



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-0424-00027/00010
Mod 0 Effective Date: 08/16/2017 Expiration Date: 08/15/2027
Mod 1 Effective Date: 12/20/2017 Expiration Date: 08/15/2027

Permit Issued To: NATIONAL FUEL GAS SUPPLY CORPORATION
6363 MAIN ST
BUFFALO, NY 14221

Contact: JOSHUA Z ENNIS
NATIONAL FUEL GAS SUPPLY CORPORATION
6363 MAIN ST
BUFFALO, NY 14221
(716) 857-6902

Facility: LIMESTONE COMPRESSOR STATION
64 PARKSIDE DR
LIMESTONE, NY 14753

Description:

(1) National Fuel Gas Supply Corporation owns and operates the Limestone Compressor Station located at 1230 Parkside Drive, Village of Limestone, New York. The Limestone Compressor Station is a natural gas storage and transmission facility consisting of one 800 HP two-stroke lean burn natural gas-fired stationary reciprocating internal combustion compressor engine; one existing 20 MMscf/day triethylene glycol (TEG) natural gas dehydration unit; an enclosed ground flare; a 0.5 MMBtu/hr reboiler; and one 220 HP emergency generator.

(2) This minor permit modification corrects descriptions for emission unit 0-0000E and process DEH to state only the dehydrator still emissions vent to the enclosed flare. The reboiler combustion emissions do not vent to the enclosed flare. The reboiler burner combustion emissions vent to atmosphere.

(3) This permit modification replaces permit Condition 15 with Condition 1-1 to remove the emission estimates for the 98% control efficiency.

(4) This permit modification replaces permit Condition 23 with Condition 1-2 to remove reference to the reboiler emissions.

New York State Department of Environmental Conservation
Facility DEC ID: 9042400027



By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: MARK F PASSUITE
 NYSDEC - REGION 9
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ____ / ____ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
 - Applications for permit renewals, modifications and transfers
 - Applications for permit renewals, modifications and transfers
 - Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 3.3

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.



Condition 4: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 4.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 4.2:

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 4.3

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 5: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 5.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

**** Facility Level ****

Condition 6: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 6.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits

DEC Permit Conditions
Renewal 1/Mod 1/FINAL

New York State Department of Environmental Conservation
Facility DEC ID: 9042400027



270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

New York State Department of Environmental Conservation

Permit ID: 9-0424-00027/00010

Facility DEC ID: 9042400027



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: NATIONAL FUEL GAS SUPPLY CORPORATION
6363 MAIN ST
BUFFALO, NY 14221

Facility: LIMESTONE COMPRESSOR STATION
64 PARKSIDE DR
LIMESTONE, NY 14753

Authorized Activity By Standard Industrial Classification Code:
4922 - NATURAL GAS TRANSMISSION
4925 - GAS PRODUCTION/DISTRIBUTION

Mod 0 Permit Effective Date: 08/16/2017

Permit Expiration Date: 08/15/2027

Mod 1 Permit Effective Date: 12/20/2017

Permit Expiration Date: 08/15/2027



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 40 CFR Part 68: Accidental release provisions.
- 2 6 NYCRR 211.1: Air pollution prohibited
- 3 6 NYCRR 231-2.6: Compliance Demonstration

Emission Unit Level

EU=0-0000D

- 4 6 NYCRR 227-1.3 (a): Compliance Demonstration
- 5 40CFR 63.6603(a), Subpart ZZZZ: Compliance Demonstration
- 6 40CFR 63.6625, Subpart ZZZZ: Compliance Demonstration
- 7 40CFR 63.6640(a), Subpart ZZZZ: Compliance Demonstration
- 8 40CFR 63.6655, Subpart ZZZZ: Compliance Demonstration
- 9 40CFR 63.6660, Subpart ZZZZ: Compliance Demonstration

