

Commonwealth of Kentucky  
Division for Air Quality  
***STATEMENT OF BASIS / SUMMARY***

Conditional Major, Construction/Operating  
Permit: F-26-019  
Diversified Midstream LLC - Myra Compressor Station  
275 Beefhide Creek Road  
Myra, KY 41549

April 14, 2026  
Johnson Luma, Reviewer

SOURCE ID: 21-195-00247  
AGENCY INTEREST: 44064  
ACTIVITY: APE20250001

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## SECTION 1 – SOURCE DESCRIPTION

SIC Code and description: 1311, Crude Petroleum and Natural Gas

Single Source Det.  Yes  No If Yes, Affiliated Source AI:

Source-wide Limit  Yes  No If Yes, See Section 4, Table A

28 Source Category  Yes  No If Yes, Category:

County: Pike

Nonattainment Area  N/A  PM<sub>10</sub>  PM<sub>2.5</sub>  CO  NO<sub>x</sub>  SO<sub>2</sub>  Ozone  Lead

If yes, list Classification:

PTE\* greater than 100 tpy for any criteria air pollutant  Yes  No

If yes, for what pollutant(s)?

PM<sub>10</sub>  PM<sub>2.5</sub>  CO  NO<sub>x</sub>  SO<sub>2</sub>  VOC

PTE\* greater than 250 tpy for any criteria air pollutant  Yes  No

If yes, for what pollutant(s)?

PM<sub>10</sub>  PM<sub>2.5</sub>  CO  NO<sub>x</sub>  SO<sub>2</sub>  VOC

PTE\* greater than 10 tpy for any single hazardous air pollutant (HAP)  Yes  No

If yes, list which pollutant(s):

PTE\* greater than 25 tpy for combined HAP  Yes  No

\*PTE does not include self-imposed emission limitations.

### Description of Facility:

Diversified Midstream LLC (Diversified) owns and operates a natural gas compression station in Pike County, Kentucky called the Myra Compressor Station. The station is used to compress natural gas as it is being shipped via pipeline. The facility consists of natural gas fired compressor engines, dehydration unit with associated natural gas-fired reboiler and thermal oxidizer, an emergency generator and storage tanks for storage of oil, produced fluids and triethylene glycol (TEG), each with capacity of less than 10,000 gallons.

**SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM**

Permit Number: F-26-019

Activities: APE20250001

Received: 02/14/2025

Application Complete Date: 08/04/2025

Permit Action:  Initial  Renewal  Significant Rev  Minor Rev  Administrative

Construction/Modification Requested?  Yes  No

Previous 502(b)(10) or Off-Permit Changes incorporated with this permit action  Yes  No

**Description of Action:**

APE20250001: *Renewal*

On February 14, 2025, the Division received the request from Diversified Midstream LLC (Diversified) for a renewal of the operating permit F-20-020. Diversified would later send in an addendum dated January 12, 2026 with updated calculations and supporting documentation to re-establish pollutant PTE for the TEG Dehydration Unit (EP06 (EU 02)) which would lower the emissions of HAPs to that of an area source and lower the emissions of VOC to that of a minor source. Additionally Diversified requested to remove requirements in the permit related to the operation of the thermal oxidizer associated with the TEG Dehydration Unit. The Division concluded that the requirements Diversified proposed to remove are necessary for the source to demonstrate compliance with source-wide limitations on VOC and HAP, and the Division has modified requirements on the use of the thermal oxidizer to maintain consistency with other permits it has issued . Additionally, Diversified requested that compliance with the benzene exemption and determination of actual average benzene emissions allow for the use of Promax Process Simulation Software in addition to the currently used GRI-GLYCalc Software. EPA allows for the use of Promax as an alternative as published as ALT-147.

APE20220001: *502(b)(10) change*

On October 8, 2021, Diversified Midstream LLC sent a written notification to the Division for an engine swing to remove and replace the EU 01 (EP05) engine with a similar engine.

