Conditional Major Operating PermitA Renewal / Significant Permit RevisionA ApplicationA

Right Beaver Compressor StationA

Permit ID: F-20-041A

Diversified Midstream LLCA

101 McQuiston Dr., Jackson Center, PA 16133A

Prepared by:A

SLR International CorporationA

West Virginia (WV):A

SLR Project No.: 116.021365.00001A

Client Reference No: AI # 44061A

September 2025A

Making Sustainability Happen

Executive SummaryA

Diversified Midstream LLC owns and operates the Right Beaver Compressor Station (facility)A located in KnottA County, Kentucky. The facility is classified as a conditional major source andA currently operates in accordance with the Conditional Major Operating Permit F-20-041,A originally issued on May 23, 2021. This permit expires on May 23, 2026.A

In accordance with Section G, Condition 2(a) of Permit F-20-041, pursuant to 401 KAR 52.030,A Section 12, this renewal application is being filed at least six months prior to the expiration dateA of the current operating permit. Additionally, through this renewal submittal, pursuant to 401A KAR 52.030, Section 16, a significant permit revision is being requested to make changes toA monitoring requirements for equipment on site.A

Pursuant to 401 KAR 52.030, Sections 4(2)(b) and (c), permit revision and renewal applicationsA shall only provide information that is related to the change, new, or different from the mostA recent permit application for sources with source-wide permit. Accordingly, this applicationA includes only the necessary KY DAQ forms and facility information.A

The enclosed submittal, both timely and complete, satisfies the submission requirements.A

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Tables in TextA

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AttachmentsA

1.0A Facility InformationA

Known permitting history for the Right Beaver Compressor Station is shown below:A

Table A: Right Beaver Compressor Station Permit HistoryA

PermitA	Permit TypeA	Activity #A	CompleteA DateA	IssuanceA DateA	Summary of ActionA
F-20-041	RenewalA	APE20200002A	12/18/20A	05/23/21A	Renewal with changesA to InsignificantA ActivitiesA
F-15-032 R2	Admin AmendA	APE20200001A	03/25/20	05/13/20	Name ChangeA
F-15-032 R1	Admin AmendA	APE20180002A	10/01/18A	10/03/18A	Ownership ChangeA
F-15-032A	Renewal	APE20140001A	06/15/15A	01/18/16A	RenewalA
F-10-012A	Initial	APE20090002A	03/12/10A	06/16/10	Renewal/Initial FESOPA
G-04-001 R2A	Admin AmendA	APE20090001A	05/22/09A	06/1/09A	Name ChangeA
G-04-001 R1A	Renewal	APE20040001A	06/26/06	11/10/06A	Comments on DraftA PermitA
G-04-001	Renewal	APE20040001A	11/08/04	05/27/05A	RenewalA

1.1A Facility LocationA

The Right Beaver Compressor Station is locatedAin Knott County at 2505 KY Route 7, Dema,A Kentucky, 41859. The GPS coordinates in decimal degrees are: Lat 37.400629, Long -82.787381.A The UTM coordinates are: E – 341.797 km, N – 4,140.816 km.A

1.2A Process DescriptionA

At the Right Beaver Compressor Station, natural gas enters the station via a distribution pipelineA system before the point of custody transfer and is first compressed using two (2) electricA compressors and one (1)Anatural gas fired compressor engine. The compressed natural gasA stream is thenAfiltered and processed throughAa triethylene glycol (TEG) dehydration unit. TheA dehydration unit removes water from the gas stream with an absorption process using TEG asA the absorption medium. The TEG is regeneratedAusing a distillation step using a natural gas firedA reboiler and recirculated back through the process. Liquid fractions removed from the naturalA gas are stored in a storage tank. The natural gas stream from the dehydration unit is thenA reintroduced into the pipeline to be transported further along the distribution system. TheA emissions from the TEG dehydration unit are routed to an enclosed flare with a controlA efficiency of 95% for VOCs and HAPs. TheAfacility is also equipped with a diesel-firedA emergency generator, small insignificant storage tanks, and insignificantAfugitive pipelineA equipment.A

1.3A Significant Revision InformationA

As previously stated in the Executive Summary, this renewal application includes a significantA revision to address the inclusion of Promax Process Simulation Software as an option andA alternativeAto GRI-GLYCalc SoftwareAfor demonstrating compliance with the benzeneA exemption and determining of actual average benzene emissions. EPA has made a recentA determination allowing for the use of Promax as an alternativeAas published as ALT-147 andA included as Attachment B to this application.A

2.0A Regulatory DiscussionA

Through this renewal/significant revision application, the Right Beaver Compressor Station willA retain its status as a conditional major source whose emissions are limited below the thresholdA for Title V. To preclude the applicability of 401 KAR 52:020 (Title V Permits), the facility utilizesA control devices to reduce emissions to below major source thresholds. Source wide emissionsA of VOC, HAP, and combined HAPs are limited to 90, 9, and 22.5 tons per year each, respectively,A as set forth in the current operating permit. The table below details the permitted emissionsA units for the site;A

Table B: Emission UnitsA

EmissionA Unit IDA	DescriptionA	ControlA
EP003	2SLB Reciprocating Compressor Engine #3 – CooperA Bessemer GMVH-8C2; 1,600 hpA	NoneA
EP004A	TulPro Glycol System: TEG Dehydrator / Reboiler – 25A mmscf/d (Dehydration Unit) & 1.25 mmBtu/hrA (Reboiler)A	Flare (95% Control Efficiency)A
EP005	Compression Ignition RICE Emergency Generator –A Cummins Model 5699460; Diesel; 235 hpA	NoneA

2.1A Emission Unit EP003 – 2SLB RICE Engine #3A

Emission Unit EP003, a 1,600 hp, 2SLB, Copper Bessemer GMVH-8C2 compressor engine isA subject to Subpart ZZZZ and maintains compliance with the regulationAin accordance withA §63.6640, Table 2d (Line 6) and Table 6 (Line 9) of Subpart ZZZZ. The reporting andA recordkeeping requirements pertaining to this engine are kept in accordance with §63.6655.A

2.2A Emission Unit EP004 – TulPro Glycol SystemA

The TEG Dehydrator Unit, Emission Unit EP004, will continue to be subject to the area sourceA requirements of this subpart and demonstrates compliancebyA keeping records detailing thatA actual average benzene emissions from the unit are less than 0.90 Mg/yr (1 ton/yr) as specifiedA in 63.774(d)(1). Compliance with this Requirement exempts the site from any of the controlA and operating requirements as outlined in 40 CFR 63.764(e)(1)(ii).A

Additionally, the reboilerAassociated withAthe TEG Dehydration unit is subject to the emissionA limits for PM and SO2 from 401 KAR 59:015, Sections 4 and 5 as wellAas subject to theA requirements from 401 KAR 59:015 Section 7.A

2.3A Emission Unit EP005 – CI RICE Emergency GeneratorA

Emission Unit EP005, a 235 hp, Diesel, Cummins Model 5699460 emergency generator isA subject to Subpart ZZZZ and maintains compliance with the regulationAin accordance withA §63.6625, §63.6640, Table 2d (Line 4) and Table 6 (Line 9) of Subpart ZZZZ. The reporting andA recordkeeping requirements pertaining to this engine are kept in accordance with §63.6655.A

2.4A Insignificant ActivitiesA

The following listed activities have been determined to be insignificantAactivities pursuant toA 401 KAR 52.030, Section 6.A

Table C: Insignificant ActivitiesA

DescriptionA	Generally Applicable RegulationA
Two (2) Electric Compressors – Rated Capacity: 1.750 hp eachA	NoneA
Two (2) 1,100 Gallon Plastic Antifreeze TanksA	NoneA
Two (2) 2,000 Gallon Steel Fresh Oil TanksA	NoneA
One (1) 1,000 Gallon Plastic Used Oil TankA	NoneA
One (1) 8,820 Gallon Steel Processed Fluids TankA	NoneA
One (1) 2,000 Gallon Steel TEG TankA	NoneA
One (1) 1,025 Gallon Plastic Water Filtration TankA	NoneA
EP06 Pipeline Equipment Leaks from Twenty-Five (25) Valves. Five (5)A Open Ended Lines, Five (5) Other, Twelve (12) Seals and Five (5) PumpsA	401 KAR 63:020A

