

PERMIT Under the Environmental Conservation Law (ECL)

		onder the Environmental Conserv	vation Law (ECL)	
		IDENTIFICATION INFORMA	ATION	
Permit Type: Permit ID:	Air State Faci 9-0466-00050 Mod 0 Effect		e: 04/23/2024	
	Mod 1 Effects	ive Date: 05/14/2019 Expiration Date	e: 04/23/2024	
	Mod 2 Effects	ive Date: 01/20/2021 Expiration Date	e: 04/23/2024	
Permit Issued	To:EASTER 925 White (Bridgeport,		DRAGE INC	
Facility:	QUINLAN 554 HOSTA OLEAN, N			
Contact:	Gary Comerford 5000 Dominion Blvd Glen Allen, VA 23060-3308 (804) 273-2531			
Description:				
compliance w	ith the ECL, a	it, the permittee agrees that the permit all applicable regulations, the General d as part of this permit.		ın
Permit Admir	nistrator:	CHARLES D CRANSTON NYSDEC - ALLEGANY SUBOI 182 E UNION ST STE 3 ALLEGANY, NY 14706	FFICE	
Authorized S	ignature:		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.



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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 1-1: Applications for permit renewals, modifications and transfers Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:

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.

Item1-1.2:

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

Item 1-1.3

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.

Division of Air Resources



Facility DEC ID: 9046600050

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 expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for 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: Permit modifications, suspensions or revocations by the Department Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

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

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator Region 9 Headquarters Division of Environmental Permits 270 Michigan Avenue Buffalo, NY 14203-2915

Division of Air Resources



Facility DEC ID: 9046600050

(716) 851-7165



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:EASTERN GAS TRANSMISSION AND STORAGE INC 925 White Oak Blvd
Bridgeport, WV 26330

Facility: QUINLAN COMPRESSOR STATION

554 HOSTAGEH RD OLEAN, NY 14760

Authorized Activity By Standard Industrial Classification Code:

None Listed On Application

Mod 0 Permit Effective Date: 04/24/2014 Permit Expiration Date: 04/23/2024

Mod 1 Permit Effective Date: 05/14/2019 Permit Expiration Date: 04/23/2024

Mod 2 Permit Effective Date: 01/20/2021 Permit Expiration Date: 04/23/2024



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NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

Renewal 1/Mod 2/FINAL

**** 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)



Permit ID: 9-0466-00050/00001 Facility DEC ID: 9046600050

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: Maintenance of Equipment

Effective between the dates of 04/24/2014 and 04/23/2024

Applicable Federal Requirement: 6 NYCRR 200.7

Item 1.1:

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.

Condition 2: Non Applicable requirements

Effective between the dates of 04/24/2014 and 04/23/2024

Applicable Federal Requirement: 6 NYCRR 201-6.4 (g)

Item 2.1:

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.

40 CFR Part 63, Subpart HH

Reason: The Quinlan Compressor Station is not subject to 40CFR63 Subpart HH – National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. As per 40CFR63.760(d), the facility does not contain a triethylene glycol (TEG) dehydration unit and, therefore, is not subject to this subpart.

40 CFR Part 63, Subpart HHH

Reason: The Quinlan Compressor Station is not subject to 40CFR63 Subpart HHH – National Emission Standards for Hazardous Air Pollutants (HAP) From Natural Gas



Permit ID: 9-0466-00050/00001 Facility DEC ID: 9046600050

Transmission and Storage Facilities. As per 40CFR63.1270(c), the facility does not contain a triethylene glycol (TEG) dehydration unit and, therefore, is not subject to this subpart. In addition, this facility is not a major source of HAP emissions.

Condition 3: Facility Permissible Emissions
Effective between the dates of 04/24/2014 and 04/23/2024

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Applicaton Specific Data

Condition 1-1: Capping Monitoring Condition

Effective between the dates of 05/14/2019 and 04/23/2024

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Replaces Condition(s) 5

Item 1-1.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 201-6.1 (a) (1)

Item 1-1.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-1.3:

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.

Item 1-1.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-1.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.



