UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

Ref: 8P-AR

AUG 25 2016

Mr. Bryan Burns
LINN Operating, Inc.
600 Travis, Suite 4900
Houston, TX 77002

Re: LINN Operating, Inc. Section 22 Compressor Station,
Permit # SMNSR-UO-000876-2014.001 &
LINN Operating, Inc. 23 Compressor Station,
Permit # SMNSR-UO-000877-2014.001,
Administrative Revisions to Synthetic Minor New Source Review Permits

Dear Mr. Burns:

The U.S. Environmental Protection Agency, Region 8 received a request from LINN Operating, Inc. (LINN), dated June 14, 2016, to administratively revise the synthetic minor permits that the EPA issued, pursuant to the Tribal Minor New Source Review (MNSR) Permit Program at 40 CFR part 49, for the LINN Section 22 and 23 Compressor Stations (SMNSR-UO-000876-2014.001 and SMNSR-UO-000877-2014.001, respectively) on February 20, 2016. LINN identified material mistakes in the final MNSR permits and requested administrative permit revisions in accordance with 40 CFR 49.159(f). Specifically, regarding the standard permit condition in C.2.(a) of each permit, Requirements for TEG Dehydration Systems, Emission Limits, LINN had submitted revised TEG Dehydration unit emission calculations on December 17, 2015 via email, between issuance of the proposed permits for public comment and final issuance of the permits. However, in the final permits the TEG dehydration unit emission limits were not modified. Additionally, the maximum horsepower (hp) limit of 931 hp listed in condition D.1.(c) of the final permit for the Section 22 Compressor Station is incorrect. This condition was intended to reference the 1,171 hp engine operating at the station.

The EPA has verified that the requested revisions qualify as administrative revisions under 40 CFR 49.159(f) and has revised the language in both permits to correctly correspond to the December 2015 revised TEG Dehydration unit emissions calculations and to correctly reference the 1,171 hp engine at the Section 22 Compressor Station. We hereby issue the enclosed final revised MNSR permits for the LINN Section 22 and 23 Compressor Stations (SMNSR-UO-000876-2016.002 and SMNSR-UO-000877-2016.002, respectively). Administrative permit revisions are not subject to the permit application, public participation, issuance or administrative and judicial review requirements of the MNSR Permit Program.

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

Sincerely,

Monica Morales, Acting Director
Air Program

Enclosures (2)

cc:

Bruce Pargeets, Director, Energy, Minerals and Air, Ute Indian Tribe
Minnie Grant, Air Coordinator, Energy, Minerals, and Air, Ute Indian Tribe

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

Air Pollution Control
Synthetic Minor Source Permit to Construct

40 CFR 49.151

 # SMNSR-UO-000876-2016.002

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

Permittee:

LINN Operating, Inc.

Permitted Facility:

Section 22 Compressor Station
Uintah and Ouray Indian Reservation
Duchesne County, Utah

Summary

On February 20, 2016, the EPA issued a synthetic minor permit for the Section 22 Compressor Station in accordance with the requirements of the Tribal Minor New Source Review (MNSR) Permit Program at 40 CFR Part 49. On June 14, 2016, the EPA received a request to administratively revise the permit to correct material mistakes in the final permit. Specifically, regarding the standard permit condition in C.2.(a) of the permit, Requirements for TEG Dehydration Systems, Emission Limits, LINN had submitted revised TEG Dehydration unit emission calculations on December 17, 2015 via email, between issuance of the proposed permit for public comment and final issuance of the permit. However, in the final permit the TEG dehydration unit emission limits were not modified. Additionally, the maximum horsepower (hp) limit of 931 hp listed in condition D.1.(c) of the final permit was incorrect. This condition was intended to reference the 1,171 hp engine operating at the station.

This permit action applies to an existing facility operating on the Uintah and Ouray Indian Reservation in Utah.

This permit does not authorize the construction of any new emission sources, or emission increases from existing units, nor does it otherwise authorize any other physical modifications to the facility or its operations. The EPA has verified that the requested revisions qualify as administrative revisions under 40 CFR 49.159(f) and has revised the language in the permit as requested. Administrative permit revisions are not subject to the permit application, public participation, issuance or administrative and judicial review requirements of the MNSR Permit Program.