F-26-019 Emission Summary				
Pollutant	2024 Actual (tpy)	Previous PTE F-20-020 (tpy)	Change (tpy)	PTE** F-26-019 (tpy)
CO	16.11	51.90	0	51.90
NO <sub>x</sub>	19.84	35.86	0	35.86
PT	0.54	0.80	0	0.80
PM <sub>10</sub>	0.53	0.78	0	0.78
PM <sub>2.5</sub>	0.53	0.78	0	0.78
SO <sub>2</sub>	0.033	0.048	0	0.048
VOC	2.88	429.71/25.25	-318.96/1.69	110.75/26.94
<b>Greenhouse Gases (GHGs)</b>				
Carbon Dioxide	6,478	9,662	1.0/0.0	9,663/9,662

Methane	28.68	26.84/1.51	-17.59/-0.87	9.25/0.64
Nitrous Oxide	N/A	0.018	0	0.018
CO <sub>2</sub> Equivalent (CO <sub>2</sub> e)	7,195	10,339/9,706	-412/-21.0	9,927/9,685
Hazardous Air Pollutants (HAPs)				
Total HAPs:	2.63	47.55/5.63	-25.51/-1.17	22.04/4.46
Formaldehyde	1.74	2.41	0	2.41
Hexane; N-Hexane	0.014	5.55/0.31	-2.80/-0.14	2.75/0.17
Benzene	0.068	6.82/0.43	-4.43/-0.22	2.39/0.21
Ethylbenzene	0.006	6.96/0.35	-6.33/-0.316	0.63/0.034
Toluene	0.065	16.06/0.84	-10.02/-0.51	5.86/0.33
Xylene	0.14	8.91/0.46	-1.84/-0.09	7.07/0.37

Potential emissions shown as uncontrolled/controlled where applicable.

\*\* Facility has taken limit on single HAP, combined HAP and VOC emissions to be below major source threshold.

### SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

#### EP05R: 810 hp, 4SLB, Natural Gas Fired Compressor Engine

**Initial Construction Date:** October 8, 2021 at the facility (with 6/8/2001 manufacturing date)

**Process Description:**

Caterpillar 3512LE with Oxidation Catalyst; 4 stroke lean burn RICE rated at 810 bhp

Fuel: Natural Gas;

Fuel Consumption: 7,407 Btu/bhp-hr

Control Device: Oxidation Catalyst;

Maximum Operating Rate: 0.0059 mscf/hr

Stack ID: 05R

**Applicable Regulation:**

**401 KAR 63:002, Section 2(4)(eeee)**, 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A (**Subpart ZZZZ**), *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*.

This regulation is applicable to all spark and compression ignition ICE. The unit is considered an existing engine at an area source as the construction of the stationary RICE commenced before June 12, 2006.

**Precluded Regulation:**

**401 KAR 52:020**, *Title V permits*

**Comments:**

Manufacturer specifications were used to obtain emission factors for NO<sub>x</sub>, CO, and Total Hydrocarbons. For VOC, the emission factor (EF) was obtained by the following equation:

$$EF_{VOC} \text{ (lb/mmscf)} = EF_{\text{Total Hydrocarbons}} \text{ (lb/mmscf)} - EF_{\text{Methane}} \text{ (lb/mmscf)} - EF_{\text{Ethane}} \text{ (lb/mmscf)}.$$

**Where:**

EF<sub>Total Hydrocarbons</sub> (g/bhp-hr) is converted to lb/mmscf and is taken from the vendor spec sheet.

EF<sub>Methane</sub> (kg/MMBtu) is converted to lb/mmscf and is taken from 40 CFR 98, Table C2.

EF<sub>Ethane</sub> (lb/MMBtu) is converted to lb/mmscf and is taken from AP-42, Table 3.2-2.

The remaining criteria pollutant emission factors and HAP emission factors are taken from AP-42, Table 3.2-2. Greenhouse gas (GHG's) emissions are calculated using emission factors from 40 CFR 98, Subpart C (Tables C1 & C2). The heat content used is 1208 lb/mmscf.

This engine was manufactured on June 8, 2001, but installed on October 8, 2021 at the Myra Compressor Station as a replacement to the engine EP05 (Emission Unit 01). The facility could not confirm the previous place or date of installation, nonetheless, the engine can be safely considered as an existing engine under 40 CFR 63, Subpart ZZZZ. The facility also identified this engine as a non-remote and non-black start engine.

Pursuant to 40 CFR 63.6603(a) and 40 CFR 63, Subpart ZZZZ Table 2d, Item 9, the permittee must install an oxidation catalyst to reduce HAP emissions from the stationary RICE.

Pursuant to 40 CFR 63.6640(c), the permittee must conduct an annual compliance demonstration

**EP05R: 810 hp, 4SLB, Natural Gas Fired Compressor Engine**

following the requirement in 40 CFR 63.6640(c)(1) through (7).