Item 1-1.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000630-08-0

CARBON MONOXIDE

Item 1-1.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

CARBON MONOXIDE FACILITY EMISSION CAP

- (1) To avoid applicability to Title V permitting under 6NYCRR Part 201-6, facility-wide emissions of Carbon Monoxide are limited to less than 99 tons per year (tpy).
- (2) The facility ensures compliance with this emission limit by operating the two-2,370 brake horsepower internal combustion engines using catalytic oxidizers. Additionally, the 814 brake horsepower emergency generator is limited to operating 1,000 hours per year.
- (3) The facility carbon monoxide emissions while operating with the catalytic oxidizer are approximately 17 tpy if operated for 8,760 hours per year and 1 tpy under actual operating conditions. If the units are run without the catalytic oxidizers for 8,760 hours per year, the emission rate potential for carbon monoxide would be 125 tpy.
- (4) The facility shall submit an annual capping compliance report to the Department certifying the facility has operated within the limit imposed by this cap. For informational purposes, the emission factors used for the facility emission sources are as follows:

Carbon Monoxide Emission Factors

Engine 1 =based on most recent portable emission test report

Engine 2 = based on most recent portable emission test report

Emergency generator = 1.9 g/bhp-hr

Boiler 1 = 84 lb/MMcf

Heater 1 = 84 lb/MMcf

Heater 2 = 84 lb/MMcf



Permit ID: 9-0466-00050/00001 Facility DEC ID: 9046600050

Parameter Monitored: CARBON MONOXIDE

Upper Permit Limit: 99 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -

SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

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

Condition 1-2: Capping Monitoring Condition Effective between the dates of 05/14/2019 and 04/23/2024

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Replaces Condition(s) 4

Item 1-2.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 201-6.1 (a) (1)

Item 1-2.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-2.3:

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.

Item 1-2.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-2.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-2.6:

The Compliance Demonstration activity will be performed for the Facility.



Permit ID: 9-0466-00050/00001 Facility DEC ID: 9046600050

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

Item 1-2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

FORMALDEHYDE FACILITY EMISSION CAP

- (1) To avoid applicability to Title V permitting under 6NYCRR Part 201-6, facility-wide emissions of formaldehyde are limited to less than 9.5 tons per year.
- (2) The facility ensures compliance with this emission limit by operating the two-2,370 brake horsepower internal combustion engines with catalytic oxidizers. Additionally, the 814 brake horsepower emergency generator is limited to operating 1,000 hours per year.
- (3) The facility formaldehyde emissions while operating with catalytic oxidizers are approximately 7 tpy if operated for 8,760 hours per year and 0.3 tpy under actual operating conditions. If the units are run without the catalytic oxidizers for 8,760 hours per year, the emission rate potential for formaldehyde would be 22 tpy.
- (4) The facility shall submit an annual capping compliance report to the Department certifying the facility has operated within the limit imposed by this cap. For informational purposes, the emission factors used for the facility emission sources are as follows:

Formaldehyde Emission Factors

Engine 1 = 0.48 g/bhp-hr X (1-0.70) reduction from

oxidizer

Engine 2 = 0.48 g/bhp-hr X (1-0.70) reduction from

oxidizer

Emergency generator = 0.02 g/bhp-hr (no oxidizer)

Boiler 1 = 7.50E-02 lb/MMcf

Heater 1 = 7.50E-02 lb/MMcf

Heater 2 = 7.50E-02 lb/MMcf

Parameter Monitored: FORMALDEHYDE Upper Permit Limit: 9.5 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -



Permit ID: 9-0466-00050/00001 Facility DEC ID: 9046600050

SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

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

Condition 21: Visible Emissions Limited Effective between the dates of 04/24/2014 and 04/23/2024

Applicable Federal Requirement: 6 NYCRR 211.2

Item 21.1:

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.

Condition 7: Compliance Demonstration Effective between the dates of 04/24/2014 and 04/23/2024

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

Item 7.1:

The Compliance Demonstration activity will be performed for the facility: The Compliance Demonstration applies to:

Emission Unit: 1-ICENG

Emission Unit: 2-AUXGN

Emission Unit: 3-HEATR

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 7.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

- (1) No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one-6-minute period per hour of not more than 27 percent opacity. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.
- (2) The facility shall conduct observations of visible emissions on a routine basis while the combustion sources



are in operation.