EU=0-0000D,Proc=E04,ES=EMGEN

- 10 40CFR 63, Subpart ZZZZ: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 11 ECL 19-0301: Contaminant List
- 12 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 13 6 NYCRR Subpart 201-5: Emission Unit Definition
- 14 6 NYCRR Subpart 201-5: Compliance Demonstration
- 1-1 6 NYCRR 201-5.1 (a) (1): Compliance Demonstration
- 16 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 17 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 18 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 19 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 20 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

EU=0-0000E

- 21 6 NYCRR 212-2.1: Compliance Demonstration
- 1-2 6 NYCRR 212-2.1 (a): Compliance Demonstration
- 22 6 NYCRR 212-2.1 (a): Compliance Demonstration



FEDERALLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6 NYCRR 200.7

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications,



required to operate such device effectively.

Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Recycling and Salvage - 6 NYCRR 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item G: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: Proof of Eligibility for Sources Defined as Trivial



Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item I: Required Emission Tests - 6 NYCRR 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item K: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item L: Federally Enforceable Requirements - 40 CFR 70.6 (b)



All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Accidental release provisions.
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable Federal Requirement:40 CFR Part 68

Item 1.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 2: Air pollution prohibited
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable Federal Requirement:6 NYCRR 211.1

Item 2.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

New York State Department of Environmental Conservation

Permit ID: 9-0424-00027/00010

Facility DEC ID: 9042400027



Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 3: Compliance Demonstration
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable Federal Requirement:6 NYCRR 231-2.6

Item 3.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

EMISSION REDUCTION CREDIT (ERC)
PERMANENT SHUTDOWN OF SOURCES

(1) On September 20, 1996, the facility permanently removed from service two (2) - Caterpillar Model G353 250 HP natural gas compressors and one (1) Clark Model HRA5 500 HP natural gas compressor. By permanently removing from service emission units 0-0000A (emission point 1), emission unit 0-0000B (emission point 2), and emission unit 0-0000C (emission point 3), the facility generated 30.4 tons per year of oxides of nitrogen emission reduction credits (ERC) and 1.3 tons per year of VOC ERCs.

(2) As a condition of this ERC certification, the discontinuation of the emission units shall be permanent.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

****** Emission Unit Level ******

Condition 4: Compliance Demonstration
Effective between the dates of 08/16/2017 and 08/15/2027



Applicable Federal Requirement:6 NYCRR 227-1.3 (a)

Item 4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000D

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

ENGINE OPACITY REQUIREMENT

(1) No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one six-minute period per hour of not more than 27 percent opacity.

(2) The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Monitoring Frequency: WHEN THE SOURCE IS OPERATING

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: Compliance Demonstration
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable Federal Requirement:40CFR 63.6603(a), Subpart ZZZZ

Item 5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000D

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

AJAX DPC 2804 LE, 800 HP
2-STROKE LEAN-BURN
TABLE 2d OPERATING LIMITS

Operate each existing non-emergency, non-black start, 2 stroke lean burn, stationary RICE located at an area

New York State Department of Environmental Conservation

Permit ID: 9-0424-00027/00010

Facility DEC ID: 904240027



source of HAP emissions with the following maintenance procedures:

- (1) Change oil and filter every 4,320 hours of operation or annually, whichever comes first;
- (2) Inspect spark plugs every 4,320 hours of operation or annually, whichever comes first, and replace as necessary; and
- (3) Inspect all hoses and belts every 4,320 hours of operation or annually, whichever comes first, and replace as necessary.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 6: Compliance Demonstration
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable Federal Requirement:40CFR 63.6625, Subpart ZZZZ

Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000D

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

AJAX DPC 2804 LE, 800 HP
2-STROKE LEAN-BURN
OPERATION AND MAINTENANCE REQUIREMENTS

- (1) Operate and maintain each existing non-emergency, non-black start 2 stroke lean burn stationary RICE located at an area source of HAP emissions and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions; [§63.6625(e)(5)]

- (2) Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed



for appropriate and safe loading of the engine, not to exceed 30 minutes; [§63.6625(h)]

(3) National Fuel Gas has the option of utilizing an oil analysis program in order to extend the specified oil change requirement. [§63.6625(j)]

The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must, at a minimum, analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows:

- (a) Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new;
- (b) Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or
- (c) Percent water content (by volume) is greater than 0.5.