Appendix AA KY DAQ FormA DEP7007AIA

Conditional Major Operating Permit Renewal / SignificantA Permit Revision ApplicationA

Right Beaver Compressor StationA

Diversified Midstream LLCA

SLR Project No.: 116.021365.00001A

September 2025A

Division for Air Quality

300 Sower Boulevard

Frankfort, KY 40601

(502) 564-3999

DEP7007AI

Administrative Information

___ Section AI.1: Source Information

___ Section AI.2: Applicant Information

___ Section AI.3: Owner Information

___ Section AI.4: Type of Application

___ Section AI.5: Other Required Information

___ Section AI.6: Signature Block

___ Section AI.7: Notes, Comments, and Explanations

Additional Documentation

___ Additional Documentation attached

Source Name: **Right Beaver Compressor Station**

KY EIS (AFS) #: **21- 119-00030**

Permit #: **F-20-041**

Agency Interest (AI) ID: **44061**

Date: **2-Sep-25**

Section AI.1: Source Information

Physical Location Address:	**Street:**	2505 KY Route 7				
	City:	Dema	**County:**	Knott	**Zip Code:**	41859
Mailing Address:	**Street or P.O. Box:**	414 Summers Street				
	City:	Charleston	**State:**	WV	**Zip Code:**	25301

Standard Coordinates for Source Physical Location

Longitude: 37.400629 (decimal degrees) **Latitude:** -82.787381 (decimal degrees)

Primary (NAICS) Category: Natural Gas Extraction **Primary NAICS #:** 211130

#

Classification (SIC) Category: Crude Petroleum and Natural Gas **Primary SIC #:** 1311

Briefly discuss the type of business conducted at this site: Natural Gas Compressor Station

Description of Area Surrounding Source: ☑ Rural Area ☐ Industrial Park ☐ Residential Area ☐ Urban Area ☐ Industrial Area ☐ Commercial Area

Is any part of the source located on federal land? ☐ Yes ☑ No

Number of Employees: 0

Approximate distance to nearest residence or commercial property: *500 ft*

Property Area:

Is this source portable? ☐ Yes ☑ No

What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?

NPDES/KPDES:	☑ Currently Hold	☐ Need	☐ N/A
Solid Waste:	☐ Currently Hold	☐ Need	☑ N/A
RCRA:	☐ Currently Hold	☐ Need	☑ N/A
UST:	☐ Currently Hold	☐ Need	☑ N/A

Type of Regulated Waste Activity:

☐ Mixed Waste Generator ☐ Generator ☐ Recycler ☐ Other: _____

☐ U.S. Importer of Hazardous Waste ☐ Transporter ☐ Treatment/Storage/Disposal Facility ☑ N/A

Section AI.2: Applicant Information

Applicant Name: Diversified Midstream LLC

Title: (if individual)

Mailing Address:
Street or P.O. Box: 101 McQuiston Dr
City: Jackson Center **State:** PA **Zip Code:** 16133

Email: (if individual) rstilwell@dgoc.com

Phone: (276) 245 6057

Technical Contact

Name: Rocky Stilwell

Title: EHS

Mailing Address:
Street or P.O. Box: PO Box 158
City: Pikeville **State:** KY **Zip Code:** 41501

Email: rstilwell@dgoc.com

Phone: (276) 245 6057

Air Permit Contact for Source

Name: Chris Boggess

Title: Senior Engineer

Mailing Address:
Street or P.O. Box: 8 Capitol St., Suite 300
City: Charleston **State:** WV **Zip Code:** 25301

Email: cboggess@slrconsulting.com

Phone: (681) 205 8949

Section AI.3: Owner Information

☑ **Owner same as applicant**

Name:

Title:

Mailing Address: **Street or P.O. Box:**

City: **State:** **Zip Code:**

Email:

Phone:

List names of owners and officers of the company who have an interest in the company of 5% or more.

Name	Position

Section AI.4: Type of Application

Current Status: ☐ Title V ☑ Conditional Major ☐ State-Origin ☐ General Permit ☐ Registration ☐ None

Requested Action: *(check all that apply)*

☐ Name Change	☐ Initial Registration	☑ Significant Revision	☐ Administrative Permit Amendment
☑ Renewal Permit	☐ Revised Registration	☐ Minor Revision	☐ Initial Source-wide OperatingPermit
☐ 502(b)(10)Change	☐ Extension Request	☐ Addition of New Facility	☐ Portable Plant Relocation Notice
☐ Revision	☐ Off Permit Change	☐ Landfill Alternate Compliance Submittal	☐ Modification of Existing Facilities
☐ Ownership Change	☐ Closure		

Requested Status: ☐ Title V ☑ Conditional Major ☐ State-Origin ☐ PSD ☐ NSR ☐ Other: _____

Is the source requesting a limitation of potential emissions? ☐ Yes ☐ No

Pollutant:	Requested Limit:	Pollutant:	Requested Limit:
☐ Particulate Matter		☐ Single HAP	
☐ Volatile Organic Compounds (VOC)		☐ Combined HAPs	
☐ Carbon Monoxide		☐ Air Toxics (40 CFR 68, Subpart F)	
☐ Nitrogen Oxides		☐ Carbon Dioxide	
☐ Sulfur Dioxide		☐ Greenhouse Gases (GHG)	
☐ Lead		☐ Other	

For New Construction:

Proposed Start Date of Construction: *(MM/YYYY)* _____ **Proposed Operation Start-Up Date:** *(MM/YYYY)* _____

For Modifications:

Proposed Start Date of Modification: *(MM/YYYY)* _____ **Proposed Operation Start-Up Date:** *(MM/YYYY)* _____

Applicant is seeking coverage under a permit shield. ☐ **Yes** ☐ **No** **Identify any non-applicable requirements for which permit shield is sought on a separate attachment to the application.**

Section AI.5 Other Required Information

Indicate the documents attached as part of this application:

- ☐ DEP7007A Indirect Heat Exchangers and Turbines
- ☐ DEP7007B Manufacturing or Processing Operations
- ☐ DEP7007C Incinerators and Waste Burners
- ☐ DEP7007F Episode Standby Plan
- ☐ DEP7007J Volatile Liquid Storage
- ☐ DEP7007K Surface Coating or Printing Operations
- ☐ DEP7007L Mineral Processes
- ☐ DEP7007M Metal Cleaning Degreasers
- ☐ DEP7007N Source Emissions Profile
- ☐ DEP7007P Perchloroethylene Dry Cleaning Systems
- ☐ DEP7007R Emission Offset Credit
- ☐ DEP7007S Service Stations
- ☐ DEP7007T Metal Plating and Surface Treatment Operations
- ☑ DEP7007V Applicable Requirements and Compliance Activities
- ☐ DEP7007Y Good Engineering Practice and Stack Height Determination
- ☐ DEP7007AA Compliance Schedule for Non-complying Emission Units
- ☐ DEP7007BB Certified Progress Report
- ☐ DEP7007CC Compliance Certification
- ☐ DEP7007DD Insignificant Activities
- ☐ DEP7007EE Internal Combustion Engines
- ☐ DEP7007FF Secondary Aluminum Processing
- ☐ DEP7007GG Control Equipment
- ☐ DEP7007HH Haul Roads
- ☐ Confidentiality Claim
- ☐ Ownership Change Form
- ☐ Secretary of State Certificate
- ☐ Flowcharts or diagrams depicting process
- ☐ Digital Line Graphs (DLG) files of buldings, roads, etc.
- ☐ Site Map
- ☐ Map or drawing depicting location of facility
- ☐ Safety Data Sheet (SDS)
- ☐ Emergency Response Plan
- ☐ Other: _____

Section AI.6: Signature Block

I, the undersigned, hereby certify under penalty of law, that I am a responsible official*, and that I have personally examined, and am familiar with, the information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the information is on knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false or incomplete information, including the possibility of fine or imprisonment.