- (3) The facility shall investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard. The facility shall investigate the cause, make any necessary corrections, and verify that the excess visible emission problem has been corrected.
- (4) Records of any excess visible emission observations, investigations, and corrective actions shall be maintained for a period of 5 years and be made available upon request.

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 8: Compliance Demonstration

Effective between the dates of 04/24/2014 and 04/23/2024

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

Item 8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

No later than October 19, 2013, compliance with the following maintenance procedures must be completed for the natural gas fired engines as follows:

TWO - 2,370 HP CATERPILLAR COMPRESSOR ENGINES

- (1) Change oil and filter every 2,160 hours of operation or annually, whichever comes first;
- (2) Inspect spark plugs every 2,160 hours of operation or annually, whichever comes first;
- (3) Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary; and
- (4) Evaluate the remote status of the stationary RICE every 12 months. Keep records of the initial and annual evaluation of the remote status of the engine. If the evaluation indicates that the stationary RICE no longer meets the definition of remote stationary RICE in §



63.6675, then you must comply with all of the requirements for existing non-emergency SI 4SLB stationary RICE with a site rating of more than 500 HP located at area sources of HAP that are not remote stationary RICE, within 1 year of the evaluation.

ONE - 814 HP CATERPILLAR EMERGENCY GENERATOR

- (1) Change oil and filter every 500 hours of operation or annually, whichever comes first;
- (2) Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; and
- (3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The facility has the option to utilize an oil analysis program as described in the permit condition for 40 CFR 63.6625 in order to extend the specified oil change requirement provided above.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 9: Compliance Demonstration Effective between the dates of 04/24/2014 and 04/23/2024

Applicable Federal Requirement: 40CFR 63.6625, Subpart ZZZZ

Item 9.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

No later than October 19, 2013, the following monitoring, installation, collection, operation, and maintenance requirements are required on the two-Caterpillar 2,370 HP engines and the one-Caterpillar 814 hp emergency generator:

(1) Operate and maintain the stationary RICE 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.



- (2) Install a non-resettable hour meter if one is not already installed on the 814 hp emergency generator.
- (3) 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, after which time the emission standards applicable to all times other than startup in Table 2d to this subpart apply.
- (4) Utilize an oil analysis program in order to extend the specified oil change requirement in 40 CFR 63.6602, if desired. 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.
- (5) If all of the condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator 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, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator 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 10: Compliance Demonstration

Effective between the dates of 04/24/2014 and 04/23/2024

Applicable Federal Requirement: 40CFR 63.6655, Subpart ZZZZ

Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.



Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

No later than October 19, 2013, the following records shall be maintained for the two-Caterpillar 2,370 HP engines and the one-Caterpillar 814 hp emergency generator:

- (1) Records of the maintenance conducted on each RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or your own maintenance plan;
- (2) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 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.
- (3) Records of the hours of operation of the emergency engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.
- (4) Maintain records in readily accessible hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report or record.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**** Emission Unit Level ****

Condition 1-3: Capping Monitoring Condition Effective between the dates of 05/14/2019 and 04/23/2024

Applicable Federal Requirement: 6 NYCRR Subpart 201-7



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Replaces Condition(s) 12

Item 1-3.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 201-6.1 (a) (1)

Item 1-3.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-3.3:

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.

Item 1-3.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-3.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-3.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-ICENG

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

Item 1-3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

(1) Catalytic oxidizers must be maintained and operated on the two-2,370 hp internal combustion engines in such a manner to reduce carbon monoxide emissions by at least 93 percent and formaldehyde emissions by a minimum of 70%.



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EPA has determined that carbon monoxide can be used as an appropriate surrogate for formaldehyde. As such, there is not a requirement to test for formaldehyde.

- (2) The carbon monoxide emissions from the inlet and outlet of the catalytic oxidizer shall be tested from each engine using a portable analyzer for carbon monoxide measurement and EPA Method 19 for determining exhaust mass flow to demonstrate the required percent reduction of carbon monoxide is achieved.
- (3) The test shall be completed on an annual basis at full available load. The test cannot be completed during periods of startup, shutdown or malfunction. A test report must be submitted 30 days after the test is completed. The test report shall contain engine operating data, calibration results, emission data and calculations.