If all of the condemning limits are not exceeded, National Fuel Gas is not required to change the oil. If any of the limits are exceeded, National Fuel Gas must change the oil within 2 days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, National Fuel Gas must change the oil within 2 days or before commencing operation, whichever is later. National Fuel Gas must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 7: Compliance Demonstration
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable Federal Requirement: 40CFR 63.6640(a), Subpart ZZZZ

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000D

Item 7.2:

Compliance Demonstration shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 9-0424-00027/00010

Facility DEC ID: 904240027



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

AJAX DPC 2804 LE, 800 HP
2-STROKE LEAN-BURN
OPERATION AND MAINTENANCE REQUIREMENTS

To demonstrate continuous compliance with work or
management practices

National Fuel Gas must: [§ 63.6640(a), Table 6]

(1) Operate and maintain the stationary RICE according to
the manufacturer's emission-related operation and
maintenance instructions; or

(2) Develop and follow your own maintenance plan which
must provide to the extent practicable for the maintenance
and operation of the engine in a manner consistent with
good air pollution control practice for minimizing
emissions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 8: Compliance Demonstration
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable Federal Requirement:40CFR 63.6655, Subpart ZZZZ

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000D

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

AJAX DPC 2804 LE, 800 HP
2-STROKE LEAN-BURN
RECORDKEEPING

(1) Keep records of the maintenance conducted on the
stationary RICE; [§63.6655(a)(4)]

(2) Records of the occurrence and duration of each

New York State Department of Environmental Conservation

Permit ID: 9-0424-00027/00010

Facility DEC ID: 904240027



malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment; [§63.6655(a)(2)]

(3) Records of actions taken during periods of malfunction to minimize emissions in accordance with § 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 9: Compliance Demonstration
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable Federal Requirement:40CFR 63.6660, Subpart ZZZZ

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000D

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

AJAX DPC 2804 LE, 800 HP
2-STROKE LEAN-BURN
RECORDKEEPING

(1) Keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 10: Compliance Demonstration
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 10.1:

The Compliance Demonstration activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 9-0424-00027/00010

Facility DEC ID: 9042400027



Emission Unit: 0-0000D

Process: E04

Emission Source: EMGEN

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Existing, Natural Gas, 220 HP, Emergency Engine

- (1) Operate and maintain the engine per manufacturer's instructions or owner-developed maintenance plan; [§63.6625(e)]
- (2) Change oil and filter every 500 hours or annually, whichever comes first; [§63.6603(a), Table 2d]. May use oil analysis program specified in §63.6625(j) instead of prescribed oil change frequency;
- (3) Inspect hoses and belts every 500 hours or annually, whichever comes first, and replace as necessary; [§63.6603(a), Table 2d]
- (4) Inspect spark plugs on the natural gas engine every 1,000 hours or annually, whichever comes first, and replace as necessary; [§63.6603(a), Table 2d]
- (5) Install hour meter on each emergency engine [§63.6625(f)] and record hours of operation; [§63.6655(e)]
- (6) Keep records of maintenance; [§63.6655(e)]
- (7) Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes; [§63.6625(h)]
- (8) Notifications not required; [§63.6645(a)(5)]
- (9) Unlimited use for emergencies (e.g., power outage, fire, flood). May operate for 100 hr/yr for maintenance and readiness testing; [§63.6640(f)]

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;

(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.



Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item C: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 11: Contaminant List
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable State Requirement:ECL 19-0301

Item 11.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000071-43-2
Name: BENZENE

CAS No: 000108-88-3
Name: TOLUENE

CAS No: 001330-20-7
Name: XYLENE, M, O & P MIXT.