Wes Smith

Authorized Signature

9/25/2025

Date

Wes Smith

Type or Printed Name of Signatory

VP Midstream Operations - Southern Division

Title of Signatory

*Responsible official as defined by 401 KAR 52:001.

Section AI.7: Notes, Comments, and Explanations

Appendix BA KY DAQ FormA DEP7007VA

Conditional Major Operating Permit Renewal / SignificantA Permit Revision ApplicationA

Right Beaver Compressor StationA

Diversified Midstream LLCA

SLR Project No.: 116.021365.00001A

September 2025A

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007V

Applicable Requirements and Compliance Activities

___ Section V.1: Emission and Operating Limitation(s)
___ Section V.2: Monitoring Requirements
___ Section V.3: Recordkeeping Requirements
___ Section V.4: Reporting Requirements
___ Section V.5: Testing Requirements
___ Section V.6: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI

Source Name: **Right Beaver Compressor Station**
KY EIS (AFS) #: **21- 119-00030**
Permit #: **F-20-041**
Agency Interest (AI) ID: **44061**
Date: **2-Sep-25**

Section V.1: Emission and Operating Limitation(s)

Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
EP004	TulPro Glycol System: NG TEG Dehydrator - Reboiler - Flare	See Section 2 (Regulatory Discussion) of Application					

Section V.2: Monitoring Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
EP004	TulPro Glycol System: NG TEG Dehydrator - Reboiler - Flare		See Section 2 (Regulatory Discussion) of Application		

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
EP004	TulPro Glycol System: NG TEG Dehydrator - Reboiler - Flare		See Section 2 (Regulatory Discussion) of Application		

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
EP004	TulPro Glycol System: NG TEG Dehydrator - Reboiler - Flare		See Section 2 (Regulatory Discussion) of Application		

Section V.5: Testing Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
EP004	TulPro Glycol System: NG TEG Dehydrator - Reboiler - Flare		See Section 2 (Regulatory Discussion) of Application		

Section V.6: Notes, Comments, and Explanations

Attachment A
Suggested Permit Language

Conditional Major Operating Permit Renewal / SignificantA Permit Revision ApplicationA

Right Beaver Compressor StationA

Diversified Midstream LLCA

SLR Project No.: 116.021365.00001A

September 2025A

Commonwealth of Kentucky
Energy and Environment Cabinet
Department for Environmental Protection
Division for Air Quality
300 Sower Boulevard, 2nd Floor
Frankfort, Kentucky 40601
(502) 564-3999

Final

AIR QUALITY PERMIT

Issued under 401 KAR 52:030

Permittee Name:	**Diversified Midstream LLC**
Mailing Address:	**101 McQuiston Drive, Jackson Center, PA 16133**
Source Name:	**Right Beaver Compressor Station**
Mailing Address:	**101 McQuiston Drive, Jackson Center, PA 16133**
Source Location:	**2505 KY 7, Dema, KY 41859**
Permit ID:	**F-20-041**
Agency Interest #:	**44061**
Activity ID:	**APE20200002**
Review Type:	**Conditional Major, Operating**
Source ID:	**21-119-00030**
Regional Office:	**Hazard Regional Office** **1332 S. KY HWY 15, Suite 100** **Hazard, KY 41701** **(606) 435-6022**
County:	**Knott**
Application Complete Date:	**December 18, 2020**
Issuance Date:	**May 23, 2021**
Expiration Date:	**May 23, 2026**

Rick Shewekah

For Melissa Duff, Director
Division for Air Quality

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(ii) The actual average benzene emissions (in terms of benzene emissions per year) as determined in accordance with 40 CFR 63.772(b)(2).

(1) Pursuant to 40 CFR 63.772(b)(2)(i), the permittee shall determine actual average benzene emissions using ***either Promax Process Simulation Software or*** the model GRI-GLYCalc™ Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI–95/0368.1).

c. Pursuant to 401 KAR 52:030, Section 10 for EP-04(03), the permittee shall record the following:

(i) A log of the qualitative visual observations as specified in **4. Specific Monitoring Requirements** including the date, time, initials of observer, whether any emissions were observed (yes/no), any Method 9 readings taken, and any corrective action taken including results due to observed emissions.

(ii) All routine and non-routine maintenance activities performed on the flare.

6. <u>Specific Reporting Requirements</u>:

a. Pursuant to 40 CFR 63.775(c)(8), a permittee of a TEG dehydration unit located at an area source that meets the criteria in 40 CFR 63.764(e)(1)(i) or 40 CFR 63.764(e)(1)(ii) is exempt from the reporting requirements for area sources in 40 CFR 63.775(c)(1) through (7), for that unit.

b. See **Section F**.

Attachment B
ALT-147 Letter (Promax to GLYCalc Equivalency Finding)

Conditional Major Operating Permit Renewal / SignificantA Permit Revision ApplicationA

Right Beaver Compressor StationA

Diversified Midstream LLCA

SLR Project No.: 116.021365.00001A

September 2025A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Josh Ravichandran
Consulting Engineer -- Western U.S.
Bryan Research & Engineering, LLC
3131 Briarcrest Drive
Bryan, TX 77807

03/31/2022

Dear Mr. Ravichandran:

This letter is our response to your original request dated September 2, 2020, to Robin Segall of my staff, supplemented by your data package and emails dated March 1, 2021, and April 21, 2021, requesting broad source category-wide approval for use of Bryan Research & Engineering's process simulation software, ProMax® (ProMax) in lieu of the GRI-GLYCalc™ software (GLYCalc) for modeling glycol dehydration unit emissions in demonstrating compliance with 40 CFR 63, Subpart HH, National Emission Standards for Hazardous Air Pollutants from Oil and Gas Production Facilities (Subpart HH). The U.S. Environmental Protection Agency's (EPA) Office of Air Quality Planning and Standards, as the delegated authority, must make the determination on any major alternatives to test methods and other compliance determination procedures required under 40 CFR parts 59, 60, 61, 63, and 65.

Background

In 1995, the EPA's Office of Research and Development along with the Gas Research Institute (GRI) and the American Petroleum Institute (API) conducted a study to assess the GRI-GLYCalc model for possible regulatory use.[1] [2] BTEX (benzene/toluene/ethylbenzene/xylene) and total volatile organic compound (VOC) emissions were measured from ten glycol dehydration unit sites using a total capture condensation (TCC) approach considered by the EPA to be the benchmark test method along with two other approaches. The BTEX and total VOC emissions results from these sites were then compared with emissions values modeled for the same units using the GRI-GLYCalc software and the following process parameter inputs: gas flow rate, gas temperature, gas pressure, glycol circulation rate, dry gas water content, lean glycol water content, gas pump volume, flash tank temperature, flash tank pressure, and reboiler

[1] C.O. Rueter, Reif, D.L., and Myers; D.B. Glycol Dehydrator BTEX and VOC Emissions Testing Results at Two Units in Texas and Louisiana, Volume I, Technical Report; EPA Report Number EPA-600/R-95-046a; March 1995. Note: Sites 1 and 2 in this EPA Report correspond to Sites 9 and 10 in Tables 1 and 2 of this letter and in the EPA Office of Research and Development memo cited below summarizing the data from ten sites tested by GRI, API, and the EPA.

[2] 'Glycol Dehydrator Emissions Test Report and Emissions Estimation Methodology,' Memo from Larry G. Jones, EPA Office of Research and Development to J. David Mobley, EPA Office of Air and Radiation, dated April 13, 1995.

temperature. Tables 1 and 2 summarize the comparative data for BTEX and total VOC, respectively, from this study for the ten units. This work provided the technical basis for including GLYCalc as an option in Subpart HH.

