



December 10, 2025

Stacie Daniels  
Combustion Section Supervisor  
Kentucky Division for Air Quality  
Kentucky Department of Environmental Protection  
300 Sower Boulevard, 2nd Floor  
Frankfort, KY 40601

*RE: Supplement to FESOP Renewal Application  
DT Midstream, Inc.  
Midwestern Gas Transmission Company  
Hartford Compressor Station – Hartford, KY  
(Source ID 21-183-00085; Agency Interest #39508)*

Dear Stacie,

Midwestern Gas Transmission Company (MGT), a subsidiary of DT Midstream, Inc., operates a natural gas transmission station located in Hartford, Ohio County, Kentucky (identified herein as the Hartford Station). This natural gas transmission facility is classified as a Conditional Major source under the Title V operating permit program and currently operates in accordance with permit F-20-043 R1, issued by the Kentucky Division for Air Quality (KDAQ) on February 22, 2021, most recently revised on February 7, 2025, and expiring on February 22, 2026. As required by Condition G.2.a. of the existing permit and 401 KAR 52:030, Section 12, MGT submitted a complete permit renewal application on August 20, 2025, ahead of the August 22, 2025, deadline.

MGT provided a detailed regulatory applicability analysis within the permit renewal, including an evaluation of the applicability of the New Source Performance Standards (NSPS) at 40 CFR 60 Subpart OOOOa (NSPS OOOOa). Through the development of the permit renewal application, MGT discovered potential discrepancies between the emissions sources at the Hartford Station permitted by the prior owner through the initial Conditional Major permit application submitted in October 2020, and the as-built emissions generating equipment. Two such discrepancies include the omission of two categories of affected facilities covered under NSPS OOOOa: reciprocating compressors and the collection of fugitive emissions components.

As alluded to in the permit renewal application, MGT continued to evaluate whether or not the apparent discrepancies between permitted and as-built equipment require the Conditional Major permit be revised to include reciprocating compressors and the collection of fugitive emissions components as new emissions sources subject to NSPS OOOOa. As discussed with KDAQ via a virtual meeting held on September 18, 2025, MGT is providing the information herein to supplement the permit renewal application and to more fully characterize NSPS OOOOa requirements as they apply to the Hartford Station. MGT has attached a set of DEP7007 series application forms in Attachment A, detailed emissions calculations in Attachment B, and suggested revisions to the Conditional Major permit in Attachment C to facilitate processing this supplemental information in conjunction with the permit renewal application.

## Description of New Emissions Sources

Permit F-20-043 R1 currently does not include any emissions sources that are subject to NSPS OOOOa. To account for the updated regulatory applicability presented in the Regulatory Applicability Updates section below, MGT has calculated potential emissions from additional emissions sources that are affected facilities under NSPS OOOOa and not currently characterized by the most recently submitted source-wide potential-to-emit (PTE). The additional emissions sources to be added to the air permit and that are affected facilities under NSPS OOOOa include the following:

- ▶ Valves in gas/vapor service;
- ▶ Connectors in gas/vapor service;
- ▶ Pressure Relief Valves (PRVs) in gas/vapor service;
- ▶ Open-ended Lines (OELs) in gas/vapor service; and
- ▶ Compressor seals in gas/vapor service.

## Fugitive Component Count Methodologies

MGT conducted a detailed review of records available after the acquisition of the Hartford Station from the prior owner. The only components for which accurate component counts are maintained are valves and compressor seals. MGT has records of 150 valves at the Hartford Station, some of which are no longer serviceable. As such, MGT believes the 150 valves to be a conservative count and has based the PTE from valves off of this recorded number.

MGT operates four (4) compressors at the Hartford Station, each of which contains two (2) compressor seals. The Hartford Station therefore operates eight (8) total compressor seals.

The remaining fugitive emissions components have been estimated based on either historic component counts or generic literature values from the American Petroleum Institute's (API) Compendium of Greenhouse Gas (GHG) Emissions Methodologies for the Natural Gas and Oil Industry, November 2021 (herein referred to as "the API Compendium"). Prior to issuance of F-20-043 in February 2021, the same area occupied by the current Hartford Station and operated by MGT was covered under the Title V operating permit program as a major source by Permit V-15-028. This prior air permit included a table of fugitive emissions component count estimates permitted under Emission Unit (EU) 05. The total estimated valves count associated with the prior operations covered by V-15-028 was 1,873, and the total estimated connector count was 10,029. For the purpose of permitting fugitive emissions components under a new EU upon issuance of a renewed Conditional Major permit, MGT has elected to estimate the component count based on the historic connector-to-valve ratio from V-15-028 (i.e.,  $10,029 \text{ connectors} / 1,873 \text{ valves} = 5.35$ ). Without an accurately documented component count from the prior owner, MGT is leveraging its best engineering judgement to assert that this connector count is conservatively high. Connector count estimates can typically be calculated assuming three (3) connectors per valve. A connector-to-valve ratio of 5.35 would likely account for any connectors associated with the 150 valves at the facility plus additional connectors throughout the rest of the pipeline at the Hartford Station. The resulting total connector count used for the PTE calculations is 803.

For other fugitive emissions components that are not typically related directly to the number of valves on-site, MGT has used generic component counts from the API Compendium. Table C-6 in the API Compendium summarizes alternative "generic" fugitive component counts for gas production, gas processing, and offshore facilities.

The generic component counts provided in Table C-6 represent component count per equipment/process type. The types of equipment included in Table C-6 that are present at the Hartford Station are compressors and meters. Based on the four (4) compressors and one (1) meter at the Hartford Station, MGT has estimated the total number of OELs and PRVs in gas/vapor service using the generic component counts in Table C-6.

Table 1 below summarizes the total number of each type of fugitive emissions component at the Hartford Station. MGT requests that these fugitive emissions components be added to the air permit upon renewal as a new emissions unit, EU06.

**Table 1. Summary of Estimated Fugitive Emissions Component Counts**

<b>Component Type</b>	<b>Count</b>
Valves	150
Connectors	803
Pressure Relief Valves	14
Open-ended Lines	22
Compressor Seals	8

## **Air Emissions Impacts**

### **New Fugitive Emissions Components**

Section 2 of Attachment B details the emission calculation methodology used to estimate the annual PTE of volatile organic compounds (VOC) and carbon dioxide equivalent (CO<sub>2</sub>e) from leaks from the pipeline components at the Hartford Station. MGT used emission factors published in EPA's "Protocol for Equipment Leak Emissions Estimates"<sup>1</sup> to calculate the annual PTE from each type of component. The emission factors chosen are representative of oil and gas production operations and as such are appropriate to use for estimating natural gas fugitive emissions from pipeline components.

The emission factors for valves, connectors, and OELs in gas service from Table 2-4 in EPA's Protocol were used for all valves, connectors, and OELs at the Hartford Station. For the PRVs and compressor seals, MGT used the emission factor for "Other" components in gas service. Per footnote c to Table 2-4 in EPA's Protocol, the "Other" equipment type was derived from "compressors, diaphragms, drains, dump arms, hatches, instruments, meters, pressure relief valves, polished rods, relief valves, and vents." As such, it is appropriate to apply the emission factor for the "Other" category to the PRVs and compressor seals.

The emission factors are representative of the total mass of leaking natural gas per hour per component (i.e., kg/hr/component). These emission factors can be applied to the emissions of VOC and CO<sub>2</sub>e by multiplying by an appropriate weight fraction. MGT estimates that the inlet gas to the Hartford Station contains approximately 86.42% by weight methane, 0.59% by weight CO<sub>2</sub>, 1.24% by weight VOC, and negligible HAP (see Section 4 of Attachment B for the speciated inlet gas stream composition). Applying these weight fractions to the emission factors from EPA's Protocol, a set of VOC, CO<sub>2</sub>, and methane emission factors were developed for each component type. Multiplying by the number of components and assuming 8,760 hr/yr of operation, the annual uncontrolled PTE of methane, CO<sub>2</sub>, CO<sub>2</sub>e, and VOC was calculated as show in Section 2.4 in Attachment B. Lastly, MGT applied an 80% control efficiency associated with implementing the quarterly optical gas imaging (OGI) program used to comply with the fugitive

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<sup>1</sup> Protocol for Equipment Leak Emissions Estimates (Document EPA-453/R-95/017, November 1995)

emission monitoring requirements of NSPS 0000a.<sup>2</sup> The controlled PTE of methane, CO<sub>2</sub>, CO<sub>2e</sub>, and VOC is also summarized in Section 2.4 of Attachment B.

## Updates to Blowdown Emissions

Through the efforts of developing this supplemental information package to permit the collection of fugitive emissions components, MGT updated the inlet gas analysis to more accurately represent the composition of inlet gas to the Hartford Station. As a result, the underlying compositional information used to derive the PTE from the miscellaneous venting and blowdowns – currently permitted as Insignificant Activity (IA) #3 – were also updated. The previous gas analysis used to derive the PTE from venting and blowdowns assumed a methane content of 89.38% by weight, a CO<sub>2</sub> content of 1.67% by weight, a VOC content of 0.51% by weight, and a total HAP content of 0.01% by weight (see Appendix B of the original Conditional Major permit application submitted by the prior owner of the Hartford Station, APE20200001).

MGT has updated the PTE calculations for venting and blowdowns based on the aforementioned updated gas composition used for speciating the emissions from fugitive emissions components. The updated PTE for IA #3 is included in Section 3 of Attachment B. The revised VOC PTE from venting and blowdowns is approximately 0.29 tpy higher than what was presented in the original Conditional Major permit application due to the increase in VOC content of the inlet gas stream. Additionally, while the methane and CO<sub>2</sub> contents of the inlet gas stream decreased compared to the compositions used in the original Conditional Major permit application, MGT has applied a higher global warming potential (GWP) of 28 to the methane emissions from venting and blowdowns to reflect the current requirements of the Greenhouse Gas Reporting Program under 40 CFR Part 98. The resulting CO<sub>2e</sub> PTE from venting and blowdowns is approximately 88.12 tpy higher than that presented in the original Conditional Major permit application.

As demonstrated by the low VOC and negligible HAP emissions, the venting and blowdowns permitted under IA #3 will continue to meet the requirements for classification as an IA pursuant to 401 KAR 52:030, Section 6. MGT has provided a revised DEP7007DD form in Attachment A.

## Regulatory Applicability Updates

The following subsections detail the federal and state requirements that are potentially applicable to the fugitive emissions components requested to be permitted as the new EU06. Refer to the original permit renewal application for a detailed site-wide state and federal regulatory applicability analysis.

### **40 CFR 60, Subpart 0000a – Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After September 18, 2015, and on or Before December 6, 2022**

#### ***Identification of Affected Facilities***

NSPS 0000a applies to affected facilities that commenced construction, reconstruction, or modification after September 18, 2015, and before December 6, 2022. The affected facilities subject to NSPS 0000a include the following:

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<sup>2</sup> Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review (Document EPA-HQ-OAR-2017-0757, October 2021).

See Section 12.5.2 Control Effectiveness – Emission Reduction.

- a) Each well affected facility, which is a single well that conducts a well completion operation following hydraulic fracturing or refracturing;
- b) Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals;
- c) Each reciprocating compressor affected facility, which is a single reciprocating compressor;
- d) Each pneumatic controller affected facility;
  - a. Each pneumatic controller affected facility not located at a natural gas processing plant, which is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 scfh.
- e) Each storage vessel affected facility, which is a single storage vessel as specified in 40 CFR 60.5365a(e)(1), (2), or (3).;
  - a. (2) Except as specified in 40 CFR 60.5365a(e)(3), a single storage vessel that commenced construction, reconstruction or modification after November 16, 2020, is a storage vessel affected facility if the potential for VOC emissions is equal to or greater than 6 tpy as determined according to 40 CFR 60.5365a(e)(2)(i) or (ii), except as provided in 40 CFR 60.5365a(e)(5)(iv). The determination may take into account requirements under a legally and practicably enforceable limit in an operating permit or other requirement established under a Federal, state, local, or tribal authority. The potential for VOC emissions is calculated on an individual storage vessel basis and is not averaged across the number of storage vessels at the site.
- f) Each group of equipment within a process unit at an onshore natural gas processing plant;
- g) Sweetening units located at an onshore natural gas processing plants;
- h) Each pneumatic pump affected facility;
- i) Except as provided in 40 CFR 60.5365a(i)(2), the collection of fugitive emissions components at a well site, as defined in 40 CFR 60.5430a, is an affected facility; and
- j) The collection of fugitive emissions components at a compressor station, as defined in 40 CFR 60.5430a, is an affected facility. For purposes of 40 CFR 60.5397a, a "modification" to a compressor station occurs when:
  - a. An additional compressor is installed at a compressor station; or
  - b. One or more compressors at a compressor station is replaced by one or more compressors of greater total horsepower than the compressor(s) being replaced. When one or more compressors is replaced by one or more compressors of an equal or smaller total horsepower than the compressor(s) being replaced, installation of the replacement compressor(s) does not trigger a modification of the compressor station for purposes of 40 CFR 60.5397a.

The Hartford Station does not operate a natural gas well, centrifugal compressor, process unit, or sweetening unit as these terms are defined in 40 CFR 60.5430a. Therefore, 40 CFR 60.5365a(a), (b), (f), (g), and (i) do not apply to the operations at the Hartford Station. Additionally, only pneumatic pumps located at natural gas processing plants or well sites are affected facilities under NSPS OOOOa. As such, 40 CFR 60.5365a(h) does not apply to the operations at the Hartford Station.

Pursuant to 40 CFR 60.5365a(d)(1), a pneumatic controller not located at a natural gas processing plant is an affected facility if it is designed as a continuous bleed natural gas-driven device operating at a natural gas bleed rate greater than 6 standard cubic feet per hour (scfh). The Hartford Station's pneumatic devices operate on instrument air and not natural gas; therefore, they are not considered affected facilities under NSPS OOOOa and 40 CFR 60.5365a(d) does not apply to the Hartford Station.

Pursuant to 40 CFR 60.5364a(e)(2), a single storage vessel that commenced construction, reconstruction, or modification after November 16, 2020, is a storage vessel affected facility under NSPS OOOOa if potential

VOC emissions are equal to or greater than 6 tpy. The Oil/Condensate Tank (TK-1) at the Hartford Station meets the definition of a "storage vessel" per 40 CFR 60.5430a and as such is potentially subject to NSPS OOOOa. However, the potential VOC emissions from TK-1 – as summarized in the initial Conditional Major permit application submitted in October 2020 – are less than 6 tpy; therefore, TK-1 is not an affected facility under NSPS OOOOa and 40 CFR 60.5365a(e) does not apply to the Hartford Station.

Pursuant to 40 CFR 60.5365a(c), a reciprocating compressor at a compressor station is an affected facility under NSPS OOOOa. Additionally, pursuant to 40 CFR 60.5365a(j), the collection of fugitive emissions components at a compressor station is an affected facility. While neither reciprocating compressors nor other fugitive emissions components (e.g., pump seals, valves, connectors, etc.) are currently permitted in F-20-043 R1, MGT has determined that the Hartford Station does operate reciprocating compressors and fugitive emissions components which are sources of air emissions, as described in detail in the Air Emissions Impacts section above. The following sections identify the requirements from NSPS OOOOa that are applicable to the reciprocating compressors and the collection of fugitive emissions components at the Hartford Station.

### ***GHG and VOC Emissions Standards for Reciprocating Compressors***

Pursuant to 40 CFR 60.5385a(a), the following standards apply to all reciprocating compressor affected facilities at the Hartford Station:

- ▶ Pursuant to 40 CFR 60.5385a(a), MGT must replace the reciprocating compressor rod packing according to either of the following schedules:
  - On or before the compressor has operated 26,000 hours since initial startup of the reciprocating compressor or the date of the most recent rod packing replacement, whichever is latest; or
  - Prior to 36 months from the date of initial startup of the reciprocating compressor or the date of the most recent rod packing replacement.
- ▶ Alternatively, pursuant to 40 CFR 60.5385a(a)(3), MGT may collect the methane and VOC emissions from the rod packing using a rod packing emissions collection system that operates under negative pressure and routes the rod packing emissions to a process through a closed vent systems that meets the requirements of 40 CFR 60.5411a(a) and (d).

MGT elects to comply with the rod packing replacement provisions of 40 CFR 60.5385a(a)(1) by replacing each reciprocating compressor rod packing on or before 26,000 hours since the previous rod packing replacement. Pursuant to 40 CFR 60.5415a(c)(1), continuous compliance is demonstrated by continuously monitoring the hours since the most recent rod packing replacement.

### ***GHG and VOC Standards for the Collection of Fugitive Emissions Components at a Compressor Station***

Pursuant to 40 CFR 60.5397a, MGT must reduce GHG and VOC emissions from fugitive emission components by complying with the requirements of 40 CFR 60.5397a(a) through (j). MGT has included the summary below to outline the requirements of NSPS OOOOa that are applicable to the collection of fugitive emission components at Hartford Station. The list of applicable requirements is also provided on the DEP7007V form included in Attachment A to this supplement.

- ▶ MGT will monitor all fugitive emission components in accordance with 40 CFR 60.5397a(b) through (g), repair all sources of fugitive emission in accordance with 40 CFR 60.5397a(h), keep records in accordance with 40 CFR 60.5397a(i), and submit reports in accordance with 40 CFR 60.5397a(j).

- ▶ MGT will develop a fugitive emissions monitoring plan that contains all required elements indicated in 40 CFR 60.5397a(c) and (d).
- ▶ MGT will conduct ongoing fugitive emissions monitoring surveys in accordance with 40 CFR 60.5397a(e) and according to the schedule of 40 CFR 60.5397a(g).
- ▶ MGT will make a first attempt at repair of each identified source of fugitive emissions no later than 30 calendar days after detection of the fugitive emissions.
- ▶ MGT will repair each identified source of fugitive emissions as soon as practicable, but no later than 30 calendar days after the first attempt at repair, notwithstanding the delay of repair provisions allowed by 40 CFR 60.5397a(h)(3).
- ▶ MGT will resurvey each identified source of fugitive emissions after repairs are completed to ensure there are no fugitive emissions.

Pursuant to 40 CFR 60.5415a(h), continuous compliance is demonstrated by meeting the periodic emissions monitoring survey and fugitive emission repair requirements of 40 CFR 60.5397a(g) and (h).

### ***Alternative Means of Emission Limitations and Alternative Fugitive Emissions Standards***

NSPS OOOOa provides alternative means of emission limitations for GHG and VOC from reciprocating compressors and the collection of fugitive emissions components at a compressor station under 40 CFR 60.5398a. Additionally, 40 CFR 60.5399a provides alternative fugitive emissions standards for the collection of fugitive emissions components at a compressor station. MGT is not requesting any alternative means of emission limitation or alternative fugitive emissions standards at this time.

### ***Recordkeeping Requirements***

MGT must maintain the following records for at least five (5) years as required by 40 CFR 60.5420a(c):

- ▶ For the reciprocating compressors, MGT will record the cumulative number of hours of operation since the previous replacement of the rod packing, the date and time of each rod packing replacement, and any deviations in cases where the reciprocating compressors are not operated in compliance with the requirements of 40 CFR 60.5385a.
- ▶ For the collection of fugitive emissions components, MGT will record the date of the startup, the fugitive emissions monitoring plan, and records of each fugitive emissions monitoring survey.

Additional details regarding the records required for the reciprocating compressors and the collection of fugitive components at the Hartford Station are provided in the DEP7007V form included in Attachment A to this supplement.

### ***Reporting Requirements***

MGT must submit the following reports as required by 40 CFR 60.5420a(b):

- ▶ An initial annual report containing the information specified in 40 CFR 60.5420a(b)(1), (4), and (7), in accordance with the procedures of 40 CFR 60.5420a(b)(11) and (13) through (14), shall be submitted no later than 90 days after the end of the initial compliance period
- ▶ Annual reports containing the information specified in 40 CFR 60.5420a(b)(1), (4), and (7), in accordance with the procedures of 40 CFR 60.5420a(b)(11) and (13) through (14), shall be submitted no later than the same date each year as the initial annual report.

Although Permit F-20-043 did not include any conditions from NSPS OOOOa, the prior owner of the Hartford Station had determined the initial compliance period in accordance with 40 CFR 60.5410a to be the period ending October 14, 2022. This set the deadline for the initial annual report to January 12, 2023 (i.e., 90 days after the end of the initial compliance period). The prior owner continued to submit subsequent annual reports containing only the information required by 40 CFR 60.5420a(b)(1) and (4) for reciprocating compressors by January 12<sup>th</sup> of each year for the prior October 15<sup>th</sup> – October 14<sup>th</sup> compliance period.

MGT proposes to continue to report the information required by 40 CFR 60.5420a(b)(1) and (4) by January 12<sup>th</sup> of each year for the prior October 15<sup>th</sup> – October 14<sup>th</sup> compliance period, and all future annual reports will include the information required by 40 CFR 60.5420a(b)(7) for the collection of fugitive emissions components.

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

Kentucky regulates the emissions of toxic air pollutant emissions through 401 KAR 63:020. The Division can require that dispersion modeling or other analyses be completed by facilities at permit renewal or when constructing equipment when there is an increase in toxic pollutant emissions, as defined under 401 KAR 63:020, Section 2(2), deemed to be "significant." This is done so that there is a documented basis for affirming that a facility does not cause an adverse impact. However, pursuant to 401 KAR 63:020, Section 1, the requirements of this rule are applicable only to the extent that such emissions are not elsewhere subject to the provisions of the KAR.

Based on the quantity of emission rates of toxic air pollutants from the fugitive emissions components presented in Section 2.4 of Attachment B, MGT anticipates that a "no adverse impact" determination can be qualitatively asserted and that the preparation of a refined air dispersion modeling analysis to evaluate the ambient impacts of toxic air pollutant emissions will not be required.

### **Certification Statement**

Based on information and belief formed after reasonable inquiry, the statements and information contained in this notification are true, accurate, and complete. This declaration is affirmed by the Hartford Station's responsible official via the signature on the DEP7007AI form in Attachment A. If you have any questions or comments about the permit renewal supplemental information provided herein, please do not hesitate to contact Kim Walker via email at [kimberly.walker@dtmidstream.com](mailto:kimberly.walker@dtmidstream.com).

Sincerely,

DT Midstream, Inc.