CAS No: 0NY100-00-0



Name: TOTAL HAP

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0

Name: VOC

Condition 12: Malfunctions and start-up/shutdown activities
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable State Requirement:6 NYCRR 201-1.4

Item 12.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 13: Emission Unit Definition



Effective between the dates of 08/16/2017 and 08/15/2027

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 13.1(From Mod 1):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0000E

Emission Unit Description:

Emission Unit 0-0000E consists of one (1), 20 MMscfd triethylene glycol natural gas dehydration unit and a 0.5 MMBtu/hr reboiler. The dehydrator still emissions are routed to an enclosed ground flare with a reported destruction efficiency of 98 percent. The reboiler burner combustion emissions are emitted to atmosphere.

Item 13.2(From Mod 0):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0000D

Emission Unit Description:

Emission Unit 0-0000D consists of one (1) Ajax Model DPC 2804LE, 800 HP two-stroke lean burn natural gas-fired stationary reciprocating internal combustion compressor engine. The engine is used during the storage, compression and transmission of natural gas. A Cummins G855, 220 HP emergency generator is also included in this emission unit.

Building(s): 01

Condition 14: Compliance Demonstration

Effective between the dates of 08/16/2017 and 08/15/2027

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

NON-APPLICABLE REQUIREMENTS

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

New York State Department of Environmental Conservation

Permit ID: 9-0424-00027/00010

Facility DEC ID: 9042400027



40 CFR PART 60, SUBPART OOOO

Reason: National Fuel Gas Corporation states the facility is not subject to 40CFR60 Subpart OOOO—Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution because no affected sources at the Limestone Compressor Station commenced construction, modification or reconstruction after August 23, 2011.

40 CFR PART 63, SUBPART HH

Reason: National Fuel Gas Corporation states the facility is not subject to 40 CFR Part 63 Subpart HH—National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities because the Limestone Compressor Station is not located between the production well and the point of custody transfer, nor is it located between a well and a natural gas processing plant.

40 CFR PART 63, SUBPART HHH

Reason: National Fuel Gas Corporation states the facility is not subject to 40 CFR 63 Subpart HHH—National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities because the facility's emission rate potential for individual and total hazardous air pollutants (HAPs) does not exceed the major source thresholds of 10 and 25 tons per year, respectively.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-1: Compliance Demonstration
Effective between the dates of 12/20/2017 and 08/15/2027

Applicable State Requirement: 6 NYCRR 201-5.1 (a) (1)

Replaces Condition(s) 15

Item 1-1.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000108-88-3	TOLUENE
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.
CAS No: 0NY100-00-0	TOTAL HAP
CAS No: 0NY998-00-0	VOC

Item 1-1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:



SYNTHETIC MINOR

(1) As specified by 6 NYCRR Part 212, a minimum control efficiency of 90% is required for the triethylene glycol (TEG) dehydration unit. By maintaining the required minimum control efficiency of 90% on the TEG unit, the facility emissions remain below major source thresholds; thus, avoiding Title V applicability and the need to cap or limit facility emissions.

(2) The pre-control and post-control emission rates of the potentially major contaminants from the TEG unit are as follows:

PRE-CONTROL EMISSIONS

Toluene	2.6 lbs/hr or 11 tpy > 10 tpy major threshold
Xylene	8 lbs/hr or 36 tpy > 10 tpy major threshold
Total Hap	13 lbs/hr or 56 tpy > 25 tpy major threshold
Total VOC	71 lbs/hr or 309 tpy > 50 tpy major threshold

POST-CONTROL (90% REQUIRED CONTROL EFFICIENCY)

Toluene	0.26 lbs/hr or 1 tpy < 10 tpy major threshold
Xylene	0.8 lbs/hr or 3.5 tpy < 10 tpy major threshold
Total HAP	1.3 lbs/hr or 5.7 tpy* < 25 tpy major threshold
Total VOC	7.1 lbs/hr or 31 tpy** < 50 tpy major threshold

* For facility total HAP, an additional 2.2 tpy must be added to account for the other sources

** For facility total VOC, an additional 14 tpy must be added to account for the other sources

(3) Maintain records of actual annual emissions based on the most recent performance test. Include emission estimates from any malfunctions or other events that may produce excess emissions. Submit an annual emission summary to the department by January 30 for the previous year to demonstrate total facility emissions have remained below major source thresholds.