**EP06 (Emission Unit 02): Triethylene Glycol (TEG) Dehydration Unit with Reboiler**

Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
PM	0.56 lb/MMBtu actual heat input	401 KAR 59:015, Section 4(1)(a)	7.6 lb/mmscf (AP-42 1.4-1)	Assumed based on burning natural gas
	20% opacity	401 KAR 59:015, Section 4(2)	NA	
SO <sub>2</sub>	3.0 lb/MMBtu actual heat input	401 KAR 59:015, Section 5(1)(a)1.	0.60 lb/mmscf (AP-42 1.4-2)	

**Initial Construction Date:** 5/1/2010

**Process Description:**

The Dehydration Unit filters the natural gas and separates excess water with an absorption process using TEG as the absorption medium. The TEG is regenerated using a distillation step and recirculated back through the process. Heat is provided by the natural gas-fired reboiler to regenerate the TEG before it is recirculated back through the process. The natural gas stream from the dehydration unit is then reintroduced into the pipeline to be transported further along the distribution system. Liquid fractions removed from the natural gas via dehydration are stored in a small storage tank at the facility.

Maximum Dehydrator Operating Rate: 0.625 mmscf/hr (15 mmscf/day)  
 Reboiler Primary Fuel: Natural Gas; Reboiler Burner Capacity: 1.5 mmBtu/hr  
 Control Device: Thermal Oxidizer; Control Efficiency: 95%  
 Stack ID#: 06

**Applicable Regulation:**

**401 KAR 59:015, *New Indirect Heat Exchangers***, applicable to indirect heat exchangers having a heat input capacity greater than one (1) million BTU per hour (MMBtu/hr) commenced on or after April 9, 1972 (401 KAR 59:015, Section 2(1)). [Applies to the Reboiler]

**401 KAR 63:002, Section 2(4)(x)**, 40 C.F.R. 63.760 through 63.777, Appendix (**Subpart HH**), *National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities*, This regulation applies to each triethylene glycol (TEG) dehydration unit at an area sources of HAP emissions. [Applies to the TEG Dehydration Unit]

**401 KAR 63:020, *Potentially hazardous matter or toxic substances*** (State-origin requirement). This regulation is applicable to any emission unit which emits or may emit potentially hazardous matter or toxic substances which may be harmful to humans, animals, and plants, where such emissions are not elsewhere subject to the provisions of the administrative regulations of the Division for Air Quality. [Applies to the Reboiler]

**EP06 (Emission Unit 02): Triethylene Glycol (TEG) Dehydration Unit with Reboiler**

**Precluded Regulation:**

**401 KAR 52:020**, *Title V permits*

**Comments:**

The Reboiler is subject to limits for PM and SO<sub>2</sub> from 401 KAR 59:015, Section 4 and Section 5. In addition, the Reboiler is subject to the requirements from 401 KAR 59:015, Section 7.

Myra Compressor Station does have a TEG Dehydration Unit. However, because the actual average benzene emissions from the dehydrator vent are less than 0.90 megagrams per year (1.0 tpy), the emissions control and operating standards of 40 CFR 63, Subpart HH do not apply pursuant to 40 CFR 63.764(e)(1)(ii). The permittee is required to keep records of the actual average benzene emissions from the dehydrator [40 CFR 63.774(d)(1)]. Furthermore, during completion of the APE20250001 Renewal, Diversified sent in an addendum with updated calculations and supporting documentation to re-establish pollutant PTE for the TEG Dehydration Unit. The Dehydration Unit's capacity dropped from 35 mmscf/day to 15 mmscf/day which allowed it to be downgraded to an area source for HAP emissions and minor source for VOC emissions, and the facility decided to take an operational limit to preclude the applicability of **401 KAR 52:020**, *Title V permits*.

Because uncontrolled emissions for the TEG Dehydration Unit no longer exceed major source thresholds due to its decreased operating capacity, the Thermal Oxidizer does not need to be in operation at all times while the TEG Dehydration Unit is in operation to preclude major source status for VOC and HAP emissions. However, the Thermal Oxidizer is necessary for the exception requirements of 40 CFR 63.764(d). Because of this, the Division removed and revised several permit requirements pertaining to the Thermal Oxidizer during the APE20250001 Renewal.

Emission factors for the TEG Dehydration Unit are no longer based on GRI-GLY Calc 4.0 as of the APE20250001 Renewal addendum, but rather Promax Process Simulation.

