United States Environmental Protection Agency
Region 8
Air Program
1595 Wynkoop Street
Denver, Colorado 80202-1129

AIR POLLUTION CONTROL
TITLE V PERMIT TO OPERATE

In accordance with the provisions of Title V of the Clean Air Act and 40 CFR Part 71 and applicable rules and regulations,

Red Cedar Gathering Company
Arkansas Loop and Simpson Treating Plants

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:

Southern Ute Indian Reservation
NW 1/4, Section 1, T32N, R9W, La Plata County, Colorado

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 EPA and citizens under the Clean Air Act (CAA).

Carl Daly, Director
Air Program
US EPA Region 8

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AIR POLLUTION CONTROL
TITLE V PERMIT TO OPERATE
Red Cedar Gathering Company
Arkansas Loop and Simpson Treating Plants

Permit Number: V-SU-00010-2005.05
Replaces Permit No.: V-SU-0010-05.04

Issue Date: November 17, 2011
Effective Date: November 17, 2011
Expiration Date: May 17, 2012

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

Permit Revision History

DATE OF REVISION	TYPE OF REVISION	SECTION NUMBER AND TITLE	DESCRIPTION OF REVISION
March 2000	**Initial Permit Issued**		**Permit #V-SU-0010-00.00**
April 2007	**1st Renewal Permit Issued**		**Permit #V-SU-0010-05.00**
August 2007	**Administrative Amendment**	I.A. Source Information; II.D. Alternative Operating Scenarios and III.Q. Off Permit Changes	**Permit #V-SU-0010-05.01** Updated Responsible Official and Facility Contact telephone numbers. Revised text for clarification in related sections discussing permitted RICE that are replaced or rebuilt.
February 2008	**Administrative Amendment**	Permit Cover; I.A. Source Information; I.B. Source Emission Points III.A. Annual Fee Payment; IV. Appendix	**Permit #V-SU-0010-05.02** Moved permit numbers and issue/effective/expiration dates from signature cover page to new permit issuance cover page following signature cover page. Removed facility contact information. Information now located only in Statement of Basis. Updated Serial Numbers based on off permit change Notifications. Changed the bank name and address for submittal of annual fee payments. Moved permit revision history table to new permit issuance cover page.
July 2008	**Administrative Amendment**	I.A. Source Information II.D. Alternative Operating Scenarios and III.Q. Off Permit Changes	**Permit #V-SU-0010-05.03** Corrected and removed plant mailing address. Now located exclusively in Statement of Basis. Text was revised to clarify the requirements due to new/amended rule promulgation.

DATE OF REVISION	TYPE OF REVISION	SECTION NUMBER AND TITLE	DESCRIPTION OF REVISION
October 2010	**Significant Modification**	Permit Cover and throughout permit;	**Permit #V-SU-0010-05.04** Revised facility name from "Arkansas Loop Treating Plant" to "Arkansas Loop and Simpson Treating Plants".
		I.B. Source Emission Points, Tables 1 and 2;	Added new emission units; Updated serial numbers/unit information based on off permit change notifications.
		II. Requirements of New Source Performance Standards at 40 CFR Part 60;	Added new section with applicable NSPS Dc requirements for heaters H-701 and H-801 and NSPS JJJJ requirements for generator engines E-004 and E-005.
		III. Requirements for National Emission Standards for Hazardous Air Pollutants at 40 CFR Part 63	Added new section with applicable RICE MACT requirements for generator engines E-004 and E-005.
		IV. Requested Emission Limits	Added new section with applicant-requested VOC and formaldehyde emission limits and associated monitoring, recordkeeping, and reporting requirements.
		V. Facility-Wide Requirements	Renumbered Section from II to V to reflect the addition of 3 new sections; Revised location of required recordkeeping to reflect EPA-approved request for waiver of on-site recordkeeping; Added applicable MACT HH recordkeeping requirement at Section V.A; Revised Section V.E. Prevention of Significant Deterioration to clarify the requirements; Added Section V.F. Chemical Accident Prevention
		VI. Part 71 Administrative Requirements	Renumbered Section from III to VI to reflect the addition of 3 new sections; Corrected language in Section VI.J. Group Processing of Minor Modifications to accurately reflect the applicable regulatory language.
		VII. Appendix	Renumbered Section from IV to VII to reflect the addition of 3 new sections; Added Section VII.B. with specific performance testing requirements associated with the applicable NSPS JJJJ requirements for engines E-004 and E-005.
November 2011	**Minor Modification**	Multiple permit sections throughout permit.	**Permit #V-SU-00010-2005.05** Revised facility name from "Arkansas Loop and Buckskin Treating Plant" to "Arkansas Loop and Simpson Treating Plants". Revised references to "Buckskin Treating Plant" to "Simpson Treating Plant" and update serial number for engine unit E-301
		IV.E. Testing Requirements	Revised condition IV.D.1 and 2 to allow EPA approved testing methods from 40 CFR Part 63, Appendix A.

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Abbreviations and Acronyms

AR	Acid Rain
ARP	Acid Rain Program
bbls	Barrels
BACT	Best Available Control Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CMS	Continuous Monitoring System (includes COMS, CEMS and diluent monitoring)
COMS	Continuous Opacity Monitoring System
CO	Carbon monoxide
CO_2	Carbon dioxide
CPMS	Continuous Parameter Monitoring System
DAHS	Data Acquisition and Handling System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
EIP	Economic Incentives Programs
EPA	Environmental Protection Agency
FGD	Flue gas desulfurization
gal	Gallon
GPM	Gallons per minute
H_2S	Hydrogen sulfide
HAP	Hazardous Air Pollutant
hr	Hour
ID	Identification Number
IEU	Insignificant Emission Unit
kg	Kilogram
lb	Pound
MACT	Maximum Achievable Control Technology
MVAC	Motor Vehicle Air Conditioner
Mg	Megagram
MMBtu	Million British Thermal Units
mo	Month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NMHC	Non-methane hydrocarbons
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standard
NSR	New Source Review
pH	Negative logarithm of effective hydrogen ion concentration (acidity)
PM	Particulate Matter
PM_{10}	Particulate matter less than 10 microns in diameter
ppm	Parts per million
ppmvd	Parts per million, volumetric dry
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
psi	Pounds per square inch
psia	Pounds per square inch absolute
RATA	Relative Accuracy Test Audit
RICE	Reciprocating Internal Combustion Engine
RMP	Risk Management Plan
scfm	Standard cubic feet per minute
SNAP	Significant New Alternatives Program
SO_2	Sulfur Dioxide
TEG	Triethylene glycol
tpy	Ton Per Year
US EPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds

LIST OF TABLES

I. Source Information and Emission Unit Identification

I.A. Source Information

Parent Company Name: Red Cedar Gathering Company

Plant Name: Arkansas Loop and Simpson Treating Plants

Plant Location: NW ¼ Section 1, T32N, R9W
Latitude: 37°03' 10.02" N
Longitude: -107° 47' 5.55" W

Region: 8

State: Colorado

County: La Plata

Reservation: Southern Ute Reservation

Tribe: Southern Ute Indian Tribe

Responsible Official: President – Chief Operating Officer

SIC Code: 1311

AFS Plant Identification Number: 08-067-00332

Other Clean Air Act Permits: There are no other Federal Clean Air Act permits, such as PSD or minor NSR, issued to this facility.

Description of Process:

The Arkansas Loop and Simpson Treating Plants are production field facilities that help meet the needs for CO_2 removal from natural gas produced on portions of the Southern Ute Reservation. Upstream of the facilities there are production (coal-bed methane) wells and compressor stations connected to a gathering pipeline system to the inlet of the facilities. The Arkansas Loop and Simpson Treating Plants provide natural gas field compression, CO_2 removal, and dehydration to remove entrained water vapor from the gas stream. The facilities are comprised of 7 reciprocating internal combustion engines (RICE) for gas compression, 5 RICE for electric generation, 3 amine plants for CO_2 removal, 6 TEG dehydration units for gas dehydration, and 3 heaters associated with the amine plants. The facilities have several other heaters, tanks, and miscellaneous equipment that qualify as insignificant emission units.