Table 1. BTEX Comparisons (tons/yr)

Emissions Measurement Method				Emissions Calculated using GLYCalc	% Difference, GLYCalc from TCC Benchmark
Site	Total Capture Condensation (TCC)	Pressurized Rich/Lean Glycol	Atmospheric Rich/Lean Glycol		
Site 1	0.34	0.43	0.5	0.4	17.6
Site 2	4.92	5.48	5.39	9.76	98.4
Site 3	89.6	98.6	98.1	85.4	-4.7
Site 4	9.89	9.88	9.87	20.6	108.3
Site 5	29.1	26.8	26.8	45.7	57.0
Site 6	8.56	10.1	8.55	13.5	57.7
Site 7	17.7	20.6	19.3	30.1	70.1
Site 8	2.61	2.71	3	4.25	62.8
Site 9	3.58	3.71	3.79	3.87	8.4
Site 10	22.8	25.9	21.4	22.3	-2.6

Table 2. Total VOC Comparisons (tons/yr)

Emissions Measurement Method				Emissions Calculated using GLYCalc	% Difference, GLYCalc from TCC Benchmark
Site	Total Capture Condensation (TCC)	Pressurized Rich/Lean Glycol	Atmospheric Rich/Lean Glycol		
Site 1	3.48	5.42	2.41	4.68	34.5
Site 2	8.37	8.39	7.87	13.4	60.1
Site 3	166	176	168	203	22.3
Site 4	155	61.1	42.5	183	18.1
Site 5	66.7	46	42.7	81.3	21.9
Site 6	48.2	40.4	24.2	66.1	37.1
Site 7	48.3	57	48.3	65.8	33.5
Site 8	45.6	28.4	26.5	44.9	-1.5
Site 9	19.8	10.7	11.4	21.8	10.1
Site 10	36.9	37.9	30.8	36.1	-2.2

In your request, you note that the GLYCalc model is allowed for a number of emissions assessments and other determinations in Subpart HH. You also note that, in all but one instance under Subpart HH §63.773(d)(3)(i)(H), where ProMax is currently allowed, facilities are allowed to use only the GLYCalc software when choosing the option to model rather than measure emissions and related parameters from their affected glycol dehydration units. Therefore, your clients are seeking use of ProMax more widely under Subpart HH as an alternative to GRI-GLYCalc. More specifically, you are requesting to use ProMax as an alternative to GLYCalc for six specific measurement-related requirements in Subpart HH as summarized below.

1. **§63.772 (b)(2)(i)** – Allows the use of GLYCalc as one of two options for determining compliance with benzene or BTEX emissions limits from glycol dehydration units.

2. **§63.772(d)(2)(iii)** – Allows use of GLYCalc as an alternative to Method 18 (40 CFR 60, Appendix A) or ASTM Method D6420-99 (Reapproved 2004) coupled with flowrate measurements for determining BTEX emissions from glycol dehydration units.

3. **§63.772(e)(3)(iii)(B)(4)** – Allows use of GLYCalc for determining the mass rate of total organic compounds (minus methane and ethane) or total hazardous air pollutants (HAP) at the inlet of the control device for a glycol dehydration unit as an alternative to Method 18 or Method 25A (40 CFR 60, Appendix A) coupled with flowrate measurements.

4. **§§63.772(e)(4)(i) and (e)(5)** – Allows use of GLYCalc to generate a condenser performance curve as an alternative to the condenser design analysis, which includes vent stream composition, constituent concentrations, flowrate, relative humidity, and temperature.

5. **§§63.773(d)(5)(ii)(B) and (C)** – Allows use of GLYCalc to generate a condenser performance curve as an alternative to the condenser design analysis.

6. **§§63.764(d)(2)(ii) and 63.775(c)** – Specifies use of GLYCalc to calculate an alternative glycol circulation rate for use in demonstrating compliance when a triethylene glycol dehydration unit is unable to meet the sales gas specification for moisture when operating at or below the glycol circulation rate determined using the equation in §63.764(d)(2)(i).

You explain that ProMax is a process simulation product developed for the oil and gas industry that is widely used and well known for its ability to predict BTEX and VOC (volatile organic compound) absorption into ethylene glycol solutions and emissions from oil and gas facilities. It includes the capability to estimate emissions of BTEX and VOC from glycol dehydration units, as well as a number of other process parameters, using process operating data. You also explain that ProMax and GLYCalc both employ vapor-liquid equilibrium (VLE) models and mass balance calculations as the basis to predict emissions.

Justification

As justification for your request to use ProMax as an alternative to GLYCalc for six specific measurement-related requirements in Subpart HH, you again point out that Subpart HH (§63.773(d)(3)(i)(H)) already allows the use of ProMax to calculate the inlet composition and flowrate of the glycol still overheads (the inlet emissions) entering a combustion control device, which are defined as E_i. You note that the composition of this waste gas stream is a result of all other unit operations within a dehydration model and can only be accurate if all other parts of the model are also considered to be accurate and, thus, ProMax should be considered for use as an alternative to GLYCalc for the six other applications that you request and were listed above. Additionally, you note that ProMax is commonly used in place of the EPA's TANKS 4.09D

programs and that these widely accepted flash calculations used for tank emissions estimates are derived from the same accurate modified equations of state that are used for the glycol dehydration unit process simulations. You further contend that, considering both ProMax and GLYCalc employ VLE models along with balance calculations to predict emissions, ProMax is far more advanced at this point when compared to the latest version of GLYCalc (Version 4.0) as it was last revised in 2000 while ProMax continues to be updated to include the most recent VLE data.

You provided a link to an article posted online in 2011 by John M. Campbell & Co.[3] This article compares predictions from the ProMax model to those from the GLYCalc model for BTEX absorption in triethylene glycol (TEG) solutions (the most commonly used adsorption solution in glycol dehydration units). The predictions are presented for three combinations of circulation rate and temperature, all at 1000 psia (6,895 kPa), with 99.0 weight % lean TEG, and three theoretical trays in the contactor column. Table 3 below summarizes these results, which show relatively consistent agreement between the two models with the exception of benzene at the lower temperature and higher circulation ratio. In all cases, the ProMax results are more conservative than the GLYCalc results as higher BTEX absorption rates would result in higher emission rates.

Table 3. ProMax versus GLYCalc at Various Circulation Rate/Temperature Combinations

Software	Temp, °F	Circulation Ratio, gal TEG/lb H_2O removed	BTEX Absorption, %			
			Benzene	Toluene	Ethylbenzene	O-xylene
GLYCalc	77	5.39	7.8	15.6	19.3	27.7
ProMax	77	5.39	11.7	19.0	22.2	32.9
GLYCalc	95	3.12	7.6	11.6	14.5	20.9
ProMax	95	3.12	8.6	13.5	15.7	23.1
GLYCalc	122	3.67	13.5	19.1	24.3	33.2
ProMax	122	3.67	13.9	21.1	24.5	34.7

In your request, you provide comparative data for ProMax and GLYCalc for Sites 1 and 2 (referred to as Sites 9 and 10 in Tables 1 and 2 above). These two sites were the only ones from the 1995 study, now decades old, where the process parameter inputs for the glycol dehydrator units were actually published.[1] The data you submitted (see Table 4 below) show generally good agreement for both BTEX and total VOC between ProMax, GLYCalc, and the total capture condensation testing approach considered the benchmark method, with the ProMax values being consistently comparable or conservative.