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

Upon compliance with this permit, LINN will have legally and practically enforceable restrictions on emissions that can be used when determining the applicability of other Clean Air Act (CAA) permitting requirements, such as under the Prevention of Significant Deterioration (PSD) Permit Program at 40 CFR Part 52 and the Title V Operating Permit Program at 40 CFR Part 71 (Part 71).

Table of Contents

I. Conditional Permit to Construct

A. General Information

Facility:	LINN Operating, Inc. – Section 22 Compressor Station
Permit number:	SMNSR-UO-000876-2014.001
SIC Code and SIC Description:	1311- Crude Petroleum and Natural Gas

Site Location:
Section 22 Compressor Station
NW ¼, SW ¼ Sec 22 T5S R4W
Uintah and Ouray Indian Reservation
Duchesne County, Utah
Latitude 40.01836, Longitude -110.19814

Corporate Office Location
LINN Operating, Inc.
600 Travis, Suite 5100
Houston, Texas 77002

The equipment listed in this permit shall be operated by LINN Operating, Inc. at the location described above.

B. Applicability

1. This federal Permit to Construct is being issued under authority of the MNSR Permit Program.

2. The requirements in this permit have been created, at the Permittee's request and pursuant to CAFO No. CAA-08-2013-0014, to establish legally and practically enforceable restrictions for limiting VOC and HAP TEG dehydration system emissions and VOC, CO, and formaldehyde engine emissions.

3. Any conditions established for this facility or any specific units at this facility pursuant to any permit issued under the authority of the PSD Permit Program or the MNSR Permit Program shall continue to apply.

4. By issuing this permit, EPA does not assume any risk of loss which may occur as a result of the operation of the permitted facility by the Permittee, Owner, and/or Operator, if the conditions of this permit are not met by the Permittee, Owner, and/or Operator.

C. Requirements for the TEG Dehydration System

1. Construction and Operational Limits

   (a) The Permittee shall install and operate emission controls as specified in this permit on one (1) TEG natural gas dehydration system meeting the following specifications:

      (i) Limited to a maximum throughput of 12 million standard cubic feet per day (MMscfd) of natural gas;
      (ii) Equipped with no more than one (1) natural gas-fired TEG reboiler with a maximum rated heat input of 0.25 million British thermal units per hour (MMBtu/hr);

(iii) Equipped with no more than one (1) TEG/gas separation unit and one (1) flash tank; and
(iv) Equipped with no more than one (1) TEG recirculation pump limited to a maximum pump rate of 3.50 gallons per minute (gpm).

(b) Only the dehydration unit that is operated and controlled as specified in this permit is approved for installation and operation under this permit.

2. Emission Limits:

(a) Emissions from the TEG dehydration system shall not exceed the following limits:

(i) VOC: 1.41 tons in any consecutive 12-month period; and
(ii) Total HAP: 0.54 tons in any consecutive 12-month period.

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

3. Emissions Calculation Requirements

(a) VOC and total HAP emissions must be calculated, in tons, and recorded at the end of each month, beginning with the first calendar month that this permit is effective.

(b) Prior to 12 full months of VOC and total HAP emissions calculations, the Permittee must, within seven (7) calendars days of the end of each month, add the emissions for that month to the calculated emissions for all previous months since the effective date of the permit and record the total. Thereafter, the Permittee must, within seven (7) calendar days of 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.

(c) VOC and total HAP emissions shall be calculated, in tons, using a generally accepted simulation model or software (examples include ProMax and GRI-GLYCalc™ Version 4.0 or higher). Inputs to the model shall be representative of actual average monthly operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled, "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1).

4. Control and Operational Requirements

(a) The Permittee shall route all emissions from the TEG dehydration system still vent through a closed-vent system to an enclosed combustion device designed and operated as specified in this permit.