Parameter Monitored: CARBON MONOXIDE

Lower Permit Limit: 93 percent degree of air cleaning or

greater

Reference Test Method: EPA Method 19 Monitoring Frequency: ANNUALLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED

VALUE AT ANY TIME

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 11: Capping Monitoring Condition

Effective between the dates of 04/24/2014 and 04/23/2024

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 11.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

Item 11.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 11.3:

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.



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Item 11.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 11.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 11.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-ICENG

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE CAS No: 000630-08-0 CARBON MONOXIDE

Item 11.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: MONITORING OF PROCESS OR CONTROL

DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

- (1) Continuous compliance with the carbon monoxide and formaldehyde emission limits shall be demonstrated by maintaining the catalyst inlet temperature between 450 degrees Fahrenheit and 1,350 degrees Fahrenheit.
- (2) A continuous temperature monitor and recording device for the measurement of inlet temperature to the catalytic oxidizer shall be maintained and operated at all times when the engines are operating except during start-up, shutdown, routine maintenance activities or malfunction. The temperature monitor and recorder must be maintained in accordance with the manufacturer recommendations.
- (3) Appropriate corrective action must be taken (e.g., repairs, catalyst cleaning, catalyst replacement) as soon as practical when catalyst inlet temperatures deviate from the required range. Details of each occurrence shall be recorded including the cause of the problem, duration, and corrective action.
- (4) The records shall be maintained for a period of five



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years and made available to the Department upon request.

Parameter Monitored: TEMPERATURE Lower Permit Limit: 450 degrees Fahrenheit Upper Permit Limit: 1350 degrees Fahrenheit

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED

RANGE EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 13: Capping Monitoring Condition Effective between the dates of 04/24/2014 and 04/23/2024

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 13.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 201-6.1 (a) (1)

Item 13.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 13.3:

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.

Item 13.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 13.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 13.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-AUXGN



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Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

Item 13.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

- (1) The hours of operation of the emergency generator are limited to 1,000 hours per each 12-month rolling period.
- (2) The hours of operation shall be recorded on a monthly basis.
- (3) The rolling 12-month total shall be calculated at the end of each calendar 12 month period.
- (4) The facility shall submit an annual capping compliance certification by January 30 of each year.
- (5) The operating log shall be available on site and furnished upon request.

Work Practice Type: HOURS PER YEAR OPERATION

Upper Permit Limit: 1000 hours per year Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

Condition 14: Compliance Demonstration Effective between the dates of 04/24/2014 and 04/23/2024

Applicable Federal Requirement:40CFR 60.48c(g), NSPS Subpart Dc

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-HEATR

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 14.2:

Compliance Demonstration shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

- (1) Record the amount of fuel combusted in the 12.2 mmBtu/hr boiler on a monthly basis. These records must be maintained for two years.
- (2) Semi-annual reporting is not required for this source.

Monitoring Frequency: MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Compliance Demonstration Effective between the dates of 04/24/2014 and 04/23/2024

Applicable Federal Requirement: 6 NYCRR 200.7

Item 15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-DEHYD

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

- (1) The pressure relief valves shall be equipped with a device to monitor and track the operation of the automatic relief valve(s). For each occurrence where the monitor indicates operation of the automatic relief valve, an entry shall be made in the log with the following information: if operation of the valve occurred or if occurrence was monitor error, date and time that the valve opened, operational cause for operation of the automatic valve, estimated duration of valve operation and emissions, and date of valve inspection to insure proper seating.
- (2) Records shall be maintained on-site for a period of 5 years and made available during working hours to representatives of Department.
- (3) If the manual valve is opened all recording requirements noted in the preceding paragraph shall apply to such a valve.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



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DESCRIPTION Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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 16: Contaminant List

Effective between the dates of 04/24/2014 and 04/23/2024

Applicable State Requirement: ECL 19-0301

Item 16.1:

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

CAS No: 000050-00-0 Name: FORMALDEHYDE

CAS No: 000630-08-0

Name: CARBON MONOXIDE

CAS No: 007446-09-5 Name: SULFUR DIOXIDE

CAS No: 0NY075-00-0



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Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC

Condition 17: Malfunctions and start-up/shutdown activities
Effective between the dates of 04/24/2014 and 04/23/2024

Applicable State Requirement: 6 NYCRR 201-1.4

Item 17.1:

- (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 18: Emission Unit Definition
Effective between the dates of 04/24/2014 and 04/23/2024

Applicable State Requirement: 6 NYCRR Subpart 201-5



Item 18.1(From Mod 1):

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

Emission Unit: 1-ICENG Emission Unit Description:

Emission Unit 1-ICENG consists of two (2) 2,370 hp reciprocating internal combustion engines (ENG01 & ENG02) manufactured by Caterpillar, Model G3608LE. The engines are utilized to compress natural gas for transportation along the pipeline during the withdrawal cycle, and to inject gas into the storage wells during the injection cycle. The emission unit is comprised of two (2) emission sources, two (2) emission control devices, and two (2) emission points.