The facility had submitted a GRI-GLY Calc 4.0 report run on August 28, 2019, and they submitted the newer updates that featured the Promax Process Simulation on January 12, 2026.

For the Reboiler, all criteria pollutant and HAP emission factors are taken from AP-42 Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4. Emission factors for the greenhouse gases are taken from 40 CFR 98 Tables C1 & C2.

**EP07 [Emission Unit 03 (EP07)]: Natural Gas Fired Emergency Engine**

**Initial Construction Date:** 6/11/2003

**Process Description:**

Cummins Model GTA855; 4 stroke, rich burn RICE rated at 293 bhp

Fuel: Natural Gas;

Fuel Consumption: 8,181 BTU/bhp-hr

Maximum Operating Rate: 0.0024 mscf/hr;

Control Device: None

**Applicable Regulation:**

**401 KAR 63:002, Section 2(4)(eeee)**, 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A (**Subpart ZZZZ**), *National Emission Standards for Hazardous Air Pollutants for Stationary*

<b>EP07 [Emission Unit 03 (EP07)]: Natural Gas Fired Emergency Engine</b>
<p><i>Reciprocating Internal Combustion Engines</i>                      This regulation is applicable to all spark and compression ignition reciprocating engines. The unit is considered an existing RICE as construction commenced before June 12, 2006.</p> <p><b><u>Precluded Regulation:</u></b>                      401 KAR 52:020, Title V permits</p> <p><b><u>Comments:</u></b>                      PTE is based on 500 hr/yr. The permittee must meet the requirements from Table 2d, item 5.                      All criteria pollutant emission factors and HAP emission factors are taken from AP-42, Table 3.2-3 in the absence of manufacturer data.                      Greenhouse gas (GHG's) emissions are calculated using emission factors from 40 CFR 98, Subpart C (Tables C1 &amp; C2).</p>

<b>EP04 [Emission Unit 04 (EP08)]: Engine #5 - 4SRB Natural Gas Fired Compressor Engine</b>						
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis (lb/mmscf)	Compliance Method		
NOx	1.0 g/kW-hr 82 ppmvd @15% O <sub>2</sub>	40 CFR 60.4233(e) & 40 CFR 60.4234	361.21 Catalyst manufacturer guarantee	Purchasing a non-certified engine and demonstrating compliance according to the requirements in 40 CFR 60.4244		
CO	2.0 g/kW-hr 270 ppmvd @15% O <sub>2</sub>		722.42 Catalyst manufacturer guarantee			
VOC	0.7 g/kW-hr 60 ppmvd @15% O <sub>2</sub>		252.85 based on allowable under 40 CFR 60, Subpart JJJJ*			
<p>* As the catalyst manufacturer guarantee is lower than that of allowable's from 40 CFR 60, Subpart JJJJ.</p> <p><b>Initial Construction Date:</b> last quarter 2019</p> <p><b><u>Process Description:</u></b>                      Waukesha L7044 GSI S5 4 Stroke Rich Burn reciprocating engine rated at 1900 bhp @1200 RPM</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">                     Fuel: Natural Gas;                      Maximum Operating Rate: 0.01071 mscf/hr;                      Engine Manufacture Date: December 2019;                 </td> <td style="width: 50%; border: none;">                     Fuel Consumption: 7,063 BTU/bhp-hr                      Control Device: Miratech 3-way catalyst                      Stack ID: 08                 </td> </tr> </table> <p><b><u>Applicable Regulation:</u></b>                      401 KAR 63:002, Section 2(4)(eeee), 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A (<b>Subpart ZZZZ</b>), <i>National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines</i>                      This regulation is applicable to all spark and compression ignition reciprocating engines.                      401 KAR 60:005, Section 2(2)(eeee), 40 C.F.R. 60.4230 through 60.4248, Tables 1 through 4 (<b>Subpart JJJJ</b>), <i>Standards of Performance for Stationary Spark Ignition Internal Combustion Engines</i></p>					Fuel: Natural Gas; Maximum Operating Rate: 0.01071 mscf/hr; Engine Manufacture Date: December 2019;	Fuel Consumption: 7,063 BTU/bhp-hr Control Device: Miratech 3-way catalyst Stack ID: 08
Fuel: Natural Gas; Maximum Operating Rate: 0.01071 mscf/hr; Engine Manufacture Date: December 2019;	Fuel Consumption: 7,063 BTU/bhp-hr Control Device: Miratech 3-way catalyst Stack ID: 08					

**EP04 [Emission Unit 04 (EP08)]: Engine #5 - 4SRB Natural Gas Fired Compressor Engine**

This regulation is applicable to Stationary Spark Ignition Combustion Engines that commenced construction on or after June 12, 2006.