I.B. Source Emission Points

Table 1 - Emission Units
Red Cedar Gathering Company, Arkansas Loop and Simpson Treating Plants

Emission Unit ID	Description	Control Equipment
E-101	Ajax-Superior 8 SGTB Compressor Engines, 1,283 site-rated bhp, natural gas fired: Serial No. 340759 Installed 6/23/2008 (constructed pre-2002)	None
E-301	Ajax-Superior 16 SGTB Compressor Engines, 2,518 site-rated bhp, natural gas fired: Serial No. 314849 Installed 5/02/2011 (constructed 4/25/1991)	None
E-401	Serial No. 321719 Installed 5/26/2009 (constructed pre-2002)	
E-501	Serial No. 323799 Installed 5/9/2008 (constructed 9/3/1993)	
E-601	Serial No. 314839 Installed 5/10/2010 (constructed 9/1/1998)	
E-001	Waukesha 5790 GL Generators, 1,074 site-rated bhp, natural gas fired: Serial No. C-12002/1 Installed 11/16/2009 (constructed 3/28/1996)	None
E-002	Serial No. 402923 Installed 10/15/2007 (constructed 2/13/1991)	
E-003	Serial No. C-12551/1 Installed 11/17/2008 (constructed 1/31/1998)	
E-004	Caterpillar G3516B Generators (Simpson), 1,622 site-rated bhp, natural gas fired: Serial No. TBD Installed 2010 (constructed 4/23/2010)	Oxidation Catalyst
E-005	Serial No. TBD Installed 2010 (constructed 4/23/2010)	
H-450	Custom Heat Medium Heater #1, Optimized Process Furnaces, Inc., 31.3 MMBtu/hr, natural gas fired: Serial No. J-89-455 Installed 1989	None
H-701	Custom Heat Medium Heater #2, Optimized Process Furnaces, Inc., 36.2 MMBtu/hr, natural gas fired: Serial No. J-90-476 Installed 1990	None
H-801	Custom Heat Medium Heater #3 (Simpson), 80 MMBtu/hr, natural gas fired: Serial No. TBD Installed 2010	None
Amine 1	Custom Amine Plant #1, 65 MMscfd Serial No. NA Installed 1989	None
Amine 2	Custom Amine Plant #2, 75 MMscfd Serial No. NA Installed 1991	None
Amine 3	Custom Amine Plant #3 (Simpson), 100 MMscfd Serial No. NA Installed 2010	None

Emission Unit ID	Description	Control Equipment
R-002	Glycol Dehydrator #1: JW Williams, 37 MMscf/day	None
R-003	Glycol Dehydrator #2: JW Williams, 37 MMscf/day	None
R-004	Glycol Dehydrator #3: JW Williams, 37 MMscf/day	None
RB-050	Glycol Dehydrator #4: JW Williams, 30 MMscf/day	None
R-007	Glycol Dehydrator #6: 70 MMscf/day (Simpson)	None
R-008	Glycol Dehydrator #7: 70 MMscf/day (Simpson)	None

Table 2 - Insignificant Emission Units
Red Cedar Gathering Company, Arkansas Loop and Simpson Treating Plants

Emission Unit ID	Description
R-002, R-003, R-004, R-050	4 - Glycol Dehydrator Reboilers, 0.6 MMBtu/hr each
01-H-001, 01-H-002, 01-H-003, 01-H-004	4 - #1 Separator Catalytic Heaters, 0.12 MMBtu/hr each
09-H-020	Capote Heater Catalytic Heater, 0.12 MMBtu/hr
CATH16, CATH17	2 - Oil Separator Building Catalytic Heaters, 0.12 MMBtu/hr each
H-850	Evaporation Pond Heater, 2.6 MMBtu/hr
01-V-010	Water / Oil Separator w/heater. 3.5 MMBtu/hr
TK-980	1,001 gal Generator Oil Makeup Tank
TK-981	500 gal Generator Coolant Drain Tank
TK-982	500 gal Generator Coolant Makeup Tank
TK-983	2,534 gal Compressor Oil Makeup Tank
TK-984	1,000 gal Compressor Coolant Storage Tank
TK-985	500 gal Compressor Coolant Drain Tank
TK-101 – TK-501	5 – 30 gal Compressor Building Coolant Day Tanks
TK-601	100 gal Compressor Building Coolant Day Tank
TK-510, TK-511	2 – 1,000 gal TEG Tanks
01-T-804	8,820 gal Waste Oil Tank
GT1	1,000 gal Gasoline Tank
OST3, OST5	2 – 300 gal Oil Storage Tanks
OST7	300 gal Used Oil Storage Tank
Surge Tank #1	7,500 gal Surge Tank
06-V-409	3,000 gal Amine Storage Tank
TK-G001, TK-G002, TK-G003	3 – 30 gal Generator Building Coolant Day Tanks
BGS-2	7,481 gal Below Grade Sump
04-VV-00, 04-VV-01	2 – Pigging Launchers
R-007, R-008,	2 - Glycol Dehydrator Reboilers, 0.75 MMBtu/hr each (Simpson)
CATH18, CATH19	Catalytic Heaters, 0.12 MMBtu/hr each (Simpson)
TK-1001	1,001 gal Generator Oil Makeup Tank (Simpson)
TK-1002	500 gal Generator Coolant Drain Tank (Simpson)

Emission Unit ID	Description
TK-1003	500 gal Generator Coolant Makeup Tank (Simpson)
TK-1004	1,000 gal TEG Tank (Simpson)
TK-1005	3,000 gal Amine Storage Tank (Simpson)
TK-1006, TK-1007, TK-1008	3 – 30 gal Generator Building Coolant Day Tanks (Simpson)

II. Requirements of New Source Performance Standards at 40 CFR Part 60

II.A. Subpart A – New Source Performance Standards, General Provisions
[40 CFR 60.1 – 60.19]

1. 40 CFR Part 60, Subpart A – Standards of Performance for New Stationary Sources, General Provisions: This facility is subject to the requirements of 40 CFR Part 60, Subpart JJJJ. As such, this facility is subject to 40 CFR Part 60, Subpart A as outlined in Table 3 of 40 CFR Part 60, Subpart JJJJ. Notwithstanding conditions in this permit, the permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart A.

   [40 CFR 60.4246]

2. 40 CFR Part 60, Subpart A – Standards of Performance for New Stationary Sources, General Provisions: This facility is subject to the requirements of 40 CFR Part 60, Subpart Dc. As such, this facility is subject to 40 CFR Part 60, Subpart A as stated at §60.1. Notwithstanding conditions in this permit, the permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart A.

   [40 CFR 60.1]

II.B. Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40c – 60.48c]

1. Applicability [40 CFR 60.40c]

   (a) This facility is subject to the requirements of 40 CFR Part 60, Subpart Dc. Notwithstanding conditions in this permit, the permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart Dc.

   (b) Requirements pursuant to 40 CFR Part 60, Subpart Dc are taken from the Code of Federal Regulations as published on June 13, 2001 (72 FR 32759) and on January 28, 2009 (74 FR 5090).

   (c) 40 CFR Part 60, Subpart Dc applies to the following emission units:

   H-701: Custom Heat Medium Heater #2; Optimized Process Furnaces, Inc.; 36.2 MMBtu/hr; Natural Gas-Fired; Installed in 1990.

   H-801: Custom Heat Medium Heater #3 (Simpson); Make/Model TBD; 80 MMBtu/hr; Natural Gas-Fired; Installation 2010.

2. Operating and Emission Limits [40 CFR 60.41c – 60.48c]

   The sole source of fuel for emission units H-701 and H-801 shall be natural gas, as defined in §60.41c.

3. Notifications [40 CFR 60.48c]

   The permittee shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of this part. This notification shall include:

(a) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility; and

(b) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

4. Recordkeeping Requirements [40 CFR 60.48c]

(a) The permittee shall record and maintain the following:

(i) Fuel used and the supplier of the fuel;
(ii) Total amount of fuel used for emission units H-701 and H-801 delivered to the property each calendar month; and
(iii) A certified statement signed by the owner or operator of the affected facility that the records of fuel and fuel supplier represent all of the fuel combusted.

(b) All required records shall be maintained by the permittee for a period of 2 years.

II.C. 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines [40 CFR 60.4230 – 60.4248]

1. Applicability [40 CFR 60.4230]

(a) This facility is subject to the requirements of 40 CFR Part 60, Subpart JJJJ. Notwithstanding conditions in this permit, the permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart JJJJ.

(b) 40 CFR Part 60, Subpart JJJJ applies to the following generator engines:

E-004: 1,622 site rated bhp, Caterpillar G3516B, natural gas fired lean burn engines; Constructed after June 12, 2006, Manufactured after July 1, 2007.

E-005: 1,622 site rated bhp, Caterpillar G3516B, natural gas fired lean burn engines; Constructed after June 12, 2006, Manufactured after July 1, 2007.

[40 CFR 60.4230(a)(4)(i)]

2. Compliance Demonstration [40 CFR 60.4243]

The permittee shall demonstrate compliance with 40 CFR Part 60, Subpart JJJJ according to one of the following methods:

(a) Certified Engine:

(i) Operate an engine certified according to procedures specified in 40 CFR Part 60, Subpart JJJJ for the same model year; and
(ii) Demonstrate compliance according to one of the methods specified in §60.4231(a); or

(b) Non-Certified Engine:

(i) Operate a non-certified engine and demonstrate compliance with the emission standards specified in the emission table in Section II.C.3 of this permit and according to the testing requirements specified in §60.4244, as applicable; and

(ii) Keep a maintenance plan and records of conducted maintenance and, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions; and

(iii) Conduct an initial performance test according to §60.4244, and subsequent performance testing every 8,760 hours of operation or 3 years, whichever comes first, thereafter, to demonstrate compliance.

[40 CFR 60.4243]

3. Emission Limits [40 CFR 60.4233]

Emissions from each generator engine units E-004 and E-005 shall not exceed the emission limits in Table 3 below.

Table 3 – NSPS JJJJ Engine Emission Limits
Red Cedar Gathering Company, Arkansas Loop and Simpson Treating Plants

Unit	Source of Emission Limit	NO_x		CO		VOC	
		g/hp-hr	ppmvd @ 15% O_2	g/hp-hr	ppmvd @ 15% O_2	g/hp-hr	ppmvd @ 15% O_2
E-004, E-005	NSPS JJJJ – New, Manuf. on or after 7/1/2007	2.0*	160*	4.0*	540*	1.0*	86*
	NSPS JJJJ – New, Manuf. on or after 7/1/2010	1.0*	82*	2.0*	270*	0.7*	60*
	NSPS JJJJ - Modified or reconstructed, Manuf. prior to 7/1/2007 [40 CFR 60.4233(e) and (f)(4)(ii)]	3.0*	250*	4.0*	540*	1.0*	86*

* Emission limit is for non-certified engines. The permittee may choose to comply with the emission standards in either units of g/hp-hr or ppmvd at 15% O_2.