Kimberly A. Walker  
Environmental Manager

### **Attachments**

cc: Chris Bender, DT Midstream  
Austin Angeline, Trinity Consultants

**ATTACHMENT A – DEP7007 SERIES FORMS**

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<p style="text-align: center;"><b>Division for Air Quality</b></p> <p style="text-align: center;">300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999</p>	<p><b>DEP7007AI</b></p> <p><b>Administrative Information</b></p> <p>___ Section AI.1: Source Information</p> <p>___ Section AI.2: Applicant Information</p> <p>___ Section AI.3: Owner Information</p> <p>___ Section AI.4: Type of Application</p> <p>___ Section AI.5: Other Required Information</p> <p>___ Section AI.6: Signature Block</p> <p>___ Section AI.7: Notes, Comments, and Explanations</p>	<p style="text-align: center;"><b>Additional Documentation</b></p> <p style="text-align: center;"><b>None</b></p> <p>___ Additional Documentation attached</p>																														
<p><b>Source Name:</b> <u>Midwestern Gas Transmission Company, L.L.C. - Hartford Compressor Station</u></p> <hr/> <p><b>KY EIS (AFS) #:</b> <u>21- 183-00085</u></p> <hr/> <p><b>Permit #:</b> <u>F-20-043 R1</u></p> <hr/> <p><b>Agency Interest (AI) ID:</b> <u>39508</u></p> <hr/> <p><b>Date:</b> <u>12/10/2025</u></p> <hr/>																																
<p><b>Section AI.1: Source Information</b></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;"><b>Physical Location</b></td> <td style="width: 15%;"><b>Street:</b></td> <td colspan="3"><u>102 Kirk Lane</u></td> </tr> <tr> <td><b>Address:</b></td> <td><b>City:</b></td> <td><b>County:</b></td> <td><b>State:</b></td> <td><b>Zip Code:</b></td> </tr> <tr> <td></td> <td><u>Hartford</u></td> <td><u>Ohio</u></td> <td></td> <td><u>42347</u></td> </tr> <tr> <td><b>Mailing Address:</b></td> <td><b>Street or P.O. Box:</b></td> <td colspan="3"><u>100 W. 5<sup>th</sup> Street</u></td> </tr> <tr> <td></td> <td><b>City:</b></td> <td><b>State:</b></td> <td><b>Zip Code:</b></td> <td></td> </tr> <tr> <td></td> <td><u>Tulsa</u></td> <td><u>OK</u></td> <td><u>74103</u></td> <td></td> </tr> </table>			<b>Physical Location</b>	<b>Street:</b>	<u>102 Kirk Lane</u>			<b>Address:</b>	<b>City:</b>	<b>County:</b>	<b>State:</b>	<b>Zip Code:</b>		<u>Hartford</u>	<u>Ohio</u>		<u>42347</u>	<b>Mailing Address:</b>	<b>Street or P.O. Box:</b>	<u>100 W. 5<sup>th</sup> Street</u>				<b>City:</b>	<b>State:</b>	<b>Zip Code:</b>			<u>Tulsa</u>	<u>OK</u>	<u>74103</u>	
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	<u>Tulsa</u>	<u>OK</u>	<u>74103</u>																													
<p><b>Standard Coordinates for Source Physical Location</b></p> <p><b>Longitude:</b> <u>-86.83837</u> (decimal degrees)      <b>Latitude:</b> <u>37.50617</u> (decimal degrees)</p>																																
<p><b>Primary (NAICS) Category:</b> <u>Pipeline Transportation of Natural Gas</u>      <b>Primary NAICS #:</b> <u>486210</u></p>																																

<b>Classification (SIC) Category:</b>		<u>Natural Gas Transmission</u>	<b>Primary SIC #:</b>		<u>4922</u>
<b>Briefly discuss the type of business conducted at this site:</b>		The Hartford Station boosts natural gas transmission pressures by compressing low-pressure transmission gas and directing it into a high-pressure transmission line.			
<b>Description of Area Surrounding Source:</b>	<input checked="" type="checkbox"/> Rural Area	<input type="checkbox"/> Industrial Park	<input type="checkbox"/> Residential Area	<b>Is any part of the source located on federal land?</b>	<input type="checkbox"/> Yes
	<input type="checkbox"/> Urban Area	<input type="checkbox"/> Industrial Area	<input type="checkbox"/> Commercial Area		<input checked="" type="checkbox"/> No
				5	
<b>Approximate distance to nearest residence or commercial property:</b>		<b>Property Area:</b>		<b>Is this source portable?</b>	
<u>~1,000 feet</u>		<u>~25 acres</u>		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?</b>					
<b>NPDES/KPDES:</b> <input type="checkbox"/> Currently Hold <input type="checkbox"/> Need <input checked="" type="checkbox"/> N/A					
<b>Solid Waste:</b> <input type="checkbox"/> Currently Hold <input type="checkbox"/> Need <input checked="" type="checkbox"/> N/A					
<b>RCRA:</b> <input checked="" type="checkbox"/> Currently Hold <input type="checkbox"/> Need <input type="checkbox"/> N/A					
<b>UST:</b> <input type="checkbox"/> Currently Hold <input type="checkbox"/> Need <input checked="" type="checkbox"/> N/A					
<b>Type of Regulated Waste Activity:</b>					
<input type="checkbox"/> Mixed Waste Generator		<input checked="" type="checkbox"/> Generator		<input type="checkbox"/> Recycler <input type="checkbox"/> Other: _____	
<input type="checkbox"/> U.S. Importer of Hazardous Waste		<input type="checkbox"/> Transporter		<input type="checkbox"/> Treatment/Storage/Disposal Facility <input type="checkbox"/> N/A	

<b>Section AI.2: Applicant Information</b>	
<b>Applicant Name:</b>	<u>Midwestern Gas Transmission Company, L.L.C.</u>
<b>Title:</b> (if individual)	_____
<b>Mailing Address:</b>	<b>Street or P.O. Box:</b> <u>100 W. 5<sup>th</sup> Street</u> <b>City:</b> <u>Tulsa</u> <b>State:</b> <u>OK</u> <b>Zip Code:</b> <u>74103</u>
<b>Email:</b> (if individual)	_____
<b>Phone:</b>	<u>918-588-7000</u>
<b>Technical Contact</b>	
<b>Name:</b>	<u>Kimberly Walker</u>
<b>Title:</b>	<u>Environmental Manager</u>
<b>Mailing Address:</b>	<b>Street or P.O. Box:</b> <u>1000 Noble Energy Drive, Suite 500</u> <b>City:</b> <u>Canonsburg</u> <b>State:</b> <u>PA</u> <b>Zip Code:</b> <u>15317</u>
<b>Email:</b>	<u>kimberly.walker@dtmidstream.com</u>
<b>Phone:</b>	<u>724-954-5329</u>
<b>Air Permit Contact for Source</b>	
<b>Name:</b>	<u>Same as Technical Contact</u>
<b>Title:</b>	_____
<b>Mailing Address:</b>	<b>Street or P.O. Box:</b> _____ <b>City:</b> _____ <b>State:</b> _____ <b>Zip Code:</b> _____
<b>Email:</b>	_____
<b>Phone:</b>	_____



**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 Operating Permit  
 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:
<input type="checkbox"/> Particulate Matter	_____	<input type="checkbox"/> Single HAP	_____
<input type="checkbox"/> Volatile Organic Compounds (VOC)	_____	<input type="checkbox"/> Combined HAPs	_____
<input type="checkbox"/> Carbon Monoxide	_____	<input type="checkbox"/> Air Toxics (40 CFR 68, Subpart F)	_____
<input type="checkbox"/> Nitrogen Oxides	_____	<input type="checkbox"/> Carbon Dioxide	_____
<input type="checkbox"/> Sulfur Dioxide	_____	<input type="checkbox"/> Greenhouse Gases (GHG)	_____
<input type="checkbox"/> Lead	_____	<input type="checkbox"/> Other	_____

**For New Construction:**

**Proposed Start Date of Construction:**    \_\_\_\_\_    **Proposed Operation Start-Up Date:** (MM/YYYY)    \_\_\_\_\_  
 (MM/YYYY)    N/A    N/A

**For Modifications:**

**Proposed Start Date of Modification:**    \_\_\_\_\_    **Proposed Operation Start-Up Date:** (MM/YYYY)    \_\_\_\_\_  
 (MM/YYYY)    N/A    N/A

**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:

- |  |   |
|--|---|
| <input type="checkbox"/> DEP7007A Indirect Heat Exchangers and Turbines                        | <input type="checkbox"/> DEP7007CC Compliance Certification <a href="#">On file with KDAQ; see also the 1H2025 SAMR</a> |
| <input checked="" type="checkbox"/> DEP7007B Manufacturing or Processing Operations            | <input checked="" type="checkbox"/> DEP7007DD Insignificant Activities  |
| <input type="checkbox"/> DEP7007C Incinerators and Waste Burners                               | <input type="checkbox"/> DEP7007EE Internal Combustion Engines  |
| <input type="checkbox"/> DEP7007F Episode Standby Plan   | <input type="checkbox"/> DEP7007FF Secondary Aluminum Processing  |
| <input type="checkbox"/> DEP7007J Volatile Liquid Storage                                      | <input type="checkbox"/> DEP7007GG Control Equipment  |
| <input type="checkbox"/> DEP7007K Surface Coating or Printing Operations                       | <input type="checkbox"/> DEP7007HH Haul Roads   |
| <input type="checkbox"/> DEP7007L Mineral Processes  | <input type="checkbox"/> Confidentiality Claim  |
| <input type="checkbox"/> DEP7007M Metal Cleaning Degreasers                                    | <input type="checkbox"/> Ownership Change Form  |
| <input checked="" type="checkbox"/> DEP7007N Source Emissions Profile                          | <input type="checkbox"/> Secretary of State Certificate   |
| <input type="checkbox"/> DEP7007P Perchloroethylene Dry Cleaning Systems                       | <input type="checkbox"/> Flowcharts or diagrams depicting process   |
| <input type="checkbox"/> DEP7007R Emission Offset Credit                                       | <input type="checkbox"/> Digital Line Graphs (DLG) files of buildings, roads, etc.                                      |
| <input type="checkbox"/> DEP7007S Service Stations   | <input type="checkbox"/> Site Map   |
| <input type="checkbox"/> DEP7007T Metal Plating and Surface Treatment Operations               | <input type="checkbox"/> Map or drawing depicting location of facility  |
| <input checked="" type="checkbox"/> DEP7007V Applicable Requirements and Compliance Activities | <input type="checkbox"/> Safety Data Sheet (SDS)  |
| <input type="checkbox"/> DEP7007Y Good Engineering Practice and Stack Height Determination     | <input type="checkbox"/> Emergency Response Plan  |
| <input type="checkbox"/> DEP7007AA Compliance Schedule for Non-complying Emission Units        | <input type="checkbox"/> Other: _____   |
| <input type="checkbox"/> DEP7007BB Certified Progress Report                                   |   |

**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.



Authorized Signature

12/15/25

Date

Jeffrey M. Holland

Type or Printed Name of Signatory

Vice President, Interstate Pipelines

Title of Signatory

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

<b>Section AI.7: Notes, Comments, and Explanations</b>

Division for Air Quality  300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	<h2 style="margin: 0;">DEP7007B</h2> <h3 style="margin: 10px 0 0 0;">Manufacturing or Processing Operations</h3> <p style="margin: 0 0 0 20px;"> <input type="checkbox"/> Section B.1: Process Information  <input type="checkbox"/> Section B.2: Materials and Fuel Information  <input type="checkbox"/> Section B.3: Notes, Comments, and Explanations                 </p>	<b style="text-align: center;">Additional Documentation</b>  ___ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG.  ___ Attach a flow diagram ___ Attach SDS
--	--	--

<b>Source Name:</b>	Midwestern Gas Transmission Company, L.L.C. - Hartford Compressor Station
<b>KY EIS (AFS) #:</b>	183-00085
<b>Permit #:</b>	F-20-043 R1
<b>Agency Interest (AI) ID:</b>	39508
<b>Date:</b>	12/10/2025

**Section B.1: Process Information**

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement	Is the Process <u>Continuous</u> or <u>Batch</u> ?	Number of Batches per 24 Hours <i>(if applicable)</i>	Hours per Batch <i>(if applicable)</i>
06	Pipeline Fugitive Emissions Components		1	Valves	N/A	N/A	10/2021	Continuous	N/A	N/A
			2	Connectors						
			3	Relief Valves						
			4	Open-Ended Lines						
			5	Compressor Seals						

**Section B.2: Materials and Fuel Information**

*\*Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit <i>(tons/hr)</i>	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				<i>(Specify Units/hr)</i>				<i>(Specify Units/hr)</i>			<i>(Specify Units)</i>		<i>(Specify Units)</i>		
06	Pipeline Fugitive Emissions	Natural Gas	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Section B.3: Notes, Comments, and Explanations**

While not process operations, the natural gas pipeline fugitive emissions components are included on this DEP7007B form to comprehensively represent all new emissions sources on required DEP7007 series forms.


Division for Air Quality  300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	<b>DEP7007N</b> Source Emissions Profile  <input type="checkbox"/> Section N.1: Emission Summary <input type="checkbox"/> Section N.2: Stack Information <input type="checkbox"/> Section N.3: Fugitive Information <input type="checkbox"/> Section N.4: Notes, Comments, and Explanations	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: center;">Additional Documentation</th> </tr> <tr> <td style="text-align: center; padding: 5px;"> <input type="checkbox"/> Complete DEP7007AI                 </td> </tr> </table>	Additional Documentation	<input type="checkbox"/> Complete DEP7007AI
Additional Documentation				
<input type="checkbox"/> Complete DEP7007AI				

**Source Name:** Midwestern Gas Transmission Company, L.L.C. - Hartford Compressor Station  
**KY EIS (AFS) #:** 21- 183-0085  
**Permit #:** F-20-043 R1  
**Agency Interest (AI) ID:** 39508  
**Date:** 12/10/2025

**N.1: Emission Summary**

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (c.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
06	Pipeline Fugitive Emissions Components	1	Valves	Quarterly OGI Monitoring	NA	NA	150	CO2e	0.24	CO2 * CO2 GWP + CH4 * CH4 GWP	100%	80%	36.0	7.20	158	31.6
							150	CO2	5.84E-05	Document EPA-453/R-95/017, November 1995	100%	80%	8.76E-03	1.75E-03	0.04	7.68E-03
							150	Methane	8.57E-03	Document EPA-453/R-95/017, November 1995	100%	80%	1.29	0.26	5.63	1.13
							150	VOC	1.23E-04	Document EPA-453/R-95/017, November 1995	100%	80%	0.02	3.68E-03	0.08	0.02
06	Pipeline Fugitive Emissions Components	2	Connectors	Quarterly OGI Monitoring	NA	NA	803	CO2e	0.01	CO2 * CO2 GWP + CH4 * CH4 GWP	100%	80%	8.57	1.71	37.5	7.51
							803	CO2	2.60E-06	Document EPA-453/R-95/017, November 1995	100%	80%	2.09E-03	4.17E-04	9.14E-03	1.83E-03
							803	Methane	3.81E-04	Document EPA-453/R-95/017, November 1995	100%	80%	0.31	0.06	1.34	0.27
							803	VOC	5.46E-06	Document EPA-453/R-95/017, November 1995	100%	80%	4.38E-03	8.76E-04	0.02	3.84E-03
06	Pipeline Fugitive Emissions Components	3	Relief Valves	Quarterly OGI Monitoring	NA	NA	14	CO2e	0.47	CO2 * CO2 GWP + CH4 * CH4 GWP	100%	80%	6.57	1.31	28.8	5.76
							14	CO2	1.14E-04	Document EPA-453/R-95/017, November 1995	100%	80%	1.60E-03	3.20E-04	7.01E-03	1.40E-03
							14	Methane	0.02	Document EPA-453/R-95/017, November 1995	100%	80%	0.23	0.05	1.03	0.21
							14	VOC	2.40E-04	Document EPA-453/R-95/017, November 1995	100%	80%	3.36E-03	6.72E-04	0.01	2.94E-03

06	Pipeline Fugitive Emissions Components	4	Open-Ended Lines	Quarterly OGI Monitoring	NA	NA	22	CO2e	0.11	CO2 * CO2 GWP + CH4 * CH4 GWP	100%	80%	2.35	0.47	10.3	2.06
							22	CO2	2.60E-05	Document EPA-453/R-95/017, November 1995	100%	80%	5.71E-04	1.14E-04	2.50E-03	5.00E-04
							22	Methane	3.81E-03	Document EPA-453/R-95/017, November 1995	100%	80%	0.08	0.02	0.37	0.07
							22	VOC	5.46E-05	Document EPA-453/R-95/017, November 1995	100%	80%	1.20E-03	2.40E-04	5.26E-03	1.05E-03
06	Pipeline Fugitive Emissions Components	5	Compressor Seals	Quarterly OGI Monitoring	NA	NA	8	CO2e	0.47	CO2 * CO2 GWP + CH4 * CH4 GWP	100%	80%	3.76	0.75	16.5	3.29
							8	CO2	1.14E-04	Document EPA-453/R-95/017, November 1995	100%	80%	9.14E-04	1.83E-04	4.00E-03	8.01E-04
							8	Methane	0.02	Document EPA-453/R-95/017, November 1995	100%	80%	0.13	0.03	0.59	0.12
							8	VOC	2.40E-04	Document EPA-453/R-95/017, November 1995	100%	80%	1.92E-03	3.84E-04	8.41E-03	1.68E-03

<b>Section N.2: Stack Information</b>									
<b>UTM Zone: 16</b>									
Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter <i>(ft)</i>	Height <i>(ft)</i>	Base Elevation <i>(ft)</i>	Northing <i>(m)</i>	Easting <i>(m)</i>	Flowrate <i>(acfm)</i>	Temperature <i>(°F)</i>	Exit Velocity <i>(ft/sec)</i>
Not applicable to this submittal									

**Section N.3: Fugitive Information**
**UTM Zone: 16**

Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side <i>(ft)</i>	Length of the Y Side <i>(ft)</i>	Northing <i>(m)</i>	Easting <i>(m)</i>	Release Temperature <i>(°F)</i>	Release Height <i>(ft)</i>
06	Pipeline Fugitive Emissions Components	1	~1,000	~660	4,151,000	514,300	Varies	Varies
		2						
		3						
		4						



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: [Midwestern Gas Transmission Company, L.L.C. - Hartford Compressor Station](#)  
 KY EIS (AFS) : 21- [183-00085](#)  
 Permit #: [F-20-043 R1](#)  
 Agency Interest (AI) ID: [39508](#)  
 Date: [12/10/2025](#)

### 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)
06	Pipeline Fugitive Emissions Components	401 KAR 63:020	Toxic Air Pollutants	N/A	N/A	The permittee shall provide the utmost care and consideration in the handling of hazardous matter or toxic substances to the potentially harmful effects of the emissions resulting from such activities. The permittee shall not allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants. Evaluation of such facilities as to adequacy of controls and/or procedures and emission potential will be made on an individual basis by the cabinet.	Compliance demonstrated based upon the emission rates of toxics and hazardous air pollutants from the affected facility.

<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>Applicable Regulation or Requirement</b>	<b>Pollutant</b>	<b>Emission Limit (if applicable)</b>	<b>Voluntary Emission Limit or Exemption (if applicable)</b>	<b>Operating Requirement or Limitation (if applicable)</b>	<b>Method of Determining Compliance with the Emission and Operating Requirement(s)</b>
06	Pipeline Fugitive Emissions Components	NSPS 0000a 40 CFR 60.5370a(b)	VOC/GHG	N/A	N/A	At all times, including periods of startup, shutdown, and malfunction, the permittee shall maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. The provisions for exemption from compliance during periods of startup, shutdown and malfunctions provided for in 40 CFR 60.8(c) do not apply to 40 CFR 60, Subpart 0000a.	Refer to monitoring, recordkeeping, and reporting requirements
06	Pipeline Fugitive Emissions Components	NSPS 0000a 40 CFR 60.5385a(a)	VOC/GHG	N/A	N/A	The permittee must replace the reciprocating compressor rod packing on or before the total number of hours of operation reaches 26,000 hours since initial startup or the most recent rod packing replacement, or the number of months since startup or since the most recent rod packing replacement reaches 36 months.	Refer to monitoring, recordkeeping, and reporting requirements
06	Pipeline Fugitive Emissions Components	NSPS 0000a 40 CFR 60.5397a(a)	VOC/GHG	N/A	N/A	The permittee must monitor all fugitive emission components in accordance with 40 CFR 60.5397a(b)-(g), repair all sources of fugitive emissions in accordance with 40 CFR 60.5397a(h), keep records in accordance with 40 CFR 60.5397a(i), and report in accordance with 40 CFR 60.5397a(j).	Refer to monitoring, recordkeeping, and reporting requirements
06	Pipeline Fugitive Emissions Components	NSPS 0000a 40 CFR 60.5397a(h)(1)	VOC/GHG	N/A	N/A	A first attempt at repair of an identified source of fugitive emissions shall be made no later than 30 calendar days after detection of the fugitive emissions.	Refer to monitoring, recordkeeping, and reporting requirements

<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>Applicable Regulation or Requirement</b>	<b>Pollutant</b>	<b>Emission Limit (if applicable)</b>	<b>Voluntary Emission Limit or Exemption (if applicable)</b>	<b>Operating Requirement or Limitation (if applicable)</b>	<b>Method of Determining Compliance with the Emission and Operating Requirement(s)</b>
06	Pipeline Fugitive Emissions Components	NSPS 0000a 40 CFR 60.5397a(h)(2)	VOC/GHG	N/A	N/A	Repair shall be completed as soon as practicable, but no later than 30 calendar days after the first attempt at repair as required in 40 CFR 60.5397a(h)(1).	Refer to monitoring, recordkeeping, and reporting requirements
06	Pipeline Fugitive Emissions Components	NSPS 0000a 40 CFR 60.5397a(h)(3)	VOC/GHG	N/A	N/A	<p>If the repair is technically infeasible, would require a vent blowdown, a compressor station shutdown, or would be unsafe to repair during operation of the unit, the repair must be completed during the next scheduled compressor station shutdown for maintenance, after a scheduled vent blowdown, or within 2 years of detecting the fugitive emissions, whichever is earliest.</p> <p>If the repair requires replacement of a fugitive emissions component or a part thereof, but the replacement cannot be acquired and installed within the repair timelines specified in 40 CFR 60.5397a(h)(1) and (2) due to either of the conditions in 40 CFR 60.5397a(h)(3)(ii)(A) or (B), the permittee must comply with the requirements as specified by 40 CFR 60.5397a(h)(3)(ii)(C) and documented in accordance with 40 CFR 60.5420a(c)(15)(vii)(I).</p>	Refer to monitoring, recordkeeping, and reporting requirements
06	Pipeline Fugitive Emissions Components	NSPS 0000a 40 CFR 60.5397a(h)(4)	VOC/GHG	N/A	N/A	Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in 40 CFR 60.5397a(h)(4)(i) through (iv), to ensure that there are no fugitive emissions.	Refer to monitoring, recordkeeping, and reporting requirements
06	Pipeline Fugitive Emissions Components	NSPS 0000a 40 CFR 60.5410a(c)	VOC/GHG	N/A	N/A	To achieve initial compliance with the standards for each reciprocating compressor affected facility, the permittee must comply with 40 CFR 60.5410a(c)(1)-(4).	Refer to monitoring, recordkeeping, and reporting requirements
06	Pipeline Fugitive Emissions Components	NSPS 0000a 40 CFR 60.5410a(j)	VOC/GHG	N/A	N/A	To achieve initial compliance with the fugitive emission standards for each collection of fugitive emissions components at a compressor station the permittee must comply with 40 CFR 60.5410a(j)(1) through (5).	Refer to monitoring, recordkeeping, and reporting requirements

## Section V.2: Monitoring Requirements

<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>Pollutant</b>	<b>Applicable Regulation or Requirement</b>	<b>Parameter Monitored</b>	<b>Description of Monitoring</b>
06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5397a(b)	Fugitive Emissions	The permittee must develop an emissions monitoring plan that covers the collection of fugitive emissions components at compressor stations within each company-defined area in accordance with 40 CFR 60.5397a(c) and (d).
06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5397a(c)-(d)	Fugitive Emissions	The permittee must include in the fugitive emissions monitoring plan the elements specified in 40 CFR 60.5397a(c)(1) through (c)(8) at a minimum, and 40 CFR 60.5397a(d)(1) through (d)(3) as applicable.
06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5397a(e)	Fugitive Emissions	Each monitoring survey shall observe each fugitive emissions component, as defined in 40 CFR 60.5430a, for fugitive emissions.
06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5397a(f)(2)	Fugitive Emissions	The permittee must conduct an initial monitoring survey within 90 days of the startup of a new compressor station for each collection of fugitive emissions components at the new compressor station. For a modified collection of fugitive emissions components at a compressor station, the initial monitoring survey must be conducted within 90 days of the modification.
06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5397a(g)(2)	Fugitive Emissions	A monitoring survey of the collection of fugitive emissions components at a compressor station must be conducted at least quarterly after the initial survey. Consecutive quarterly monitoring surveys must be conducted at least 60 days apart.
06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5397a(g)(3)	Fugitive Emissions	Fugitive emissions components that are designated difficult-to-monitor must meet the specifications of 40 CFR 60.5397a(g)(3)(i) through (iv).
06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5397a(g)(4)	Fugitive Emissions	Fugitive emissions components that are designated unsafe-to-monitor must meet the specifications of 40 CFR 60.5397a(g)(4)(i) through (iv).
06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5415a(c)(1)	Hours of operation and months since startup	The permittee must continuously monitor the number of hours of operation for each reciprocating compressor affected facility or track the number of months since initial startup or since the date of the most recent reciprocating compressor rod packing replacement, whichever is latest.

### Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5420a(c)	N/A	All records required by NSPS 0000a must be maintained either onsite or at the nearest local field office for at least 5 years. Any records required to be maintained by NSPS 0000a that are submitted electronically via the EPA's CDX may be maintained in electronic format.
06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5420a(c)(3)	Hours since last rod packing replacement	<p>The permittee must maintain records of the cumulative number of hours of operation, or number of months since initial startup or since the previous replacement of the reciprocating compressor rod packing, whichever is latest.</p> <p>The permittee must maintain records of the date and time of each reciprocating compressor rod packing replacement.</p> <p>The permittee must maintain records of deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in 40 CFR 60.5385a, including the date and time the deviation began, duration of the deviation, and a description of the deviation.</p>
06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5420a(c)(15)	Fugitive Emissions	<p>The permittee must maintain records of the date of the startup or the date of the first day of production after modification for each collection of fugitive emissions components at a compressor station.</p> <p>The permittee must maintain records of the fugitive emissions monitoring plan.</p> <p>The permittee must maintain records of each monitoring survey as specified in 40 CFR 60.5420(c)(15)(vii)(A)-(I).</p>

## Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5420a(b)	N/A	The permittee must submit annual reports containing the information specified in 40 CFR 60.5420a(b)(1) through (8) and (12). The permittee must submit annual reports following the procedure specified in 40 CFR 60.5420a(b)(11). The initial annual report is due no later than 90 days after the end of the initial compliance period as determined according to 40 CFR 60.5410a. Subsequent annual reports are due no later than the same date each year as the initial annual report. The permittee may submit one report for multiple affected facilities provided the report contains all of the information required. Annual reports may coincide with Title V reports as long as all required elements of the annual report are included.
06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5420a(b)(1)	General	The permittee shall report the general information specified in 40 CFR 60.5420a(b)(1)(i)-(iv).
06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5420a(b)(4)	Hours since last rod packing replacement	The permittee shall report the cumulative number of hours of operation, or the number of months since initial startup or since the previous reciprocating compressor rod packing replacement, whichever is latest.  The permittee shall report, for each deviation that occurred during the reporting period and recorded as specified in 40 CFR 5420a(c)(3)(iii), the date and time the deviation began, duration of the deviation and a description of the deviation.
06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5420a(b)(7)	Fugitive Emissions	The permittee shall report the designation of the type of site at which the collection of fugitive emissions components is located. For each collection of fugitive emissions components at a compressor station that became an affected facility during the reporting period, the permittee must include the date of startup or the date of modification.  For each fugitive emissions monitoring survey performed during the annual reporting period, the permittee shall report the information specified in 40 CFR 60.5420a(b)(7)(ii)(A)-(G).

06	Pipeline Fugitive Emissions Components	VOC/GHG	NSPS 0000a 40 CFR 60.5420a(b)(11) and (13)-(14)	N/A	<p>The permittee must submit reports to EPA via CEDRI in accordance with 40 CFR 60.5420a(b)(11).</p> <p>The permittee may assert a claim of EPA system outage for failure to timely comply with the reporting requirement. To assert a claim of EPA system outage, the permittee must meet the requirements outlined in 40 CFR 60.5420a(b)(13)(i)-(vii).</p> <p>The permittee may assert a claim of force majeure for failure to timely comply with the reporting requirement. To assert a claim of force majeure, the permittee must meet the requirements outlined in 40 CFR 60.5420a(b)(14)(i)-(v).</p>
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**Section V.5: Testing Requirements**

<b>Emission Unit #</b>	<b>Emission Unit Description</b>	<b>Pollutant</b>	<b>Applicable Regulation or Requirement</b>	<b>Parameter Tested</b>	<b>Description of Testing</b>
06	Pipeline Fugitive Emissions Components	VOC/GHG	401 KAR 50:045, Section 1	N/A	Testing shall be conducted at such times as may be requested by the Cabinet.



Division for Air Quality

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

**DEP7007DD**

**Insignificant Activities**

- \_\_\_ Section DD.1: Table of Insignificant Activities
- \_\_\_ Section DD.2: Signature Block
- \_\_\_ Section DD.3: Notes, Comments, and Explanations

**Source Name:** Midwestern Gas Transmission Company, L.L.C. - Hartford Compressor Station

**KY EIS (AFS** 21- 183-00085

**Permit #:** F-20-043 R1

**Agency Interest (AI) ID:** 39508

**Date:** 12/10/2025

**Section DD.1: Table of Insignificant Activities**

\*Identify each activity with a unique Insignificant Activity number (IA #); for example: 1, 2, 3... etc.

Insignificant Activity #	Description of Activity including Rated Capacity	Serial Number or Other Unique Identifier	Applicable Regulation(s)	Calculated Emissions
1	TK-1 Oil/Condensate Loading	N/A	401 KAR 63:020	VOC: 0.63 tpy
2	TK-1 Oil/Condensate Tank	N/A	401 KAR 63:020	VOC: 1.34 tpy
3	Venting/Blowdown Emissions	N/A	401 KAR 63:020	<b>VOC: 0.50 tpy</b>

**Section DD.2: 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.

**By:**



**Authorized Signature**

Jeffrey M. Holland

**Type/Print Name of Signatory**

12/15/25

**Date**

Vice President, Interstate Pipelines

**Title of Signatory**

<b>Section DD.3: Notes, Comments, and Explanations</b>
The only update to the list of insignificant activities compared to the original Conditional Major permit application submitted in October 2020 is the updated PTE from the misc. venting and blowdowns under IA #3.

## **ATTACHMENT B – DETAILED EMISSIONS CALCULATIONS**

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## 1. Facility Potential Emissions Summary

Unit ID	Description	NOx	CO	VOC	SO <sub>2</sub>	PM	HCHO	HAP	CO <sub>2</sub> e
		TPY	TPY	TPY	TPY	TPY	TPY	TPY	TPY
C-1	2,500-hp Caterpillar G3608 A4 Engine	7.24	3.86	3.62	0.04	0.72	0.97	1.41	10,468.61
C-2	2,500-hp Caterpillar G3608 A4 Engine	7.24	3.86	3.62	0.04	0.72	0.97	1.41	10,468.61
C-3	5,000-hp Caterpillar G3616 A4 Engine	14.48	10.14	7.24	0.08	1.44	2.41	3.30	20,547.10
C-4	5,000-hp Caterpillar G3616 A4 Engine	14.48	10.14	7.24	0.08	1.44	2.41	3.30	20,547.10
C-5	1,468-hp Caterpillar G3512 A4 Generator	0.81	2.02	0.57	<0.01	0.02	0.21	0.23	355.49
TK-1	75-bbl Oil/Condensate Tank	--	--	1.34	--	--	--	0.06	0.42
TL-1	Truck Loading	--	--	0.63	--	--	--	0.03	1.58
<b>EU06</b>	<b>Fugitive Emissions</b>	--	--	<b>0.03</b>	--	--	--	<b>0.00</b>	<b>50.17</b>
BD	Miscellaneous Venting and Blowdowns to Atmosphere	--	--	<b>0.50</b>	--	--	--	<b>0.00</b>	<b>986.73</b>
<b>Total =</b>		<b>44.26</b>	<b>30.03</b>	<b>24.79</b>	<b>0.26</b>	<b>4.35</b>	<b>6.97</b>	<b>9.73</b>	<b>63,425.80</b>

Notes:

1) Miscellaneous venting and blowdowns to atmosphere include, but are not limited to, miscellaneous planned and unplanned venting to atmosphere from pressure relief valves, startup, shut-down, maintenance, compressor blowdowns, and/or pigging actions.

## 2. Derivation of Emissions Factors and Calculations for Fugitive Emissions Components (EU06)

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> Emission factors and control efficiencies for the pollutants represented on the 7007N form for EU06: Fugitive Emissions from Piping Components are documented in this section.

### 2.1 Process Descriptions

**Process ID: 1**

EU ID - PID: 06-01  
Process Description: Valves  
Control Device Description: Quarterly OGI Monitoring  
Applicable Regulation: 40 CFR OOOOa  
Construction Date: 2021  
Fugitive Emissions? Yes  
Count Emissions for PTE? Yes

SCC: 30600811

SCC Description: Industrial Processes - Petroleum  
Industry (3-06) - Fugitive  
Emissions (3-06-008) - Pipeline  
Valves: Gas Streams (3-06-008-  
11)

SCC Units: Each-Year Valve Operating

**Process ID: 3**

EU ID - PID: 06-03  
Process Description: Relief Valves  
Control Device Description: Quarterly OGI Monitoring  
Applicable Regulation: 40 CFR OOOOa  
Construction Date: 2021  
Fugitive Emissions? Yes  
Count Emissions for PTE? Yes

SCC: 30600822

SCC Description: Industrial Processes - Petroleum  
Industry (3-06) - Fugitive  
Emissions (3-06-008) - Vessel  
Relief Valves: All Streams (3-06-  
008-22)

SCC Units: Each-Year Valve Operating

**Process ID: 2**

EU ID - PID: 06-02  
Process Description: Connectors  
Control Device Description: Quarterly OGI Monitoring  
Applicable Regulation: 40 CFR OOOOa  
Construction Date: 2021  
Fugitive Emissions? Yes  
Count Emissions for PTE? Yes

SCC: 30600816

SCC Description: Industrial Processes - Petroleum  
Industry (3-06) - Fugitive  
Emissions (3-06-008) - Flanges:  
All Streams (3-06-008-16)

SCC Units: Each-Year Flange Operating

**Process ID: 4**

EU ID - PID: 06-04  
Process Description: Open-Ended Lines  
Control Device Description: Quarterly OGI Monitoring  
Applicable Regulation: 40 CFR OOOOa  
Construction Date: 2021  
Fugitive Emissions? Yes  
Count Emissions for PTE? Yes

SCC: 30600815

SCC Description: Industrial Processes - Petroleum  
Industry (3-06) - Fugitive  
Emissions (3-06-008) - Open-  
ended Valves: All Streams (3-06-  
008-15)

SCC Units: Each-Year Valve Operating

**Process ID: 5**  
EU ID - PID: 06-05  
Process Description: Compressor Seals  
Control Device Description: Quarterly OGI Monitoring  
Applicable Regulation: 40 CFR OOOOa  
Construction Date: 2021  
Fugitive Emissions? Yes  
Count Emissions for PTE? Yes

SCC: 30600819  
SCC Description: Industrial Processes - Petroleum  
Industry (3-06) - Fugitive  
Emissions (3-06-008) -  
Compressor Seals: Gas Streams  
(3-06-008-19)  
SCC Units: Each-Year Seal Operating

## 2.2 Component Counts for EU06

### 2.2.1 Site-specific Fugitive Component Counts

- > Valve counts are based on counts provided from site's Maximo system.
- > Connector counts are based on a ratio of valves to connectors provided in a previous permit that covered operations at a compressor station at the same physical location (V-15-028).

Valve Count	150
Historic Ratio of Connectors to Valves	5.35
Connector Count	803
Compressor Seals per Compressor	8

### 2.2.2 Generic Fugitive Component Counts

- > Open-ended line, pressure relief valve, and compressor seal counts are based on the American Petroleum Institute's (API) *Compendium of GHG Emissions Methodologies: For the Natural Gas and Oil Industry*, Table C-6 for Alternate "Generic" Fugitive Counts for Gas Production, Gas Processing, and Offshore Facilities.

#### Compressors

Number of Compressors	4
Open-Ended Lines per Compressor	5
Relief Valves per Compressor	3

#### Meters

Number of Meters	1
Open-Ended Lines per Meter	2
Relief Valves per Meter	2

#### Site Total

- > Site total counts are the sum of generic components from the compressors and meters

Open-Ended Line Count	22
Relief Valve Count	14

### 2.2.3 Summary of Pipeline Component Counts

> The total component counts below represent an estimate of natural gas piping components at the Hartford Station

Component Type	Count	Basis
Valves	150	Site-specific count
Connectors	803	Historic ratio of valves to connectors from Permit V-15-028
Relief Valves	14	API Compendium, Table C-6
Open-Ended Lines	22	API Compendium, Table C-6
Compressor Seals	8	API Compendium, Table C-6

### 2.3 Derivation and Documentation of Emission Factors for EU06

> The emission factors presented below are from EPA's Protocol for Equipment Leak Emissions Estimates (Document EPA-453/R-95/017, November 1995), Page 2-15. These emission factors are representative of oil and gas production operations and as such are appropriate to use for estimating natural gas piping fugitive emissions from components in gas service.

Component Type	Emission Factor (kg/hr/comp.) <sup>1</sup>	Emission Factor (lb/hr/comp.)	Basis
Valves	4.50E-03	9.92E-03	EPA-453/R-95/017 Table 2-4
Connectors	2.00E-04	4.41E-04	EPA-453/R-95/017 Table 2-4
Relief Valves	8.80E-03	1.94E-02	EPA-453/R-95/017 Table 2-4
Open-Ended Lines	2.00E-03	4.41E-03	EPA-453/R-95/017 Table 2-4
Compressor Seals	8.80E-03	1.94E-02	EPA-453/R-95/017 Table 2-4

<sup>1</sup> Emissions from pressure relief valves and compressor seals are rolled into the "Other" category

> Speciated emission factors are based on the composition of the inlet pipeline gas

Pollutant	Content of Pipeline Gas (wt. %)	Valves Emission Factor (lb/hr/comp)	Relief Valves Emission Factor (lb/hr/comp)	Open-Ended Lines Emission Factor (lb/hr/comp)	Compressor Seals Emission Factor (lb/hr/comp)	Connectors Emission Factor (lb/hr/comp)
CO2	0.59%	5.84E-05	1.14E-04	2.60E-05	1.14E-04	2.60E-06
Methane	86.42%	8.57E-03	0.02	3.81E-03	0.02	3.81E-04
VOC	1.24%	1.23E-04	2.40E-04	5.46E-05	2.40E-04	5.46E-06

<sup>1</sup> Example: VOC EF = TOC EF \* VOC wt. %

## 2.4 Potential Emissions Summary for EU06

> Annual emissions are based on 8,760 hr of operation per year.

<b>Pollutant</b>	<b>Valves Uncontrolled Annual Emissions (tpy)</b>	<b>Relief Valves Uncontrolled Annual Emissions (tpy)</b>	<b>Open-Ended Lines Uncontrolled Annual Emissions (tpy)</b>	<b>Compressor Seals Uncontrolled Annual Emissions (tpy)</b>	<b>Connectors Uncontrolled Annual Emissions (tpy)</b>	<b>Total Uncontrolled Emissions (tpy)</b>
CO2	0.04	7.01E-03	2.50E-03	4.00E-03	9.14E-03	<b>0.06</b>
Methane	5.63	1.03	0.37	0.59	1.34	<b>8.96</b>
CO2e	158	28.8	10.3	16.5	37.5	<b>251</b>
VOC	0.08	0.01	5.26E-03	8.41E-03	0.02	<b>0.13</b>

Quarterly OGI Control Efficiency **80%**

<b>Pollutant</b>	<b>Valves Controlled Annual Emissions (tpy)</b>	<b>Relief Valves Controlled Annual Emissions (tpy)</b>	<b>Open-Ended Lines Controlled Annual Emissions (tpy)</b>	<b>Compressor Seals Controlled Annual Emissions (tpy)</b>	<b>Connectors Controlled Annual Emissions (tpy)</b>	<b>Total Controlled Emissions (tpy)</b>
CO2	7.68E-03	1.40E-03	5.00E-04	8.01E-04	1.83E-03	<b>0.01</b>
Methane	1.13	0.21	0.07	0.12	0.27	<b>1.79</b>
CO2e	31.6	5.76	2.06	3.29	7.51	<b>50.2</b>
VOC	0.02	2.94E-03	1.05E-03	1.68E-03	3.84E-03	<b>0.03</b>

### 3. Miscellaneous Venting and Blowdown Emissions Calculations (IA #3)

Component	Molecular Weight	Stream 1	Emissions	
		Inlet Gas	scf/yr <sup>1</sup>	TPY <sup>2</sup>
		Mole %		
Hydrogen Sulfide	34.081	0.000%	0	0.00
Carbon Dioxide	44.010	0.230%	4,140	0.24
Nitrogen	28.013	0.180%	3,240	0.12
Helium	4.003	0.000%	0	0.00
Oxygen	31.999	0.000%	0	0.00
Methane	16.043	92.580%	1,666,440	35.23
Ethane	30.069	6.550%	117,900	4.67
Propane	44.096	0.390%	7,020	0.41
i-Butane	58.122	0.030%	540	0.04
n-Butane	58.122	0.040%	720	0.06
i-Pentane	72.149	0.000%	0	0.00
n-Pentane	72.149	0.000%	0	0.00
n-Hexane	86.175	0.000%	0	0.00
Other Hexanes	86.175	0.000%	0	0.00
Heptanes	100.202	0.000%	0	0.00
Benzene	78.114	0.000%	0	0.00
Toluene	92.141	0.000%	0	0.00
Ethylbenzene	106.167	0.000%	0	0.00
Xylenes	106.167	0.000%	0	0.00
Octanes	114.229	0.000%	0	0.00
1-Trimethylpentane	114.231	0.000%	0	0.00
Nonanes	128.255	0.000%	0	0.00
Decanes	142.282	0.000%	0	0.00
<b>Totals =</b>		100.000%	<b>1,800,000</b>	<b>40.77</b>
		<b>Total VOC =</b>	<b>8,280</b>	<b>0.50</b>
		<b>Total HAP =</b>	<b>0</b>	<b>0.00</b>

Estimated Annual Volume

1,800,000 scf/yr

Molar volume conversion @60° F and 1 atm: 1 lb/mole =

379.4 scf

Notes:

1) Calculated as follows: Total Losses scf/yr \* mol% of component.

2) Calculated as follows: component scf/yr / 379.4 molar volume conversion \* MW component / 2000 lb/ton.

#### 4. Inlet Natural Gas Analysis

Component	Molecular Weight	Stream 1			
		Inlet Gas			
		Mole %	Equiv. Wt. Basis	Weight %	HC Weight %
Hydrogen Sulfide	34.081		0.00	0.00%	-
Carbon Dioxide	44.010	0.2300%	0.10	0.59%	-
Nitrogen	28.013	0.1800%	0.05	0.29%	-
Helium	4.003		0.00	0.00%	-
Oxygen	31.999		0.00	0.00%	-
Methane	16.043	92.58%	14.85	86.42%	87.19%
Ethane	30.069	6.55%	1.97	11.46%	11.56%
Propane	44.096	0.39%	0.17	1.00%	1.01%
i-Butane	58.122	0.03%	0.02	0.10%	0.10%
n-Butane	58.122	0.04%	0.02	0.14%	0.14%
i-Pentane	72.149	0.00%	0.00	0.00%	0.00%
n-Pentane	72.149	0.00%	0.00	0.00%	0.00%
n-Hexane	86.175	0.00%	0.00	0.00%	0.00%
Other Hexanes	86.175		0.00	0.00%	0.00%
Heptanes	100.202		0.00	0.00%	0.00%
Benzene	78.114		0.00	0.00%	0.00%
Toluene	92.141		0.00	0.00%	0.00%
Ethylbenzene	106.167		0.00	0.00%	0.00%
Xylenes	106.167		0.00	0.00%	0.00%
Octanes	114.229		0.00	0.00%	0.00%
2,2,4-Trimethylpentane	114.231		0.00	0.00%	0.00%
Nonanes	128.255		0.00	0.00%	0.00%
Decanes	142.282		0.00	0.00%	0.00%
<b>Totals =</b>		<b>100.0000%</b>	<b>17.19</b>	<b>100.00%</b>	<b>100.00%</b>
		<b>Total HC =</b>	<b>17.03</b>		

## **ATTACHMENT C – SUGGESTED PERMIT REVISIONS**

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## **SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

### **Emission Unit 06 Fugitive Emissions from Piping Components**

#### **Description:**

Plant-wide fugitive emissions from valves, connectors, pressure relief valves, open ended lines, and compressor seals.

Control Device: Quarterly Optical Gas Imaging  
Construction Commenced: 2021

<u>Component Type</u>	<u>Service</u>	<u>Count</u>
<u>Valves</u>	<u>Gas</u>	<u>150</u>
<u>Connectors</u>	<u>Gas</u>	<u>803</u>
<u>Pressure Relief Valves</u>	<u>Gas</u>	<u>14</u>
<u>Open-Ended Lines</u>	<u>Gas</u>	<u>22</u>
<u>Compressor Seals</u>	<u>Gas</u>	<u>8</u>

*\*Note: The pipeline equipment count listed above reflects an estimated count of the equipment as of the date of issuance of this permit but is not intended to limit the permittee to the exact numbers specified. The permittee may add or remove pipeline equipment without a permit revision as long as the equipment continues to comply with the applicable requirements listed below, and the changes do not cause a significant increase of emissions or potential to emit.*

#### **APPLICABLE REGULATIONS:**

401 KAR 60:005, Section 2(2)(iii), 40 C.F.R. 60.5360a through 60.5432a, Tables 1 through 3 (Subpart OOOOa), Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 and On or Before December 6, 2022.

#### **STATE-ORIGIN REQUIREMENTS:**

401 KAR 63:020, Potentially hazardous matter or toxic substances, is applied to each affected facility which emits or may potentially emit hazardous matter or toxic substances.

#### **1. Operating Limitations:**

- a. The permittee must be in compliance with the standards of 40 CFR 60, Subpart OOOOa no later than August 2, 2016 or upon startup, whichever is later. [40 CFR 60.5370a(a)]
- b. The permittee must replace the reciprocating compressor rod packing according to either 40 CFR 60.5385a(a)(1) or (2), or the permittee must comply with 40 CFR 60.5385a(a)(3). [40 CFR 60.5385a(a)]
  - (1) On or before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of the reciprocating compressor affected facility, August 2, 2016, or the date of the most recent reciprocating compressor rod packing replacement, whichever is latest. [40

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

- CFR 60.5385a(a)(1)]
- (2) Prior to 36 months from the date of the most recent rod packing replacement, or 36 months from the date of startup for a new reciprocating compressor for which the rod packing has not yet been replaced. [40 CFR 60.5385a(a)(2)]
- (3) Collect the methane and VOC emissions from the rod packing using a rod packing emissions collection system that operates under negative pressure and route the rod packing emissions to a process through a closed vent system that meets the requirements of 40 CFR 60.5411a(a) and (d). [40 CFR 60.5385a(a)(3)]
- c. To achieve initial compliance with the standards for each reciprocating compressor affected facility the permittee must comply with 40 CFR 60.5410a(c)(1) through (4). [40 CFR 60.5410a(c)]
- (1) During the initial compliance period, the permittee must continuously monitor the number of hours of operation or track the number of months since initial startup, since August 2, 2016, or since the last rod packing replacement, whichever is latest. [40 CFR 60.5410a(c)(1)]
- (2) The permittee must submit the initial annual report for the reciprocating compressor as required in 40 CFR 60.5420a(b)(1) and (4). [40 CFR 60.5410a(c)(3)]
- (3) The permittee must maintain the records as specified in 40 CFR 60.5420a(c)(3) for each reciprocating compressor affected facility. [40 CFR 60.5410a(c)(4)]
- d. For each reciprocating compressor affected facility complying with 40 CFR 60.5385a(a)(1) or (2), the permittee must demonstrate continuous compliance according to 40 CFR 60.5415a(c)(1) through (3). [40 CFR 60.5415a(c)]
- (1) The permittee must continuously monitor the number of hours of operation for each reciprocating compressor affected facility or track the number of months since initial startup, since August 2, 2016, or since the date of the most recent reciprocating compressor rod packing replacement, whichever is latest. [40 CFR 60.5415a(c)(1)]
- (2) The permittee must submit the annual reports as required in 40 CFR 60.5420a(b)(1) and (4) and maintain records as required in 40 CFR 60.5420a(c)(3). [40 CFR 60.5415a(c)(2)]
- (3) The permittee must replace the reciprocating compressor rod packing on or before the total number of hours of operation reaches 26,000 hours or the number of months since the most recent rod packing replacement reaches 36 months. [40 CFR 60.5415a(c)(3)]
- e. For each affected facility under 40 CFR 60.5365a(j), the permittee must reduce GHG (in the form of a limitation on emissions of methane) and VOC emissions by complying with the requirements of 40 CFR 60.5397a(a) through (j). The requirements in 40 CFR 60.5397a are independent of the closed vent system and cover requirements in 40 CFR 60.5411a. Alternatively, the permittee may comply with the requirements of 40 CFR 60.5398b, including the notification, recordkeeping, and reporting requirements outlined in 40 CFR 60.5424b. For the purpose of 40 CFR 60, Subpart OOOOa, compliance with the requirements in 40 CFR 60.5398b will be deemed compliance with 40 CFR 60.5397a. When complying with 40 CFR 60.5398b, the definitions in 40 CFR 60.5430b shall apply for those activities conducted under 40 CFR 60.5398b. [40 CFR 60.5397a]
- f. The permittee must monitor all fugitive emission components, as defined in 40 CFR 60.5430a, in accordance with 40 CFR 60.5397a(b) through (g). The permittee must repair all sources of fugitive emissions in accordance with 40 CFR 60.5397a(h). The permittee must keep records in accordance with 40 CFR 60.5397a(i) and report in accordance with

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

40 CFR 60.5397a(j). For purposes of 40 CFR 60.5397a, fugitive emissions are defined as any visible emission from a fugitive emissions component observed using optical gas imaging or an instrument reading of 500 parts per million (ppm) or greater using Method 21 of appendix A-7 to Part 60. [40 CFR 60.5397a(a)]

- g. At all times, including periods of startup, shutdown, and malfunction, the permittee shall maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. The provisions for exemption from compliance during periods of startup, shutdown and malfunctions provided for in 40 CFR 60.8(c) do not apply to 40 CFR 60, Subpart OOOOa. [40 CFR 60.5370a(b)]
- h. To achieve initial compliance with the fugitive emission standards for each collection of fugitive emissions components at a compressor station the permittee must comply with 40 CFR 60.5410a(j)(1) through (5). [40 CFR 60.5410a(j)]
- (1) The permittee must develop a fugitive emissions monitoring plan as required in 40 CFR 60.5397a(b), (c), and (d). [40 CFR 60.5410a(j)(1)]
  - (2) The permittee must conduct an initial monitoring survey as required in 40 CFR 60.5397a(f). [40 CFR 60.5410a(j)(2)]
  - (3) The permittee must maintain the records specified in 40 CFR 60.5420a(c)(15). [40 CFR 60.5410a(j)(3)]
  - (4) The permittee must repair each identified source of fugitive emissions for each affected facility as required in 40 CFR 60.5397a(h). [40 CFR 60.5410a(j)(4)]
  - (5) The permittee must submit the initial annual report for each collection of fugitive emissions components at a well site and each collection of fugitive emissions components at a compressor station compressor station as required in 40 CFR 60.5420a(b)(1) and (7). [40 CFR 60.5410a(j)(5)]
- i. For each collection of fugitive emissions components at a compressor station, the permittee must demonstrate continuous compliance with the fugitive emission standards specified in 40 CFR 60.5397a(a)(1) according to 40 CFR 60.5415a(h)(1) through (4). [40 CFR 60.5415a(h)]
- (1) The permittee must conduct periodic monitoring surveys as required in 40 CFR 60.5397a(g). [40 CFR 60.5415a(h)(1)]
  - (2) The permittee must repair each identified source of fugitive emissions as required in 40 CFR 60.5397a(h). [40 CFR 60.5415a(h)(2)]
  - (3) The permittee must maintain records as specified in 40 CFR 60.5420a(c)(15). [40 CFR 60.5415a(h)(3)]
  - (4) The permittee must submit annual reports for collection of fugitive emissions components at a well site and each collection of fugitive emissions components at compressor station as required in 40 CFR 60.5420a(b)(1) and (7). [40 CFR 60.5415a(h)(4)]
- j. Each identified source of fugitive emissions shall be repaired, as defined in 40 CFR 60.5430a, in accordance with 40 CFR 60.5397a(h)(1) and (2). [40 CFR 60.5397a(h)]
- (1) A first attempt at repair shall be made no later than 30 calendar days after detection of the fugitive emissions. [40 CFR 60.5397a(h)(1)]
  - (2) Repair shall be completed as soon as practicable, but no later than 30 calendar days

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

- after the first attempt at repair as required in 40 CFR 60.5397a(h)(1). [40 CFR 60.5397a(h)(2)]
- (3) Delay of repair will be allowed if the conditions in 40 CFR 60.5397a(h)(3)(i) or (ii) are met. [40 CFR 60.5397a(h)(3)]
- i. If the repair is technically infeasible, would require a vent blowdown, a compressor station shutdown, or would be unsafe to repair during operation of the unit, the repair must be completed during the next scheduled compressor station shutdown for maintenance, after a scheduled vent blowdown, or within 2 years of detecting the fugitive emissions, whichever is earliest. For purposes of 40 CFR 60.5397a(h)(3), a vent blowdown is the opening of one or more blowdown valves to depressurize major production and processing equipment, other than a storage vessel. [40 CFR 60.5397a(h)(3)(i)]
- ii. If the repair requires replacement of a fugitive emissions component or a part thereof, but the replacement cannot be acquired and installed within the repair timelines specified in 40 CFR 60.5397a(h)(1) and (2) due to either of the conditions specified in 40 CFR 60.5397a(h)(3)(ii)(A) or (B), the repair must be completed in accordance with 40 CFR 60.9397a(h)(3)(ii)(C) and documented in accordance with 40 CFR 60.5420a(c)(15)(vii)(I). [40 CFR 60.5397a(h)(3)(ii)]
- A. Valve assembly supplies had been sufficiently stocked but are depleted at the time of the required repair. [40 CFR 60.5397a(h)(3)(ii)(A)]
- B. A replacement fugitive emissions component or a part thereof requires custom fabrication. [40 CFR 60.5397a(h)(3)(ii)(B)]
- C. The required replacement must be ordered no later than 10 calendar days after the first attempt at repair. The repair must be completed as soon as practicable, but no later than 30 calendar days after receipt of the replacement component, unless the repair requires a compressor station shutdown. If the repair requires a compressor station shutdown, the repair must be completed in accordance with the timeframe specified in 40 CFR 60.5397a(h)(3)(i). [40 CFR 60.5397a(h)(3)(ii)(C)]
- (4) Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in 40 CFR 60.5397a(h)(4)(i) through (iv), to ensure that there are no fugitive emissions. [40 CFR 60.5397a(h)(4)]
- i. The permittee may resurvey the fugitive emissions components to verify repair using either Method 21 of appendix A-7 of part 60 or optical gas imaging. [40 CFR 60.5397a(h)(4)(i)]
- ii. For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph must be taken of that component or the component must be tagged during the monitoring survey when the fugitives were initially found for identification purposes and subsequent repair. The digital photograph must include the date that the photograph was taken and must clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture). [40 CFR 60.5397a(h)(4)(ii)]
- iii. Operators that use Method 21 of appendix A-7 of part 60 to resurvey the repaired fugitive emissions components are subject to the resurvey provisions specified in 40 CFR 60.5397a(h)(4)(iii)(A) and (B). [40 CFR 60.5397a(h)(4)(iii)]
- A. A fugitive emissions component is repaired when the Method 21 instrument indicates a concentration of less than 500 ppm above background or when no soap bubbles are observed when the alternative screening procedures specified in section 8.3.3 of Method 21 of appendix A-7 of part 60 are used. [40 CFR

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

60.5397a(h)(4)(iii)(A)]

B. Operators must use the Method 21 monitoring requirements specified in 40 CFR 60.5397a(c)(8)(ii) or the alternative screening procedures specified in section 8.3.3 of Method 21 of appendix A-7 of part 60. [40 CFR 60.5397a(h)(4)(iii)(B)]

iv. Operators that use optical gas imaging to resurvey the repaired fugitive emissions components, are subject to the resurvey provisions specified in 40 CFR 60.5397a(h)(4)(iv)(A) and (B). [40 CFR 60.5397a(h)(4)(iv)]

A. A fugitive emissions component is repaired when the optical gas imaging instrument shows no indication of visible emissions. [40 CFR 60.5397a(h)(4)(iv)(A)]

B. Operators must use the optical gas imaging monitoring requirements specified in paragraph (c)(7) of this section. [40 CFR 60.5397a(h)(4)(iv)(B)]

**2. Emission Limitations:**

a. Persons responsible for a source from which hazardous matter or toxic substances may be emitted shall provide the utmost care and consideration, in the handling of these materials, to the potentially harmful effects of the emissions resulting from such activities. No owner or operator shall allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants. Evaluation of such facilities as to adequacy of controls and/or procedures and emission potential will be made on an individual basis by the cabinet. [401 KAR 63:020, Section 3]

**Compliance Demonstration Method:**

Based upon the emission rates of toxics and hazardous air pollutants determined by the Cabinet using information provided in the application and supplemental information submitted by the source, the Cabinet determines the affected facility to be in compliance with 401 KAR 63:020.

**3. Testing Requirements:**

a. Testing shall be conducted at such times as may be requested by the Cabinet. [401 KAR 50:045, Section 1]

**4. Monitoring Requirements:**

a. The permittee must develop an emissions monitoring plan that covers the collection of fugitive emissions components at compressor stations within each company-defined area in accordance with 40 CFR 60.5397a(c) and (d). [40 CFR 60.5397a(b)]

b. Fugitive emissions monitoring plans must include the elements specified in 40 CFR 60.5397a(c)(1) through (8), at a minimum. [40 CFR 60.5397a(c)]

(1) Frequency for conducting surveys. Surveys must be conducted at least as frequently as required by 40 CFR 60.5397a(f) and (g). [40 CFR 60.5397a(c)(1)]

(2) Technique for determining fugitive emissions (i.e., Method 21 of appendix A-7 to part 60 or optical gas imaging meeting the requirements in 40 CFR 60.5397a(c)(7)(i) through (vii)). [40 CFR 60.5397a(c)(2)]

(3) Manufacturer and model number of fugitive emissions detection equipment to be used. [40 CFR 60.5397a(c)(3)]

(4) Procedures and timeframes for identifying and repairing fugitive emissions components from which fugitive emissions are detected, including timeframes for

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- fugitive emission components that are unsafe to repair. The repair schedule must meet the requirements of 40 CFR 60.5397a(h) at a minimum. [40 CFR 60.5397a(c)(4)]
- (5) Procedures and timeframes for verifying fugitive emission component repairs. [40 CFR 60.5397a(c)(5)]
- (6) Records that will be kept and the length of time records will be kept. [40 CFR 60.5397a(c)(6)]
- (7) If using optical gas imaging, the plan must also include the elements specified in 40 CFR 60.5397a(c)(7)(i) through (vii). [40 CFR 60.5397a(c)(7)]
- i. Verification that the optical gas imaging equipment meets the specifications of 40 CFR 60.5397a(c)(7)(i)(A) and (B). This verification is an initial verification, and may either be performed by the facility, by the manufacturer, or by a third party. For the purposes of complying with the fugitive emissions monitoring program with optical gas imaging, a fugitive emission is defined as any visible emissions observed using optical gas imaging. [40 CFR 60.5397a(c)(7)(i)]
- A. The optical gas imaging equipment must be capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions. [40 CFR 60.5397a(c)(7)(i)(A)]
- B. The optical gas imaging equipment must be capable of imaging a gas that is half methane, half propane at a concentration of 10,000 ppm at a flow rate of ≤60g/hr from a quarter inch diameter orifice. [40 CFR 60.5397a(c)(7)(i)(B)]
- ii. Procedure for a daily verification check. [40 CFR 60.5397a(c)(7)(ii)]
- iii. Procedure for determining the operator's maximum viewing distance from the equipment and how the operator will ensure that this distance is maintained. [40 CFR 60.5397a(c)(7)(iii)]
- iv. Procedure for determining maximum wind speed during which monitoring can be performed and how the operator will ensure monitoring occurs only at wind speeds below this threshold. [40 CFR 60.5397a(c)(7)(iv)]
- v. Procedures for conducting surveys, including the items specified in 40 CFR 60.5397a(c)(7)(v)(A) through (C). [40 CFR 60.5397a(c)(7)(v)]
- A. How the operator will ensure an adequate thermal background is present in order to view potential fugitive emissions. [40 CFR 60.5397a(c)(7)(v)(A)]
- B. How the operator will deal with adverse monitoring conditions, such as wind. [40 CFR 60.5397a(c)(7)(v)(B)]
- C. How the operator will deal with interferences (e.g., steam). [40 CFR 60.5397a(c)(7)(v)(C)]
- vi. Training and experience needed prior to performing surveys. [40 CFR 60.5397a(c)(7)(vi)]
- vii. Procedures for calibration and maintenance. At a minimum, procedures must comply with those recommended by the manufacturer. [40 CFR 60.5397a(c)(7)(vii)]
- (8) If using Method 21 of appendix A-7 of part 60, the plan must also include the elements specified in 40 CFR 60.5397a(c)(8)(i) through (iii). For the purposes of complying with the fugitive emissions monitoring program using Method 21 of appendix A-7 of part 60 a fugitive emission is defined as an instrument reading of 500 ppm or greater. [40 CFR 60.5397a(c)(8)]
- i. **Verification that the monitoring equipment meets the requirements specified in Section 6.0 of Method 21 at 40 CFR part 60, appendix A-7.** For purposes of instrument capability, the fugitive emissions definition shall be 500 ppm or greater methane using a FID-based instrument. If the permittee wishes to use an analyzer other than a FID-based instrument, the permittee must develop a site-specific

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fugitive emission definition that would be equivalent to 500 ppm methane using a FID-based instrument (e.g., 10.6 eV PID with a specified isobutylene concentration as the fugitive emission definition would provide equivalent response to the compound of interest). [40 CFR 60.5397a(c)(8)(i)]

- ii. **Procedures for conducting surveys.** At a minimum, the procedures shall ensure that the surveys comply with the relevant sections of Method 21 at 40 CFR part 60, appendix A-7, including Section 8.3.1. [40 CFR 60.5397a(c)(8)(ii)]
  - iii. **Procedures for calibration.** The instrument must be calibrated before use each day of its use by the procedures specified in Method 21 of appendix A-7 of part 60. At a minimum, the permittee must also conduct precision tests at the interval specified in Method 21 of appendix A-7 of part 60, Section 8.1.2, and a calibration drift assessment at the end of each monitoring day. The calibration drift assessment must be conducted as specified in 40 CFR 60.5397a(c)(8)(iii)(A). Corrective action for drift assessments is specified in 40 CFR 60.5397a(c)(8)(iii)(B) and (C). [40 CFR 60.5397a(c)(8)(iii)]
    - A. Check the instrument using the same calibration gas that was used to calibrate the instrument before use. Follow the procedures specified in Method 21 of appendix A-7 of part 60, Section 10.1, except do not adjust the meter readout to correspond to the calibration gas value. If multiple scales are used, record the instrument reading for each scale used. Divide the arithmetic difference of the initial and post-test calibration response by the corresponding calibration gas value for each scale and multiply by 100 to express the calibration drift as a percentage. [40 CFR 60.5397a(c)(8)(iii)(A)]
    - B. If a calibration drift assessment shows a negative drift of more than 10 percent, then all equipment with instrument readings between the fugitive emission definition multiplied by (100 minus the percent of negative drift/divided by 100) and the fugitive emission definition that was monitored since the last calibration must be re-monitored. [40 CFR 60.5397a(c)(8)(iii)(B)]
    - C. If any calibration drift assessment shows a positive drift of more than 10 percent from the initial calibration value, then, at the permittee's discretion, all equipment with instrument readings above the fugitive emission definition and below the fugitive emission definition multiplied by (100 plus the percent of positive drift/divided by 100) monitored since the last calibration may be re-monitored. [40 CFR 60.5397a(c)(8)(iii)(C)]
- c. Each fugitive emissions monitoring plan must include the elements specified in 40 CFR 60.5397a(d)(1) through (3), at a minimum, as applicable. [40 CFR 60.5397a(d)]
- (1) If using optical gas imaging, the plan must include procedures to ensure that all fugitive emissions components are monitored during each survey. Example procedures include, but are not limited to, a sitemap with an observation path, a written narrative of where the fugitive emissions components are located and how they will be monitored, or an inventory of fugitive emissions components. [40 CFR 60.5397a(d)(1)]
  - (2) If using Method 21 of appendix A-7 of part 60, the plan must include a list of fugitive emissions components to be monitored and method for determining the location of fugitive emissions components to be monitored in the field (e.g., tagging, identification on a process and instrumentation diagram, etc.). [40 CFR 60.5397a(d)(2)]
  - (3) The fugitive emissions monitoring plan must include the written plan developed for all of the fugitive emissions components designated as difficult-to-monitor in accordance with 40 CFR 60.5397a(g)(3), and the written plan for fugitive emissions components designated as unsafe-to-monitor in accordance with 40 CFR 60.5397a(g)(4). [40 CFR

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- d. Each monitoring survey shall observe each fugitive emissions component, as defined in 40 CFR 60.5430a, for fugitive emissions. [40 CFR 60.5397a(e)]
- e. The permittee must conduct an initial monitoring survey within 90 days of the startup of a new compressor station for each collection of fugitive emissions components at the new compressor station or by June 3, 2017, whichever is later. For a modified collection of fugitive emissions components at a compressor station, the initial monitoring survey must be conducted within 90 days of the modification or by June 3, 2017, whichever is later. [40 CFR 60.5397a(f)(2)]
- f. A monitoring survey of each collection of fugitive emissions components at a compressor station must be performed at the frequencies specified in 40 CFR 60.5397a(g)(2), with the exceptions noted in 40 CFR 60.5397a(g)(3) through (6). [40 CFR 60.5397a(g)]
- (1) A monitoring survey of the collection of fugitive emissions components at a compressor station must be conducted at least quarterly after the initial survey. Consecutive quarterly monitoring surveys must be conducted at least 60 days apart. [40 CFR 60.5397a(g)(2)]
- (2) Fugitive emissions components that cannot be monitored without elevating the monitoring personnel more than 2 meters above the surface may be designated as difficult-to-monitor. Fugitive emissions components that are designated difficult-to-monitor must meet the specifications of 40 CFR 60.5397a(g)(3)(i) through (iv). [40 CFR 60.5397a(g)(3)]
- i. A written plan must be developed for all of the fugitive emissions components designated difficult-to-monitor. This written plan must be incorporated into the fugitive emissions monitoring plan required by 40 CFR 60.5397a(b), (c), and (d). [40 CFR 60.5397a(g)(3)(i)]
- ii. The plan must include the identification and location of each fugitive emissions component designated as difficult-to-monitor. [40 CFR 60.5397a(g)(3)(ii)]
- iii. The plan must include an explanation of why each fugitive emissions component designated as difficult-to-monitor is difficult-to-monitor. [40 CFR 60.5397a(g)(3)(iii)]
- iv. The plan must include a schedule for monitoring the difficult-to-monitor fugitive emissions components at least once per calendar year. [40 CFR 60.5397a(g)(3)(iv)]
- (3) Fugitive emissions components that cannot be monitored because monitoring personnel would be exposed to immediate danger while conducting a monitoring survey may be designated as unsafe-to-monitor. Fugitive emissions components that are designated unsafe-to-monitor must meet the specifications of 40 CFR 60.5397a(g)(4)(i) through (iv). [40 CFR 60.5397a(g)(4)]
- i. A written plan must be developed for all of the fugitive emissions components designated unsafe-to-monitor. This written plan must be incorporated into the fugitive emissions monitoring plan required by 40 CFR 60.5397a(b), (c), and (d). [40 CFR 60.5397a(g)(4)(i)]
- ii. The plan must include the identification and location of each fugitive emissions component designated as unsafe-to-monitor. [40 CFR 60.5397a(g)(4)(ii)]
- iii. The plan must include an explanation of why each fugitive emissions component designated as unsafe-to-monitor is unsafe-to-monitor. [40 CFR 60.5397a(g)(4)(iii)]
- iv. The plan must include a schedule for monitoring the fugitive emissions components

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designated as unsafe-to-monitor. [40 CFR 60.5397a(g)(4)(iv)]

- g. The permittee must continuously monitor the number of hours of operation for each reciprocating compressor affected facility or track the number of months since initial startup or since the date of the most recent reciprocating compressor rod packing replacement, whichever is latest. [40 CFR 60.5415a(c)(1)]

**5. Recordkeeping Requirements:**

- a. Records for each monitoring survey shall be maintained as specified 40 CFR 60.5420a(c)(15). [40 CFR 60.5397a(i)]

- b. The permittee must maintain the records identified as specified in 40 CFR 60.7(f) and in 40 CFR 60.5420a(c)(1) through (18). All records required by 40 CFR 60, Subpart OOOOa must be maintained either onsite or at the nearest local field office for at least 5 years. Any records required to be maintained by 40 CFR 60, Subpart OOOOa that are submitted electronically via the EPA's CDX may be maintained in electronic format. [40 CFR 60.5420a(c)]

(1) For each reciprocating compressor affected facility, the permittee must maintain the records in 40 CFR 60.5420a(c)(3)(i) through (iii). [40 CFR 60.5420a(c)(3)]

- i. Records of the cumulative number of hours of operation or number of months since initial startup, since August 2, 2016, or since the previous replacement of the reciprocating compressor rod packing, whichever is latest. Alternatively, a statement that emissions from the rod packing are being routed to a process through a closed vent system under negative pressure. [40 CFR 60.5420a(c)(3)(i)]
- ii. Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in 40 CFR 60.5385a(a)(3). [40 CFR 60.5420a(c)(3)(ii)]
- iii. Records of deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in 40 CFR 60.5385a, including the date and time the deviation began, duration of the deviation, and a description of the deviation. [40 CFR 60.5420a(c)(3)(iii)]

(2) For each collection of fugitive emissions components at a well site and each collection of fugitive emissions components at a compressor station, maintain the records identified in 40 CFR 60.5420a(c)(15)(i) through (viii). [40 CFR 60.5420a(c)(15)]

- i. The date of the startup of production or the date of the first day of production after modification for each collection of fugitive emissions components at a well site and the date of startup or the date of modification for each collection of fugitive emissions components at a compressor station. [40 CFR 60.5420a(c)(15)(i)]
- ii. The fugitive emissions monitoring plan as required in 40 CFR 60.5397a(b), (c), and (d). [40 CFR 60.5420a(c)(15)(vi)]
- iii. The records of each monitoring survey as specified in 40 CFR 60.5420a(c)(15)(vii)(A) through (I). [40 CFR 60.5420a(c)(15)(vii)]
- A. Date of the survey. [40 CFR 60.5420a(c)(15)(vii)(A)]
- B. Beginning and end time of the survey. [40 CFR 60.5420a(c)(15)(vii)(B)]
- C. Name of operator(s), training, and experience of the operator(s) performing the survey. [40 CFR 60.5420a(c)(15)(vii)(C)]
- D. Monitoring instrument used. [40 CFR 60.5420a(c)(15)(vii)(D)]
- E. Fugitive emissions component identification when Method 21 of appendix A-7 of part 60 is used to perform the monitoring survey. [40 CFR

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60.5420a(c)(15)(vii)(E)]

- F. Ambient temperature, sky conditions, and maximum wind speed at the time of the survey. For compressor stations, operating mode of each compressor (i.e., operating, standby pressurized, and not operating-depressurized modes) at the station at the time of the survey. [40 CFR 60.5420a(c)(15)(vii)(F)]
- G. Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan. [40 CFR 60.5420a(c)(15)(vii)(G)]
- H. Records of calibrations for the instrument used during the monitoring survey. [40 CFR 60.5420a(c)(15)(vii)(H)]
- I. Documentation of each fugitive emission detected during the monitoring survey, including the information specified in 40 CFR 60.5420a(c)(15)(vii)(I)(1) through (9). [40 CFR 60.5420a(c)(15)(vii)(I)]
  - (1) Location of each fugitive emission identified. [40 CFR 60.5420a(c)(15)(vii)(I)(1)]
  - (2) Type of fugitive emissions component, including designation as difficult-to-monitor or unsafe-to-monitor, if applicable. [40 CFR 60.5420a(c)(15)(vii)(I)(2)]
  - (3) If Method 21 of appendix A-7 of part 60 is used for detection, record the component ID and instrument reading. [40 CFR 60.5420a(c)(15)(vii)(I)(3)]
  - (4) For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph or video must be taken of that component or the component must be tagged for identification purposes. The digital photograph must include the date that the photograph was taken and must clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture). The digital photograph or identification (e.g., tag) may be removed after the repair is completed, including verification of repair with the resurvey. [40 CFR 60.5420a(c)(15)(vii)(I)(4)]
  - (5) The date of first attempt at repair of the fugitive emissions component(s). [40 CFR 60.5420a(c)(15)(vii)(I)(5)]
  - (6) The date of successful repair of the fugitive emissions component, including the resurvey to verify repair and instrument used for the resurvey. [40 CFR 60.5420a(c)(15)(vii)(I)(6)]
  - (7) Identification of each fugitive emission component placed on delay of repair and explanation for each delay of repair. [40 CFR 60.5420a(c)(15)(vii)(I)(7)]
  - (8) For each fugitive emission component placed on delay of repair for reason of replacement component unavailability, the operator must document: the date the component was added to the delay of repair list, the date the replacement fugitive component or part thereof was ordered, the anticipated component delivery date (including any estimated shipment or delivery date provided by the vendor), and the actual arrival date of the component. [40 CFR 60.5420a(c)(15)(vii)(I)(8)]
  - (9) Date of planned shutdowns that occur while there are any components that have been placed on delay of repair. [40 CFR 60.5420a(c)(15)(vii)(I)(9)]

**6. Reporting Requirements:**

- a. Annual reports shall be submitted for each collection of fugitive emissions components at a compressor station that include the information specified in 40 CFR 60.5420a(b)(7).

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

Multiple collection of fugitive emissions components at a compressor station may be included in a single annual report. [40 CFR 60.5397a(j)]

- b. The permittee must submit annual reports containing the information specified in 40 CFR 60.5420a(b)(1) through (8) and (12) and performance test reports as specified in 40 CFR 60.5420a(b)(9) or (10), if applicable. The permittee must submit annual reports following the procedure specified in 40 CFR 60.5420a(b)(11). The initial annual report is due no later than 90 days after the end of the initial compliance period as determined according to 40 CFR 60.5410a. Subsequent annual reports are due no later than same date each year as the initial annual report. The permittee may submit one report for multiple affected facilities provided the report contains all of the information required as specified in 40 CFR 60.5420a(b)(1) through (8) and (12). The permittee may arrange with the Administrator a common schedule on which reports required by part 60 may be submitted as long as the schedule does not extend the reporting period. [40 CFR 60.5420a(b)]

(1) The general information specified in 40 CFR 60.5420a(b)(1)(i) through (iv) is required for all reports. [40 CFR 60.5420a(b)(1)]

- i. The company name, facility site name associated with the affected facility, and address of the affected facility. If an address is not available for the site, include a description of the site location and provide the latitude and longitude coordinates of the site in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983.
- ii. An identification of each affected facility being included in the annual report.
- iii. Beginning and ending dates of the reporting period.
- iv. A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(2) For each reciprocating compressor affected facility, the information specified in 40 CFR 60.5420a(b)(4)(i) through (iii). [40 CFR 60.5420a(b)(4)]

- i. The cumulative number of hours of operation or the number of months since initial startup, since August 2, 2016, or since the previous reciprocating compressor rod packing replacement, whichever is latest. Alternatively, a statement that emissions from the rod packing are being routed to a process through a closed vent system under negative pressure.
- ii. If applicable, for each deviation that occurred during the reporting period and recorded as specified in 40 CFR 60.5420a(c)(3)(iii), the date and time the deviation began, duration of the deviation and a description of the deviation.
- iii. If required to comply with 40 CFR 60.5385a(a)(3), the information in paragraphs 40 CFR 60.5420a(b)(4)(iii)(A) through (C).
  - A. Dates of each inspection required under 40 CFR 60.5416a(a) and (b);
  - B. Each defect or leak identified during each inspection, and date of repair or date of anticipated repair if repair is delayed; and
  - C. Date and time of each bypass alarm or each instance the key is checked out if the permittee is subject to the bypass requirements of 40 CFR 60.5416a(a)(4)

(3) For the collection of fugitive emissions components at compressor station, report the information specified in 40 CFR 60.5420a(b)(7)(i) through (iii), as applicable. [40 CFR 60.5420a(b)(7)]

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

- i. Designation of the type of site (i.e., well site or compressor station) at which the collection of fugitive emissions components is located. [40 CFR 60.5420a(b)(7)(i)(A)]
  - ii. For each fugitive emissions monitoring survey performed during the annual reporting period, the information specified in 40 CFR 60.5420a(b)(7)(ii)(A) through (G). [40 CFR 60.5420a(b)(7)(ii)]
      - A. Date of the survey. [40 CFR 60.5420a(b)(7)(ii)(A)]
      - B. Monitoring instrument used. [40 CFR 60.5420a(b)(7)(ii)(B)]
      - C. Any deviations from the monitoring plan elements under 40 CFR 60.5397a(c)(1), (2), and (7) and (c)(8)(i) or a statement that there were no deviations from these elements of the monitoring plan. [40 CFR 60.5420a(b)(7)(ii)(C)]
      - D. Number and type of components for which fugitive emissions were detected. [40 CFR 60.5420a(b)(7)(ii)(D)]
      - E. Number and type of fugitive emissions components that were not repaired as required in 40 CFR 60.5397a(h). [40 CFR 60.5420a(b)(7)(ii)(E)]
      - F. Number and type of fugitive emission components (including designation as difficult-to-monitor or unsafe-to-monitor, if applicable) on delay of repair and explanation for each delay of repair. [40 CFR 60.5420a(b)(7)(ii)(F)]
      - G. Date of planned shutdown(s) that occurred during the reporting period if there are any components that have been placed on delay of repair. [40 CFR 60.5420a(b)(7)(ii)(G)]
- c. The permittee must submit reports to the EPA via CEDRI, except as outlined in 40 CFR 60.5420a(b)(11). CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must use the appropriate electronic report template on the CEDRI website for 40 CFR 60, Subpart OOOOa (<https://www.epa.gov/electronic-reporting-air-emissions/cedri/>). If the reporting form specific to this subpart is not available on the CEDRI website at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in 40 CFR 60.4. Once the form has been available in CEDRI for at least 90 calendar days, the permittee must begin submitting all subsequent reports via CEDRI. The date reporting forms become available will be listed on the CEDRI website. Unless the Administrator or delegated state agency or other authority has approved a different schedule for submission of reports, the reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted. The EPA will make all the information submitted through CEDRI available to the public without further notice to the permittee. Do not use CEDRI to submit information claimed as CBI. Although we do not expect persons to assert a claim of CBI, if the permittee wishes to assert a CBI claim for some of the information in the report, submit a complete file using the appropriate electronic report template on the CEDRI website, including information claimed to be CBI, to the EPA following the procedures in 40 CFR 60.5420a(b)(11)(i) and (ii). Clearly mark the part or all of the information that is claimed to be CBI. Information not marked as CBI may be authorized for public release without prior notice. Information marked as CBI will not be disclosed except in accordance with procedures set forth in 40 CFR part 2. All CBI claims must be asserted at the time of submission. Anything submitted using CEDRI cannot later be claimed CBI. Furthermore, under CAA section 114(c), emissions data is not entitled to confidential treatment, and the EPA is required to make emissions data available to the public. Thus, emissions data will not be protected as CBI and will be made publicly available. Submit the same file submitted to the CBI office with the CBI omitted must be

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

submitted to the EPA via the EPA's CDX as described earlier in 40 CFR 60.5420a(b)(11) [40 CFR 60.5420a(b)(11)]

- d. If the permittee is required to electronically submit a report through CEDRI in the EPA's CDX, the permittee may assert a claim of EPA system outage for failure to timely comply with the reporting requirement. To assert a claim of EPA system outage, the permittee must meet the requirements outlined in 40 CFR 60.5420a(b)(13)(i) through (vii). [40 CFR 60.5420a(b)(13)]
- e. If the permittee is required to electronically submit a report through CEDRI in the EPA's CDX, the permittee may assert a claim of force majeure for failure to timely comply with the reporting requirement. To assert a claim of force majeure, the permittee must meet the requirements outlined in 40 CFR 60.5420a(b)(14)(i) through (v). [40 CFR 60.5420a(b)(14)]



## AIR PERMIT RENEWAL APPLICATION

**Midwestern Gas Transmission Company  
Hartford Compressor Station  
Hartford, KY**

Prepared By:

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August 2025



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# 1. APPLICATION SUMMARY

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## 1.1 Purpose of Application

DT Midstream, Inc. (DT Midstream) owns a natural gas transmission station operated by Midwestern Gas Transmission Company (MGT) and located in Hartford, Ohio County, Kentucky (identified herein as the Hartford Station). This natural gas transmission facility is classified as a Conditional Major source under the Title V operating permit program and currently operates in accordance with permit F-20-043 R1, issued by Kentucky Division for Air Quality (KDAQ) on February 22, 2021, and most recently revised on February 7, 2025. As the permit expires on February 22, 2026, a renewal application for the permit must be submitted at least six months prior to the permit expiration date, or by August 22, 2025. This document and its appendices constitute the renewal application for the Hartford Station, as required under Condition G.2.a. of the existing permit and 401 KAR 52:030, Section 12.

## 1.2 Summary of Application Contents

Following this introduction, Section 2 presents summary information about the Hartford Station including its location and a brief description of operations. Section 3 provides an analysis of applicable regulatory requirements under state and federal air quality programs with a focus on the regulatory implications of any updates made to applicable regulations since the initial Conditional Major permit F-20-043 was issued.

Appendix A presents an aerial map that shows the location of the Hartford Station relative to nearby geographic features, as well as a simplified process flow diagram (PFD) representing the facility's primary gas transmission operation. Appendix B provides the required DEP7007 series application forms. Appendix C includes red-line strike-out (RLSO) mark-ups of select pages of the current permit, which identify DT Midstream's requested permit changes. DT Midstream has not installed, shutdown, or modified any emissions-generating equipment since the issuance of the current permit, and no underlying emissions calculation methodologies have been revised during the permit term. As such, the current facility-wide potential-to-emit (PTE) is equal to the PTE provided in the most recent source-wide permit application, and detailed emission unit-specific PTE calculations are not included with this application.

Pursuant to 401 KAR 52:030, Section 4(2)(c), applications for permit renewals shall provide only information that is new or different from the most recent source-wide permit application. As such, the application forms included in Appendix B are limited to the 7007AI and DD forms required to be submitted with all permit renewal applications. Other application forms addressing specific emission unit categories (e.g., 7007EE form for internal combustion engines) and the emissions, stacks, and controls information on the 7007N form have previously been provided to KDAQ and would not provide any new or different information from the most recent source-wide application. Additionally, as discussed further in Section 3.2.1.3 regarding the applicability of 40 CFR 60 Subpart OOOOa (NSPS OOOOa), DT Midstream will provide updated 7007B, N, and V forms, as applicable, for the reciprocating compressors and other fugitive emissions components (e.g., pump seals, valves, connectors, etc.) after completing additional review of the applicability of NSPS OOOOa to the Hartford Station. Lastly, the 7007CC form was provided to KDAQ in January 2025 as part of the annual compliance certification, and as such it is not duplicated in this application.

## **2. FACILITY AND OPERATIONS DESCRIPTION**

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### **2.1 Facility Location**

The Hartford Station is located in Ohio County approximately 5 miles northeast of Hartford, KY. The property encompasses an area of approximately 25 acres and is bordered by a rural community. The approximate Universal Transverse Mercator (UTM) coordinates for the center of the facility are 514.3 km East and 4,151.0 km North in Zone 16. Figure A-1 provides an aerial view of the main site operations.

### **2.2 Facility Summary of Operations**

The Hartford Station is a natural gas transmission facility that increases natural gas transmission pressures by compressing low-pressure transmission gas and directing it into a high-pressure transmission line. This primary operation at the Hartford Station is conducted via four natural gas-fired stationary internal combustion engines (ICE) (EU C1 - EU C4). Each compressor engine was installed and commenced operation in 2021. EU C1 and EU C2 are each rated for 2,500 horsepower (hp) at ambient conditions. EU C3 and EU C4 are each rated for 5,000 hp at ambient conditions. Additionally, the facility's operations are supported by an emergency use generator powered by a 1,468 hp natural gas-fired ICE, which was also installed in 2021 (EU C5).

### **2.3 Air Permit History Summary**

The current location of the Hartford Station was previously the site of another compressor station operated by MGT. This prior site was permitted as a major source under the Title V permitting program and covered under Title V permit V-15-028, issued by KDAQ on January 12, 2016. The natural gas compressors at this previously permitted site were driven by two natural gas-fired turbines. Ancillary operations were served by a natural gas-fired emergency generator engine, a natural gas-fired boiler (EU04), and various storage vessels and combustion units permitted as insignificant activities. Additionally, the collection of equipment leak components – including pump/compressor seals, valves, connectors, and open-ended lines – were permitted as an individual emission unit. This permit would have expired on January 12, 2021; however, all equipment at the site was removed and the Title V permit was closed in 2020.

In October 2020, MGT submitted an initial permit application to construct a new compressor station located at the same site as the previous compressor station permitted under V-15-028. This new Hartford Station operates the equipment previously described under Section 2.2. As described further in Sections 3.1.2 and 3.1.3, MGT accepted voluntary facility-wide emissions limitations on carbon monoxide (CO), single Hazardous Air Pollutants (HAP), and total HAP; as such, the new Hartford Station was permitted under Conditional Major permit F-20-043.

One permit action has been submitted since issuance of F-20-043 on February 22, 2021. On January 9, 2025, an Administrative Permit Amendment was submitted to KDAQ designating DT Midstream as the new owner of the Hartford Station. This Ownership Change notification was accepted by KDAQ and a revised Conditional Major permit (F-20-043 R1) was issued February 7, 2025. No permit actions have been submitted since the issuance of F-20-043 R1.

## 3. APPLICABLE REQUIREMENTS SUMMARY

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Section 3.1 provides general air quality regulatory information for the Hartford Station, including the facility's status with respect to the Prevention of Significant Deterioration (PSD) and Title V permitting programs. This section also discusses the facility's status as an area source of HAP. In accordance with the regulatory requirements for a permit renewal application established by 401 KAR 52:030, Section 4(2)(c), Sections 3.2 and 3.3 of this application focus on describing potential newly applicable or modified requirements that could impact the Hartford Station since the issuance of the current permit on February 22, 2021.

### 3.1 Source Classification

#### 3.1.1 Prevention of Significant Deterioration

The Hartford Station is in Ohio County, which has been designated by EPA as unclassified/attainment for all criteria pollutants. Therefore, with respect to the federal New Source Review (NSR) permitting program, only PSD requirements could potentially apply to the source.

Kentucky has incorporated the requirements of the PSD permitting program into its State Implementation Plan (SIP) at 401 KAR 51:017. These PSD regulations specifically define 28 industrial source categories for which the major stationary source threshold of any regulated NSR pollutant is 100 tons per year (tpy). For all unlisted sources, the major stationary source threshold of any regulated NSR pollutant is 250 tpy. As a natural gas transmission facility, the Hartford Station is not included under one of these 28 industrial source categories. Thus, the major stationary source threshold under the PSD program for a regulated NSR pollutant emitted at the Hartford Station is 250 tpy. Since the potential emissions of CO are greater than 250 tpy, the Hartford Station would be classified as a major stationary source. However, as described further in Section 3.1.2, the Hartford Station received a voluntary emissions limitation on CO to preclude being a major stationary source for NSR/PSD.

This renewal application submittal is not associated with a construction project or a facility modification that involves PSD applicability considerations. Accordingly, the Hartford Station will continue to be a synthetic minor source for CO and a true minor source for all other regulated NSR pollutants under the PSD program.

#### 3.1.2 Title V Permitting Program

40 CFR Part 70 contains the regulations implementing the federal Title V operating permit program. Kentucky has incorporated the provisions of this federal program in its Title V operating permit program at 401 KAR 52:020. As specified in 401 KAR 52:001, Section 1(46), a major source with respect to the Title V regulations encompasses facilities with potential emissions of 100 tpy of any regulated pollutant, 10 tpy of any single HAP, and/or 25 tpy of any combination of HAP. The potential emissions of CO, single HAP, and combined HAP from the Hartford Station exceed the corresponding major source thresholds. To preclude applicability of 401 KAR 52:020, the Hartford Station has taken self-imposed limits of 90 tpy of CO, 9 tpy of single HAP, and 22.5 tpy of combined HAP; as such, the Hartford Station is classified as a conditional major source under Kentucky's Title V operating permit program and is subject to 401 KAR 52:030.

As noted in the PSD applicability discussion above, this renewal application submittal is not associated with a construction project or facility modification which could increase facility-wide potential emissions above

the major source thresholds or relax existing facility-wide emissions limitations. The Hartford Station will continue to operate as a conditional major source subject to 401 KAR 52:030 upon permit renewal.

### **3.1.3 Hazardous Air Pollutants**

A major source of HAP is a source with potential emissions in excess of 25 tpy for total combined HAP and/or potential emissions in excess of 10 tpy for any individual HAP. The potential emissions of an individual HAP (i.e., formaldehyde) and those of all combined HAP from the Hartford Station exceed the corresponding major source thresholds. However, the Hartford station has taken self-imposed limits of 9 tpy of any single HAP and 22.5 tpy of combined HAP; therefore, the Hartford Station is classified as an area/minor source of HAP. The Hartford Station is not requesting a revision to any HAP emission calculation methodologies with this permit renewal.

## **3.2 Regulatory Analysis**

There were no additional permit actions submitted since the last revision of the Hartford Station's permit. The following subsections provide high-level analyses of various applicable or potentially applicable federal and state regulations.

### **3.2.1 40 CFR Part 60 – New Source Performance Standards**

New Source Performance Standards (NSPS) regulations require new, modified, or reconstructed sources to control emissions to the level achievable by the best demonstrated technology as specified in the applicable provisions. The following subsections assess the applicability of various NSPS.

#### ***3.2.1.1 40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines***

40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (NSPS JJJJ) applies to owners and operators of stationary spark ignition (SI) internal combustion engines (ICE) that commence construction, modification, or reconstruction after June 12, 2006. The Hartford Station commenced construction on two 2,500 hp stationary SI ICE, two 5,000 hp stationary SI ICE, and one 1,468 hp emergency SI ICE in 2021. As such, NSPS JJJJ is applicable to the Hartford Station.

DT Midstream has reviewed the updates made to NSPS JJJJ since issuance of F-20-043 on February 22, 2021, and determined that there are no significant updates to NSPS JJJJ that affect the applicability of the limitations and requirements therein. However, there are some minor clerical revisions needed to the NSPS JJJJ requirements within the air permit, such as the removal of references to 40 CFR Part 90 within specific recordkeeping provisions. DT Midstream has included these requested updates within the permit RLSO in Appendix C to this application.

#### ***3.2.1.2 40 CFR 60, Subpart OOOO – Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015***

40 CFR 60, Subpart OOOO – Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015 (NSPS OOOO) regulates volatile organic compound (VOC) emissions from specific sources within the oil and natural gas industry that commenced construction, modification, or reconstruction after August 23, 2011, and on or before September 18, 2015, and which include the following affected facilities listed in 40 CFR 60.5365(a) through (g):

- a) Each natural gas well affected facility;
- b) Each centrifugal compressor affected facility;
- c) Each reciprocating compressor affected facility;
- d) Each continuous bleed natural gas-driven pneumatic controller affected facility;
- e) Each storage vessel affected facility with a VOC PTE greater than or equal to 6 tpy;
- f) Each group of equipment (pump, pressure relief device, open-ended valve or line, valve, and flange or other connector in VOC service or wet gas service) within a process unit except compressors; and
- g) Sweetening units located at onshore natural gas processing plants.

The Hartford Station does not operate a natural gas well, process unit, or sweetening unit as these terms are defined in 40 CFR 60.5430. Therefore, 40 CFR 60.5365(a), (f), (g), and (h) do not apply to the operations at the Hartford Station.

As defined in 40 CFR 60.5365(b) and (c), each centrifugal/reciprocating compressor affected facility includes only those compressors located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. 40 CFR 60.5430 defines a "wellhead" as *"the piping, casing, tubing and connected valves protruding above the earth's surface for an oil and/or natural gas well. The wellhead ends where the flow line connects to a wellhead valve. The wellhead does not include other equipment at the well site except for any conveyance through which gas is vented to the atmosphere."* The compressors driven by the natural gas-fired ICE (EU C1 – EU C4) are not located between a wellhead and point of custody transfer to the natural gas transmission and storage segment. Therefore, 40 CFR 60.5365(b) and (c) do not apply to the operations at the Hartford Station.

As defined in 40 CFR 60.5365(d)(1) through (3), only those pneumatic controllers located within the oil production segment, natural gas production segment, and natural gas processing plants are affected facilities. As a natural gas transmission facility, the Hartford Station is not a part of an oil production segment, natural gas production segment, or natural gas processing plant. Therefore, 40 CFR 60.5365(d)(1) through (3) do not apply to the operations at the Hartford Station.

As defined in 40 CFR 60.5365(e), storage vessels located in the oil and natural gas production segment, natural gas processing segment, or natural gas transmission and storage segment, and which have the potential for VOC emissions equal to or greater than 6 tpy are affected facilities. 40 CFR 60.5430 defines a "storage vessel" as *"a tank or other vessel that contains an accumulation of crude oil, condensate, intermediate hydrocarbon liquids, or produced water."* The Oil/Condensate Tank (TK-1) permitted in Section C of F-20-043 R1 as an insignificant activity meets the definition of a "storage vessel" as it is designed to store natural gas pipeline liquids that are separated from the incoming low-pressure gas stream. However, as provided in the original Conditional Major permit application for the Hartford Station, the potential VOC emissions from this storage tank are well below the 6 tpy threshold for consideration as an affected facility. As such, the Hartford Station does not operate a storage vessel affected facility and 40 CFR 60.5365(e) does not apply.

Based on the regulatory analysis provided above – and considering the fact that no affected facilities were constructed, reconstructed, or modified between August 23, 2011, and September 18, 2015 – NSPS OOOO is not applicable and will continue to be inapplicable to the Hartford Station upon permit renewal.

**3.2.1.3 40 CFR 60, Subpart 0000a – Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After September 18, 2015, and on or Before December 6, 2022**

40 CFR 60, Subpart 0000a – Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After September 18, 2015, and on or Before December 6, 2022 (NSPS 0000a) applies to affected facilities that commenced construction, reconstruction, or modification after September 18, 2015, and before December 6, 2022. The specific sources covered by NSPS 0000a include the following:

- a) Each well affected facility, which is a single well that conducts a well completion operation following hydraulic fracturing or refracturing;
- b) Each centrifugal compressor affected facility;
- c) Each reciprocating compressor affected facility;
- d) Each pneumatic controller affected facility;
- e) Each storage vessel affected facility with VOC PTE greater than or equal to 6 tpy;
- f) Each group of equipment within a process unit at an onshore natural gas processing plant;
- g) Sweetening units located at an onshore natural gas processing plants;
- h) Each pneumatic pump affected facility;
- i) All fugitive emissions components at a well site; and
- j) All fugitive emissions at a compressor station.

The Hartford Station does not operate a natural gas well, centrifugal compressor, process unit, or sweetening unit as these terms are defined in 40 CFR 60.5430a. Therefore, 40 CFR 60.5365a(a), (b), (f), (g), and (i) do not apply to the operations at the Hartford Station. Additionally, only pneumatic pumps located at natural gas processing plants or well sites are affected facilities under NSPS 0000a. As such, 40 CFR 60.5365a(h) does not apply to the operations at the Hartford Station.

Pursuant to 40 CFR 60.5365a(d)(1), a pneumatic controller not located at a natural gas processing plant is an affected facility if it is designed as a continuous bleed natural gas-driven device operating at a natural gas bleed rate greater than 6 standard cubic feet per hour (scfh). Any pneumatic controllers at the Hartford Station are designed with bleed rates less than 6 scfh; therefore, they are not considered affected facilities under NSPS 0000a and 40 CFR 60.5365a(d) does not apply to the Hartford Station.

Pursuant to 40 CFR 60.5364a(e)(2), a single storage vessel that commenced construction, reconstruction, or modification after November 16, 2020, is a storage vessel affected facility under NSPS 0000a if potential VOC emissions are equal to or greater than 6 tpy. The Oil/Condensate Tank (TK-1) at the Hartford Station meets the definition of a "storage vessel" per 40 CFR 60.5430a and as such is potentially subject to NSPS 0000a. However, the potential VOC emissions from TK-1 – as summarized in the October 2020 initial permit application – are less than 6 tpy; therefore, TK-1 is not an affected facility under NSPS 0000a and 40 CFR 60.5365a(e) does not apply to the Hartford Station.

Pursuant to 40 CFR 60.5365a(c), a reciprocating compressor at a compressor station is an affected facility under NSPS 0000a. Additionally, pursuant to 40 CFR 60.5365a(j), the collection of fugitive emissions components at a compressor station is an affected facility. On December 31, 2024, DT Midstream closed on the purchase of the Hartford Compressor Station. After the purchase – and through the efforts of developing this permit renewal application – DT Midstream discovered potential discrepancies between the emissions sources at the Hartford Station permitted by the prior owner through the October 2020 initial permit application and the as-built emissions generating equipment. While neither reciprocating compressors nor other fugitive emissions components (e.g., pump seals, valves, connectors, etc.) are

currently permitted in F-20-043 R1, DT Midstream has determined that the Hartford Station does operate reciprocating compressors and fugitive emissions components which are potentially sources of air emissions. Upon discovery of these potential discrepancies, DT Midstream initiated a preliminary corrective action to begin conducting quarterly fugitive emissions monitoring as would be required by 40 CFR 60.5397a(g)(2) should such fugitive emissions monitoring be determined to be necessary to comply with the fugitive emissions standards of NSPS OOOOa.

While DT Midstream is not providing a 7007V form to document all applicable requirements of NSPS OOOOa at this time, the information provided herein serves as an initial assessment of the applicability of NSPS OOOOa. DT Midstream will continue to evaluate these discrepancies between permitted and as-built equipment at the Hartford Station and will submit an addendum to this permit renewal application outlining a final NSPS OOOOa applicability assessment regarding the potentially subject reciprocating compressors and fugitive emissions components.

***3.2.1.4 40 CFR 60, Subpart OOOOb – Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After December 6, 2022***

40 CFR 60, Subpart OOOOb – Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After December 6, 2022 (NSPS OOOOb) applies to affected facilities that commenced construction, reconstruction, or modification after December 6, 2022. The specific sources covered by NSPS OOOOb include the following:

- a) Each well affected facility, which is a single well drilled for the purpose of producing oil or natural gas;
- b) Each centrifugal compressor affected facility;
- c) Each reciprocating compressor affected facility;
- d) Each process controller affected facility;
- e) Each storage vessel affected facility with VOC PTE greater than or equal to 6 tpy or methane PTE greater than or equal to 20 tpy;
- f) Each group of equipment within a process unit at an onshore natural gas processing plant;
- g) Each sweetening unit affected facility;
- h) Each pump affected facility; and
- i) All fugitive emissions components at a well site, centralized production facility, or a compressor station.

No potentially subject equipment at the Hartford Station has been constructed, modified, or reconstructed since at least December 6, 2022. As such, NSPS OOOOb is not applicable to the Hartford Station and will remain inapplicable upon permit renewal.

***3.2.1.5 40 CFR 60, Subpart OOOOc – Emissions Guidelines for Greenhouse Gas Emissions from Existing Crude Oil and Natural Gas Facilities***

40 CFR 60, Subpart OOOOc – Emissions Guidelines for Greenhouse Gas Emissions from Existing Crude Oil and Natural Gas Facilities (NSPS OOOOc) establishes emissions guidelines and compliance schedules to be included in a state plan developed by all air pollution control agencies in the United States with one or more designated facilities that commenced construction, modification, or reconstruction on or before December 6, 2022. Presumptive standards that could be applicable to the Hartford Station are included in 40 CFR 60.5385c through 60.5430c as part of the “model rule” of NSPS OOOOc. Under the “model rule,” the specific sources covered by NSPS OOOOc as “designated facilities” include the following:

- a) Each well designated facility, which is a single well drilled for the purpose of producing oil or natural gas;
- b) Each centrifugal compressor designated facility;
- c) Each reciprocating compressor designated facility;
- d) Each process controller designated facility;
- e) Each storage vessel designated facility, which is a tank battery that has the potential for methane emissions equal to or greater than 20 tpy;
- f) Each group of equipment within a process unit at an onshore natural gas processing plant;
- g) Each pump designated facility; and
- h) All fugitive emissions components at a well site, centralized production facility, or a compressor station.

All potentially subject designated facilities at the Hartford Station commenced construction, modification, or reconstruction prior to December 6, 2022. Pursuant to the presumptive standard under the model rule at 40 CFR 60.5387c and Table 1 to NSPS OOOOc, any owner or operator of a designated facility must comply with the presumptive standards of the model rule within 36 months after the state plan submittal deadline of March 9, 2026.

The Hartford Station will comply with the provisions of the NSPS OOOOc state plan within 36 months of its submittal deadline as required by 40 CFR 60.5387c and Table 1 to NSPS OOOOc. Once NSPS OOOOc has been incorporated into a final SIP, DT Midstream will provide an updated 7007V form outlining the applicable requirements from NSPS OOOOc.

### **3.2.2 40 CFR Part 63 – National Emissions Standards for Hazardous Air Pollutants**

The National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations established in 40 CFR Part 61 and Part 63 regulate the emissions of HAP. NESHAP standards primarily apply to major sources of HAP, though some subparts of Part 63 have been revised to include area sources of HAP as well. The NESHAP regulations under 40 CFR Part 61 establish emissions standards on a pollutant basis, whereas those under 40 CFR Part 63 establish standards on a source category basis. The following subsections assess the applicability of various NESHAP.

#### ***3.2.2.1 40 CFR 63, Subpart HH – National Emissions Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities***

40 CFR 63, Subpart HH – National Emissions Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities (NESHAP HH) applies to owners and operators of emission points located at oil and natural gas production facilities. Only such facilities that meet the following criteria are subject to this regulation:

- 1. Facilities that are major or area sources of HAP; and
- 2. Facilities that process, upgrade, or store hydrocarbon liquids prior to the point of custody transfer; or
- 3. Facilities that process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user.

The Hartford Station does not process, upgrade, or store hydrocarbon liquids prior to the point of custody transfer, nor does the compressor station process, upgrade, or store natural gas. Therefore, NESHAP HH does not apply to the Hartford Station and will remain inapplicable upon permit renewal.

### **3.2.2.2 40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)**

40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) (RICE NESHAP) applies to any existing, new, or reconstructed stationary RICE at major or area sources of HAP emissions, excluding stationary RICE tested at a stationary RICE test cell/stand. Pursuant to 40 CFR 63.6590(a)(2)(iii), for stationary RICE located at an area source, a stationary RICE is “new” if construction of the stationary RICE commenced on or after June 12, 2006. As stated previously, the Hartford Station commenced construction on EU C1 – EU C5 in 2021; therefore, each of these five engines meets the definition of a new stationary RICE under RICE NESHAP. However, 40 CFR 63.6590(c) lists various affected sources which must meet the requirements of either 40 CFR 60, Subpart IIII or Subpart JJJJ in order to meet the requirements of RICE NESHAP. In such an instance, no further requirements from RICE NESHAP apply. As described in Section 3.1.3, the Hartford Station is not requesting a revision to any HAP emission calculation methodologies with this permit renewal; as such, the Hartford Station will remain an area source of HAP emissions and will therefore will continue to comply with RICE NESHAP by complying with NSPS JJJJ as allowed by 40 CFR 63.6590(c)(1).

Pursuant to Condition 1.a. under the EU C1 – CU C4 emission unit group and Condition 1.a. under EU C5, the Hartford Station complies with the provisions of RICE NESHAP by complying with NSPS JJJJ. No other provisions from RICE NESHAP are listed in F-20-043 R1. Nonetheless, DT Midstream has reviewed the updates made to RICE NESHAP since issuance of F-20-043 on February 22, 2021, and determined that there are no significant updates to RICE NESHAP that affect the applicability of the limitations, requirements, and alternative compliance allowances therein.

### **3.2.3 Kentucky State Implementation Plan Regulations**

The following subsections discuss the applicability of relevant Kentucky SIP regulations.

#### **3.2.3.1 401 KAR 59:050 – New Storage Vessels for Petroleum Liquids**

An affected facility under 401 KAR 59:050 includes any storage vessel for petroleum liquids which commenced operation after July 24, 1984, has a storage capacity greater than 580 gallons and less than 10,567 gallons, and is located in either an urban county designated nonattainment for ozone under 401 KAR 51:010 or in any other county and is part of a major source of VOC. The Oil/Condensate Tank (TK-1) is potentially subject to this regulation as it meets the storage capacity criteria. However, Ohio County is designated as being in attainment or unclassifiable for ozone under 401 KAR 51:010, and the Hartford Station is not a major source of VOC. As such, the provisions of 401 KAR 59:050 are not applicable to the Hartford Station and will continue to be inapplicable upon permit renewal.

#### **3.2.3.2 401 KAR 63:020 – Potentially Hazardous Matter or Toxic Substances**

Kentucky regulates the emissions of toxic air pollutants through 401 KAR 63:020. KDAQ can require that dispersion modeling or other analyses be completed by facilities at permit renewal or when constructing equipment when there is an increase in toxic pollutant emissions, as defined under 401 KAR 63:020, Section 2(2), deemed to be “significant.” This is done so that there is a documented basis for affirming that a facility does not cause an adverse impact on the health and welfare of humans, animals, and plants.

The Hartford Station is compliant with 401 KAR 63:020 through compliance with the conditions of F-20-043 as determined by KDAQ through a SCREEN View model performed on January 7, 2021, of potentially hazardous matter or toxic substances (including hexane, benzene, ethylbenzene, toluene, and xylene). Since there have been no projects which modified existing equipment in any way that would increase the potential

emissions of air toxics or installed any new equipment that are sources of air toxics since the most recent source-wide permit application, DT Midstream does not anticipate that any additional air dispersion modeling will need to be performed in conjunction with this permit renewal application.

## **APPENDIX A. FACILITY AERIAL MAP AND PFD**

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- ▶ Figure A-1: Aerial Map Showing Property Line of the Hartford Station
- ▶ Figure A-2: Hartford Station PFD

Figure A-1: Aerial Map of the Hartford Station and Surrounding Area



**Figure A-2: Hartford Station Process Flow Diagram**

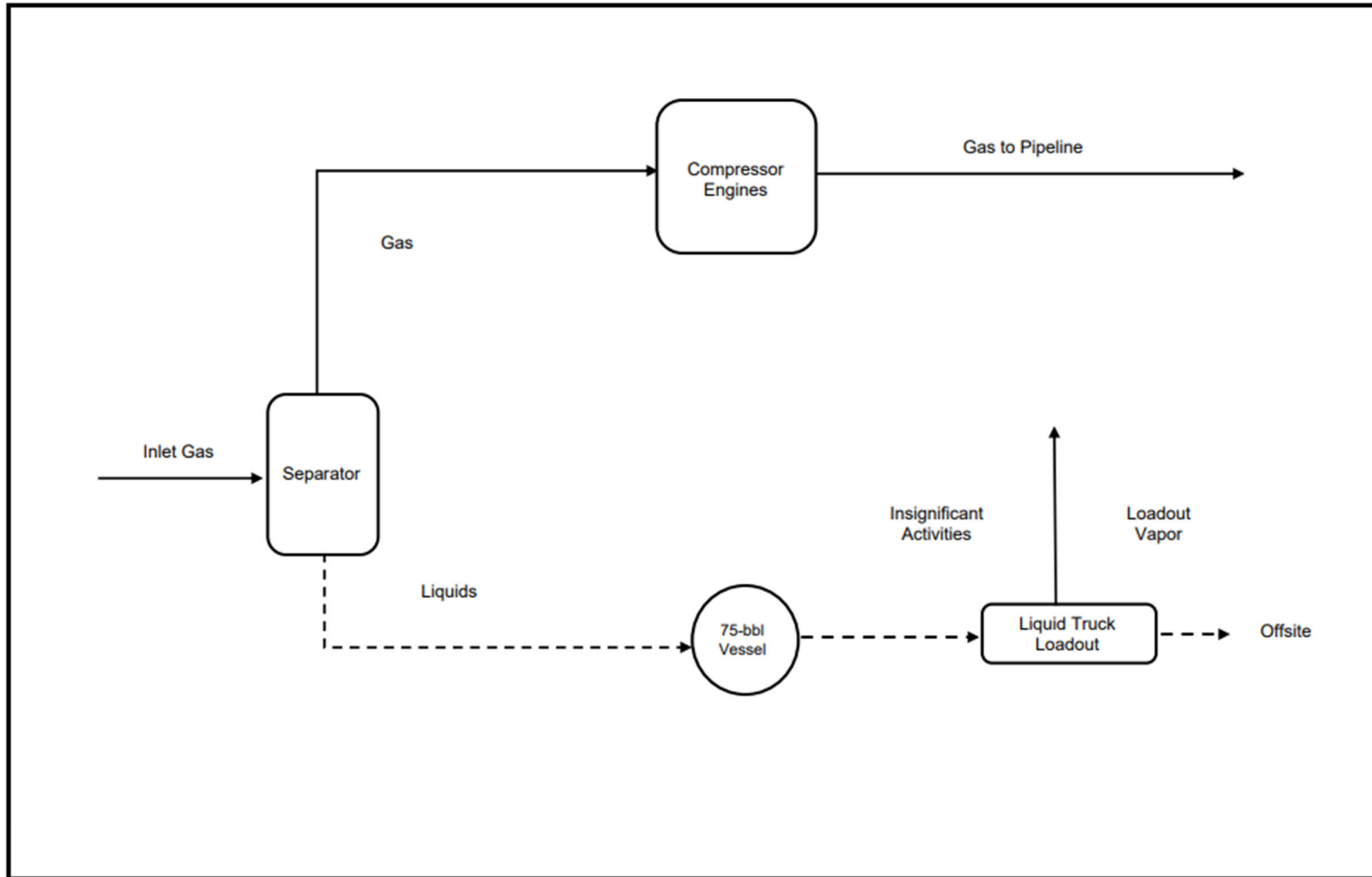


Figure Title: **Process Flow Diagram**



**MGT Hartford Compressor Station**  
Figure 2.  
Ohio County, Kentucky  
October 2020

## APPENDIX B. DEP7007 APPLICATION FORMS

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- ▶ **7007AI** – Administrative Information
- ▶ **7007DD** – Insignificant Activities

<p style="text-align: center;"><b>Division for Air Quality</b></p> <p style="text-align: center;">300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999</p>	<p><b>DEP7007AI</b></p> <p><b>Administrative Information</b></p> <p>___ Section AI.1: Source Information</p> <p>___ Section AI.2: Applicant Information</p> <p>___ Section AI.3: Owner Information</p> <p>___ Section AI.4: Type of Application</p> <p>___ Section AI.5: Other Required Information</p> <p>___ Section AI.6: Signature Block</p> <p>___ Section AI.7: Notes, Comments, and Explanations</p>	<p style="text-align: center;"><b>Additional Documentation</b></p> <p style="text-align: center;"><b>None</b></p> <p>___ Additional Documentation attached</p>																														
<p><b>Source Name:</b> <u>Midwestern Gas Transmission Company, L.L.C. - Hartford Compressor Station</u></p> <hr/> <p><b>KY EIS (AFS) #:</b> <u>21- 183-00085</u></p> <hr/> <p><b>Permit #:</b> <u>F-20-043 R1</u></p> <hr/> <p><b>Agency Interest (AI) ID:</b> <u>39508</u></p> <hr/> <p><b>Date:</b> <u>8/20/2025</u></p> <hr/>																																
<p><b>Section AI.1: Source Information</b></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;"><b>Physical Location</b></td> <td style="width: 15%;"><b>Street:</b></td> <td colspan="3"><u>102 Kirk Lane</u></td> </tr> <tr> <td><b>Address:</b></td> <td><b>City:</b></td> <td><b>County:</b></td> <td><b>Zip Code:</b></td> <td><u>42347</u></td> </tr> <tr> <td></td> <td></td> <td><u>Hartford</u></td> <td><u>Ohio</u></td> <td></td> </tr> <tr> <td><b>Mailing Address:</b></td> <td><b>Street or P.O. Box:</b></td> <td colspan="3"><u>100 W. 5<sup>th</sup> Street</u></td> </tr> <tr> <td></td> <td><b>City:</b></td> <td><b>State:</b></td> <td><b>Zip Code:</b></td> <td><u>74103</u></td> </tr> <tr> <td></td> <td><u>Tulsa</u></td> <td><u>OK</u></td> <td></td> <td></td> </tr> </table>			<b>Physical Location</b>	<b>Street:</b>	<u>102 Kirk Lane</u>			<b>Address:</b>	<b>City:</b>	<b>County:</b>	<b>Zip Code:</b>	<u>42347</u>			<u>Hartford</u>	<u>Ohio</u>		<b>Mailing Address:</b>	<b>Street or P.O. Box:</b>	<u>100 W. 5<sup>th</sup> Street</u>				<b>City:</b>	<b>State:</b>	<b>Zip Code:</b>	<u>74103</u>		<u>Tulsa</u>	<u>OK</u>		
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	<u>Tulsa</u>	<u>OK</u>																														
<p><b>Standard Coordinates for Source Physical Location</b></p> <p><b>Longitude:</b> <u>-86.83837</u> (decimal degrees)      <b>Latitude:</b> <u>37.50617</u> (decimal degrees)</p>																																
<p><b>Primary (NAICS) Category:</b> <u>Pipeline Transportation of Natural Gas</u>      <b>Primary NAICS #:</b> <u>486210</u></p>																																

<b>Classification (SIC) Category:</b>		<u>Natural Gas Transmission</u>	<b>Primary SIC #:</b>		<u>4922</u>
<b>Briefly discuss the type of business conducted at this site:</b>		<u>The Hartford Station boosts natural gas transmission pressures by compressing low-pressure transmission gas and directing it into a high-pressure transmission line.</u>			
<b>Description of Area Surrounding Source:</b>	<input checked="" type="checkbox"/> Rural Area	<input type="checkbox"/> Industrial Park	<input type="checkbox"/> Residential Area	<b>Is any part of the source located on federal land?</b>	<input type="checkbox"/> Yes
	<input type="checkbox"/> Urban Area	<input type="checkbox"/> Industrial Area	<input type="checkbox"/> Commercial Area		<input checked="" type="checkbox"/> No
<b>Approximate distance to nearest residence or commercial property:</b>		<b>Property Area:</b>		<b>Is this source portable?</b>	
<u>~1,000 feet</u>		<u>~25 acres</u>		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?</b>					
<b>NPDES/KPDES:</b> <input type="checkbox"/> Currently Hold <input type="checkbox"/> Need <input checked="" type="checkbox"/> N/A					
<b>Solid Waste:</b> <input type="checkbox"/> Currently Hold <input type="checkbox"/> Need <input checked="" type="checkbox"/> N/A					
<b>RCRA:</b> <input checked="" type="checkbox"/> Currently Hold <input type="checkbox"/> Need <input type="checkbox"/> N/A					
<b>UST:</b> <input type="checkbox"/> Currently Hold <input type="checkbox"/> Need <input checked="" type="checkbox"/> N/A					
<b>Type of Regulated Waste Activity:</b>					
<input type="checkbox"/> Mixed Waste Generator		<input checked="" type="checkbox"/> Generator		<input type="checkbox"/> Recycler	
<input type="checkbox"/> U.S. Importer of Hazardous Waste		<input type="checkbox"/> Transporter		<input type="checkbox"/> Treatment/Storage/Disposal Facility	
				<input type="checkbox"/> Other: _____	
				<input type="checkbox"/> N/A	

## Section AI.2: Applicant Information

**Applicant Name:** Midwestern Gas Transmission Company, L.L.C.  
**Title:** (if individual) \_\_\_\_\_  
**Mailing Address:** **Street or P.O. Box:** 100 W. 5<sup>th</sup> Street  
**City:** Tulsa **State:** OK **Zip Code:** 74103  
**Email:** (if individual) \_\_\_\_\_  
**Phone:** 918-588-7000

### Technical Contact

**Name:** Kimberly Walker  
**Title:** Environmental Manager  
**Mailing Address:** **Street or P.O. Box:** 1000 Noble Energy Drive, Suite 500  
**City:** Canonsburg **State:** PA **Zip Code:** 15317  
**Email:** kimberly.walker@dtmidstream.com  
**Phone:** 724-954-5329

### Air Permit Contact for Source

**Name:** Same as Technical Contact  
**Title:** \_\_\_\_\_  
**Mailing Address:** **Street or P.O. Box:** \_\_\_\_\_  
**City:** \_\_\_\_\_ **State:** \_\_\_\_\_ **Zip Code:** \_\_\_\_\_  
**Email:** \_\_\_\_\_  
**Phone:** \_\_\_\_\_



**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 Operating Permit  
 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:
<input type="checkbox"/> Particulate Matter	_____	<input type="checkbox"/> Single HAP	_____
<input type="checkbox"/> Volatile Organic Compounds (VOC)	_____	<input type="checkbox"/> Combined HAPs	_____
<input type="checkbox"/> Carbon Monoxide	_____	<input type="checkbox"/> Air Toxics (40 CFR 68, Subpart F)	_____
<input type="checkbox"/> Nitrogen Oxides	_____	<input type="checkbox"/> Carbon Dioxide	_____
<input type="checkbox"/> Sulfur Dioxide	_____	<input type="checkbox"/> Greenhouse Gases (GHG)	_____
<input type="checkbox"/> Lead	_____	<input type="checkbox"/> Other	_____

**For New Construction:**

**Proposed Start Date of Construction:** \_\_\_\_\_ *(MM/YYYY)*    **Proposed Operation Start-Up Date:** *(MM/YYYY)* \_\_\_\_\_  
N/A N/A

**For Modifications:**

**Proposed Start Date of Modification:** \_\_\_\_\_ *(MM/YYYY)*    **Proposed Operation Start-Up Date:** *(MM/YYYY)* \_\_\_\_\_  
N/A N/A

**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:

- |  |                 |   |
|--|-----------------|---|
| <input type="checkbox"/> DEP7007A Indirect Heat Exchangers and Turbines                    |                 | <input type="checkbox"/> DEP7007CC Compliance Certification <a href="#">On file with KDAQ; see also the 1H2025 SAMR</a> |
| <input type="checkbox"/> DEP7007B Manufacturing or Processing Operations                   | To be provided. | <input checked="" type="checkbox"/> DEP7007DD Insignificant Activities  |
| <input type="checkbox"/> DEP7007C Incinerators and Waste Burners                           |                 | <input type="checkbox"/> DEP7007EE Internal Combustion Engines  |
| <input type="checkbox"/> DEP7007F Episode Standby Plan                                     |                 | <input type="checkbox"/> DEP7007FF Secondary Aluminum Processing  |
| <input type="checkbox"/> DEP7007J Volatile Liquid Storage                                  |                 | <input type="checkbox"/> DEP7007GG Control Equipment  |
| <input type="checkbox"/> DEP7007K Surface Coating or Printing Operations                   |                 | <input type="checkbox"/> DEP7007HH Haul Roads   |
| <input type="checkbox"/> DEP7007L Mineral Processes  |                 | <input type="checkbox"/> Confidentiality Claim  |
| <input type="checkbox"/> DEP7007M Metal Cleaning Degreasers                                |                 | <input type="checkbox"/> Ownership Change Form  |
| <input type="checkbox"/> DEP7007N Source Emissions Profile                                 | To be provided. | <input type="checkbox"/> Secretary of State Certificate   |
| <input type="checkbox"/> DEP7007P Perchloroethylene Dry Cleaning Systems                   |                 | <input checked="" type="checkbox"/> Flowcharts or diagrams depicting process  |
| <input type="checkbox"/> DEP7007R Emission Offset Credit                                   |                 | <input type="checkbox"/> Digital Line Graphs (DLG) files of buildings, roads, etc.                                      |
| <input type="checkbox"/> DEP7007S Service Stations   |                 | <input type="checkbox"/> Site Map   |
| <input type="checkbox"/> DEP7007T Metal Plating and Surface Treatment Operations           |                 | <input checked="" type="checkbox"/> Map or drawing depicting location of facility                                       |
| <input type="checkbox"/> DEP7007V Applicable Requirements and Compliance Activiti          | To be provided. | <input type="checkbox"/> Safety Data Sheet (SDS)  |
| <input type="checkbox"/> DEP7007Y Good Engineering Practice and Stack Height Determination |                 | <input type="checkbox"/> Emergency Response Plan  |
| <input type="checkbox"/> DEP7007AA Compliance Schedule for Non-complying Emission Units    |                 | <input type="checkbox"/> Other: _____   |
| <input type="checkbox"/> DEP7007BB Certified Progress Report                               |                 |   |

**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.

  
 \_\_\_\_\_  
 Authorized Signature

8/20/25  
 \_\_\_\_\_  
 Date

Jeffrey M. Holland  
 \_\_\_\_\_  
 Type or Printed Name of Signatory

Vice President, Interstate Pipelines  
 \_\_\_\_\_  
 Title of Signatory

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

<b>Section AI.7: Notes, Comments, and Explanations</b>

Division for Air Quality

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

**DEP7007DD**

**Insignificant Activities**

- \_\_\_ Section DD.1: Table of Insignificant Activities
- \_\_\_ Section DD.2: Signature Block
- \_\_\_ Section DD.3: Notes, Comments, and Explanations

**Source Name:** Midwestern Gas Transmission Company, L.L.C. - Hartford Compressor Station

**KY EIS (AFS** 21- 183-00085

**Permit #:** F-20-043 R1

**Agency Interest (AI) ID:** 39508

**Date:** 8/20/2025

**Section DD.1: Table of Insignificant Activities**

\*Identify each activity with a unique Insignificant Activity number (IA #); for example: 1, 2, 3... etc.

Insignificant Activity #	Description of Activity including Rated Capacity	Serial Number or Other Unique Identifier	Applicable Regulation(s)	Calculated Emissions
1	TK-1 Oil/Condensate Loading	N/A	401 KAR 63:020	VOC: 0.63 tpy
2	TK-1 Oil/Condensate Tank	N/A	401 KAR 63:020	VOC: 1.34 tpy
3	Venting/Blowdown Emissions	N/A	401 KAR 63:020	VOC: 0.21 tpy

**Section DD.2: 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.

**By:**



**Authorized Signature**

Jeffrey M. Holland

**Type/Print Name of Signatory**

8/20/25

**Date**

Vice President, Interstate Pipelines

**Title of Signatory**



## **APPENDIX C. REQUESTED CHANGES TO EXISTING PERMIT**

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This appendix contains redline-strikeout mark-ups of select pages of Conditional Major Permit F-20-043 R1, which represent DT Midstream's requested changes to the existing permit language.

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

**Final**

**AIR QUALITY PERMIT  
Issued under 401 KAR 52:030**

**Permittee Name:** Midwestern Gas Transmission Company  
**Mailing Address:** 500 Woodward Avenue, Suite 2900, Detroit, MI 48226

**Source Name:** Midwestern Gas Transmission Company - Hartford  
Compressor Station

**Mailing Address:** 100 W. 5<sup>th</sup> Street, Tulsa, OK 74103

**Source Location:** 102 Kirk Lane, Hartford, KY 42347

**Permit ID:** F-20-043 R1

**Agency Interest #:** 39508

**Activity ID:** APE20250001

**Review Type:** Conditional Major, Operating

**Source ID:** 21-183-00085

**Regional Office:** Owensboro Regional Office  
3032 Alvey Park Dr. W., Suite 700  
Owensboro, KY 42303  
(270) 687-7304

**County:** Ohio

**Application**

**Complete Date:** December 1, 2020

**Issuance Date:** February 22, 2021

**Revision Date:** February 7, 2025

**Expiration Date:** February 22, 2026

*Rick Shewekah*

---

**For Michael J. Kennedy, P.E.  
Director  
Division for Air Quality**

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<b>SECTION</b>	<b>ISSUANCE PAGE</b>	
A. PERMIT AUTHORIZATION	Revision	1
B. EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS	Revision	2
C. INSIGNIFICANT ACTIVITIES	Initial	11
D. SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS	Initial	12
E. SOURCE CONTROL EQUIPMENT REQUIREMENTS	Initial	13
F. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS	Initial	14
G. GENERAL PROVISIONS	Revision	17
H. ALTERNATE OPERATING SCENARIOS	Initial	22
I. COMPLIANCE SCHEDULE	Initial	22

<b>Permit</b>	<b>Permit Type</b>	<b>Activity#</b>	<b>Complete Date</b>	<b>Issuance Date</b>	<b>Summary of Action</b>
F-20-043	Conditional Major/Synthetic Minor	APE20200001	12/1/2020	2/22/2021	Initial Construction Permit
F-20-043 R1	Administrative Amendment	APE20250001	12/7/2024	2/7/2025	Ownership change

## **SECTION A – PERMIT AUTHORIZATION**

Pursuant to a duly submitted application the Kentucky Energy and Environment Cabinet (Cabinet) hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit was issued under the provisions of Kentucky Revised Statutes (KRS) Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:030, Federally-enforceable permits for non-major sources.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Cabinet or any other federal, state, or local agency.

**SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS****Emission Unit C-1                      Compressor Engine 1**

**Description:** Caterpillar G3608 A4, 2,500 Hp  
Engine Type:                      4 stroke, Lean burn  
Primary Fuel:                      Natural gas  
Max Operating Rate:              0.0161 MMscf/hr  
Construction commenced:      ~~Proposed~~ 2021  
Control Device:                      Oxidation Catalyst (CAT-1)

**Emission Unit C-2                      Compressor Engine 2**

**Description:** Caterpillar G3608 A4, 2,500 Hp  
Engine Type:                      4 stroke, Lean burn  
Primary Fuel:                      Natural gas  
Max Operating Rate:              0.0161 MMscf/hr  
Construction commenced:      ~~Proposed~~ 2021  
Control Device:                      Oxidation Catalyst (CAT-2)

**Emission Unit C-3                      Compressor Engine 3**

**Description:** Caterpillar G3616 A4, 5,000 Hp  
Engine Type:                      4 stroke, Lean burn  
Primary Fuel:                      Natural gas  
Max Operating Rate:              0.032 MMscf/hr  
Construction commenced:      ~~Proposed~~ 2021  
Control Device:                      Oxidation Catalyst (CAT-3)

**Emission Unit C-4                      Compressor Engine 4**

**Description:** Caterpillar G3616 A4, 5,000 Hp  
Engine Type:                      4 stroke, Lean burn  
Primary Fuel:                      Natural gas:  
Max Operating Rate:              0.032 MMscf/hr  
Construction commenced:      ~~Proposed~~ 2021  
Control Device:                      Oxidation Catalyst (CAT-4)

**APPLICABLE REGULATIONS:**

401 KAR 60:005, Section 2(2)(eeee), 40 C.F.R. 60.4230 to 60.4248, Tables 1 to 4 (Subpart JJJJ), Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

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

**SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)****1. Operating Limitations:**

- a. The permittee shall must meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart JJJJ. No further requirements apply under 40 CFR 63, Subpart ZZZZ. [40 CFR 63.6590(c)(1)]
- b. The permittee of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in 40 CFR 60.4233 over the entire life of the engine. [40 CFR 60.4234]
- c. The permittee may operate their engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the permittee is required to conduct a performance test to demonstrate compliance with the emission standards of 40 CFR 60.4233(e) [40 CFR 60.4243(e)].
- d. To preclude applicability of 401 KAR 52:020 for HAPs, the permittee shall operate the oxidation catalyst associated with the engine at all times each engine is operating. [401 KAR 52:030, Section 10]

**2. Emission Limitations:**

The permittee of a stationary SI ICE with a maximum engine power greater than or equal to 75 KW (100 HP) (except gasoline and rich burn engines that use LPG) must comply with the emission standards in Table 1 to 40 CFR 60, Subpart JJJJ for the stationary SI ICE as follows: [40 CFR 60.4233(e)]

- a. NO<sub>x</sub>: 1.0 g/hp-hr [82 ppmvd @ 15% O<sub>2</sub>]
- b. CO: 2.0 g/hp-hr [270 ppmvd @ 15% O<sub>2</sub>]
- c. VOC: 0.7 g/hp-hr [60 ppmvd @ 15% O<sub>2</sub>]

**Compliance Demonstration Method:**

- i. The permittee of a stationary SI internal combustion engine that must comply with the emission standards specified in 40 CFR 60.4233(e), must demonstrate compliance according to one of the methods specified in 40 CFR 60.4243(b)(1) or (2) as follows: [40 CFR 60.4243(b)]
  - 1) Purchasing an engine certified according to procedures specified in 40 CFR 60, Subpart JJJJ, for the same model year and demonstrating compliance according to one of the methods specified in 40 CFR 60.4243(a); or
  - 2) Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in 40 CFR 60.4233(e) and according to the requirements specified in 40 CFR 60.4244, as applicable, and according to 40 CFR 60.4243(b)(2)(ii).
    - A. For a stationary SI internal combustion engine greater than 500 HP, the permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee must conduct an initial performance test and conduct

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

subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.

ii. See **3. Testing Requirements** and **6. Specific Reporting Requirements**.

d. See **Section D**.

### **3. Testing Requirements:**

- a. The permittee of stationary SI ICE that conduct performance tests must follow the procedures in 40 CFR 60.4244(a) through (f): [40 CFR 60.4244]
  - i. Each performance test must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and according to the requirements in 40 CFR 60.8 and under the specific conditions that are specified by Table 2 to 40 CFR 60, Subpart JJJJ. [40 CFR 60.4244(a)]
  - ii. The permittee may not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in 40 CFR 60.8(c). If the stationary SI internal combustion engine is non-operational, the permittee does not need to startup the engine solely to conduct a performance test; however, the permittee must conduct the performance test immediately upon startup of the engine [40 CFR 60.4244(b)].
  - iii. The permittee must conduct three separate test runs for each performance test required in 40 CFR 60.4244, as specified in 40 CFR 60.8(f). Each test run must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and last at least 1 hour [40 CFR 60.4244(c)].
- b. To determine compliance with the NO<sub>x</sub> mass per unit output emission limitation, convert the concentration of NO<sub>x</sub> in the engine exhaust using Equation 1 of 40 CFR 60.4244 as follows: [40 CFR 60.4244(d)]

$$ER = \frac{C_d \times 1.912 \times 10^{-3} \times Q \times T}{HP - hr}$$

Where:

ER = Emission rate of NO<sub>x</sub> in g/HP-hr.

C<sub>d</sub> = Measured NO<sub>x</sub> concentration in parts per million by volume (ppmv).

1.912 × 10<sup>-3</sup> = Conversion constant for ppm NO<sub>x</sub> to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meter per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, horsepower-hour (HP-hr).

- c. To determine compliance with the CO mass per unit output emission limitation, convert the concentration of CO in the engine exhaust using Equation 2 of 40 CFR 60.4244 as follows: [40 CFR 60.4244(e)]

$$ER = \frac{C_d \times 1.164 \times 10^{-3} \times Q \times T}{HP - hr}$$

Where:

ER = Emission rate of CO in g/HP-hr.

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

$C_d$  = Measured CO concentration in ppmv.

$1.164 \times 10^{-3}$  = Conversion constant for ppm CO to grams per standard cubic meter at 20 degrees Celsius.

$Q$  = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis.

$T$  = Time of test run, in hours.

HP-hr = Brake work of the engine, in HP-hr.

- d. For purposes of 40 CFR 60, Subpart JJJJ, when calculating emissions of VOC, emissions of formaldehyde should not be included. To determine compliance with the VOC mass per unit output emission limitation, convert the concentration of VOC in the engine exhaust using Equation 3 as follows: [40 CFR 60.4244(f)]

$$ER = \frac{C_d \times 1.833 \times 10^{-3} \times Q \times T}{HP - hr}$$

Where:

ER = Emission rate of VOC in g/HP-hr.

$C_d$  = VOC concentration measured as propane in ppmv.

$1.833 \times 10^{-3}$  = Conversion constant for ppm VOC measured as propane, to grams per standard cubic meter at 20 degrees Celsius.

$Q$  = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis.

$T$  = Time of test run, in hours.

HP-hr = Brake work of the engine, in HP-hr.

- e. If the permittee chooses to measure VOC emissions using either Method 18 of 40 CFR part 60, appendix A, or Method 320 of 40 CFR part 63, appendix A, then it has the option of correcting the measured VOC emissions to account for the potential differences in measured values between these methods and Method 25A. The results from Method 18 and Method 320 can be corrected for response factor differences using Equations 4 and 5 of 40 CFR 60.4244 below. The corrected VOC concentration can then be placed on a propane basis using Equation 6 of 40 CFR 60.4244 below: [40 CFR 60.4244(g)]

$$RF_i = \frac{C_{Mi}}{C_{Ai}}$$

Where:

$RF_i$  = Response factor of compound i when measured with EPA Method 25A.

$C_{Mi}$  = Measured concentration of compound i in ppmv as carbon.

$C_{Ai}$  = True concentration of compound i in ppmv as carbon.

$$C_{icorr} = RF_i \times C_{imeas}$$

Where:

$C_{icorr}$  = Concentration of compound i corrected to the value that would have been measured by EPA Method 25A, ppmv as carbon.

$C_{imeas}$  = Concentration of compound i measured by EPA Method 320, ppmv as carbon.

$$C_{Peq} = 0.6098 \times C_{icorr}$$

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

Where:

$C_{peq}$  = Concentration of compound i in mg of propane equivalent per DSCM.

