

**LAUREL MOUNTAIN MIDSTREAM, LLC**  
**Springhill Compressor Station**  
**General Permit BAQ-GPA/GP-5 Permit Application**

## RULE APPLICABILITY ANALYSIS - NESHAP ZZZZ

TITLE 40 PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS  
**Subpart ZZZZ—Stationary Reciprocating Internal Combustion Engines (RICE)**

No.	HP	Make/Model	Type	Serial Number	Control	Construction Date	Affected?
2	1,340	CAT G3516LE	4SLB	4EK05095	None	After 06/12/06	JJJJ Only
3	1,340	CAT G3516LE	4SLB	4EK04913	OxCat	Before 06/12/06	<b>YES</b>

Citation	Requirement (Limited to: Stationary RICE, HP>25, Area Source of HAP Emissions)	Applies to	
		2	3
§63.6585 (Applicability)	(b) A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year.	N	N
	(c) An area source of HAP emissions is a source that is not a major source.	Y	Y
	(d) Being subject to NESHAP ZZZZ does not, by itself, subject the source to Title V Operating Permits under 40 CFR part 71.	Y	Y
§63.6590 (Affected Sources)	(a) An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions.	Y	Y
	(1) Existing stationary RICE.	N	Y
	(iii) Stationary RICE at an area source of HAP emissions is "existing" if construction or reconstruction commenced before 06/12/06.	N	Y
	(2) New stationary RICE.	Y	N
	(iii) Stationary RICE located at an area source of HAP emissions is "new" if construction of the stationary RICE commenced on or after 06/12/06.	Y	N
	(3) Reconstructed stationary RICE.	N	N
	(iii) Stationary RICE at an area source of HAP emissions is "reconstructed" if reconstruction commenced on or after 06/12/2006.	N	N
	(b) Stationary RICE subject to limited requirements.	N	N
(c) Stationary RICE subject to Regulations under 40 CFR Part 60.	Y	N	
(1) RICE that is new or reconstructed and located at an area source of HAP emissions must meet requirements of this part by meeting the requirements of 40 CFR part 60 subpart JJJJ (NSPS JJJJ) for Spark Ignition Internal Combustion Engines. <u>No further requirements apply for such engines under this part.</u>	Y	N	
§63.6595 (Compliance Requirements)	(a) Affected sources.	na	Y
	(1) Existing spark ignition (SI) stationary RICE located at an area source of HAP emissions must comply with the applicable emission limitations and operating limitations no later than 10/19/13.	na	Y
§63.6603 (Emission and Operating Limitations)	(a) Existing stationary RICE at an area source of HAP emissions must comply with Table 2b and Table 2d.	na	Y
	Table 2b - 4SLB RICE HP>500 HP. (see Attached)	na	Y
	Table 2d.7 - 4SLB RICE HP≤500: a. Change oil and oil filter every 1,440 hrs or annually, b. Inspect spark plugs every 1,440 hrs or annually, and c. Inspect belts and hoses every 1,440 hrs or annually. [Also: Operate and maintain SI RICE in a manner consistent with safety and good air pollution control practices; and maintain records of maintenance.]	na	N

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(Continued)

<b>Emission and Operating Limitations</b> <b>Existing, Non-Emergency, 4SLB, SI RICE, bhp&gt;500</b>
1) Comply with emission limits: a) Concentration of CO $\leq 47$ ppmvd; <u>or</u> b) Reduce CO emissions by $\geq 93\%$ .
2) Conduct initial performance test prior to 04/17/14.
3) Conduct subsequent performance tests every 8,760 hrs or 3 yrs, whichever comes first.
4) Comply with performance test requirements: a) For CO concentration limits ( $\leq 47$ ppmvd) use EPA Test Methods. b) For CO reduction limits ( $\geq 93\%$ ) use a portable analyzer. c) Conduct three separate test runs for each performance test. d) Each test run must last at least 1 hour.
5) Comply with operating limits: a) If OxCat is used: i) Maintain pressure drop across the catalyst $\pm 2$ inches of water. ii) Maintain temperature at catalyst inlet $450 \leq F \leq 1350$ . b) If OxCat is not used: i) Petition the Administrator for operating limits. ii) Comply with operating limits approved by the Administrator.
6) Comply with work or management practices: a) Operating and maintaining SI RICE according to manufacturer's instructions; or b) Develop and follow owner-operator developed maintenance plan.
7) Demonstrate continuous compliance: a) Install a CEMS and/or CPMS. b) Record pressure drop, temperature, and/or other parameters. c) Monitor continuously at all times that the engine is operating. d) Conduct an annual RATA. e) Conduct daily and periodic data quality checks.
8) Notifications: a) Submit initial notification on or before 07/16/08. b) Submit notification of intent to conduct performance test at least 60 days prior to test. c) Submit notification of compliance status, including the performance test results, on or before the 60th day following a performance test.
9) Reports: a) Semiannual compliance reports covering the periods from 01/01 through 06/30 and from 07/01 through 12/31, and be postmarked or delivered no later than 07/31 or 01/31. b) Semiannual compliance report must contain: i) Company name and address. ii) Statement by a responsible official, certifying the accuracy of the content of the report. iii) Date of report, and beginning and ending dates of the reporting period. iv) Identification of each parameter and pollutant (CO or formaldehyde) monitored. v) Description of the SI RICE. vi) Description of the CPMS and/or CEMS. vii) Date of the latest CPMS/CEMS certification or audit. viii) Description of any changes in processes or controls since the last report.

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**RULE APPLICABILITY ANALYSIS - NESHAP ZZZZ**

(Continued)

**Continued - Emission and Operating Limitations**  
**Existing, Non-Emergency, 4SLB, SI RICE, bhp>500**

9) Reports (Continued): b) Semiannual compliance report must contain: (Continued) ix) If deviations or malfunctions occurred during the reporting period: (1) Description of each deviation. (2) Date and time that each deviation/malfunction started and stopped. (3) Total duration of deviation/malfunction and percent of total operating time. (4) Breakdown of equipment problems, process problems, or other causes. (5) Description of actions to minimize emissions. (6) Description of actions to correct the deviation/malfunction. x) If there are no deviations or malfunctions: (1) Statement that there were no deviations from the emission or operating limits. (2) Statement that there were no periods when CEMS/CPMS was malfunctioning.
10) Records: a) Copy of each notification and report, including all support documentation. b) Occurrence and duration of each deviation or malfunction of operation. c) Performance tests and performance evaluations. d) All required maintenance performed. e) Corrective actions taken during periods of malfunction to minimize emissions. f) Corrective actions to restore malfunctioning equipment. g) For each CEMS or CPMS: i) Previous (i.e., superseded) versions of the performance evaluation plan. ii) Requests for alternatives to the relative accuracy test for CEMS or CPMS.
11) Show continuous compliance with each emission or operating limitation.
12) Maintenance conducted on SI RICE and after-treatment control device.
13) Initial performance test is not required on a unit previously tested if: a) Test used the same methods. b) Test not older than 2 years. c) Test reviewed and accepted by the Administrator; and either: i) No process or equipment changes have been made, or ii) Demonstrate that results of the performance test reliably demonstrate compliance despite changes.
14) Establish operating limitation during the initial performance test.
15) Do not start the SI RICE solely to conduct the performance test. However, performance test shall be conducted when the SI RICE is started up again.
16) Catalyst change requires a performance test to reestablish the values measured during the initial performance test.

### Applicable Requirements for Glycol Dehydration Units

40 CFR Part 63 Subpart HH (NESHAP From Oil and Natural Gas Production Facilities)		
Citation	Requirement Description	Comment
§ 63.760(b)(2)	For area sources, the affected source includes each triethylene glycol (TEG) dehydration unit located at a facility that meets the criteria specified in paragraph (a) of this section	The Springhill TEG dehydrator meets the applicability criteria.
§ 63.764(e)(1)(ii)	The owner or operator is exempt from the control, monitoring, recordkeeping and reporting requirements of the rule, except that the records of the exemption determination must be maintained as required in §63.774(d)(1).	The Springhill TEG dehydrator will have actual annual average benzene emissions < 0.90 megagrams per year

**Applicability of 40 CFR Part 98 to Springhill Compressor Station**

40 CFR Part 98 (Mandatory Greenhouse Gas Reporting Rule)		
Citation	Requirement Description	Comment
§ 98.2	GHG reporting is required for a facility that contains any source category that is listed in Table A-4 of this subpart that emits 25,000 metric tons CO <sub>2</sub> e or more per year in combined emissions from stationary fuel combustion units, miscellaneous uses of carbonate, and all applicable source categories that are listed in Table A-3 and Table A-4 of this subpart.	The Springhill Compressor Station has the potential to emit > 25,000 tonnes CO <sub>2</sub> e per year and will be subject to the rule if actual emissions exceed 25,000 tonnes CO <sub>2</sub> e per year.
§ 98.3(b)	Annual GHG reports must be submitted no later than March 31 of each calendar year for GHG emissions in the previous calendar year.	Annual GHG reports will be submitted as necessary
§ 98.33	GHG emission calculation methodology for stationary combustion sources	The emission calculation methodologies are applicable as the Davis station contains stationary combustion sources.
§ 98.34	Monitoring and QA/QC Requirements	If routine fuel sampling and analysis for the fuel HHV is performed the Tier 2 calculation methodology will be used, otherwise Tier 1 will be used.
§ 98.36	Data Reporting Requirements	The data reporting requirements will be followed as necessary.
§ 98.37	Records to be Maintained	The required records will be maintained as appropriate.