Building(s): COMPRESSOR

Item 18.2(From Mod 0):

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

Emission Unit: 2-AUXGN

Emission Unit Description:

Emission Unit 2-AUXGN consists of an 814 bhp auxiliary generator (GEN01), Caterpillar Model 3512, used for backup power supply. The emission unit is comprised of one (1) emission source and one (1) emission point. This emission source does not utilize emission control equipment.

Building(s): AUXILIARY

Item 18.3(From Mod 0):

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

Emission Unit: 3-HEATR Emission Unit Description:

Emission Unit 3-HEATR consists of one 12.2 million Btu per hour (mmBtu/hr) heater (HTR01) and one 7.5 mmBtu/hr heater (HTR02) used to heat the gas as needed during the withdrawal cycle. The emission unit is comprised of two (2) emission sources and two (2) emission points. This emission source does not utilize emission control equipment.

Building(s): OUTSIDE

Item 18.4(From Mod 0):

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

Emission Unit: 4-DEHYD

Emission Unit Description:

Emission Unit 4-DEHYD consists of a separation system (SEP01), a dehydration system (DEH01), a separation tank (SEPTK), and two (2) regeneration storage tanks (REGTK and RGTK2). The emission unit is comprised of five (5) emission sources, one (1) emission control device, and two



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(2) emission points.

The two emission points include the pressure relief vents for the dehydrator and the condensate tank manual blowdown vent. The pressure relief vents are only expected to generate emissions during a malfunction situation.

Building(s): OUTSIDE

Condition 19: Renewal deadlines for state facility permits Effective between the dates of 04/24/2014 and 04/23/2024

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

Item 19.1:

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 20: Compliance Demonstration Effective between the dates of 04/24/2014 and 04/23/2024

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

Item 20.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 20.2:

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 1/30/2015. Subsequent reports are due every 12 calendar month(s).

Condition 6: Air pollution prohibited

Effective between the dates of 04/24/2014 and 04/23/2024

Applicable State Requirement: 6 NYCRR 211.1



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Item 6.1:

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. 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.

**** Emission Unit Level ****

Condition 22: Emission Point Definition By Emission Unit Effective between the dates of 04/24/2014 and 04/23/2024

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 22.1(From Mod 0):

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

Emission Unit: 1-ICENG

Emission Point: ICEO1

Height (ft.): 43 Diameter (in.): 28

NYTMN (km.): 4657.5 NYTME (km.): 213.2 Building:

COMPRESSOR

Emission Point: ICEO2

Height (ft.): 43 Diameter (in.): 28

NYTMN (km.): 4657.5 NYTME (km.): 213.2 Building:

COMPRESSOR

Item 22.2(From Mod 0):

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

Emission Unit: 2-AUXGN

Emission Point: AUX01

Height (ft.): 25 Diameter (in.): 10

NYTMN (km.): 4657.5 NYTME (km.): 213.2 Building: AUXILIARY

Item 22.3(From Mod 0):

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

Emission Unit: 3-HEATR

Emission Point: HTR01

Height (ft.): 33 Diameter (in.): 30

NYTMN (km.): 4657.5 NYTME (km.): 213.2 Building: OUTSIDE

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Emission Point: HTR02

Height (ft.): 0 Diameter (in.): 8

NYTMN (km.): 4657.5 NYTME (km.): 213.2 Building: OUTSIDE

Item 22.4(From Mod 0):

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

Emission Unit: 4-DEHYD

Emission Point: RELV1

Height (ft.): Length (in.): Width (in.):

NYTMN (km.): 4657.5 NYTME (km.): 213.2 Building:

COMPRESSOR

Emission Point: RELV2

Height (ft.): Length (in.): Width (in.):