(b) The Permittee shall design, install, continuously operate, and maintain the closed-vent system such that it is compliant with the following requirements:

(i) The closed-vent system shall route all gases, vapors, and fumes emitted from the still vent to the enclosed combustor;

(ii) All vent lines, connections, fittings, valves, relief valves, or any other appurtenance employed to contain and collect gases, vapors, and fumes and transport them to control equipment shall be maintained and operated during any time the control equipment is operating;

(iii) The closed-vent system shall be designed to operate with no detectable emissions;

(iv) If the closed-vent system contains one or more bypass devices that could be used to divert all or a portion of the gases, vapors, or fumes from entering the control device, the Permittee shall meet the one of following requirements for each bypass device:

(A) At the inlet to the bypass device that could divert the stream away from the control device and into the atmosphere, properly install, calibrate, maintain, and operate a flow indicator that is capable of taking periodic readings and sounding an alarm when the bypass device is open such that the stream is being, or could be, diverted away from the control device and into the atmosphere; or

(B) Secure the bypass device valve installed at the inlet to the bypass device in the non-diverting position using a car-seal or a lock-and-key type configuration;

(v) The Permittee shall minimize leaks of hydrocarbon emissions from all vent lines, connections, fittings, valves, relief valves, or any other appurtenance employed to contain, collect, and transport gases, vapors, and fumes to the control device.

(c) The Permittee shall design, install, continuously operate, and maintain an enclosed combustion device such that the mass content of the uncontrolled emissions of VOC and total HAP from the TEG dehydration system still vent are reduced by at least 95.0% by weight.

(d) The Permittee shall ensure that each enclosed combustion device is:

(i) Operated properly at all times that natural gas is routed to it;

(ii) Operated with a liquid knock-out system to collect any condensable vapors (to prevent liquids from going through the control device);

(iii) Equipped with a flash-back flame arrestor;

(iv) Equipped with one of the following:

(A) A continuous burning pilot flame, a thermocouple, and a malfunction alarm and notification system if the pilot flame fails; or

(B) An electronically controlled auto-ignition system with a malfunction alarm and notification system if the pilot flame fails while produced natural gas or natural gas emissions are flowing to the enclosed combustor;

(v) Maintained in a leak-free condition; and

(vi) Operated with no visible smoke emissions.

(e) The Permittee shall follow the manufacturer's recommended maintenance schedule and operational procedures to ensure optimum performance of the TEG dehydration system, closed-vent system, and enclosed combustion device.

5. Testing Requirements

(a) The Permittee shall ensure that the enclosed combustion device has sufficient capacity to achieve at least a 95.0% VOC and HAP emission destruction efficiency for the minimum and maximum hydrocarbon volumetric flow rate and BTU content routed to the device.

(b) The Permittee shall ensure that the enclosed combustion device is:

(i) A model demonstrated by a manufacturer to meet the benzene destruction efficiency requirements of this permit using the procedures specified in 40 CFR 60.5413(d) for VOC emissions by the due date of the first annual report as specified in Condition I.E.1.(a) of this permit; or

(ii) Demonstrated by the Permittee to meet the VOC and HAP destruction efficiency requirements of this permit by using the appropriate EPA approved performance test methods specified in 40 CFR Part 63, Subpart HH for control device performance tests for enclosed combustion devices by the due date of the first annual report specified in Condition I.E.1.(a) of this permit.

(c) The Permittee shall perform testing of the inlet wet gas stream to the TEG dehydration system (extended wet gas analysis) at least once every consecutive 12-month period. Alternatively, wet gas from the facility inlet separator can be taken for use in a process simulation software package. The analysis shall include the inlet gas temperature and pressure at which the sample was taken.

6. Monitoring Requirements

(a) The Permittee shall inspect the enclosed combustion device on a monthly and bi-annual basis to ensure proper operation according to the manufacturer's maintenance recommendations.

(b) The Permittee shall inspect the pilot light on the enclosed combustion device at least once per calendar week to ensure that it is lit.

(c) The Permittee shall monitor the closed-vent system for leaks of hydrocarbon emissions from all vent lines, connections, fittings, valves, relief valves, or any other appurtenance employed to contain, collect, and transport gases, vapors, and fumes to the enclosed combustion devices as follows:

(i) Visit the facility on a quarterly basis to inspect the closed-vent system for defects that could result in air emissions and document each inspection. Defects include, but are not limited to, visible cracks, holes, or gaps in piping; loose connections; or broken or missing caps or other closure devices. If a quarterly visit is not feasible due to sudden, infrequent, and unavoidable events (e.g. weather, road

conditions), every effort shall be made to visit the facility as close to quarterly as possible;

(ii) The inspections shall be based on audio, visual, and olfactory procedures; and

(iii) Any leaks detected in the closed-vent system shall be addressed immediately unless the repair requires resources not currently available. If the resources are not available, the leak shall be repaired no later than 15 days after initial detection of the leak.

