Turbine Speed (%)	70.5	70.6	70.8	
Gas Producer Speed (%)	94.0	94.0	94.0	
Compressor Suction Pressure (psig)	656.0	655.0	654.0	
Compressor Discharge Pressure (psig)	817.0	817.0	816.0	
T-5 Average Temperature (°F)	1149	1147	1145	
Air Inlet Temperature (T1) (°F)	40.0	38.0	38.0	
Measured BSFC (Btu/hp-hr)	9283	9275	9307	
Engine Compressor Discharge, PCD (psig)	88.0	89.0	89.0	
Horsepower (from compressor dynamometer)	3559	3572	3570	
Fuel Data				
Fuel Heating Value (Gross Btu/scf)	1028	1028	1028	
Fuel O2 F-Factor (DSCFH/MMBTU)	8635	8635	8635	
Fuel Flow Rate (lb/hr)	1415.0	1419.0	1423.0	
Fuel Flow Rate (SCFH)	32128.7	32219.5	32310.3	
Ambient Conditions				
Atmospheric Pressure (in. Hg)	25.10	25.10	25.10	
Temperature (°F dry)	40	40	40	
Temperature (°F wet)	36	36	36	
Humidity (lbs/lb of air)	0.0043	0.0043	0.0043	
Measured Emissions (dry) (corrected for instrument drift)				
NOx (ppmv)	10.53	10.52	10.56	
CO (ppmv)	13.34	13.90	14.59	
O2 (%)	16.66	16.67	16.71	
CO2 (%)	2.39	3.65	3.65	
Calculated Emissions Concentrations				***Average***
NOx (ppmv @ 15% O2)	14.6	14.7	14.9	**14.73**
NOx (ppmv @15% O2, ISO Day) (NSPS Limit = 167)	**16.3**	**16.3**	**16.6**	**16.39**
CO (ppmv @ 15% O2)	18.55	19.36	20.56	**19.49**
CO (ppmv @ 15% O2, ISO Day)	**20.6**	**21.6**	**22.9**	**21.70**
Fo Factor	1.77	1.16	1.15	**1.36**
Exhaust Flow Rates				
via EPA Methods 1-4 (SCFH, dry)			1.39E+06	**1.39E+06**
via EPA Method 19 (SCFH, dry)	1.40E+06	1.41E+06	1.43E+06	**1.42E+06**
Mass Emission Rates (Based on Method 19)				
NOx (lbs/hr) (Limit = 5.18)	1.77	1.77	1.81	**1.78**
CO (lbs/hr) (Limit = 4.15)	1.36	1.42	1.52	**1.43**
NOx (tons/yr)	7.74	7.77	7.91	**7.81**
CO (tons/yr)	5.96	6.24	6.65	**6.28**