NYTMN (km.): 4657.5 NYTME (km.): 213.2 Building:

COMPRESSOR

Condition 23: Process Definition By Emission Unit

Effective between the dates of 04/24/2014 and 04/23/2024

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 23.1(From Mod 1):

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

Emission Unit: 1-ICENG

Process: 101 Source Classification Code: 2-02-001-05

Process Description:

Process 101 includes two (2) 2,370 HP natural gas fired reciprocating internal combustion engines (RICE) equipped with catalytic oxidizers for carbon monoxide and formaldehyde control. The engines are used to compress natural gas for transportation along the pipeline in the withdrawal cycle and to inject gas into the storage wells during the injection cycle. Each engine was manufactured prior to 2007 and is subject to the RICE rules of 40 CFR 63 Subpart ZZZZ. The control efficiency of the catalytic oxidizers is monitored annually.

ENG01: Caterpillar G3608LE, Serial No. = BEN00268,

Manufactured 3/15/2005

ENG02: Caterpillar G3608LE, Serial No. = BEN00270,

Manufactured 3/17/2005

Emission Source/Control: ENG01 - Combustion Design Capacity: 2,370 horsepower (mechanical)

Emission Source/Control: ENG02 - Combustion Design Capacity: 2,370 horsepower (mechanical)



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Emission Source/Control: OXID1 - Control Control Type: CATALYTIC OXIDATION

Emission Source/Control: OXID2 - Control Control Type: CATALYTIC OXIDATION

Item 23.2(From Mod 0):

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

Emission Unit: 2-AUXGN

Process: 201 Source Classification Code: 3-13-999-99

Process Description:

Process 201 includes one 814 bhp auxiliary generator used for backup power supply. The emergency natural gas fired engine is limited to 1,000 operating hours per year. The engine was manufactured prior to 2007 and is subject to the RICE rules of 40 CFR 63 Subpart ZZZZ.

GEN01: Caterpillar G3512LE, Serial No. = CTM0039, Manufactured = 11/1/2005

Emission Source/Control: GEN01 - Combustion Design Capacity: 814 horsepower (mechanical)

Item 23.3(From Mod 0):

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

Emission Unit: 3-HEATR

Process: 301 Source Classification Code: 1-05-001-06

Process Description:

Process 301 includes one 12.2 million Btu per hour (mmBtu/hr) heater and one 7.5 mmBtu/hr heater used to heat the gas as necessary during the withdrawal cycle. The 12.2 mmBtu/hr boiler is subject to 40 CFR 60 Subpart Dc which requires recording the amount of fuel combusted on a monthly basis. These records must be maintained for two years. Semi-annual reporting is not required for this source.

Emission Source/Control: HTR01 - Combustion Design Capacity: 12.2 million Btu per hour

Emission Source/Control: HTR02 - Combustion Design Capacity: 7.5 million Btu per hour

Item 23.4(From Mod 0):

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

Emission Unit: 4-DEHYD

Process: 401 Source Classification Code: 3-01-100-05

Process Description:

Process 401 includes a separation system and a



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dehydration system. The dehydration system is a desiccant bead unit and is not a glycol dehydration unit. Therefore, 40 CFR 63 Subpart HH and HHH do not apply to this process. The system includes a vapor reclaim system to capture emissions from the storage tanks and recycle the vapor and excess gas back into the system. More specifically, the dehydration system causes liquids, including condensable VOCs, to be adsorbed on the desiccant media. When the desiccant is regenerated, the accumulated liquids are transferred into two 30,000 gallon pressurized storage vessels. The recovered liquid is removed off site for disposal. Any gases that flash off from the storage vessels during transfer are contained and injected back into the natural gas transmission pipeline for distribution with the natural gas.

The permit requires monitoring, recordkeeping and reporting of the pressure relief valves associated with the two-30,000 gallon pressurized storage vessels. Quinlan must record each instance that the relief valves are opened and gases are vented to the atmosphere.

Emission Source/Control: DEH01 - Process

Emission Source/Control: REGTK - Process

Design Capacity: 30,000 gallons

Emission Source/Control: RGTK2 - Process

Design Capacity: 30,000 gallons

Emission Source/Control: SEP01 - Process

Emission Source/Control: SEPTK - Process



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