**Precluded Regulation:**

**401 KAR 52:020**, *Title V permits*

**Comments:**

Manufacturer specifications were used for the calculation of NO<sub>x</sub> and CO emission factors. The remaining criteria pollutant emission factors and HAP emission factors are taken from AP-42, Table 3.2-3.

Greenhouse gas (GHG's) emissions are calculated using emission factors from 40 CFR 98, Subpart C (Tables C1 & C2).

The engine is not a certified engine. Based on the emissions factors provided by the engine manufacturer, the emission of CO and NO<sub>x</sub> are over the major source threshold. However, pursuant to 40 CFR 60.4236(b), after July 1, 2009, owners and operators may not install stationary SI ICE with a maximum engine power of greater than or equal to 500 HP that do not meet the applicable requirements in 40 CFR 60.4233. Pursuant to 40 CFR 60.4233(e), owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 75 KW (100 HP) must comply with the emission standards in Table 1 of 40 CFR 60, Subpart JJJJ for their stationary SI ICE. According to Table 1 for non-emergency SI natural gas engines greater than 500 hp, manufactured after 7/1/2010 must comply with NO<sub>x</sub> and CO limits of 1.0 and 2.0 g/HP-hr respectively. Based on these emission factors, the potential emissions from the engine cannot exceed 16.95 tpy of NO<sub>x</sub> and 33.91 tpy of CO. In order to meet compliance with the limits in 40 CFR 60, Subpart JJJJ, the engine has a Miratech 3-way catalyst control system for control of NO<sub>x</sub>, CO and VOC. The control system manufacturer specifications identify target outlet emissions to be limited to 1.0 g/bhp-hr for NO<sub>x</sub>, 2.0 g/bhp-hr for CO and 0 g/bhp-hr for VOC emissions. The calculated reduction for NO<sub>x</sub> is 91.4% and 80% for CO.

The catalyst is integrated with the engine and has an auto cutoff such that when the exhaust temperature exceeds the catalyst manufacturer recommended values, the engine is automatically shut down.

The engine is a replacement for one of the three existing electric engines at the facility. The facility is not subject to 40 CFR 60, Subpart OOOOa, as the existing compressor was not replaced. Only the engine that drives the compressor was replaced. The change did not constitute a 'modification' under 40 CFR 60, Subpart OOOOa.

**SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)**

**Testing Requirements/Results**

Emission Unit(s)	Control Device	Parameter	Regulatory Basis	Frequency	Test Method	Permit Limit (ppmvd @15% O <sub>2</sub> )	Test Result (ppmvd@ 15% O <sub>2</sub> )	Thruput and Operating Parameter(s) Established During Test	Activity Graybar	Date of last Compliance Testing
EP05	Oxidation Catalyst	CO	40 CFR 63, Subpart ZZZZ	Initial	Methods 3A and 19 (ASTM D6348-03)	47 ppmvd	5.97 ppmvd	770 bhp	CMN2013 0001	8/6/2013
				Annual		47 ppmvd	9.06 ppmvd	804 bhp	CMN2014 0001	8/19/2014
				Annual		47 ppmvd	8.70 ppmvd	729 bhp	CMN2015 0001	6/24/2015
				Annual		47 ppmvd	13.3 ppmvd	802 bhp	CMN2016 0001	6/29/2016
				Annual		47 ppmvd	2.3 ppmvd	799.33 bhp	CMN2018 0001	1/17/2018
				Annual		47 ppmvd	3.95 ppmvd	799.33 bhp	CMN2018 0002	10/17/2018
				Annual		47 ppmvd	4.01 ppmvd	731.33 bhp	CMN2019 0001	10/14/2019
				Annual		47 ppmvd	3.21 ppmvd	739.00 bhp	CMN2020 0001	10/6/2020
				Annual		47 ppmvd	14.21 ppmvd	785.03 bhp	CMN2021 0001	9/28/2021
EP05R	Oxidation Catalyst	CO	40 CFR 63, Subpart ZZZZ	Annual	Methods 3A and 19 (ASTM D6348-03)	47.0 ppmvd	9.22 ppmvd	809.67 bhp	CMN2022 0001	9/20/2022
						47 ppmvd	10.07 ppmvd	809 bhp	CMN2023 0002	9/19/2023
						47.0 ppmvd	11.28 ppmvd	808.00 bhp	CMN2024 0002	9/17/2024