[3] http://www.jmcampbell.com/tip-of-the-month/2011/06/absorption-of-aromatics-compounds-in-teg-dehydration-process/

Table 4. ProMax versus GLYCalc and Total Capture Condensation Method

Site	Pollutant	Method and Results (tons/yr)			% Difference, ProMax from GLYCalc	% Difference, ProMax from TCC Benchmark
		Total Capture Condensation (TCC)	GLYCalc	ProMax		
Site 1 (9)	BTEX	3.58	3.88	4.15	7.0	15.9
Site 2 (10)	BTEX	22.9	22.3	26.8	20.2	17.0
Site 1 (9)	Total VOC	19.8	21.8	21.7	-0.05	9.6
Site 2 (10)	Total VOC	36.9	36.1	39	8.0	5.7

With your data package, you also included comparisons of glycol dehydration unit BTEX, benzene, HAP, and VOC emissions data generated using GLYCalc and ProMax. You explain that the process input data used to run the ProMax and GLYCalc model simulations came from thirteen glycol dehydration units located in West Virginia having a wide range of inlet gas compositions[4] to represent the range of natural gas from various basins across the country, with and without flash tanks, and with and without regenerator controls. Parity plots in units of tons of emissions per year were used to summarize the comparisons for uncontrolled regenerator emission results for BTEX, HAP, and VOC; uncontrolled flash tank emission results for BTEX, HAP, and VOC; and uncontrolled regenerator emission results for benzene. These parity plots are presented as Figures 1, 2, and 3. The agreement for BTEX, benzene, and HAPS are very good and the agreement for VOC is also good, though slightly more variable.

[4] The methane mole fractions ranged from 86% to 98%, the ethane mole fractions from 1.5% to 9%, the VOC mole fractions (or C3+) from 0.08% to 3.7%, and the BTEX concentrations from 0 to 756 ppm. These ranges of concentrations can be found within a single basin and also across different basins.

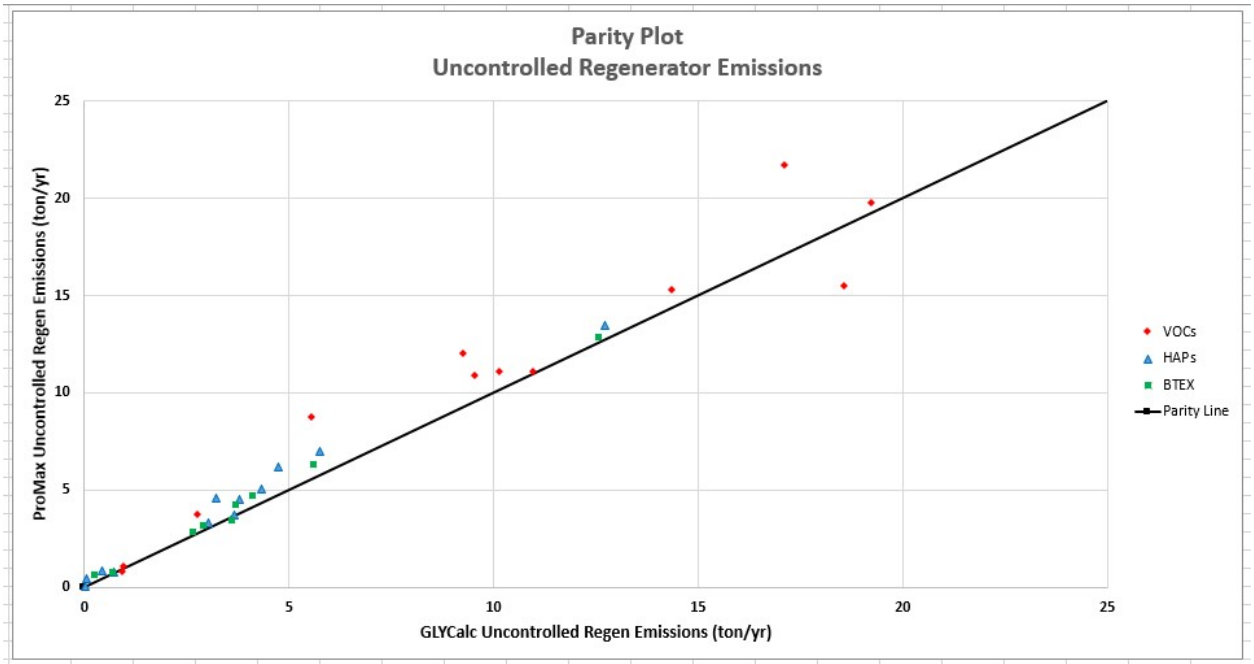

Figure 1. Parity plot for BTEX, HAP, and VOC emissions (tons/yr) from uncontrolled regenerators as determined by ProMax versus GLYCalc.

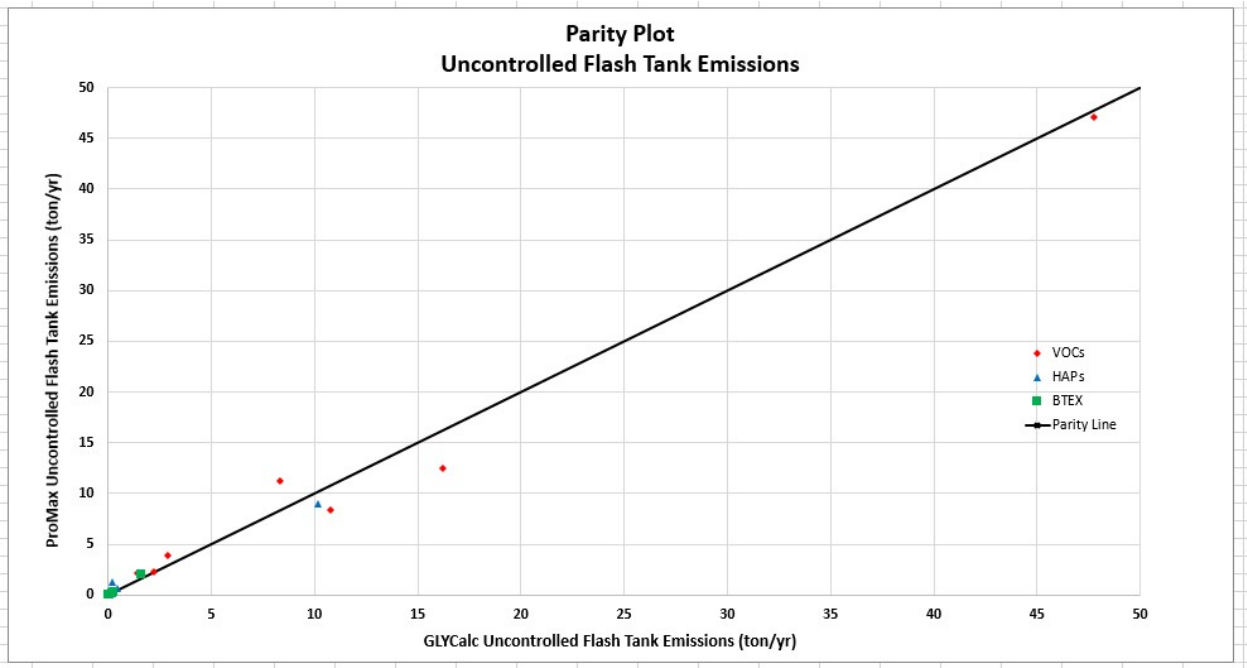

Figure 2. Parity plot for BTEX, HAP, and VOC emissions (tons/yr) from uncontrolled flash tanks as determined by ProMax versus GLYCalc.

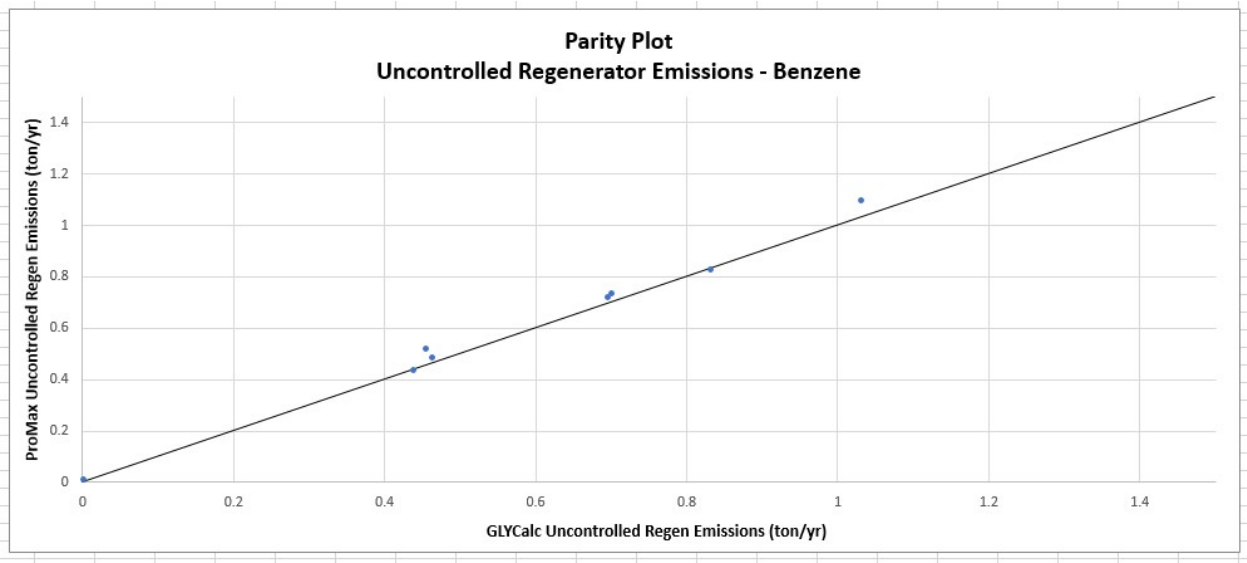

Figure 3. Parity plot for benzene emissions (tons/yr) from uncontrolled regenerators as determined by ProMax versus GLYCalc.

Lastly, you included data/information in your submittal intended to show that the VLE data upon which the ProMax model is based yields outputs that compare well with empirical data published by the Gas Processors Association (GPA).[5] In specific, Figure 4 is a parity plot for BTEX compounds along with methane comparing ProMax calculated mole percent of each compound in the liquid and vapor phases to the empirically measured results from GPA studies. The ProMax calculated and GPA empirical data compare well for both vapor and liquid phases.

[5] GPA Research Report RR-131, The Solubility of Selected Aromatic Hydrocarbons in Triethylene Glycol; H.-J. Ng, C.-J. Chen, and D.B. Robinson; DB Robinson Research Ltd, Alberta; Project 895; December 1991.

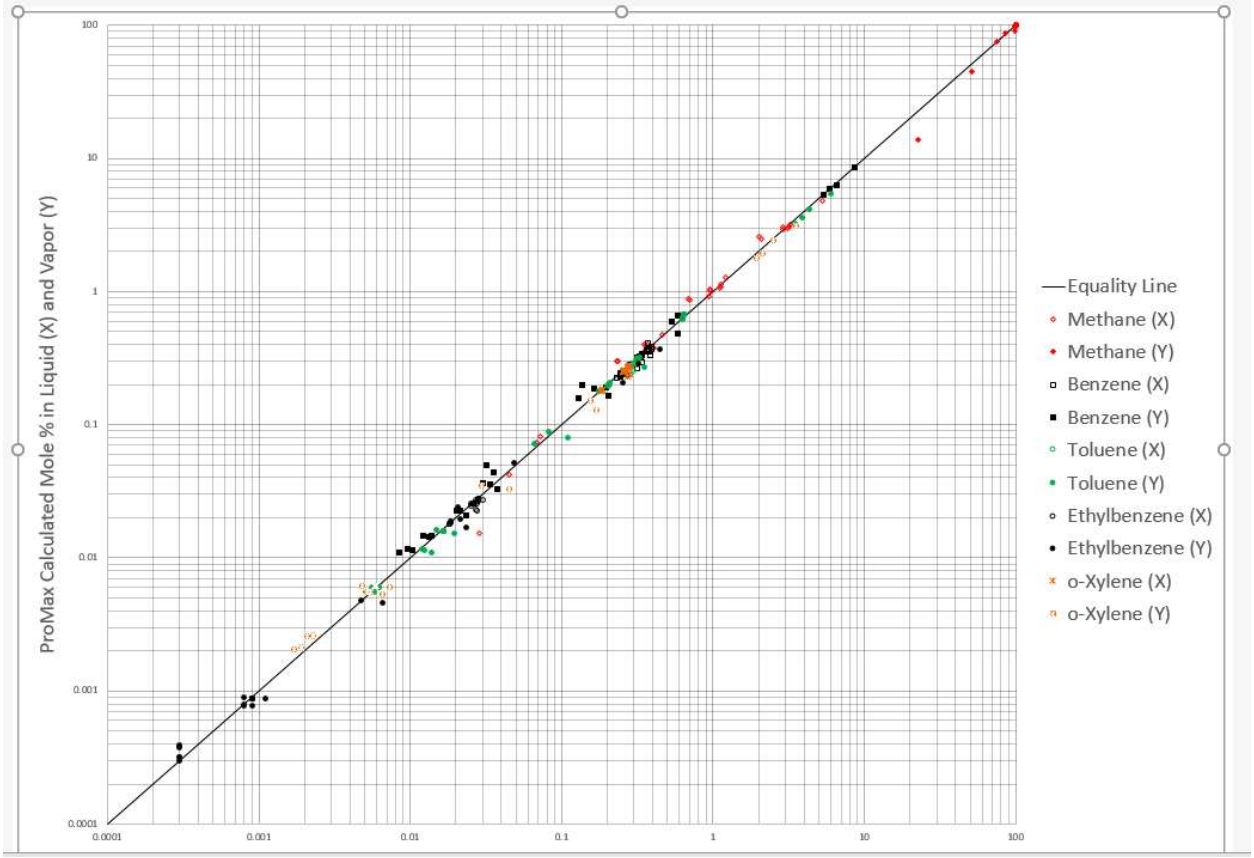

Figure 4. Parity plot for benzene, toluene, ethylbenzene, o-xylene, and methane (mole percent in the liquid and vapor phases) as calculated by ProMax versus empirically measured results from GPA.

Determination

We have reviewed your submittal including the supporting data and Subpart HH in detail. We conclude that the ProMax model results are typically equivalent or more conservative when compared to the results from the GLYCalc model and the total capture condensation method used by the EPA in its research. Therefore, we agree that the ProMax model would be suitable for performing the emissions and related parameter determinations for which the GLYCalc model is already allowed in Subpart HH and, with this letter, approve the use of the ProMax model, Version 5.0 or higher, as an alternative to the GLYCalc model under the following specific sections of 40 CFR 63, Subpart HH subject to the caveats explained below.

- §63.772 (b)(2)(i)
- §63.772(d)(2)(iii)
- §63.772(e)(3)(iii)(B)(4)
- §§63.772(e)(4)(i) and (e)(5)
- §§63.773(d)(5)(ii)(B) and (C)
- §§63.764(d)(2)(ii) and 63.775(c)

Use of the ProMax model, Version 5.0 or higher, as an alternative to the GLYCalc model is subject to the following caveats.

- Inputs to the ProMax, Version 5.0 or above, software shall include the parameters listed below, which must be representative of the actual operating conditions of the glycol dehydration unit:
    - Wet gas flowrate
    - Wet gas composition (dry basis)
    - Wet gas water content (if unknown, can assume a worst-case of 100% saturation)
    - Wet gas (absorber) temperature
    - Wet gas (absorber) pressure
    - Glycol circulation rate (or dry gas water content or glycol circulation ratio)
    - Dry gas water content
    - Lean glycol water content
    - Gas pump volume ratio (when gas injection pump is used)
    - Reboiler temperature
    - Flash tank parameters (when installed)
        - Temperature
        - Pressure
    - Control device parameters (when installed)
        - Combustion device destruction efficiency
        - Condenser temperature and pressure
    - Stripping gas (if used)
        - Type (dry gas, flash gas, nitrogen)
        - Flowrate

- Affected facilities using this alternative (ProMax as an alternative to GLYCalc under Subpart HH) for their affected glycol dehydration units must notify the responsible agency before use of the alternative and notification should include a copy of this letter.

- Facilities must include a copy of this letter with each report presenting results using the ProMax software.

- Once a facility chooses to use ProMax as an alternative to GLYCalc under one or more of the Subpart HH provisions listed above, the facility must continue to use ProMax in meeting the provision(s) until the owner/operator receives approval from this office for use of a new alternative method or the responsible agency for use of any other options in Subpart HH, including returning to the use of GLYCalc (see §63.7(f)(5)).

Because we have approved this alternative method for application to glycol dehydration units under 40 CFR 63 Subpart HH, wherever GLYCalc has been previously allowed as detailed above, we will post this letter as ALT-147 on the EPA website at *https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods* for use by other interested parties.

If you have any questions regarding this approval or need further assistance, please contact Robin Segall at (919) 541-0893 or *segall.robin@epa.gov* or Jason DeWees at (919) 541- 9724 or *dewees.jason@epa.gov.*

Sincerely,

Steffan M. Johnson, Group Leader
Measurement Technology Group

cc: Sara Ayres, OECA/OC (ayres.sara@epa.gov)
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Claudia Smith, EPA Region 8 (smith.claudia@epa.gov)
Matt Witosky, OAQPS/SPPD (witosky.matthew@epa.gov)
Regional Testing Contacts

regulation, or other legally binding document, the guidance documents will not be controlling.

Authority: 21 U.S.C. 408.

Dated: January 13, 2023.

Michal Freedhoff,

Assistant Administrator, Office of Chemical Safety and Pollution Prevention.

[FR Doc. 2023–00940 Filed 1–18–23; 8:45 am]

BILLING CODE 6560–50–P

ENVIRONMENTAL PROTECTION AGENCY

[EPA–HQ–OAR–2007–1196; FRL–10485–01–OAR]

Recent Postings of Broadly Applicable Alternative Test Methods

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice of availability.

SUMMARY: This notice announces the broadly applicable alternative test method approval decisions that the Environmental Protection Agency (EPA) made under and in support of New Source Performance Standards (NSPS) and the National Emission Standards for Hazardous Air Pollutants (NESHAP) between January 1, 2022, and December 31, 2022.

FOR FURTHER INFORMATION CONTACT: An electronic copy of each alternative test method approval document is available at *https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods.* For questions about this notice, contact Mrs. Lula H. Melton, Air Quality Assessment Division, Office of Air Quality Planning and Standards (E143–02), Environmental Protection Agency, Research Triangle Park, NC 27711; telephone number: (919) 541–2910; fax number: (919) 541–0516; email address: *melton.lula@epa.gov.* For technical questions about individual alternative test method decisions, refer to the contact person identified in the individual approval document(s).

SUPPLEMENTARY INFORMATION:

I. General Information

A. Does this notice apply to me?

This notice will be of interest to entities regulated under 40 Code of Federal Regulations (CFR) parts 59, 60, 61, 63 and 65; state, local, and tribal agencies; and the EPA Regional offices responsible for implementation and enforcement of regulations under 40 CFR parts 59, 60, 61, 63, and 65.

B. How can I get copies of this information?

You may access copies of the broadly applicable alternative test method approval documents at *https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods.*

II. Background

This notice identifies broadly applicable alternative test methods that the EPA approved in 2022 under the NSPS, 40 CFR part 60 and the NESHAP, and 40 CFR part 63 programs. See Table 1 of this notice for the summary of these test methods. Source owners and operators may voluntarily use these broadly applicable alternative test methods in lieu of otherwise required test methods or related testing procedures. Use of these broadly applicable alternative test methods are not intended to and should not change the applicable emission standards.

The Administrator has the authority to approve the use of alternative test methods for compliance with requirements under 40 CFR parts 59, 60, 61, 63, and 65. This authority is found in 40 CFR 60.8(b)(3), 61.13(h)(1)(ii), and 63.7(e)(2)(ii). Additional and similar authority can be found in 40 CFR 59.104(f) and 65.158(a)(2). The criteria for approval and procedures for submission and review of broadly applicable alternative test methods are explained in a previous **Federal Register** notice published at 72 FR 4257 (January 30, 2007) and located at *https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods.* As explained in this notice, we will announce approvals for broadly applicable alternative test methods at *https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods* as they are issued and publish an annual notice that summarizes approvals for broadly applicable alternative test methods during the preceding year.

As also explained in the January 30, 2007 notice, our approval decisions involve thorough technical reviews of numerous source-specific requests for alternatives and modifications to test methods and procedures. Based on these reviews, we have often found that these modifications or alternatives would be equally valid and appropriate to apply to other sources within a particular class, category, or subcategory. Consequently, we have concluded that where either a method modification or an alternative method is clearly broadly applicable to a class, category, or subcategory of sources, it is both equitable and efficient to simultaneously approve its use for all appropriate sources and situations.

Use of approved alternative test methods is not mandatory but rather permissive. Sources are not required to employ such a method but may choose to do so in appropriate circumstances. As specified in 40 CFR 63.7(f)(5), however, a source owner or operator electing to use an alternative method for 40 CFR part 63 standards must continue to use the alternative method until otherwise authorized. Source owners or operators should, therefore, review the specific broadly applicable alternative method approval decision at *https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods* before electing to employ any alternative method. Source owners or operators choosing to use a broadly applicable alternative should also notify their regulatory agency prior to using the alternative.

III. Approved Alternative Test Methods and Modifications to Test Methods

This notice specifies five broadly applicable alternative test methods that the EPA approved between January 1, 2022, and December 31, 2022. The alternative method decision letter/memo designation numbers, test methods affected, sources allowed to use this alternative, and method modifications or alternative methods allowed are summarized in Table 1 of this notice. A summary of approval documents was previously made available on our Technology Transfer Network between January 1, 2022, and December 31, 2022. For more detailed information, please refer to the complete copies of these approval documents available at *https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods.*

As also explained in our January 30, 2007 notice, we will revisit approvals of alternative test methods in response to written requests or objections indicating that a particular approved alternative test method either should not be broadly applicable or that its use is not appropriate or should be limited in some way. Any objection to a broadly applicable alternative test method, as well as the resolution of that objection, will be announced at *https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods* and in a subsequent **Federal Register** notice. If we decide to retract a broadly applicable test method, we will likely consider the need for an appropriate

transition period for users either to request case-by-case approval or to transition to an approved method.

Dated: January 13, 2023.

Richard A. Wayland,

Director, Air Quality Assessment Division.

TABLE 1—APPROVED ALTERNATIVE TEST METHODS AND MODIFICATIONS TO TEST METHODS REFERENCED IN OR PUBLISHED UNDER APPENDICES IN 40 CFR PARTS 60 AND 63 POSTED BETWEEN JANUARY 2022 AND DECEMBER 2022 [a]

Alternative method decision letter/memo No.	As an alternative or modification to . . .	For . . .	You may . . .
ALT–146	ASTM E2779–10—Standard Test Method for Determining Particulate Matter Emissions from Pellet Heaters.	Certification testing of pellet heaters subject to 40 CFR part 60, subpart AAA—Standards of Performance for New Residential Wood Heaters.	Use the modified methodology in the Agency's memorandum dated February 2, 2022, entitled ''Appropriate Calculation of Medium Burn Rate Category in ASTM E–2779 Testing to calculate the Medium Burn Rate Category to conduct certification testing on pellet heaters with the caveats in the Agency's approval letter dated February 4, 2022.
ALT 147	GRI–GLYCalc software for modeling glycol dehydration unit emissions.	Sources subject to 40 CFR part 63, subpart HH—National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.	Use Pro-Max, Version 5.0 or higher for modeling glycol dehydration unit emissions with the provisos specified in the Agency's approval letter dated March 31, 2022.
ALT 148	Flow test methods specified in 40 CFR 63.565(d)(3)(iii).	Sources subject to 40 CFR part 63, subpart Y—National Emission Standards for Marine Tank Vessel Loading Operations.	Use Method 2B—Exhaust Volume Flow Rate.
ALT 149	SW–846 Method 8270D and SW–846 Method 8015C.	Sources subject to 40 CFR part 63, subpart HHHHHHH—Polyvinyl Chloride and Copolymers Production: National Emission Standards for Hazardous Air Pollutants.	Use SW–846 Method 8270E and SW–846 Method 8015D with the provisos specified in the Agency's approval letter dated July 27, 2022.
ALT 150	Surface Emission Monitoring (SEM) procedures required under the cited sections of the following subparts: 40 CFR 60, Subpart WWW, §§ 60.753(d) and 60.755(c)–(e); 40 CFR 60, Subpart XXX, §§ 60.763(d) and 60.765(c)–(d); 40 CFR 60, Subpart Cf, §§ 60.34f(d) and 60.36f(c)–(e); 40 CFR 62, Subpart OOO, §§ 62.16716(d) and 62.16720; 40 CFR 63, Subpart AAAA, §§ 63.1958(d) and 63.1960(c)–(d).	Sources subject to 40 CFR part 60, subparts WWW, XXX, and Cf (Emission Guidelines), 40 CFR part 62, subpart OOO (Federal Plan), and 40 CFR part 63, subpart AAAA.	Use Other Test Method 51 (OTM–51) with the provisos specified in the Agency's approval letter dated December 15, 2022.

[a] Source owners or operators should review the specific broadly applicable alternative method approval letter at *https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods* before electing to employ any alternative test method.

[FR Doc. 2023–01004 Filed 1–18–23; 8:45 am]

BILLING CODE 6560–50–P

ENVIRONMENTAL PROTECTION AGENCY

[EPA–HQ–OW–2002–0059; FRL–10519–01–OW]

Proposed Information Collection Request; Clean Water State Revolving Fund and Drinking Water State Revolving Fund Programs

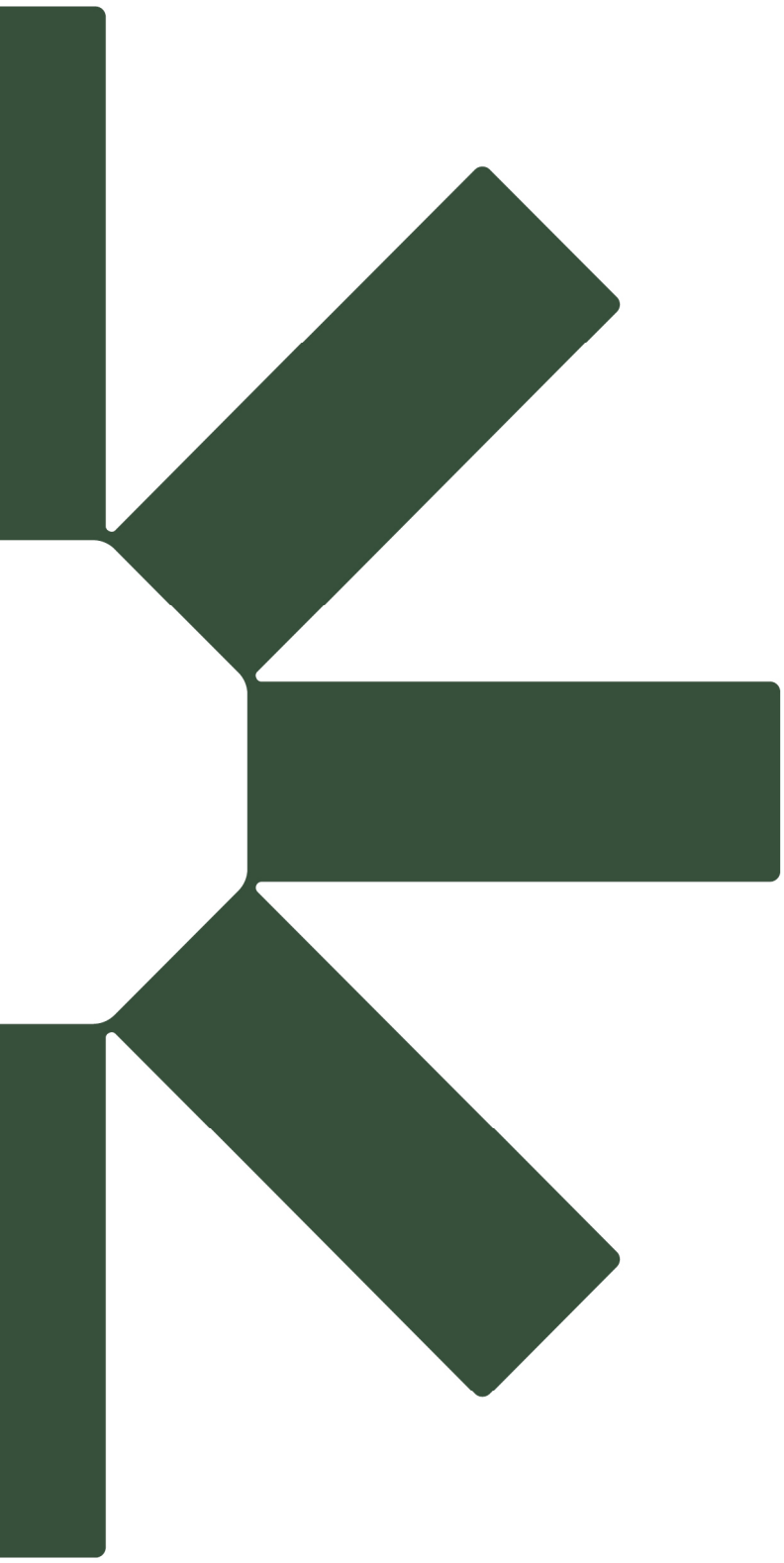
AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice.

SUMMARY: The Environmental Protection Agency (EPA) is planning to submit an information collection request (ICR), ''Clean Water State Revolving Fund and Drinking Water State Revolving Fund Programs'' (EPA ICR No. 1803.09 OMB Control No. 2040–0185) to the Office of Management and Budget (OMB) for review and approval in accordance with the Paperwork Reduction Act (PRA). Before doing so, the EPA is soliciting public comments on specific aspects of the proposed information collection as described in the **SUPPLEMENTARY INFORMATION** section. This is a proposed renewal of the ICR, which is currently approved through August 31, 2023, for the Drinking Water State Revolving Fund (DWSRF). This ICR consolidates the DWSRF and Clean Water State Revolving Fund (CWSRF) ICRs (ICR No. 1803.08 and ICR NO. 1391.12, respectively) because they affect the same set of respondents in similar ways. Additional information collection requirements made necessary by the Bipartisan Infrastructure Law (BIL) are similar for both programs. Therefore, EPA is consolidating the DWSRF and CWSRF ICRs, in addition to updating and renewing them, to provide a more coherent picture of the information components of EPA's SRF program. An Agency may not conduct or sponsor a collection of information nor is a person required to respond unless it displays a currently valid OMB control number.

DATES: Comments must be submitted on or before March 20, 2023.

ADDRESSES: Submit your comments, referencing Docket ID No. EPA–HQ–OW–2002–0059, online using *www.regulations.gov* (our preferred method), by email to *OW-Docket@epa.gov,* or by mail to: EPA Docket Center, Environmental Protection



Making Sustainability Happen