4. Testing Requirements [40 CFR 60.4243 & 60.4244]

(a) The permittee conducting performance tests must follow the procedures in 40 CFR 60.4244(a) through (f).

[40 CFR 60.4244]

(b) Reference Method performance tests shall be conducted, according to 40 CFR 60.4244, upon startup and for all replacement engines for E-004 or E-005 that are non-certified to measure NOx, CO, and VOC emissions to demonstrate compliance with the emission limits in Section II.C.3 of this permit. 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.

[40 CFR 60.4243(b)(2)(ii)]

(c) 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 60.4243(b)(2)(ii)]

5. Recordkeeping Requirements [40 CFR 60.4245, 40 CFR 71.6(a)(3)(ii)]

(a) The permittee must keep records of the following for generator engine units E-004 and E-005:

(i) All notifications submitted to comply with this Subpart and all documentation supporting any notification;
(ii) Maintenance conducted on each engine;
(iii) If generator engine units E-004 or E-005 are certified engines, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR Parts 90 and 1048; and
(iv) If generator engine units E-004 or E-005 are not certified engines, or are certified engines operating in a non-certified manner and subject to §60.4243(a)(2), documentation that the engine meets the emission standards.

[40 CFR 60.4245(a)]

6. Notification and Reporting Requirements [40 CFR 60.19 & 60.4245, 40 CFR 71.6(a)(3)(iii)]

(a) The permittee must, for engine units E-004 and E-005 that have not been certified by an engine manufacturer to meet the emission standards in §60.4231, submit an initial notification as required in §60.7(a)(1). The notification must include the following information:

(i) Name and address of the owner or operator;
(ii) The address of the affected source;
(iii) Engine information, including make, model, engine family, serial number, model year, maximum engine power, and engine displacement;
(iv) Emission control equipment; and
(v) Fuel used.

[40 CFR 60.4245(c)]

(b) The permittee must submit a copy of each performance test of E-004 and E-005, required by §60.4244 and this permit, within 60 days after the test has been completed.

[40 CFR 60.4245(d)]

III. Requirements of National Emission Standards for Hazardous Air Pollutants for Source Categories at 40 CFR Part 63

III.A. Subpart A – National Emission Standards for Hazardous Air Pollutants for Source Categories, General Provisions [40 CFR 63.1 – 63.16]

40 CFR Part 63, Subpart A – National Emission Standards for Hazardous Air Pollutants, General Provisions: This facility is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ. As such, this facility is subject to 40 CFR Part 63, Subpart A outlined in Table 8 of 40 CFR Part 63, Subpart ZZZZ. Notwithstanding conditions in this permit, the permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart A.

[40 CFR 63.6665]

III.B. 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants From Reciprocating Internal Combustion Engines [40 CFR 63.6580 - 63.6675]

1. Applicability [40 CFR 63.6585 – 63.6590]

   (a) This facility is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ for major sources of hazardous air pollutants (HAPs). Notwithstanding conditions in this permit, the permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart ZZZZ.

   (b) 40 CFR Part 63, Subpart ZZZZ applies to the following generator engines:

   E-004 and E-005: 1,622 site rated bhp, Caterpillar G3516B, natural gas fired lean burn engines; Constructed after December 19, 2002.

   (c) Requirements pursuant to 40 CFR Part 63, Subpart ZZZZ are taken from the Federal Register as published on June 15, 2004 (69 FR 33506), as amended January 18, 2008 (73 FR 3604), March 3, 2010 (75 FR 9648), June 30, 2010 (75 FR 37732), and August 20, 2010 (75 FR 51570).

2. Emission Limits [40 CFR 63.6600 – 63.6605]

   (a) Emissions from generator engine units E-004 and E-005, equipped with oxidation catalyst devices, must meet the following emission limitations according to Table 2a of 40 CFR Part 63, Subpart ZZZZ:

   (i) Except during periods of startup:

   (A) Reduce CO emissions by 93% or more; or
   (B) Limit the concentration of formaldehyde in the engine exhaust to 14 ppmvd or less at 15% O_2.

   [40 CFR 63.6600(b)]

(ii) During periods of startup:

(A) Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which the non-startup emission limitations apply.

[40 CFR 63.6600(b)]

(b) The permittee shall comply with the emission limitations at all times.

[40 CFR 63.6605(a)]

3. Work Practice and Operating Requirements [40 CFR 63.6600 – 63.6605]

(a) Generator engine units E-004 and E-005, equipped with oxidation catalyst devices, must meet the following operating limitations according to Table 2b of 40 CFR Part 63, Subpart ZZZZ:

(i) Maintain the catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water at 100% load plus or minus 10% from the pressure drop across the catalyst measured during the initial performance test; and

(ii) Maintain the temperature of the engine exhaust so that the catalyst inlet temperature is greater than or equal to 450°F and less than or equal to 1350°F.

[40 CFR 63.6600(b)]

(b) The permittee shall comply with the operating limitations at all times.

[40 CFR 63.6605(a)]

4. Operation and Maintenance Requirements [40 CFR 63.6605]

At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions to the levels required by 40 CFR Part 63, Subpart ZZZZ. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if the required levels have been achieved. Determination of whether such operations and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[40 CFR 63.6605(b)]

5. Performance Test Requirements [40 CFR 63.6610 – 63.6615]

(a) The permittee must conduct an initial performance test or other initial compliance demonstrations that apply within 180 days after the compliance date that is specified for generator engine units E-004 and E-005, in §63.6595 and according to the provisions of §63.7(a)(2).

[40 CFR 63.6610(a)]

(b) The permittee is not required to conduct an initial performance test on units for which a performance test has been previously conducted, but the test must meet all of the conditions described in §§63.6610(d)(1) through (5).

[40 CFR 63.6610(d)]

(c) The permittee shall perform subsequent performance tests semi-annually. After compliance is demonstrated for 2 consecutive tests, the testing frequency shall be reduced to annually. However, should the results of any subsequent annual performance test indicate that generator engine units E-004 and E-005, are not in compliance with the CO or formaldehyde emission limitations, or the permittee deviates from any operating limitations, then semi-annual performance tests shall be resumed on the non-compliant engine(s).

[40 CFR 63.6615]

6. Performance Test Procedures [40 CFR 63.6610, 63.6620]

(a) For each engine complying with the requirement to reduce CO emissions, the permittee must perform the following according to Table 4 of 40 CFR Part 63, Subpart ZZZZ:

(i) Measure the O_2 concentration at the inlet and outlet of the control device using a portable CO and O_2 analyzer according to ASTM D6522-00 or Methods 3A and 10. Measurements to determine O_2 concentration must be made at the same time as the measurements for CO concentration; and

(ii) Measure the CO concentration at the inlet and the outlet of the control device using a portable CO and O_2 analyzer according to ASTM D6522-00 or Methods 3A and 10. The CO concentration must be at 15% O_2, dry basis.

(b) For each engine complying with the requirement to limit the concentration of formaldehyde or CO in the engine exhaust, the permittee must perform the following according to Table 4 of 40 CFR Part 63, Subpart ZZZZ:

(i) Select sampling port location and number of traverse points using Method 1 or 1A of 40 CFR Part 60, Appendix A and §63.7(d)(1)(i). If using a control device, the sampling site must be located at the outlet of the control device;

(ii) Determine the O_2 concentration of the engine exhaust at the sample port locations using Methods 3 or 3A or 3B of 40 CFR Part 60, Appendix A, or ASTM Method D6522-00 (2005). Measurements to determine O_2 concentration must be made at the same time as the measurements for formaldehyde concentration;

(iii) Measure moisture content of the engine exhaust at the sample port locations using Method 4 of 40 CFR Part 60, Appendix A, or Test Method 320 of 40 CFR Part 63, Appendix A, or ASTM D 6348-03. Measurements to determine moisture

content must be made at the same time and location as the measurements of formaldehyde concentration;

(iv) Measure the formaldehyde at the exhaust of the engine using Method 320 of 40 CFR Part 63, Appendix A, or ASTM D6348-03, provided in ASTM D6348-03 Annex A5 (Analyte Spiking Technique). The percent R must be greater than or equal to 70 and less than or equal to 130. Formaldehyde concentration must be at 15% of O_2, dry basis. Results of this test consist of the average of the 3 1-hour or longer runs; and

(v) Measure CO at the exhaust of the engine using Methods 3A and 10 of 40 CFR Part 60, Appendix A, ASTM Method D6522-00 (2005), Method 320 of 40 CFR Part 63, Appendix A, or ASTM D6348-03. CO concentration must be at 15% O2, dry basis. Results of this test consist of the average of the 3 1-hour or longer runs.

[40 CFR 63.6610(a) and Table 4 of 40 CFR Part 63, Subpart ZZZZ]

(c) The permittee must conduct each performance test according to the requirements in Table 4 of 40 CFR Part 63, Subpart ZZZZ. If generator engine units E-004 or E-005 are non-operational, the permittee does not need to start up the engine solely to conduct the performance test. The permittee can conduct the performance test when the engine is started up again.

[40 CFR 63.6620(b)]

(d) The permittee must conduct 3 separate test runs for each performance test required. Each test run must last at least 1 hour as specified in §63.7(e)(3).

[40 CFR 63.6620(d)]

(e) The permittee must use the equations of §63.6620(e) to:

(i) Determine compliance with percent reduction requirement;
(ii) Normalize CO or formaldehyde concentration at the inlet and outlet of the control device to a dry basis and to 15% oxygen, or an equivalent percent CO_2;
(iii) Calculate the fuel-specific F_o value for the fuel burned during the test;
(iv) Calculate the CO_2 correction factor for correcting measurement data to 15% oxygen; and
(v) Calculate the NO_x and SO_2 gas concentrations.

[40 CFR 63.6620(e)]

(f) The engine percent load during a performance test must be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load in a specific application. A written report of the average percent load determination must be included in the notification of compliance status. The following information must be included in the written report:

(i) The engine model number;
(ii) The engine manufacturer;
(iii) The year of purchase;
(iv) The manufacturer's site-rated brake horsepower;
(v) The ambient temperature, pressure, and humidity during the performance test;

(vi) All assumptions that were made to estimate or calculate percent load during the performance test must be clearly explained; and

(vii) If measurement devices such as flow meters, kilowatt meters, beta analyzers, strain gauges, etc. are used, the model number of the measurement device, and an estimate of its accuracy in percentage of true value must be provided.

[40 CFR 63.6620(i)]

7. Monitoring [40 CFR 63.6625, 63.6635]

(a) The permittee must install, operate, and maintain a CPMS according to the requirements in §63.8 of the General Provisions of 40 CFR Part 63.

[40 CFR 63.6625(b)]

[Explanatory Note: According to #25 of the September 30, 2005 EPA Questions and Answers Memorandum for NESHAPs for Stationary RICE, the provisions of 40 CFR 63.8 for monitoring of the catalyst inlet temperature are not federally required until the performance specifications are promulgated.]

(b) Except for monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must monitor continuously at all times that the engine(s) is/are operating.

[40 CFR 63.6635(b)]

(c) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee must, however, use all the valid data collected during all other periods.

[40 CFR 63.6635(c)]

8. Initial Compliance Requirements [40 CFR 63.6630 – 63.6645]

(a) The permittee must demonstrate initial compliance with each emission and operating limitation in 40 CFR Part 63, Subpart ZZZZ that applies according to the following:

(i) For generator engine units E-004 and E-005 complying with the requirement to reduce CO emissions, using an oxidation catalyst as specified in this permit, and using a CPMS, the permittee shall:

(A) Demonstrate that the average reduction of emissions of CO determined from the initial performance test achieves the required CO percent reduction;

(B) Install a CPMS to continuously monitor catalyst inlet temperature according to the requirements in §63.6625(b); and

[Explanatory Note: According to #25 of the September 30, 2005 EPA Questions and Answers Memorandum for NESHAPs for Stationary RICE, the provisions of

40 CFR 63.8 for monitoring of the catalyst inlet temperature are not federally required until the performance specifications are promulgated.]

(C) Record the catalyst pressure drop and catalyst inlet temperature during the initial performance test.

(ii) For generator engine units E-004 and E-005, complying with the requirement to reduce CO emissions, using an oxidation catalyst as specified in this permit, and using a CEMS the permittee shall:

(A) Install a CEMS to continuously monitor CO and either O_2 or CO_2 at both the inlet and outlet of the oxidation catalyst according to the requirements in §63.6625(a);

(B) Conduct a performance evaluation of the CEMS using performance specifications 3 and 4A of 40 CFR Part 60, Appendix B; and

(C) Demonstrate that the average reduction of CO equals or exceeds the required percent reduction. The initial test comprises the first 4-hour period after successful validation of the CEMS. Compliance is based on the average percent reduction achieved during the 4-hour period.

(iii) For generator engine units E-004 and E-005, complying with the requirement to limit the concentration of formaldehyde in the engine exhaust, using an oxidation catalyst as specified in this permit, the permittee shall:

(A) Demonstrate that the average formaldehyde concentration, corrected to 15% O_2, dry basis, from the 3 test runs is less than or equal to the formaldehyde emission limitation;

(B) Install a CPMS to continuously monitor catalyst inlet temperature according to the requirements in §63.6625(b); and

(C) Record the catalyst pressure drop and catalyst inlet temperature during the initial performance test.

[40 CFR 63.6630(a)]

(b) During the initial performance test, the permittee must establish each of the following operating limitations for generator engine units E-004 and E-005:

(i) The pressure drop across the catalyst at 100% load plus or minus 10%; and
(ii) The temperature range of the engine exhaust so that the catalyst inlet temperature is greater than or equal to 450°F and less than or equal to 1350°F.

[40 CFR 63.6630(b)]

(c) The permittee must submit the Notification of Compliance Status containing the results of the initial compliance demonstration, including the performance test results, before the

close of business on the 60th day following the completion of the performance test according to requirements of §63.10(d)(2).

[40 CFR 63.6630(c) and 40 CFR 63.6645(h)(2)]

9. Continuous Compliance Requirements [40 CFR 63.6640, 63.6645, 94.11]

(a) The permittee must demonstrate continuous compliance with each emission limitation and operating limitation in 40 CFR Part 63, Subpart ZZZZ that applies according to the following methods:

(i) For generator engine units E-004 and E-005, complying with the requirement to reduce CO emissions, using an oxidation catalyst as specified in Section III.B.2(a)(i)(A) of this permit, and using a CPMS the permittee shall:

(A) Conduct semi-annual performance tests for CO to demonstrate that the required CO percent reduction is achieved. After compliance has been demonstrated for 2 consecutive tests, the permittee may reduce the frequency of subsequent performance tests to annually. If the results of any subsequent annual performance test indicate the engine is not in compliance with the CO emissions limitation, or the permittee deviates from any of the operating limitations, the permittee must resume semiannual performance tests;

(B) Collect the catalyst inlet temperature data according to §63.6625(b), reduce these data to 4-hour rolling averages, and maintain the 4-hour rolling average within the operating limitations for the catalyst inlet temperature; and

(C) Measure the pressure drop across the catalyst once per month and demonstrate that the pressure drop across the catalyst is within the operating limitation established during the performance test.

(ii) For generator engine units E-004 and E-005, complying with the requirement to reduce CO emissions, using an oxidation catalyst as specified in this permit, and using a CEMS the permittee shall:

(A) Collect monitoring data according to §63.6625(a), reducing the measurements to 1-hour averages, calculating the percent reduction of CO emission according to §63.6620;
(B) Demonstrate that the catalyst achieves the required percent reduction of CO emissions over the 4-hour averaging period; and
(C) Conduct an annual RATA of the CEMS using performance specifications 3 and 4A of 40 CFR Part 60, Appendix B, as well as daily and periodic data quality checks in accordance with 40 CFR Part 60 Appendix F, Procedure 1.

(iii) For generator engine units E-004 and E-005, complying with the requirement to limit the concentration of formaldehyde in the engine exhaust, using an oxidation catalyst as specified in this permit, the permittee shall:

(A) Conduct semiannual performance tests for formaldehyde to demonstrate that the emissions remain at or below the formaldehyde concentration limit. After compliance has been demonstrated for 2 consecutive tests, the permittee may reduce the frequency of subsequent performance tests to annually. If the results of any subsequent annual performance test indicate the engine is not in compliance with the formaldehyde emissions limitation, or the permittee deviates from any of the operating limitations, the permittee must resume semiannual performance tests;

(B) Collect the catalyst inlet temperature data according to §63.6625(b);

(C) Reduce the data to 4-hour rolling averages;

(D) Maintain the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature; and

(E) Measure the pressure drop across the catalyst once per month and demonstrate that the pressure drop across the catalyst is within the operating limitation established during the performance test.

[40 CFR 63.6640(a)]

(b) The permittee must report each instance in which an emission or operating limit was not met. These instances are deviations from the emission and operating limitations and must be reported according to reporting requirements of §63.6650 and this permit.

[40 CFR 63.6640(b)]

(c) Upon changing of catalyst, the values of the operating parameters measured during the initial performance test must be reestablished. Upon reestablishment of the operating parameters, the permittee must conduct a performance test to demonstrate that the required emission limitations continue to be met.

[40 CFR 63.6640(b)]

(d) Deviations from the emission of operating limitations that occur during 200 hours of operation from engine startup (engine burn-in periods) are not violations.

[40 CFR 63.6640(d)]

(e) Rebuilt stationary RICE: Engine rebuilding means to overhaul an engine or to otherwise perform extensive service on the engine (or on a portion of the engine or engine system). For the purpose of this definition, perform extensive service means to disassemble the engine (or portion of the engine or engine system), inspect and/or replace many of the Parts, and reassemble the engine (or portion of the engine or engine system) in such a manner that significantly increases the service life of the resultant engine.

[40 CFR 63.6640(d) and 40 CFR 94.11(a)]

(f) The permittee must also report each instance in which the requirements in Table 8 of 40 CFR Part 63, Subpart ZZZZ, were not met.

[40 CFR 63.6645(h)]

10. Notifications [40 CFR 63.6645]

(a) The permittee must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) of the General Provisions of 40 CFR Part 63 that apply by the dates specified.

[40 CFR 63.6645(a)]

(b) Upon startup of a new or reconstructed stationary RICE occurring on or after August 16, 2004, the permittee must submit an Initial Notification not later than 120 days after it becomes subject to 40 CFR Part 63, Subpart ZZZZ.

[40 CFR 63.6645(c)]

(c) If the permittee is required to submit an Initial Notification, but the engine in question is otherwise not affected by the requirements of 40 CFR Part 63, Subpart ZZZZ, in accordance with §63.6590(b), the notification should include the information in §§63.9(b)(2)(i) through (v), and a statement that the engine has no additional requirements and explain the basis of the exclusion (for example, that it operates exclusively as an emergency stationary RICE).

[40 CFR 63.6645(d)]

(d) If a performance test is required, the permittee must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in §63.7(b)(1).

[40 CFR 63.6645(g)]

(e) If a performance test or other initial compliance demonstration is required, the permittee must submit a Notification of Compliance Status according to §63.9(h)(2)(ii).

[40 CFR 63.6645(h)]

11. Recordkeeping [40 CFR 63.10, 63.6655, 63.6660]

(a) The permittee must keep the following records to comply with the emission and operating limitations in 40 CFR Part 63, Subpart ZZZZ that apply:

(i) A copy of each notification and report that was submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements of §63.10(b)(2)(xiv);
(ii) Records of the occurrence and duration of each malfunction operation (i.e. process equipment) or the air pollution control monitoring equipment;
(iii) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii);
(iv) Records of all required maintenance performed on the air pollution control equipment; and

(v) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b) and Section III.B.4. of this permit, including corrective actions to restore malfunctioning process and air pollution control monitoring equipment to its normal or usual manner of operation.

[40 CFR 63.6655(a)]

(b) For each CEMS or CPMS, the permittee must keep the following records:

(i) Records described in §63.10(b)(2)(vi) through (xi);
(ii) Previous (i.e., superseded) versions of the performance evaluation plan as required in §63.8(d)(3); and

[Explanatory Note: According to #25 of the September 30, 2005 EPA Questions and Answers Memorandum for NESHAPs for Stationary RICE, the provisions of 40 CFR 63.8 for monitoring of the catalyst inlet temperature are not federally required until the performance specifications are promulgated.]

(iii) Requests for alternatives to the relative accuracy test for CEMS or CPMS as required in §63.8(f)(6)(i), if applicable.

[40 CFR 63.6655(b)]

(c) The permittee must keep the records required in Section III.B.12. of this permit to show continuous compliance with each emission or operating limitation in 40 CFR Part 63, Subpart ZZZZ that applies.

[40 CFR 63.6655(d)]

(d) Records must be in a form suitable and readily available for expeditious review.

[40 CFR 63.6660(a) and 40 CFR 63.10(b)(1)]

(e) The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

[40 CFR 63.6660(b) and 40 CFR 63.10(b)(1)]

(f) The permittee must keep each record readily accessible in hard copy or electronic form on site at the source for 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1).

[40 CFR 63.6660(c) and 40 CFR 63.10(b)(1)]

12. Reporting [40 CFR 63.6650]

(a) The permittee must submit a compliance report semi-annually by April 1 and October 1 of each year. The report due on April 1 shall cover the prior 6-month period from September 1 through the end of February. The report due on October 1 shall cover the prior 6-month period from March 1 through the end of August.

[40 CFR 63.6650(b)]

(b) The compliance report shall be submitted with the semi-annual monitoring report required by §71.6(a)(3)(iii)(A) and this permit. Submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to EPA.

[40 CFR 63.6650(f)]

(c) The semi-annual compliance report must contain the following:

(i) Company name and address;
(ii) Statement by the responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report;
(iii) The date of the report and beginning and ending dates of the reporting period;
(iv) In the event a malfunction has occurred during the reporting period, the report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction of an engine to minimize emissions in accordance with this permit, including actions taken to correct a malfunction;
(v) If there are no deviations from any applicable emission limitations, or operating limitations, a statement that there were no deviations from the emissions limitations or operating limitations during the reporting period; and
(vi) If there were no periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.

[40 CFR 63.6650(c)]

(d) For each deviation from an emission or operating limitation that occurs for an engine where a CMS is not being used to comply with the emission and operating limits, the compliance report must contain the following information:

(i) Information required in this permit;
(ii) The total operating time of the engine at which the deviation occurred during the reporting period; and
(iii) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.

[40 CFR 63.6650(d)]

(e) For each deviation from an emission or operating limitation that occurs for an engine where a CMS is being used to comply with the emission and operating limits, the compliance report must contain the following information:

(i) Information required in this permit;
(ii) The date and time that each malfunction started and stopped;
(iii) The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks;

(iv) The date, time, and duration that each CMS was out-of-control, including the information in §63.8(c)(8);
(v) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction of during another period;
(vi) A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period;
(vii) A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes;
(viii) A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the engine at which the CMS downtime occurred during the reporting period;
(ix) An identification of each parameter and pollutant (CO or formaldehyde) that was monitored at the engine;
(x) A brief description of the engine;
(xi) A brief description of the CMS;
(xii) The date of the last CMS certification audit; and
(xiii) A description of any changes in CMS, processes, or controls since the last reporting period.

[40 CFR 63.6650(e)]

IV. Requested Emission Limits

IV.A. Applicability

1. The requirements in this section have been created, at the permittee's request to avoid PSD permitting for the construction of the Simpson Treating Plant (an otherwise PSD significant modification to the Arkansas Loop Gas Plant).

2. The requirements in this section are intended to establish enforceable restrictions on the PTE of the Arkansas Loop and Simpson Treating Plants project in order to keep the net project-only PTE below the 40 tpy PSD significance thresholds for VOC and NO_x emissions. The restrictions include the removal of existing engine unit E-201 and TEG dehydration unit R-006, the addition of enforceable VOC and formaldehyde emission limits on new generator engines, E-004 and E-005, and the addition of an enforceable project-wide VOC emission limit.

3. The requirements for the engines E-004 and E-005 in this section should be applied in conjunction with the enforceable requirements of 40 CFR Part 60, Subpart JJJJ, and 40 CFR Part 63, Subpart ZZZZ.

IV.B. Removal of Compressor Engine Unit E-201 and TEG Dehydration Unit R-006

1. The permittee shall shut down, permanently remove from service, and physically remove from the facility, compressor engine unit E-201 and TEG dehydration unit R-006 at the Arkansas Loop Treating Plant prior to starting up any emission unit or IEU at the Simpson Treating Plant.

2. The permittee shall submit to EPA documentation sufficient to verify that the engine and dehydrator have been physically removed from the facility prior to starting up any emission unit or IEU at the Simpson Treating Plant. This documentation shall be submitted within 30 days of the physical removal of the engine and dehydrator.

IV.C. Emission Limits

1. VOC emissions from each generator engine units E-004 and E-005, each equipped with an oxidation catalyst, shall not exceed:

   (a) 0.6 g/bhp-hr;
   (b) 2.1 lbs/hr; and
   (c) 9.4 tpy.

2. Formaldehyde emissions from each generator engine units E-004 and E-005, each equipped with an oxidation catalyst, shall not exceed:

   (a) 0.4 g/bhp-hr;
   (b) 1.4 lbs/hr; and
   (c) 6.3 tpy.

3. Total cumulative VOC emissions from the following emission units at the Simpson Treating Plant shall not exceed 41.6 tons during any consecutive 12 months:

(a) E-004, E-005 – Caterpillar 3516 LE Generators;
(b) H-801 – Custom Heat Medium Heater #3;
(c) Amine 3 – Custom Amine Plant #3;
(d) R-007, R-008 – TEG Dehydrators #6 and #7, and associated reboilers (IEUs);
(e) Storage Tanks TK-1001 – TK-1008 (IEUs); and
(f) Catalytic Heaters CATH18 and CATH19 (IEUs).

IV.D. Work Practice and Operational Requirements

1. Generator engine units E-004 and E-005 shall each be equipped with oxidation catalyst control systems capable of reducing uncontrolled VOC and formaldehyde emissions by at least 57% at maximum operating rate (90% to 100% of engine capacity at site location).

2. The permittee shall install temperature-sensing devices (i.e. thermocouple or resistance temperature detectors) before the oxidation catalyst for generator engine units E-004 and E-005 in order to monitor the inlet temperature of the catalyst for each engine. Each temperature-sensing device shall be accurate to within plus or minus 0.75% of span.

3. The engine exhaust temperature for generator engine units E-004 and E-005 at the inlet to the oxidation catalyst, shall be maintained at all times the engine unit operates at no less than 550ºF and no more than 1250ºF.

4. If the catalyst inlet temperature on generator engine units E-004 or E-005 deviates from the acceptable range, then the following actions shall be taken:

   (a) Immediately upon determining a deviation of the catalyst inlet temperature, corrective action shall be taken on that engine to assess performance problems and/or tuning issues and the oxidation catalyst shall be inspected for possible damage and problems affecting catalyst effectiveness (including, but not limited to, plugging, fouling, destruction, or poisoning of the catalyst).

   (b) If the problem can be corrected by following the engine and/or the oxidation catalyst manufacturer's recommended procedures, or equivalent procedures provided they bring the catalyst inlet temperature back within the acceptable temperature range, then the permittee shall correct the problem within 24 hours of inspecting the engine and oxidation catalyst.

   (c) If the problem cannot be corrected using the manufacturer's recommended procedures, then the affected engine shall cease operating immediately and shall not be returned to routine service until the catalyst inlet temperature is measured and found to be within the acceptable temperature range for that engine. The permittee shall also notify EPA in writing of the problem within 15 working days of observing the problem and include in the notification the cause of the problem and a corrective action plan that outlines the steps and timeframe for bringing the inlet temperature range into compliance. (The corrective action may include removal and cleaning of the oxidation catalyst according to the manufacturer's methods, or replacement of the oxidation catalyst.)

   (d) The permittee's completion of any or all of the actions prescribed by this permit shall not

constitute, nor qualify as, an exemption from any other VOC or formaldehyde emission limits in this permit.

5. The permittee shall install pressure-sensing devices before and after the oxidation catalyst for generator engine units E-004 and E-005 in order to monitor the pressure drop across the catalyst beds.

6. During operation the pressure drop across the oxidation catalyst on each of the generating engines, E-004 and E-005 shall be maintained to within 4 inches of water from the baseline pressure drop reading taken during the initial performance test.

7. If the pressure drop exceeds 4 inches of water from the baseline pressure drop reading taken during the initial performance test, then the following actions shall be taken:

   (a) Immediately upon determining a deviation of the pressure drop, corrective action shall be taken to assess performance problems for possible damage and problems affecting catalyst effectiveness (including, but not limited to, plugging, fouling, destruction, or poisoning of the catalyst). Investigation may include monitoring of VOC and formaldehyde emissions to ensure the catalyst is functioning and testing the pressure transducers. If the cause is determined to be the catalyst, then the catalyst shall be inspected and cleaned or replaced, if necessary.

   (b) If the problem can be corrected by following the engine and/or the oxidation catalyst manufacturer's recommended procedures, or equivalent procedures provided they bring the pressure drop across the catalyst back under 4 inches of water from the baseline pressure drop reading taken during the initial performance test, then the permittee shall correct the problem within 24 hours of inspecting the catalyst.

   (c) If the problem cannot be corrected using the manufacturer's recommended procedures, then the affected engine shall cease operating immediately and shall not be returned to routine service until the catalyst pressure is measured and found to be within the acceptable range for that engine. The permittee shall also notify EPA in writing of the problem within 15 working days of observing the problem and include in the notification the cause of the problem and a corrective action plan that outlines the steps and timeframe for bringing the pressure range into compliance. (The corrective action may include removal and cleaning of the catalyst according to the manufacturer's methods or replacement of the catalyst.)

   (d) The permittee's completion of any or all of the actions prescribed by this permit shall not constitute, nor qualify as, an exemption from any other VOC or formaldehyde emission limits in this permit.

8. All emission units at the Arkansas Loop and Simpson Treating Plants shall be fired only with natural gas. The natural gas shall be pipeline-quality in all respects except that CO_2 concentration in the gas shall not be required to be within pipeline-quality.

   [The purpose of this permit condition is to ensure there are no contaminants in the fuel that might foul the oxidation converter. CO_2 is not a potential foulant of the oxidation catalyst.]

9. The permittee shall follow, for each engine and any respective oxidation catalyst, the manufacturer's recommended maintenance schedule and procedures to ensure optimum performance of each generator engine units E-004 and E-005 and their respective oxidation catalyst.

IV.E. Testing Requirements [40 CFR 71.6(a)(3)(i)(A) through (C)]

1. Performance tests shall be conducted for generator engine units E-004 and E-005 for measuring VOC emissions from each engine to demonstrate compliance with the emission limits in this permit.

   (a) The performance test for VOC emissions shall be conducted within 90 calendar days of the effective date of this permit.

   (b) Subsequent performance tests shall be conducted on an annual basis thereafter.

   (c) The performance tests for VOC emissions shall be conducted in accordance with appropriate reference methods specified in 40 CFR Part 60, Appendix A, or 40 CFR Part 63, Appendix A. The permittee may submit to EPA a written request for approval of an alternate testing method, but shall only use that alternate test method after obtaining written approval from EPA.

2. Performance tests shall be conducted for generator engine units E-004 and E-005 for measuring formaldehyde emissions from the engines to demonstrate compliance with the emission limits in this permit.

   (a) The performance tests for formaldehyde shall be conducted within 90 calendar days of the effective date of this permit.

   (b) Subsequent performance tests shall be conducted on an annual basis thereafter.

   (c) The performance tests for measuring formaldehyde emissions shall be conducted in accordance with 40 CFR Part 63, Appendix A. The permittee may submit to EPA a written request for approval of an alternate testing method, but shall only use that alternate test method after obtaining written approval from EPA.

3. The pressure drop across each oxidation catalyst and the inlet temperature to the oxidation catalyst for generator engine units E-004 and E-005 shall both be measured during the initial and subsequent performance test.

4. All tests for VOC and formaldehyde emissions must meet the following requirements:

   (a) All tests shall be performed within 10% of 100% peak (or the highest achievable) load.

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

(c) Each source test shall consist of at least 3 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 (lbs/hr and g/hp-hr).

(d) A source test plan for the initial performance test for VOC and formaldehyde emissions shall be submitted to EPA for approval within 45 calendar days of the effective date of this permit. Source test plans for subsequent performance tests shall be submitted to EPA for approval within 60 calendar days of the date the test is planned. The source test plan shall include and address the following elements:

(i) Purpose of the test;
(ii) Engines and oxidation catalysts to be tested;
(iii) Expected engine operating rate(s) during test;
(iv) Schedule/dates for test;
(v) Sampling and analysis procedures (sampling locations, test methods, laboratory identification);
(vi) Quality assurance plan (calibration procedures and frequency, sample recovery and field documentation, chain of custody procedures); and
(vii) Data processing and reporting (description of data handling and quality control procedures, report content).

IV.F. Monitoring Requirements [40 CFR 71.6(a)(3)(i)(A) through (C)]

1. The permittee shall measure VOC emissions from generator engine units E-004 and E-005 at least quarterly, and every time the oxidation catalyst is changed out, to demonstrate compliance with the emission limits in this permit. To meet this requirement, the permittee shall measure VOC emissions from generator engine units E-004 and E-005 using a portable analyzer and a monitoring protocol approved by EPA. The permittee shall submit the analyzer specifications and monitoring protocol to EPA for approval within 45 calendar days of the effective date of this permit. Monitoring for VOC emissions shall commence during the first complete calendar quarter following the permittee's submittal of the initial performance test results for VOC emissions to EPA.

2. The permittee shall measure formaldehyde emissions from units E-004 and E-005 annually to demonstrate compliance with the formaldehyde emission limits in this permit. Annual formaldehyde monitoring for units E-004 and E-005 shall commence during the first complete calendar quarter following the permittee's submittal of the initial compliance test results to EPA.

3. The engine exhaust temperature at the inlet to each oxidation catalyst shall be measured daily.

4. The pressure drop across each oxidation catalyst shall be measured daily.

5. For any one engine: If results of 2 consecutive quarterly tests are <u>less</u> than 80% of the VOC lb/hr emission limit, required test frequency shall change from quarterly to semi-annual. If results of 2 consecutive semi-annual tests are <u>less</u> than 80% of the emission limit, required test frequency shall change from semi-annual to annual. If results of any one test are <u>more</u> than 80% of the emission limit, required test frequency shall change back to quarterly.

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

1. At the end of the first full calendar month following the VOC and formaldehyde initial performance tests for generator engine units E-004 and E-005, the permittee shall calculate the emissions of total VOC from units E-004 and E-005 for that month using the results of the initial performance tests required in this permit. The permittee shall also calculate the total VOC emissions for that month from all other emission units at the Arkansas Loop and Simpson Treating Plants, specified in this permit, including IEUs. The permittee shall add those calculated VOC emissions to the VOC emissions from generator engine units E-004 and E-005. The total project-wide VOC emissions shall be recorded.

2. The project-wide emissions of VOC shall be calculated as follows:

   (a) For generator engine units E-004 and E-005 equipped with oxidation catalysts, VOC emissions for the month shall be calculated by multiplying the initial performance test results for VOC and formaldehyde for each engine, in g/hp-hr and lbs/hr, by the number of operating hours for the engine for that month. Acetaldehyde emissions for the month for each engine shall be calculated by multiplying the AP-42 emission factor by the number of operating hours for the engine for that month. For each engine, the calculated VOC, formaldehyde, and acetaldehyde emissions shall be added together to calculate the total VOC emissions for that month.

   (b) For remaining emission units at the Arkansas Loop and Simpson Treating Plants, specified in this permit, except IEUs, emissions for the month for each unit shall be calculated my multiplying the VOC emission factor for that unit (as shown in the Part 71 significant modification application), in lbs/hr, by the number of operating hours for that unit for the month. If data on operating hours is not available for a Particular unit for that month, full-time operation of that unit shall be assumed.

   (c) Emissions for IEUs at the Arkansas Loop and Simpson Treating Plants specified in this permit, for the month shall be recorded as 1/12 of the annual estimated emissions listed for IEUs on the Form PTE of the Part 71 significant modification application.

3. Subsequent to the initial calculation, project-wide emissions of VOC shall be calculated each month, as specified above, except that for calculating VOC and formaldehyde emissions from generator engine units E-004 and E-005, results from the most recent performance tests shall be used in the calculation, if more current than the initial performance test. The project-wide emissions of VOC shall be recorded at the end of each month, beginning with the first full calendar month after the initial calculation. Prior to 12 full months of operation under the significantly modified Part 71 operating permit, the permittee shall, at the end of each month, add the emissions for that month to the calculated emissions for all previous months since permit issuance and record the total. Thereafter, the permittee shall, at the end of each month, add the emissions for that month to the calculated emissions for the preceding 11 months and record a new 12 month total. VOC emissions from all controlled, uncontrolled, and insignificant emitting units (Tables 1 and 2) shall be included in the calculation.

4. The permittee shall comply with the following recordkeeping requirements:

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

   (b) Records shall be kept of vendor specifications to demonstrate that the accuracy of the temperature-sensing device at each oxidation catalyst is at least as accurate as that specified in this permit.

   (c) Records shall be kept of all pressure drop measurements required by this permit, as well as a description of any corrective actions taken pursuant to this permit.

   (d) Records shall be kept that are sufficient to demonstrate, pursuant to this permit, that the fuel for the engines is pipeline-quality natural gas in all respects, with the exception of CO_2 concentration in the natural gas.

   (e) The permittee shall keep records of all required testing and monitoring in this permit. The records shall include the following:

      (i) The date, place, and time of sampling or measurements;
      (ii) The date(s) analyses were performed;
      (iii) The company or entity that performed the analyses;
      (iv) The analytical techniques or methods used;
      (v) The results of such analyses or measurements; and
      (vi) The operating conditions as existing at the time of sampling or measurement.

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

1. The permittee shall submit to EPA, a written report of the results of the initial performance tests and temperature and pressure drop measurements required in this permit. This report shall be submitted within 90 calendar days of the date of testing completion. Thereafter, the permittee shall submit to EPA as Part of the semi-annual monitoring report required in this permit, a written report of the results of subsequent performance tests and temperature and pressure drop measurements that occurred during the reporting period.

2. If the permittee determines that the method used to demonstrate compliance with an emission limit in this section of the permit for a Particular pollutant during a reporting period also meets the requirements for demonstrating compliance with the emission limits of the same pollutant in Sections II and III of this permit, the permittee may submit a detailed description of the test plan and streamlining efforts to EPA for approval at least 60 days before the report is due.

V. Facility-Wide Requirements

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

Conditions in this section of the permit apply to all emissions units located at the facility, including any units not specifically listed in this permit**.**

[40 CFR 71.6(a)(1)]

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 federally recognized controls) one or more hazardous air pollutants 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. The permittee is the owner or operator of a glycol dehydration unit that is exempt from the control requirements under §63.764. The permittee shall retain each determination used to demonstrate that actual flowrate of natural gas throughput is less than 85,000 scm/day (3,000,000 scf/day) or the actual average benzene emissions are below 1 tpy.

   [40 CFR 63.764(e)(1)(ii), 63.772(b)(2) and 63.774(d)(1)]

3. Records shall be kept, as required by the off permit changes condition of this permit, for changes made in accordance with the approved Alternative Operating Scenario.

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

1. The permittee shall promptly report to the EPA Regional Office 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 timeframe 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 hazardous air pollutant 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 hazardous air pollutant or a toxic air pollutant that continues for more than 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.

2. If any of the conditions above are met, the source must notify EPA by telephone (1-800-227-8917) or facsimile (303-312-6064) based on the timetables listed above. *[Notification by telephone or fax must specify that this notification is a deviation report for a Part 71 permit]*. A written notice, certified consistent with this permit must be submitted within 10 working days of the occurrence. All deviations reported under this section must also be identified in the 6-month report required under this permit.

[Explanatory note: To help Part 71 permittees meet reporting responsibilities, EPA has developed a form "PDR" for prompt deviation reporting. The form may be found on EPA website at: http://www.epa.gov/air/oaqps/permits/p71forms.html]

3. "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 demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.

V.C. 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 the 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 the Administrator under that section.

V.D. Alternative Operating Scenarios [40 CFR 71.6(a)(9) and 40 CFR 71.6(a)(3)(ii)]

Engine Replacement/Overhaul

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 process shall be utilized to maintain the permitted emission limits of the replaced engine and incorporate the new applicable requirements.]

V.E. Prevention of Significant Deterioration [40 CFR 52.21]

This facility is a major stationary source for the purposes of Prevention of Significant Deterioration (PSD) requirements. Any projects at this facility which meet the definition of "major modification" at 40 CFR 52.21(b)(2) would require that the permittee obtain a pre-construction permit pursuant to federal regulations. In the event that the permittee elects to use the method specified in 52.21(b)(41)(ii)(a) through (c) for calculating the projected actual emissions of a proposed project, the permittee shall comply with all of the requirements of 40 CFR 52.21(r)(6) that apply to the project.

V.F. Chemical Accident Prevention [Clean Air Act Sections 112(r)(1), 112(r)(3), 112(r)(7) & 40 CFR Part 68]

1. The permittee has more than a threshold quantity of a regulated substance in a process, as determined under §68.115, and shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR Part 68 no later than the latest of the following dates:

   (a) June 21, 1999; or

   (b) Three years after the date on which a regulated substance is first listed under 40 CFR §68.130; or

   (c) The date on which a regulated substance is first present above a threshold quantity in process.

   [40 CFR 68.10(a)]

   (d) This facility is subject to 40 CFR Part 68 and shall certify compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as Part of the annual compliance certification required by this permit.

   [40 CFR 68.215(a)(ii)]

VI. Part 71 Administrative Requirements

VI.A. Annual Fee Payment [40 CFR 71.6(a)(7) and 40 CFR 71.9]

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

[40 CFR 71.9(a)]

2. The permittee shall pay the annual permit fee each year no later than October 1. The fee shall cover the previous calendar year.

[40 CFR 71.9(h)]

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.

[40 CFR 71.9(k)(1)]

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

For regular U.S. Postal Service mail	**For non-U.S. Postal Service express mail** (FedEx, Airborne, DHL, and UPS)
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

[40 CFR 71.9(k)(2)]

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 this permit.

[40 CFR 71.9(h)(1)]

[Explanatory note: The fee filing form "FF" and the fee calculation worksheet form "FEE" may be found on EPA website at: http://www.epa.gov/air/oaqps/permits/p71forms.html]

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/ton) in effect at the time of calculation.

[40 CFR 71.9(c)(1)]

(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 units actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year.

[40 CFR 71.9(c)(6)]

(ii) Actual emissions shall be computed using methods required by the permit for determining compliance, such as monitoring or source testing data.

[40 CFR 71.9(h)(3)]

(iii) If actual emissions cannot be determined using the compliance methods in the permit, the permittee shall use other federally recognized procedures.

[40 CFR 71.9(e)(2)]

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

(b) 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;

[40 CFR 71.9(c)(5)(i)]

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

[40 CFR 71.9(c)(5)(ii)]

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

[40 CFR 71.9(c)(5)(iii)]

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

[40 CFR 71.9(h)(2)]

[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 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 §71.6(a)(3)(ii).]

[40 CFR 71.9(i)]

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 §71.9(l).

[40 CFR 71.9(l)]

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

[40 CFR 71.9(j)(2)]

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 EPA along with full payment of the EPA assessed fee.

[40 CFR 71.9(j)(3)]

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

The permittee shall submit an annual emissions report of its actual emissions for both criteria pollutants and regulated HAPs for this facility 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 EPA by October 1.

The annual emissions report shall be submitted to EPA at the address listed in Section IV.E. of this permit.

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

VI.C. Compliance Requirements

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.

   [40 CFR 71.6(a)(6)(i)]

   (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.

   [40 CFR 71.6(a)(6)(ii)]

   (c) For the purpose of submitting compliance certifications in accordance with this permit, 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.

[Section 113(a) and 113(e)(1) of the Act, 40 CFR 51.212, 52.12, 52.33, 60.11(g), and 61.12]

2. Compliance Schedule

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

[40 CFR 71.5(c)(8)(iii)(A)]

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

[40 CFR 71.5(c)(8)(iii)(B)]

3. Compliance Certifications

(a) The permittee shall submit to EPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices annually by October 1, and shall cover the 12 month period ending on August 31 of the year the certification of compliance is due.

[Explanatory note: To help Part 71 permittees meet reporting responsibilities, EPA has developed a reporting form for annual compliance certifications. The form may be found on EPA website at: http://www.epa.gov/air/oaqps/permits/p71forms.html]

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

[40 CFR 71.6(c)(5)]

(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.

[40 CFR 71.6(c)(5)(iii)]

VI.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 EPA, within a reasonable time, any information that 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.

[40 CFR 71.6(a)(6)(v) and 40 CFR 71.5(a)(3)]

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.

[40 CFR 71.5(b)]

VI.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: EPA has developed a reporting form "CTAC" for certifying truth, accuracy and completeness of Part 71 submissions. The form may be found on EPA website at: http://www.epa.gov/air/oaqps/permits/p71forms.html]

2. Any documents required to be submitted under this permit, including reports, test data, monitoring data, notifications, compliance certifications, 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 80202-1129

VI.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.

VI.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.

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

1. The permittee may request the use of administrative permit amendment procedures for a permit revision that:

   (a) Corrects typographical errors;

   (b) 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;

   (c) Requires more frequent monitoring or reporting by the permittee;

   (d) 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;

   (e) 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 §§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 §71.6; or

   (f) Incorporates any other type of change which EPA has determined to be similar to those listed above in subparagraphs (a) through (e) above.

[Note to permittee: If subparagraphs (a) through (e) above do not apply, please contact EPA for a determination of similarity prior to submitting your request for an administrative permit amendment under this provision.]

VI.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.

[40 CFR 71.7(e)(1)(i)(A)]

2. Notwithstanding the list of changes ineligible for minor permit modification procedures in paragraph 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 EPA.