Emission Unit(s)	Control Device	Parameter	Regulatory Basis	Frequency	Test Method	Permit Limit (ppmvd @15% O <sub>2</sub> )	Test Result (ppmvd@ 15% O <sub>2</sub> )	Thruput and Operating Parameter(s) Established During Test	Activity Graybar	Date of last Compliance Testing
						47.000 ppmvd	9.830 ppmvd	809 bhp	CMN2025 0001	9/9/2025
EP06	Thermal Oxidizer	VOC/HAP	401 KAR 52:030, Section 10	Initial and every 5 years	USEPA Method 25A	95% destruction efficiency; 90 tpy for VOC; 22.5 tpy combined HAPs; 9 tpy single HAP	0.8 ppmvd @3% O <sub>2</sub> ; 99.996 %DE	1369°F outlet temperature	CMN2016 0002	10/12/2016
							12.25 ppmvd @3% O <sub>2</sub>	1394°F outlet temperature	CMN2021 0002	12/15/2021
EP04 (EP08)	3-way catalyst	CO	40 CFR 60, Subpart JJJJ	Initial and every 8,760 hours of operation or 3 years, whichever comes first	Refer to Table 2 of 40 CFR 60, Subpart JJJJ for test methods	270 ppmvd or 2.0 g/hp-hr	18.81 ppmvd	1766.33 bhp	CMN2020 0002	10/6/2020
		NO <sub>x</sub>				82 ppmvd or 1.0 g/hp-hr	34.01 ppmvd			
		VOC				60 ppmvd or 0.7 g/hp-hr	0.91 ppmvd			
		CO				270 ppmvd or 2.0 g/hp-hr	5.14 ppmvd	1800.00 bhp	CMN2021 0001	9/28/2021
		NO <sub>x</sub>				82 ppmvd or 1.0 g/hp-hr	8.02 ppmvd			
		VOC				60 ppmvd or 0.7 g/hp-hr	1.09 ppmvd			

Emission Unit(s)	Control Device	Parameter	Regulatory Basis	Frequency	Test Method	Permit Limit (ppmvd @15% O <sub>2</sub> )	Test Result (ppmvd@ 15% O <sub>2</sub> )	Thruput and Operating Parameter(s) Established During Test	Activity Graybar	Date of last Compliance Testing
		CO				270 ppmvd or 2.0 g/hp-hr	34.84 ppmvd or 0.27 g/hp-hr	1866 bhp	CMN2022 0002	9/20/2022
		NO <sub>x</sub>			82 ppmvd or 1.0 g/hp-hr	53.92 ppmvd or 0.68 g/hp-hr				
		VOC			60 ppmvd or 0.7 g/hp-hr	2.05 ppmvd or 0.02 g/hp-hr				
		CO				270 ppmvd or 2.0 g/hp-hr	9.20 ppmvd or 0.08 g/hp-hr	1514 bhp	CMN2024 0001	9/17/2024
		NO <sub>x</sub>			82 ppmvd or 1.0 g/hp-hr	62.44 ppmvd or 0.86 g/hp-hr				
		VOC			60 ppmvd or 0.7 g/hp-hr	0.85 ppmvd or 0.01 g/hp-hr				
		CO				270 ppmvd or 2.0 g/hp-hr	21.52 ppmvd or 0.18 g/hp-hr	1506 bhp	CMN2025 0001	9/9/2025
		NO <sub>x</sub>			82 ppmvd or 1.0 g/hp-hr	53.85 ppmvd or 0.741				

Emission Unit(s)	Control Device	Parameter	Regulatory Basis	Frequency	Test Method	Permit Limit (ppmvd @15% O <sub>2</sub> )	Test Result (ppmvd@ 15% O <sub>2</sub> )	Thruput and Operating Parameter(s) Established During Test	Activity Graybar	Date of last Compliance Testing
							g/hp-hr			
		VOC				60 ppmvd or 0.7 g/hp-hr	1.44 ppmvd or 0.019 g/hp-hr			

**SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS**

**Table A - Group Requirements:**

<b>Emission and Operating Limit</b>	<b>Regulation</b>	<b>Emission Unit</b>
<90 tpy of VOC emissions <9 tpy single HAP <22.5 tpy combined HAPs	To preclude the applicability of <b>401 KAR 52:020, Title V Permits</b>	Source-wide

**Table B - Summary of Applicable Regulations:**

<b>Applicable Regulations</b>	<b>Emission Unit</b>
<b>401 KAR 59:015, New Indirect Heat Exchangers</b>	EP06
<b>401 KAR 60:005, Section 2(2)(eee), 40 C.F.R. 60.4230 through 60.4248, Tables 1 through 4 (Subpart JJJJ), Standards of Performance for Stationary Spark Ignition Internal Combustion Engines</b>	EP04 (EP08)
<b>401 KAR 63:020, Potentially hazardous matter or toxic substances</b>	EP06
<b>401 KAR 63:002, Section 2(4)(x), 40 C.F.R. 63.760 through 63.777, Appendix (Subpart HH), National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities</b>	EP06
<b>401 KAR 63:002, Section 2(4)(eee), 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A (Subpart ZZZZ), National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines</b>	EP05R, EP07, EP04 (EP08)

<b>Precluded Regulations</b>	<b>Emission Unit</b>
<b>401 KAR 52:020, Title V permits</b>	

**Table D - Summary of Non Applicable Regulations:**

N/A

**Air Toxic Analysis**

**401 KAR 63:020, Potentially Hazardous Matter or Toxic Substances**

The Division for Air Quality (Division) has performed modeling using SCREEN View on September 9, 2025 of potentially hazardous matter or toxic substances (Ethylene Glycol, Glycol Ethers, and Polynuclear Aromatic Hydrocarbons (PAH)) that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant. Based upon this information, the Division has determined that the conditions outlined in this permit will assure compliance with the requirements of 401 KAR 63:020.

**Single Source Determination**

N/A

**SECTION 5 – PERMITTING HISTORY**

<b>Permit</b>	<b>Permit type</b>	<b>Activity#</b>	<b>Complete Date</b>	<b>Issuance Date</b>	<b>Summary of Action</b>	<b>PSD/Syn Minor</b>
F0-10-011	Initial	APE20090003	2/21/2010	5/21/2010	Initial Operating Permit	N/A
F-15-018	Renewal	APE20140001	1/18/2015	9/15/2015	Initial Construction Permit	N/A
F-15-018 R1	Sig. Revision	APE20150001	11/18/2015	2/29/2016	Renewal	N/A
F-15-018 R2	Minor Revision	APE20160001	5/11/2016	5/19/2016	Added second process line, EP20 – EP23	N/A
F-15-018 R3	Admin. Amendment	APE20180001	10/01/2018	10/3/2018	Change of Ownership	N/A
F-20-020	Renewal	APE20190001	4/13/20	8/10/20	Renewal and Addition of Engine	N/A
	Administrative Amendment	APE20200001	3/4/20		Name Change	N/A

**SECTION 6 – PERMIT APPLICATION HISTORY**

N/A

## **APPENDIX A – ABBREVIATIONS AND ACRONYMS**

AAQS	– Ambient Air Quality Standards
BACT	– Best Available Control Technology
Btu	– British thermal unit
CAM	– Compliance Assurance Monitoring
CMS	– Continuous Monitoring System
CPMS	– Continuous Parametric Monitoring System
CO	– Carbon Monoxide
Division	– Kentucky Division for Air Quality
ESP	– Electrostatic Precipitator
GHG	– Greenhouse Gas
HAP	– Hazardous Air Pollutant
HF	– Hydrogen Fluoride (Gaseous)
MSDS	– Material Safety Data Sheets
mmHg	– Millimeter of mercury column height
NAAQS	– National Ambient Air Quality Standards
NESHAP	– National Emissions Standards for Hazardous Air Pollutants
NO <sub>x</sub>	– Nitrogen Oxides
NSR	– New Source Review
PM	– Particulate Matter
PM <sub>10</sub>	– Particulate Matter equal to or smaller than 10 micrometers
PM <sub>2.5</sub>	– Particulate Matter equal to or smaller than 2.5 micrometers
PSD	– Prevention of Significant Deterioration
PTE	– Potential to Emit
SO <sub>2</sub>	– Sulfur Dioxide
TEG	– Triethylene Glycol
TF	– Total Fluoride (Particulate & Gaseous)
VOC	– Volatile Organic Compounds