- f. To preclude 401 KAR 52:020, for HAP emissions the permittee shall conduct an initial performance test for each engine to determine the uncontrolled and controlled emission factors (in units of g/HP-hr and lb/mmscf) for formaldehyde using either Method 320 or Method 323. [401 KAR 52:030, Section 10]
- g. During each performance test, the permittee shall monitor and record the inlet temperature of the oxidation catalyst and the pressure drop across the oxidation catalyst at least once every 15 minutes during each of the three test runs, for each engine. [401 KAR 52:030, Section 10]
- h. Testing shall be conducted at such times as may be requested by the Cabinet. [401 KAR 50:045, Section 1]

**4. Specific Monitoring Requirements:**

- a. The permittee shall monitor and keep records of the hours of operation of each engine, on a monthly basis. [401 KAR 52:030, Section 10]
- b. The permittee shall monitor on a continuous basis (at least once every fifteen (15) minutes) the inlet temperature of the oxidation catalyst to ensure proper operation of the control device on each engine based on values outlined in 7. **Specific Control Equipment Operating Conditions** b. [401 KAR 52:030, Section 10]
- c. The permittee shall monitor and record the pressure drop across the oxidation catalyst at least once monthly to ensure proper operation of the control device on each engine. The pressure drop shall be kept within the range specified in 7. **Specific Control Equipment Operating Conditions** c. [401 KAR 52:030, Section 10]

**5. Specific Recordkeeping Requirements:**

- a. The permittee of all stationary SI ICE must keep records of the information in 40 CFR 60.4245(a)(1) through (4) as follows: [40 CFR 60.4245]
  - i. All notifications submitted to comply with 40 CFR 60, Subpart JJJJ and all documentation supporting any notification.
  - ii. Maintenance conducted on the engine.
  - iii. If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts ~~90~~, 1048, 1054, and 1060, as applicable.
  - iv. If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to 40 CFR 60.4243(a)(2), documentation that the engine meets the emission standards.
- b. The permittee shall keep records of maintenance and operation of the oxidation catalyst on each engine. [401 KAR 52:030, Section 10]

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

c. The permittee shall average all values for the catalyst inlet temperature collected each day while the engine is running and shall keep records of the daily average catalyst inlet temperature, for each engine. If a 24-hour average inlet temperature for an engine falls outside the operating temperature range established in 7. **Specific Control Equipment Operating Conditions** b., then the permittee shall assume a destruction efficiency of zero for that time period for the purpose of estimating emissions for that engine. [401 KAR 52:030, Section 10]

~~e.d.~~ Any records required to be maintained by this subpart that are submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for the permittee to make records, data, and reports available upon request to a delegated air agency or the EPA as part of an on-site compliance evaluation. [40 CFR 60.4245(j)]

**6. Specific Reporting Requirements:**

a. The permittee of stationary SI ICE greater than or equal to 500 HP that have not been certified by an engine manufacturer to meet the emission standards in 40 CFR 60.4231 must submit an initial notification as required in 40 CFR 60.7(a)(1). The notification must include the information in 40 CFR 60.4245(c)(1) through (5) of this 40 CFR 60.4245. Beginning on February 26, 2025 submit the notification electronically according to 40 CFR 60.4245(g).as follows: [40 CFR 60.4245(c)]

- i. Name and address of the owner or operator;
- ii. The address of the affected source;
- iii. Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement;
- iv. Emission control equipment; and
- v. Fuel used.

b. The permittee of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in 40 CFR 60.4244 within 60 days after the test has been completed. Performance test reports using EPA Method 18, EPA Method 320, or ASTM D6348-03 (incorporated by reference—see 40 CFR 60.17) to measure VOC require reporting of all QA/QC data. For Method 18, report results from sections 8.4 and 11.1.1.4; for Method 320, report results from sections 8.6.2, 9.0, and 13.0; and for ASTM D6348-03 report results of all QA/QC procedures in Annexes 1-7. Beginning on February 26, 2025, performance tests must be reported electronically according to 40 CFR 60.4245(f). [40 CFR 60.4245(d)]

c. Beginning on February 26, 2025, within 60 days after the date of completing each performance test, the permittee must submit the results following the procedures specified in 40 CFR 60.4245(g). Data collected using test methods that are supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT website (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>) at the time of the test must be submitted in a file format generated using the EPA's ERT. Alternatively, the permittee may submit an electronic file consistent with the extensible markup language (XML) schema listed on the EPA's ERT website. Data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT website at the time of the test must be included as an attachment in the ERT or an alternate electronic file. [40 CFR 60.4245(f)]

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

- d. The permittee must submit notifications or reports to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The EPA will make all the information submitted through CEDRI available to the public without further notice to the permittee. The permittee shall not use CEDRI to submit information claimed as CBI. Although it is not expected for persons to assert a claim of CBI, if the permittee wishes to assert a CBI claim for some of the information in the report or notification, the permittee must submit a complete file in the format specified in 40 CFR 60 Subpart JJJJ, including information claimed to be CBI, to the EPA following the procedures in paragraphs (g)(1) and (2) of this section. The permittee shall clearly mark the part or all of the information claimed to be CBI. Information not marked as CBI may be authorized for public release without prior notice. Information marked as CBI will not be disclosed except in accordance with procedures set forth in 40 CFR part 2. All CBI claims must be asserted at the time of submission. Anything submitted using CEDRI cannot later be claimed CBI. Furthermore, under CAA section 114(c), emissions data is not entitled to confidential treatment, and the EPA is required to make emissions data available to the public. Thus, emissions data will not be protected as CBI and will be made publicly available. The permittee must submit the same file submitted to the CBI office with the CBI omitted to the EPA via the EPA's CDX as described in 40 CFR 60.4245(g). [40 CFR 60.4245(g)]
- i. The preferred method to receive CBI is for it to be transmitted electronically using email attachments, File Transfer Protocol, or other online file sharing services. Electronic submissions must be transmitted directly to the OAQPS CBI Office at the email address [oaqpscbi@epa.gov](mailto:oaqpscbi@epa.gov), and as described in 40 CFR 60.4245(g), should include clear CBI markings. ERT files should be flagged to the attention of the Group Leader, Measurement Policy Group; all other files should be flagged to the attention of the Stationary Spark Ignition Internal Combustion Engine Sector Lead. If assistance is needed with submitting large electronic files that exceed the file size limit for email attachments, and if the permittee does not have its own file sharing service, please email [oaqpscbi@epa.gov](mailto:oaqpscbi@epa.gov) to request a file transfer link. [40 CFR 60.4245(g)(1)]
- ii. If the permittee cannot transmit the file electronically, the permittee may send CBI information through the postal service to the following address: OAQPS Document Control Officer (C404-02), OAQPS, U.S. Environmental Protection Agency, 109 T.W. Alexander Drive, P.O. Box 12055, Research Triangle Park, North Carolina 27711. ERT files should be sent to the attention of the Group Leader, Measurement Policy Group, and all other files should be sent to the attention of the Stationary Spark Ignition Internal Combustion Engine Sector Lead. The mailed CBI material should be double wrapped and clearly marked. Any CBI markings should not show through the outer envelope. [40 CFR 60.4245(g)(2)]
- e. If the permittee is required to electronically submit a report through CEDRI in the EPA's CDX, the permittee may assert a claim of EPA system outage for failure to timely comply with that reporting requirement. To assert a claim of EPA system outage, the permittee must meet the requirements outlined in 40 CFR 60.4245(h)(1) through (7). [40 CFR 60.4245(h)]
- i. The permittee must have been or will be precluded from accessing CEDRI and submitting a required report within the time prescribed due to an outage of either the EPA's CEDRI or CDX systems. [40 CFR 60.4245(h)(1)]
- ii. The outage must have occurred within the period of time beginning five business days prior to the date that the submission is due. [40 CFR 60.4245(h)(2)]
- iii. The outage may be planned or unplanned. [40 CFR 60.4245(h)(3)]

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

- iv. The permittee must submit notification to the Administrator in writing as soon as possible following the date the permittee first knew, or through due diligence should have known, that the event may cause or has caused a delay in reporting. [40 CFR 60.4245(h)(4)]
  - v. The permittee must provide to the Administrator a written description identifying:
    - 1) The date(s) and time(s) when CDX or CEDRI was accessed and the system was unavailable; [40 CFR 60.4245(h)(5)(i)]
    - 2) A rationale for attributing the delay in reporting beyond the regulatory deadline to EPA system outage; [40 CFR 60.4245(h)(5)(ii)]
    - 3) A description of measures taken or to be taken to minimize the delay in reporting; and [40 CFR 60.4245(h)(5)(iii)]
    - 4) The date by which the permittee proposes to report, or if the permittee has already met the reporting requirement at the time of the notification, the date the permittee reported. [40 CFR 60.4245(h)(5)(iv)]
  - vi. The decision to accept the claim of EPA system outage and allow an extension to the reporting deadline is solely within the discretion of the Administrator. [40 CFR 60.4245(h)(6)]
  - vii. In any circumstance, the report must be submitted electronically as soon as possible after the outage is resolved. [40 CFR 60.4245(h)(7)]
- f. If the permittee is required to electronically submit a report through CEDRI in the EPA's CDX, the permittee may assert a claim of force majeure for failure to timely comply with that reporting requirement. To assert a claim of force majeure, the permittee must meet the requirements outlined in 40 CFR 60.4245(i)(1) through (5). [40 CFR 60.4245(i)]
- i. The permittee may submit a claim if a force majeure event is about to occur, occurs, or has occurred or there are lingering effects from such an event within the period of time beginning five business days prior to the date the submission is due. For the purposes of this section, a force majeure event is defined as an event that will be or has been caused by circumstances beyond the control of the affected facility, its contractors, or any entity controlled by the affected facility that prevents the permittee from complying with the requirement to submit a report electronically within the time period prescribed. Examples of such events are acts of nature (e.g., hurricanes, earthquakes, or floods), acts of war or terrorism, or equipment failure or safety hazard beyond the control of the affected facility (e.g., large scale power outage). [40 CFR 60.4245(i)(1)]
  - ii. The permittee must submit notification to the Administrator in writing as soon as possible following the date the permittee first knew, or through due diligence should have known, that the event may cause or has caused a delay in reporting. [40 CFR 60.4245(i)(2)]
  - iii. The permittee must provide to the Administrator:
    - 1) A written description of the force majeure event; [40 CFR 60.4245(i)(3)(i)]
    - 2) A rationale for attributing the delay in reporting beyond the regulatory deadline to the force majeure event; [40 CFR 60.4245(i)(3)(ii)]
    - 3) A description of measures taken or to be taken to minimize the delay in reporting; and [40 CFR 60.4245(i)(3)(iii)]
    - 4) The date by which the permittee proposes to report, or if the permittee has already met the reporting requirement at the time of the notification, the date the permittee reported. [40 CFR 60.4245(i)(3)(iv)]
  - iv. The decision to accept the claim of force majeure and allow an extension to the reporting deadline is solely within the discretion of the Administrator. [40 CFR 60.4245(i)(4)]

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

v. In any circumstance, the reporting must occur as soon as possible after the force majeure event occurs. [40 CFR 60.4245(i)(5)]

~~e.g.~~ See Section F.

**7. Specific Control Equipment Operating Conditions:**

- a. The permittee shall install, operate, and maintain the oxidation catalyst in accordance with the manufacturer's recommendations. A copy of the manufacturer's recommendations shall be kept on file. [401 KAR 52:030, Section 10]
- b. The permittee shall maintain the temperature of each stationary RICE exhaust so that the catalyst inlet temperature is greater than 600 °F and less than 1250 °F during all periods except startup and shutdown. [401 KAR 52:030, Section 10]
- c. The permittee shall maintain the catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water at 100 percent load plus or minus 10 percent from the pressure drop across the catalyst that was measured during the most recent performance test approved by the Division. [401 KAR 52:030, Section 10]
- d. The permittee shall minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine. [401 KAR 52:030, Section 10]

**SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)****Emission Unit C-5                      Emergency Generator Engine 1**

**Description:** Caterpillar G3512 A4, 1,468 HP (Certified)  
Engine Type:                      4 stroke, Lean burn  
Primary Fuel:                      Natural gas  
Max Operating Rate:              0.009443 MMscf/hr  
Construction commenced:      Proposed 2021  
Control Device:                    None

**APPLICABLE REGULATIONS:**

401 KAR 60:005, Section 2(2)(eeee), 40 C.F.R. 60.4230 to 60.4248, Tables 1 to 4 (Subpart JJJJ), Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

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

**1. Operating Limitations:**

- a. The permittee shall must meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart JJJJ. No further requirements apply under 40 CFR 63, Subpart ZZZZ. [40 CFR 63.6590(c)(1)]
- b. The permittee of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in 40 CFR 60.4233 over the entire life of the engine. [40 CFR 60.4234]
- c. The permittee of a stationary SI internal combustion engine that must comply with the emission standards specified in 40 CFR 60.4233(e), must demonstrate compliance according to 40 CFR 60.4243(b)(1) as follows: [40 CFR 60.4243(b)]
  - i. Purchasing an engine certified according to procedures specified in 40 CFR 60, Subpart JJJJ, for the same model year and demonstrating compliance according to one of the methods specified in 40 CFR 60.4243(a).
- d. For an emergency stationary ICE, the permittee must operate the emergency stationary ICE according to the requirements in 40 CFR 60.4243(d)(1) through (3). In order for the engine to be considered an emergency stationary ICE under 40 CFR 60, Subpart JJJJ, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in 40 CFR 60.4243(d)(1) through (3), is prohibited. If the permittee does not operate the engine according to the requirements in 40 CFR 60.4243(d)(1) through (3), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. [40 CFR 60.4243(d)]
  - i. There is no time limit on the use of emergency stationary ICE in emergency situations.
  - ii. The permittee may operate the emergency stationary ICE for the purpose specified in 40 CFR 60.4243(d)(2)(i) for a maximum of 100 hours per calendar year. Any operation

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

for non-emergency situations as allowed by 40 CFR 60.4243(d)(3) counts as part of the 100 hours per calendar year allowed by 40 CFR 60.4243(d)(2).

- 1) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.
- iii. Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in 40 CFR 60.4243(d)(2). Except as provided in 40 CFR 60.4243(d)(3)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
  - 1) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
    - A. The engine is dispatched by the local balancing authority or local transmission and distribution system operator;
    - B. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
    - C. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
    - D. The power is provided only to the facility itself or to support the local transmission and distribution system.
    - E. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.
- e. The permittee of stationary SI natural gas fired engines may operate the engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the permittee is required to conduct a performance test to demonstrate compliance with the emission standards of 40 CFR 60.4233. [40 CFR 60.4243(e)]
- f. If the emergency stationary SI internal combustion engine does not meet the standards applicable to non-emergency engines, the permittee must install a non-resettable hour meter. [40 CFR 60.4237(a)]

## **SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

### **2. Emission Limitations:**

The permittee of stationary SI ICE with a maximum engine power greater than or equal to 75 KW (100 HP) (except gasoline and rich burn engines that use LPG) must comply with the emission standards in Table 1 to 40 CFR 60, Subpart JJJJ for the stationary SI ICE as follows:

[40 CFR 60.4233(e)]

- a. NO<sub>x</sub>: 2.0 g/hp-hr [160 ppmvd @ 15% O<sub>2</sub>]
- b. CO: 4.0 g/hp-hr [540 ppmvd @ 15% O<sub>2</sub>]
- c. VOC: 1.0 g/hp-hr [86 ppmvd @ 15% O<sub>2</sub>]

### **Compliance Demonstration Method:**

See **1. Operating Limitations**, c.

### **3. Testing Requirements:**

Testing shall be conducted at such times as may be requested by the Cabinet. [401 KAR 50:045, Section 1]

### **4. Specific Monitoring Requirements:**

The permittee of all stationary SI ICE must keep records of the information in 40 CFR 60.4245(a)(1) through (4) as follows: [40 CFR 60.4245]

- a. All notifications submitted to comply with 40 CFR 60, Subpart JJJJ and all documentation supporting any notification.
- b. Maintenance conducted on the engine.
- c. If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts ~~90~~, 1048, 1054, and 1060, as applicable.
- d. If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to 40 CFR 60.4243(a)(2), documentation that the engine meets the emission standards.

### **5. Specific Recordkeeping Requirements:**

a. For all stationary SI emergency ICE greater than or equal to 500 HP manufactured on or after July 1, 2010, that do not meet the standards applicable to non-emergency engines, the permittee must keep records of the hours of operation of the engine that is recorded through the non- resettable hour meter. The permittee 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. [40 CFR 60.4245(b)]

b. Any records required to be maintained by this subpart that are submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for the permittee to make records, data, and reports available upon request to a delegated air agency or the EPA as part of an on-site compliance evaluation. [40 CFR 60.4245(j)]

### **6. Specific Reporting Requirements:**

a. The permittee of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in 40 CFR 60.4244 within 60 days after the test has been completed. Performance test reports using EPA Method 18, EPA Method 320, or ASTM D6348-03 (incorporated by reference—see 40 CFR 60.17) to measure

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

VOC require reporting of all QA/QC data. For Method 18, report results from sections 8.4 and 11.1.1.4; for Method 320, report results from sections 8.6.2, 9.0, and 13.0; and for ASTM D6348-03 report results of all QA/QC procedures in Annexes 1-7. Beginning on February 26, 2025, performance tests must be reported electronically according to 40 CFR 60.4245(f). [40 CFR 60.4245(d)]

- b. Beginning on February 26, 2025, within 60 days after the date of completing each performance test, the permittee must submit the results following the procedures specified in 40 CFR 60.4245(g). Data collected using test methods that are supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT website (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>) at the time of the test must be submitted in a file format generated using the EPA's ERT. Alternatively, the permittee may submit an electronic file consistent with the extensible markup language (XML) schema listed on the EPA's ERT website. Data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT website at the time of the test must be included as an attachment in the ERT or an alternate electronic file. [40 CFR 60.4245(f)]
- c. The permittee must submit notifications or reports to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The EPA will make all the information submitted through CEDRI available to the public without further notice to the permittee. The permittee shall not use CEDRI to submit information claimed as CBI. Although it is not expected for persons to assert a claim of CBI, if the permittee wishes to assert a CBI claim for some of the information in the report or notification, the permittee must submit a complete file in the format specified in 40 CFR 60 Subpart JJJJ, including information claimed to be CBI, to the EPA following the procedures in paragraphs (g)(1) and (2) of this section. The permittee shall clearly mark the part or all of the information claimed to be CBI. Information not marked as CBI may be authorized for public release without prior notice. Information marked as CBI will not be disclosed except in accordance with procedures set forth in 40 CFR part 2. All CBI claims must be asserted at the time of submission. Anything submitted using CEDRI cannot later be claimed CBI. Furthermore, under CAA section 114(c), emissions data is not entitled to confidential treatment, and the EPA is required to make emissions data available to the public. Thus, emissions data will not be protected as CBI and will be made publicly available. The permittee must submit the same file submitted to the CBI office with the CBI omitted to the EPA via the EPA's CDX as described in 40 CFR 60.4245(g). [40 CFR 60.4245(g)]
- i. The preferred method to receive CBI is for it to be transmitted electronically using email attachments, File Transfer Protocol, or other online file sharing services. Electronic submissions must be transmitted directly to the OAQPS CBI Office at the email address [oaqpscbi@epa.gov](mailto:oaqpscbi@epa.gov), and as described in 40 CFR 60.4245(g), should include clear CBI markings. ERT files should be flagged to the attention of the Group Leader, Measurement Policy Group; all other files should be flagged to the attention of the Stationary Spark Ignition Internal Combustion Engine Sector Lead. If assistance is needed with submitting large electronic files that exceed the file size limit for email attachments, and if the permittee does not have its own file sharing service, please email [oaqpscbi@epa.gov](mailto:oaqpscbi@epa.gov) to request a file transfer link. [40 CFR 60.4245(g)(1)]
- ii. If the permittee cannot transmit the file electronically, the permittee may send CBI information through the postal service to the following address: OAQPS Document Control Officer (C404-02), OAQPS, U.S. Environmental Protection Agency, 109 T.W.

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

- Alexander Drive, P.O. Box 12055, Research Triangle Park, North Carolina 27711. ERT files should be sent to the attention of the Group Leader, Measurement Policy Group, and all other files should be sent to the attention of the Stationary Spark Ignition Internal Combustion Engine Sector Lead. The mailed CBI material should be double wrapped and clearly marked. Any CBI markings should not show through the outer envelope. [40 CFR 60.4245(g)(2)]
- d. If the permittee is required to electronically submit a report through CEDRI in the EPA's CDX, the permittee may assert a claim of EPA system outage for failure to timely comply with that reporting requirement. To assert a claim of EPA system outage, the permittee must meet the requirements outlined in 40 CFR 60.4245(h)(1) through (7). [40 CFR 60.4245(h)]
- i. The permittee must have been or will be precluded from accessing CEDRI and submitting a required report within the time prescribed due to an outage of either the EPA's CEDRI or CDX systems. [40 CFR 60.4245(h)(1)]
- ii. The outage must have occurred within the period of time beginning five business days prior to the date that the submission is due. [40 CFR 60.4245(h)(2)]
- iii. The outage may be planned or unplanned. [40 CFR 60.4245(h)(3)]
- iv. The permittee must submit notification to the Administrator in writing as soon as possible following the date the permittee first knew, or through due diligence should have known, that the event may cause or has caused a delay in reporting. [40 CFR 60.4245(h)(4)]
- v. The permittee must provide to the Administrator a written description identifying:
- 1) The date(s) and time(s) when CDX or CEDRI was accessed and the system was unavailable; [40 CFR 60.4245(h)(5)(i)]
  - 2) A rationale for attributing the delay in reporting beyond the regulatory deadline to EPA system outage; [40 CFR 60.4245(h)(5)(ii)]
  - 3) A description of measures taken or to be taken to minimize the delay in reporting; and [40 CFR 60.4245(h)(5)(iii)]
  - 4) The date by which the permittee proposes to report, or if the permittee has already met the reporting requirement at the time of the notification, the date the permittee reported. [40 CFR 60.4245(h)(5)(iv)]
- vi. The decision to accept the claim of EPA system outage and allow an extension to the reporting deadline is solely within the discretion of the Administrator. [40 CFR 60.4245(h)(6)]
- vii. In any circumstance, the report must be submitted electronically as soon as possible after the outage is resolved. [40 CFR 60.4245(h)(7)]
- e. If the permittee is required to electronically submit a report through CEDRI in the EPA's CDX, the permittee may assert a claim of force majeure for failure to timely comply with that reporting requirement. To assert a claim of force majeure, the permittee must meet the requirements outlined in 40 CFR 60.4245(i)(1) through (5). [40 CFR 60.4245(i)]
- i. The permittee may submit a claim if a force majeure event is about to occur, occurs, or has occurred or there are lingering effects from such an event within the period of time beginning five business days prior to the date the submission is due. For the purposes of this section, a force majeure event is defined as an event that will be or has been caused by circumstances beyond the control of the affected facility, its contractors, or any entity controlled by the affected facility that prevents the permittee from complying with the requirement to submit a report electronically within the time period prescribed. Examples of such events are acts of nature (e.g., hurricanes, earthquakes, or floods), acts of war or terrorism, or equipment failure or safety hazard beyond the control of the

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

- affected facility (e.g., large scale power outage). [40 CFR 60.4245(i)(1)]
- ii. The permittee must submit notification to the Administrator in writing as soon as possible following the date the permittee first knew, or through due diligence should have known, that the event may cause or has caused a delay in reporting. [40 CFR 60.4245(i)(2)]
  - iii. The permittee must provide to the Administrator:
    - 1) A written description of the force majeure event; [40 CFR 60.4245(i)(3)(i)]
    - 2) A rationale for attributing the delay in reporting beyond the regulatory deadline to the force majeure event; [40 CFR 60.4245(i)(3)(ii)]
    - 3) A description of measures taken or to be taken to minimize the delay in reporting; and [40 CFR 60.4245(i)(3)(iii)]
    - 4) The date by which the permittee proposes to report, or if the permittee has already met the reporting requirement at the time of the notification, the date the permittee reported. [40 CFR 60.4245(i)(3)(iv)]
  - iv. The decision to accept the claim of force majeure and allow an extension to the reporting deadline is solely within the discretion of the Administrator. [40 CFR 60.4245(i)(4)]
  - v. In any circumstance, the reporting must occur as soon as possible after the force majeure event occurs. [40 CFR 60.4245(i)(5)]