[40 CFR 71.7(e)(1)(i)(B)]

3. An application requesting the use of minor permit modification procedures shall meet the requirements of §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 §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 §71.8.

[40 CFR 71.7(e)(1)(ii)]

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 §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.

[40 CFR 71.7(e)(1)(v)]

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

[40 CFR 71.7(e)(1)(vi)]

VI.J. Group Processing of Minor Permit Modifications. [40 CFR 71.7(e)(2)]

1. Group processing of modifications by EPA may be used only for those permit modifications:

   (a) That meet the criteria for minor permit modification procedures under this permit; and

   (b) That collectively are below the threshold level of 10% of the emissions allowed by the permit for the emissions unit for which the change is requested, 20% of the applicable definition of major source in §71.2, or 5 tpy, whichever is least.

   [40 CFR 71.7(e)(2)(i)]

2. An application requesting the use of group processing procedures shall be submitted to EPA, shall meet the requirements of §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 §71.5(d), that the proposed modification meets the criteria for use of group processing procedures and a request that such procedures be used;

   (d) A list of the source's other pending applications awaiting group processing, and a determination of whether the requested modification, aggregated with these other applications, equals or exceeds the threshold set above; and

   (e) Completed forms for the permitting authority to use to notify affected States as required under §71.8.

   [40 CFR 71.7(e)(2)(ii)]

3. 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 §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.

[40 CFR 71.7(e)(2)(v)]

4. The permit shield under §71.6(f) may not extend to group processing of minor permit modifications.

[40 CFR 71.7(e)(2)(vi)]

VI.K. Significant Permit Modifications [40 CFR 71.7(e)(3)]

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.

[40 CFR 71.7(e)(3)(i)]

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.

[40 CFR 71.7(e)(3)(i)]

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 §71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change.

[40 CFR 71.7(e)(3)(ii), 71.8(d), and 71.5(a)(2)]

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

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

   (a) Additional applicable requirements under the Act become applicable to a major Part 71 source with a remaining permit term of 3 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 §71.7 (c)(3);

   (b) 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;

(c) 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

(d) EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

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

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

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

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

1. 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;

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

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

4. 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.

VI.O. Emergency Provisions [40 CFR 71.6(g)]

1. In addition to any emergency or upset provision contained in any applicable requirement, the permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:

   (a) An emergency occurred and that the permittee can identify the cause(s) of the emergency;
   (b) The permitted facility was at the time being properly operated;
   (c) During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; and
   (d) The permittee submitted notice of the emergency to EPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirements for prompt notification of deviations.

2. In any enforcement preceding the permittee attempting to establish the occurrence of an emergency has the burden of proof.

3. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

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

A change in ownership or operational control of this facility 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 EPA.

VI.Q. 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:

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 EPA of each change, except for changes that qualify as insignificant activities under §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; and

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. For replacement of an existing permitted compressor engine with a new or overhauled engine of the same make, model, horsepower rating, and configured to operate in the same manner as the engine being replaced, in addition to satisfying all other provisions for Off Permit Changes, the permittee satisfies the following provisions:

(a) The replacement engine employs air emissions control devices, monitoring, record keeping and reporting that are equivalent to those employed by the engine being replaced;

(b) The replacement of the existing engine does not constitute a major modification or major new source as defined in Federal PSD regulations 40 CFR 52.21;

(c) No new applicable requirements, as defined in 40 CFR 71.2, are triggered by the replacement; and

(d) The following information is provided in a written notice to EPA, prior to installation of the replacement engine, in addition to the standard information listed above for contemporaneous written notices for off permit changes:

(i) Make, model number, serial number, horsepower rating and configuration of the existing engine and the replacement engine;
(ii) Manufacture date, all rebuild dates, and installation date of the replacement engine;
(iii) If applicable, documentation of the cost to rebuild a replacement engine versus the cost to purchase a new engine in order to support claims that an engine is not "reconstructed," as defined in 40 CFR 60.15 and 40 CFR 63.2.
(iv) 40 CFR Part 60, Subpart IIII (CI Engine NSPS) non-applicability documentation as appropriate;
(v) 40 CFR Part 60, Subpart JJJJ (SI Engine NSPS) non-applicability documentation as appropriate;
(vi) 40 CFR Part 63, Subpart ZZZZ (RICE MACT) non-applicability documentation for major sources, as appropriate;
(vii) Documentation to demonstrate that the replacement does not constitute a major new source or major modification, as defined in Federal PSD rules (40 CFR 52.21), as follows:

A. If the replacement will not constitute a "physical change or change in the method of operation" as described in §52.21(b)(2)(i), an explanation of how that conclusion was reached shall be provided.

B. If the replacement will constitute a "physical change or change in the method of operation" as described §52.21(b)(2)(i), the following information shall be provided:

(1) If the existing source is a "major stationary source" as defined in §52.21(b)(1): For each "regulated NSR pollutant" as defined in §52.21(b)(50), a demonstration (including all calculations) that the replacement will not be a "major modification" as defined in §52.21(b)(2). A modification is major only if it causes a "significant emissions increase" as defined in §52.21(b)(40), and also causes a "significant net emissions increase" as defined in §§52.21(b)(3) and (b)(23).

The procedures of §52.21(a)(2)(iv) shall be used to calculate whether or not there will be a significant emissions increase. If there will be a significant emissions increase, then calculations shall be provided to demonstrate there will not be a significant net emissions increase. These latter calculations shall include all sourcewide contemporaneous and creditable emission increases and decreases, as defined in §52.21(b)(3), summed with the PTE of the replacement unit(s).

If netting is used to demonstrate that the replacement will not constitute a "major modification," verification shall be provided that the replacement engine(s) or turbine(s) employ emission controls at least equivalent in control effectiveness to those employed by the engine(s) or turbine(s) being replaced.

PTE of replacement unit(s) shall be determined based on the definition of PTE in §52.21(b)(4). For each "regulated NSR pollutant" for which the PTE is not "significant," calculations used to reach that conclusion shall be provided.

(2) If the existing source is not a "major stationary source" as defined in §52.21(b)(1): For each "regulated NSR pollutant," a demonstration (including all calculations) that the replacement engine(s) or turbine(s), by itself, will not constitute a "major stationary source" as defined in §52.21(b)(1)(i).

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

9. 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 replacement of any 1 engine, or by replacement of multiple engines.

VI.R. 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 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.

   [40 CFR 71.6(a)(11)]

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.

   [40 CFR 71.5(a)(1)(iii)]

3. If the permittee submits a timely and complete permit application for renewal, consistent with §71.5(a)(2), but 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 §71.6(f) shall remain in effect until the renewal permit has been issued or denied.

[40 CFR 71.7(c)(3)]

4. The permittee's failure to have a Part 71 permit is not a violation of this Part until 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 EPA.

[40 CFR 71.7(b)]

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.

[40 CFR 71.7(c)(1)]

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.

[40 CFR 71.5(a)(2) and 71.5(c)(5)]

VII. Appendix

VII.A. Inspection Information

1. Driving Directions

From Durango:

- Take 160 east, turn onto 550 south
- Take 550 south, north of Bondad turn left onto County Road 310-318 ("Bondad-Ignacio Highway")
- Take County Road 310-318 east approximately 2.9 miles (before mile marker 3)
- Turn right onto dirt road, continue approximately 0.2 mile (cross cattle guard)
- Turn left onto dirt road, will pass Red Cedar employee parking lot, and follow road over Texaco Hill, approximately 4.8 miles to Crows Foot intersection
- From Crows Foot intersection, stay right and travel 0.3 miles
- Turn right into Arkansas Loop and Simpson Treating Plants

From Ignacio:

- Take 172 south turn right onto County Road 318-310
- Take 318-310 west for approximately 5.1 miles to intersection of County Roads 318 and 311 (before mile marker 10)
- Turn left, travel south on road SUT-151 approximately 1.5 miles to top of Herrera Hill
- Turn right on road SUT-150 and follow road for approximately 3.6 miles to Crows Foot intersection
- From Crows Foot intersection, stay left and travel 0.3 miles
- Turn right into the Arkansas Loop and Simpson Treating Plants

From Ignacio (Bad weather & road conditions):

- Take 172 south, turn right onto County Road 318-310 ("Bondad-Ignacio Highway) to mile marker 3
- Approximately 0.1 mile past mile marker 3 to intersection, turn left onto dirt road for approximately 0.2 miles (across cattle guard)
- Turn left onto dirt road, will pass Red Cedar employee parking lot, and follow road over Texaco hill, approximately 4.8 miles to Crows Foot intersection
- From Crows Foot intersection, stay right and travel 0.3 miles
- Turn right into the Arkansas Loop and Simpson Treating Plants

Since the road system and navigation to the site can be difficult, it is best to arrange an escort with plant personnel.

Note: A SUIT crossing permit is required, where applicable.

2. Global Positioning System (GPS)

Latitude: 37˚ 03' 10.02" N
Longitude: -107˚ 47' 5.55" W

3. Safety Considerations:

All visitors to the facility are expected to adhere to Red Cedar Gathering Company's safety policies. Policies of Particular concern are those regarding the Personal Protective Equipment (PPE) and performance of Hot Work. As posted at the entrance to the station, Red Cedar Gathering Company requires persons entering the site to wear a hard hat, safety glasses, safety toe footwear, hearing protection, and fire retardant clothing. Red Cedar Gathering Company also requires a prior to the performance of any hot work at the station.