(d) The Permittee shall monitor the enclosed combustion device to confirm proper operation as follows:

(i) Inspect the enclosed combustion device on a monthly and bi-annual basis to ensure proper operation according to the manufacturer's maintenance recommendations;

(ii) Visually inspect the combustion source (continuous burning pilot flame or automatic igniter) to ensure proper operation whenever an operator is on site, at a minimum, once per calendar week; and

(iii) Visually confirm that no smoke is present during operation of each smokeless enclosed combustion device whenever an operator is on site; at a minimum, quarterly.

(e) The Permittee shall operate and maintain a meter that continuously measures the natural gas flowrate from the TEG dehydration system. The meter shall be inspected on a monthly basis to ensure proper operation per the manufacturer's specifications.

(f) The Permittee shall convert monthly natural gas flowrate to a daily average by dividing the monthly flowrate by the number of days in the month that the TEG dehydration system processed natural gas. The Permittee shall document the actual monthly average natural gas flowrate.

7. Recordkeeping Requirements

The Permittee shall document compliance with the VOC and HAP emissions destruction efficiency and VOC and total HAP emission limits in this permit by keeping the following records:

(a) All manufacturer and/or vendor specifications for the TEG dehydration system, closed-vent system, enclosed combustion device, and any monitoring equipment;

(b) The results of all required performance tests;

(c) All extended wet gas analyses;

(d) The actual monthly average natural gas flow rate;

(e) Monitoring system breakdowns or other events that result in invalid data, maintenance, and repairs;

(f) The date, time, and length of any events in which the still vent stream was bypassing the enclosed combustion device or was not otherwise controlled;

(g) Inspections of the closed-vent system, enclosed combustion device, and any defects observed and the corrective action taken;

(h) Maintenance conducted on the enclosed combustion device; and

(i) The total monthly and consecutive 12-month VOC and total HAP emissions calculations for the TEG dehydration unit.

D. Requirements for the 1,171 Horsepower Compressor Engine

1. Construction and Operational Requirements

The Permittee shall install and operate emission controls as specified in this permit on the existing engine used for natural gas compression, meeting the following specifications:

(a) Operated as a 4-stroke lean-burn engine;

(b) Fired with natural gas; and

(c) Limited to a maximum site rating of 1,171 horsepower (hp).

2. Emission Limits:

(a) Emissions from the engine shall not exceed the following:

(i) CO: 0.50 pounds per hour (lb/hr);
(ii) VOC: 0.71 lb/hr; and
(iii) Formaldehyde: 0.44 lb/hr

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

3. Control and Operational Requirements

(a) The Permittee shall install, continuously operate, and maintain a catalytic control system on the engine that is capable of reducing the uncontrolled emissions of CO by at least 93%, and VOC and formaldehyde by at least 45%, to meet the emission limits specified in this permit.

(b) Except during startups, which shall not exceed 30 minutes, the engine exhaust temperature at the inlet to the catalyst bed shall be maintained at all times the engine operates with an inlet temperature of at least 500 ºF and no more than 1,250 ºF.

(c) During operation the pressure drop across the catalyst bed shall be maintained to within ±2 inches of water from the baseline pressure drop reading taken during the most recent performance test or catalyst cleaning or replacement, whichever is more recent.

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

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

(f) The Permittee may rebuild an existing permitted engine or replace an existing permitted engine with an engine of the same hp rating, and configured to operate in the same manner as the engine being rebuilt or replaced. Any emission limits, requirements, control technologies, testing or other provisions that apply to the engines that are rebuilt or replaced shall also apply to the replaced engines.

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

4. Performance Test Requirements

(a) Performance tests shall be conducted on the engine for measuring CO, VOC emissions to demonstrate compliance with the emission limits in this permit.

(i) The initial performance tests shall be conducted within 90 calendar days after the effective date of this permit. The results of performance tests conducted prior to the effective date of this permit may be used to demonstrate compliance with the initial performance test requirements, provided the tests were conducted in an equivalent manner as the performance test requirements in this permit; and

(ii) Subsequent performance tests shall be conducted every 3 years or 8,760 hours of operation, whichever comes first.

(b) All performance tests conducted on the engine shall meet the following requirements:

(i) All tests for CO and VOC shall be conducted in accordance with the performance test procedures in the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines at 40 CFR Part 60, Subpart JJJJ (NSPS JJJJ) for the appropriate engine type and pollutant. The Permittee may submit to the EPA a written request for approval of alternate test methods, but shall only use the alternate test methods after obtaining written approval from the EPA.

(ii) All tests shall be performed at a maximum operating rate (90% to 110% of the maximum achievable engine load available at the time of the test), and according to the requirements in 40 CFR 60.8 and under the specific conditions specified for the appropriate engine type in NSPS JJJJ. The Permittee may submit to the EPA a written request for approval of testing at an alternate load level, but may only test at that level after obtaining written approval from the EPA;

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

(iv) Each test shall consist of at least three 1-hour or longer valid test runs, as specified in 40 CFR 60.8(f). Emission results shall be reported as the arithmetic average of all valid test runs and shall be in terms of the emission limits (lb/hr) in this permit;

(v) The pressure drop across each catalyst bed and the inlet temperature to each catalyst bed shall be measured and recorded at least once per test to establish a baseline pressure drop and to demonstrate compliance with the operating limitations of this permit;

(vi) The Permittee shall not perform engine tuning or make any adjustments to engine settings, catalytic control system settings, processes or operational parameters immediately prior to the engine testing or during the engine testing. Any such tuning or adjustments may result in a determination by the EPA that the test is invalid. Artificially increasing an engine load to meet testing requirements is not considered engine tuning or adjustments;

(vii) The Permittee shall not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in 40 CFR 60.8(c);

(viii) The Permittee shall not abort any engine tests that demonstrate non-compliance with the CO, VOC, or formaldehyde emission limits in this permit;

(ix) Performance test plans shall be submitted to the EPA for approval 60 calendar days prior to the date the test is planned;

(x) Performance test plans that have already been approved by the EPA for the emission units approved in this permit may be used in lieu of new test plans unless the EPA requires the submittal and approval of new test plans. The Permittee may submit new plans for EPA approval at any time;

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

(A) Purpose of the test;
(B) Engine and catalytic control system to be tested;
(C) Expected engine operating rate during the test;
(D) Sampling and analysis procedures (sampling locations, test methods, laboratory identification);
(E) Quality assurance plan (calibration procedures and frequency, sample recovery and field documentation, chain of custody procedures); and
(F) Data processing and reporting (description of data handling and quality control procedures, report content); and

(xii) The Permittee shall notify the EPA at least 30 calendar days prior to scheduled performance testing. The Permittee shall notify the EPA at least one (1) week prior to scheduled performance testing if the testing cannot be performed.

(c) If the permitted engine is not operating, the Permittee does not need to start up the engine solely to conduct the performance test. The Permittee may conduct the performance test when the engine is started up again.

5. Monitoring Requirements

(a) The Permittee shall monitor the engine exhaust temperature at least every 30 days, and each time the catalyst is cleaned or replaced, using temperature-sensing device at the inlet to the catalyst bed to obtain a direct reading of the temperature, in accordance with the manufacturer recommended maintenance schedule and procedures, or equivalent procedures developed by the Permittee or vendor, to ensure optimum performance of the catalytic control system.

(b) The Permittee shall monitor the pressure drop across the catalyst bed on the engine at least every 30 days, and each time the catalyst is cleaned or replaced, using pressure sensing devices before and after the catalyst bed to obtain a direct reading of the differential pressure, in accordance with the manufacturer recommended maintenance schedule and procedures, or equivalent procedures developed by the Permittee or vendor, to ensure optimum performance of the catalytic control system. *[Note to Permittee: Engine exhaust temperature and differential pressure measurements, in general, are used to determine when the elements of the catalyst bed are fouling, blocked or blown out and thus require cleaning or replacement.]*

(c) The Permittee shall perform the first measurements of the engine exhaust temperature and the pressure drop across the catalyst bed no more than 30 days from the effective date of this permit. Thereafter, the Permittee shall measure the engine exhaust temperature and pressure drop across the catalyst bed, at a minimum, every 30 days, and each time the catalyst is cleaned or replaced. Subsequent performance tests, as required in this permit, can be used to meet the periodic engine exhaust temperature and pressure drop monitoring requirements provided the test occurs within the 30-day window. The engine exhaust temperature and pressure drop readings can be a one-time measurement on that day, the average of performance test runs performed on that day, or an average of all the measurements on that day if continuous readings are taken.

(d) Except during startups, which shall not exceed 30 minutes, if the engine exhaust temperature at the inlet to the catalyst bed on the engine deviates from the acceptable range specified in this permit, then the Permittee shall follow the manufacturer recommendations for bringing the engine exhaust temperature back within the acceptable range.

(e) If the pressure drop across the catalyst bed exceeds ± two (2) inches of water from the baseline pressure drop reading taken during the most recent performance test, then the Permittee shall follow the manufacturer recommendations for bringing the pressure drop back within ± two (2) inches of water from the baseline pressure drop reading taken during the most recent performance test.

(f) The Permittee is not required to conduct emissions monitoring and parametric monitoring of exhaust temperature and catalyst differential pressure on the engine if it has not operated during the monitoring period. The Permittee shall certify that the engine did not operate during the monitoring period in the annual report specified in this permit.

6. Recordkeeping Requirements

(a) Records shall be kept of manufacturer and/or Permittee or vendor-developed specifications and recommended maintenance procedures for the engine, catalytic control system, temperature-sensing device, and pressure-measuring device.

(b) Records shall be kept of all calibration and maintenance conducted for the engine and catalytic control system.

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

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

(d) Records shall be kept of all catalyst cleanings or replacements, engine rebuilds and engine replacements.

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

(f) Records shall be kept of each instance of a deviation of the operating limitations in this permit for the inlet temperature to the catalyst bed or pressure drop across a catalyst bed. The Permittee shall include in the record the cause of the problem, the corrective action taken, and the timeframe for bringing the pressure drop and/or inlet temperature range into compliance.

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

E. Requirements for Records Retention

1. The Permittee shall retain all records required by this permit for a period of at least five (5) years from the date the record was created.

2. Records shall be kept in the vicinity of the facility, such as at the facility, the location that has day-to-day operational control over the facility, or the location that has day-to-day responsibility for compliance of the facility.

F. Requirements for Reporting

1. Annual Emission Reports

   (a) The Permittee shall submit a written annual report of the actual annual emissions from all emission units at the facility each year no later than April 1st. The annual report shall cover the period for the previous calendar year. All reports shall be certified to truth and accuracy by the responsible official.

   (b) The report shall include VOC, NO_X, CO, total HAP, and formaldehyde emissions.

   (c) The report shall be submitted to:

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

   The report may be submitted via electronic mail to R8AirPermitting@epa.gov.

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

   U.S. Environmental Protection Agency, Region 8
   Office of Enforcement, Compliance & Environmental Justice
   Air Toxics and Technical Enforcement Program, 8ENF-AT
   1595 Wynkoop Street
   Denver, Colorado 80202

   Documents may be submitted via electronic mail to R8AirReportEnforcement@epa.gov.

3. The Permittee shall promptly submit to the EPA a written report of any deviations of emission or operational limits specified in this permit and a description of any corrective actions or preventative measures taken. A "prompt" deviation report is one that is post marked or submitted via electronic mail to r8airreportenforcement@epa.gov as follows:

   (a) Within 30 days from the discovery of a deviation that would cause the Permittee to exceed the emission limits or operational limits if left un-corrected for more than five (5) days after discovering the deviation; and

   (b) By April 1st for the discovery of a deviation of recordkeeping or other permit conditions during the preceding calendar year that do not affect the Permittee's ability to meet the emission limits.

4. The Permittee shall submit a written report for any required performance tests to the EPA Regional Office within 60 days after completing the tests.

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

II. General Provisions

A. Conditional Approval:

Pursuant to the authority of 40 CFR 49.151, the EPA hereby conditionally grants this permit to construct. This authorization is expressly conditioned as follows:

1. *Document Retention and Availability:* This permit and any required attachments shall be retained and made available for inspection upon request at the location set forth herein.

2. *Permit Application:* The Permittee shall abide by all representations, statements of intent and agreements contained in the application submitted by the Permittee. The EPA shall be notified 10 days in advance of any significant deviation from this permit application as well as any plans, specifications or supporting data furnished.

3. *Permit Deviations:* The issuance of this permit may be suspended or revoked if the EPA determines that a significant deviation from the permit application, specifications, and supporting data furnished has been or is to be made. If the proposed source is constructed, operated, or modified not in accordance with the terms of this permit, the Permittee will be subject to appropriate enforcement action.

4. *Compliance with Permit:* The Permittee shall comply with all conditions of this permit, including emission limitations that apply to the affected emissions units at the permitted facility/source. Noncompliance with any permit term or condition is a violation of this permit and may constitute a violation of the CAA and is grounds for enforcement action and for a permit termination or revocation.

5. *Fugitive Emissions:* The Permittee shall take all reasonable precautions to prevent and/or minimize fugitive emissions during the construction period.

6. *NAAQS and PSD Increments:* The permitted source shall not cause or contribute to a NAAQS violation or a PSD increment violation.

7. *Compliance with Federal and Tribal Rules, Regulations, and Orders:* Issuance of this permit does not relieve the Permittee of the responsibility to comply fully with all other applicable federal and tribal rules, regulations, and orders now or hereafter in effect.

8. *Enforcement:* It is not a defense, for the Permittee, in an enforcement action, to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

9. *Modifications of Existing Emissions Units/Limits:* For proposed modifications, as defined at 40 CFR 49.152(d), that would increase an emissions unit allowable emissions of pollutants above its existing permitted annual allowable emissions limit, the Permittee shall first obtain a permit modification pursuant to the MNSR regulations approving the increase. For a proposed modification that is not otherwise subject to review under the PSD or MNSR regulations, such proposed increase in the annual allowable emissions limit shall be approved through an administrative permit revision as provided at 40 CFR 49.159(f).

10. *Relaxation of Legally and Practically Enforceable Limits:* At such time that a new or modified source within this permitted facility/source or modification of this permitted facility/source becomes a major stationary source or major modification solely by virtue of a relaxation in any legally and practically enforceable limitation which was established after August 7, 1980, on the capacity of the permitted facility/source to otherwise emit a pollutant, such as a restriction on hours of operation, then the requirements of the PSD regulations shall apply to the source or modification as though construction had not yet commenced on the source or modification.

11. *Revise, Reopen, Revoke and Reissue, or Terminate for Cause:* This permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee, for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. The EPA may reopen this permit for a cause on its own initiative, e.g., if this permit contains a material mistake or the Permittee fails to assure compliance with the applicable requirements.

12. *Severability Clause:* The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.

13. *Property Rights:* This permit does not convey any property rights of any sort or any exclusive privilege.

14. *Information Requests:* The Permittee shall furnish to the EPA, within a reasonable time, any information that the EPA may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating this permit or to determine compliance with this permit. For any such information claimed to be confidential, the Permittee shall also submit a claim of confidentiality in accordance with 40 CFR Part 2, Subpart B.

15. *Inspection and Entry:* The EPA or its authorized representatives may inspect this permitted facility/source during normal business hours for the purpose of ascertaining compliance with all conditions of this permit. Upon presentation of proper credentials, the Permittee shall allow the EPA or its authorized representative to:

    (a) Enter upon the premises where this permitted facility/source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of this permit;

    (b) Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of this permit;

    (c) Inspect, during normal business hours or while this permitted facility/source is in operation, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

    (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements; and

    (e) Record any inspection by use of written, electronic, magnetic and photographic media.

16. *Permit Effective Date:* This permit is effective immediately upon issuance unless comments resulted in a change in the proposed permit, in which case the permit is effective 30 days after issuance. The Permittee may notify the EPA, in writing, that this permit or a term or condition of it is rejected. Such notice should be made within 30 days of receipt of this permit and should include the reason or reasons for rejection.

17. *Permit Transfers:* Permit transfers shall be made in accordance with 40 CFR 49.159(f). The Air Program Director shall be notified in writing at the address shown below if the company is sold or changes its name.

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

18. *Invalidation of Permit:* Unless this permitted source of emissions is an existing source, this permit becomes invalid if construction is not commenced within 18 months after the effective date of this permit, construction is discontinued for 18 months or more, or construction is not completed within a reasonable time. The EPA may extend the 18-month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between the constructions of the approved phases of a phased construction project. The Permittee shall commence construction of each such phase within 18 months of the projected and approved commencement date.

19. *Notification of Start-Up:* The Permittee shall submit a notification of the anticipated date of initial start-up of this permitted source to the EPA within 60 days of such date, unless this permitted source of emissions is an existing source.

B. Authorization:

Authorized by the United States Environmental Protection Agency, Region 8

Monica Morales 8/23/2016

Monica Morales, Acting Director — Date
Air Program