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 12 calendar month(s).

New York State Department of Environmental Conservation

Permit ID: 9-0424-00027/00010

Facility DEC ID: 9042400027



Condition 16: Renewal deadlines for state facility permits
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 16.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 17: Compliance Demonstration
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 9
270 Michigan Ave.
Buffalo, NY 14203

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 18: Visible Emissions Limited
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable State Requirement:6 NYCRR 211.2

Item 18.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.



**** Emission Unit Level ****

Condition 19: Emission Point Definition By Emission Unit
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 19.1(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0000D

Emission Point: 00004

Height (ft.): 20

Diameter (in.): 17

NYTMN (km.): 4662.4

NYTME (km.): 198.4

Building: 01

Item 19.2(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0000E

Emission Point: 00005

Height (ft.): 20

Diameter (in.): 36

NYTMN (km.): 4662.373

NYTME (km.): 198.427

Condition 20: Process Definition By Emission Unit
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 20.1(From Mod 1):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0000E

Process: DEH

Process Description:

Process DEH includes operation of a 20 MMscfd triethylene glycol natural gas dehydration unit and a 0.5 MMBtu/hr reboiler. The dehydrator still emissions are routed to an enclosed ground flare with a reported destruction efficiency of 98 percent. The reboiler burner combustion emissions are vented to atmosphere.

Emission Source/Control: C0001 - Control

Control Type: FLARING

Emission Source/Control: DEH01 - Process

Design Capacity: 20 million standard cubic feet per day

Emission Source/Control: REBL1 - Process

New York State Department of Environmental Conservation

Permit ID: 9-0424-00027/00010

Facility DEC ID: 9042400027



Item 20.2(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0000D

Process: E04

Source Classification Code: 2-03-002-01

Process Description:

Process 0-0000D includes the operation of one (1) Ajax Model DPC 2804LE, 800 HP two-stroke lean burn natural gas-fired stationary reciprocating internal combustion compressor engine and a Cummins 220 HP emergency generator. Each engine is subject to 40CFR63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Emission Source/Control: EMGEN - Combustion

Design Capacity: 220 horsepower (mechanical)

Emission Source/Control: ENG04 - Combustion

Design Capacity: 800 horsepower (mechanical)

Condition 21: Compliance Demonstration

Effective between the dates of 08/16/2017 and 08/15/2027

Applicable State Requirement:6 NYCRR 212-2.1

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000E

Regulated Contaminant(s):

CAS No: 000071-43-2 BENZENE

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

PART 212 EVALUATION
DEHYDRATON UNIT

(1) The 20 MMscf/day triethylene glycol (TEG) dehydration unit is subject to 6NYCRR Part 212.

(2) The TEG unit emits, benzene, a High Toxicity Air Contaminant (HTAC) listed in Section 212-2.2 Table 2. Prior to control, the benzene Potential to Emit (PTE) is 0.88 lbs/hr or 7,700 lbs/yr exceeding the mass emission limit of 100 lbs/yr.



(3) The facility owner or operator shall either limit the actual annual HTAC emissions from all process operations at the facility so as to not exceed the mass emission limit listed for the individual HTAC; or demonstrate compliance with the air cleaning requirements for the HTAC as specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants, of this Part for the environmental rating assigned to the contaminant by the department.

(4) As per Table 4, benzene is an A-rated contaminant requiring a minimum 90% control.

(5) The facility maintains compliance with the control requirements by continuously operating an enclosed ground flare with a reported destruction efficiency of 98 percent.

Parameter Monitored: BENZENE

Lower Permit Limit: 90 percent degree of air cleaning or greater

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-2: Compliance Demonstration
Effective between the dates of 12/20/2017 and 08/15/2027

Applicable State Requirement: 6 NYCRR 212-2.1 (a)

Replaces Condition(s) 23

Item 1-2.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000E

Regulated Contaminant(s):
CAS No: 000071-43-2 BENZENE

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

DEMONSTRATING CONTINUOUS COMPLIANCE
ENCLOSED GROUND FLARE OPERATION

New York State Department of Environmental Conservation

Permit ID: 9-0424-00027/00010

Facility DEC ID: 9042400027



- (1) The enclosed ground flare shall be operated at all times when gases, vapors, and fumes are vented from the glycol dehydration unit to the control device.
- (2) The actual annual average natural gas throughput (in terms of natural gas flowrate to the glycol dehydration unit per day) shall be maintained.
- (3) A device equipped with a continuous recorder to measure the combustion zone temperature of the enclosed ground flare shall be installed, calibrated, operated, and maintained.
- (4) A minimum combustion zone temperature of 1,450 degrees Fahrenheit shall be maintained.
- (5) The combustion zone temperature shall be monitored and data collected at all times the affected source is operating, except for malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments).
- (6) Records of all inspection and monitoring data shall be maintained in a form suitable and readily available for expeditious review.
- (7) Records of each malfunction of the enclosed ground flare and temperature monitoring equipment shall be maintained. The records shall include the occurrence and duration of each malfunction and the actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning air pollution control, or monitoring equipment to its normal or usual manner of operation.
- (8) Records shall be kept for 5 years following the date of each recorded action.
- (9) An annual deviation report shall be submitted to the department by January 30 for the previous year. The report shall document the times and durations of each malfunction, an estimate of excess emissions and identify the corrective actions taken.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1450 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

New York State Department of Environmental Conservation

Permit ID: 9-0424-00027/00010

Facility DEC ID: 9042400027



The initial report is due 1/30/2018.
Subsequent reports are due every 12 calendar month(s).

Condition 22: Compliance Demonstration
Effective between the dates of 08/16/2017 and 08/15/2027

Applicable State Requirement: 6 NYCRR 212-2.1 (a)

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0000E

Regulated Contaminant(s):

CAS No: 000071-43-2 BENZENE

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

ENCLOSED GROUND FLARE
ROUTINE PERFORMANCE TESTING
DEMONSTRATE MINIMUM COMBUSTION ZONE TEMPERATURE

(1) A performance test to demonstrate compliance with the required minimum 90 percent control efficiency of the enclosed ground flare must be completed within one year upon issuance of the Air State Renewal permit.

(2) By maintaining the required minimum control efficiency of 90% on the benzene emissions from the glycol dehydration and reboiler unit, the facility satisfies the requirement specified in Subdivision 212-2.3(b), Table 4. In addition, the 90% reduction in emissions ensures the facility remains below major source thresholds. Thus, avoiding Title V applicability and the need to cap or limit toluene, xylene, Total Hap and Total VOC emissions.

(3) The performance test shall demonstrate the enclosed combustion device reduces the mass content of either benzene, TOC or total HAP in the gases vented to the device by 90.0 percent by weight or greater. The performance test shall use either Method 18, 40 CFR part 60, appendix A, or Method 25A, 40 CFR part 60, appendix A, or another method approved by the Department.

(4) The performance test must be conducted at the maximum normal operating process load.

New York State Department of Environmental Conservation

Permit ID: 9-0424-00027/00010

Facility DEC ID: 9042400027



(5) The performance test must demonstrate the minimum combustion zone temperature of 1,450 degrees Fahrenheit is achieved.

(6) A performance test protocol shall be submitted to the Department for approval at least 60 days prior to completion of the test. The Department must be notified 10 days prior to the scheduled test date so a Department representative may be present during the test.

(7) The results of the performance test shall be submitted to the Department within 60 days following completion of the performance test.

(8) Subsequent performance test requirements will be at the discretion of the Department based on design, operation and maintenance practices used to minimize the impact of excess emissions on ambient air quality, the environment and human health.

Parameter Monitored: BENZENE

Lower Permit Limit: 90 percent degree of air cleaning or greater

Reference Test Method: as approved by the department

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION