

**Koda Resources – Antelope Flats/Sand Wash Compressor Station
Full Compliance Evaluation (FCE)
On-Site Clean Air Act (CAA) Inspection**

Inspection Date: September 18, 2024

Inspection Report Date: November 25, 2024

EPA Representatives: Michael Stovern, Colin Schwartz, Chris Andrade, James Floyd

Tribal Representatives: Lonnie Favel, Alverna Nelson

Company Representatives: Jim Gress, Rex Anderson, Eloy Torres, Grizz Oleen, Kelly Jensen, Ryan Watkins

Inspection Report Prepared By: Michael Stovern

Inspection Report Reviewed By: Scott Patefield **SCOTT PATEFIELD**  Digitally signed by SCOTT PATEFIELD
Date: 2024.11.25 10:06:33 -07'00'

Last CAA Inspection: May 10, 2021

Applicable Rules: Synthetic Minor NSR Permit (Syn Minor permit)
40 C.F.R. Part 63, Subpart HH (MACT HH)
40 C.F.R. Part 63, Subpart ZZZZ (MACT ZZZZ)
40 C.F.R. Part 60, Subpart JJJJ (NSPS JJJJ)

CAA Permit History: Synthetic Minor permit: SMNSR-UO-000027-2019.002
Issue Date: January 13, 2020
Effective Date: CD Termination (1:07-cv-01034)

General Source Information

Parent Company name: Koda Resources

Facility Name: Antelope Flats/Sand Wash Compressor Station

Facility Location: Latitude 39.995, Longitude -109.4712

EPA Region: 8

County, State: Uintah County, Utah

Reservation: Uintah & Ouray Reservation

Tribe: Ute Indian Tribe

Responsible Official: Michael Rynearson

NAICS Code: 211111

ICIS-AIR ID Number: 080000004904700154

Overall Inspection Findings

Synthetic Minor Permit violations/concerns

1. The EPA did not identify any areas of concern.

NSPS JJJJ violations/concerns

1. The EPA did not identify any areas of concern.

MACT ZZZZ violations/concerns

1. The EPA did not identify any areas of concern.

MACT HH violations/concerns

1. The EPA did not identify any areas of concern.

Title V Permit violations/concerns

1. The source was not able to provide records demonstrating they completed and submitted the annual emission inventory and paid emission fees for the two months the facility was operating and the permit was active in 2022.
2. The source was not able to provide records of submittal of Annual Compliance Certification for calendar year 2021.

Previous Compliance Status

The previous full compliance evaluation of this facility occurred in 2021 and the inspection report did not identify any compliance concerns.

Current Compliance Status

The source was not able to provide records demonstrating they completed and submitted the annual emission inventory and paid emission fees for the two months the facility was operating and the permit was active in 2022. The source was not able to provide records of submittal of Annual Compliance Certification for calendar year 2021. It should be noted that this reporting period occurred when the facility was under different ownership.

General Inspection Observations and Commentary

This Full Compliance Evaluation (FCE) was conducted via an on-site inspection and follow-up record review.

Opening Meeting:

The EPA inspectors, Tribal reps and Koda staff met at the Natural Buttes Compressor Station at 7:30 am on 9/18/2024. The inspectors proceeded to follow the Koda staff to the Antelope Flats compressor station. Once on-site the inspectors presented their credentials to the staff and made introductions. The inspectors started the opening meeting at 8:15 am by stating that the purpose of the inspection was to complete a Full Compliance Evaluation (FCE) of the facility with respect to all applicable Clean Air Act (CAA) regulations. The inspectors started by asked a series of questions regarding facility operations, monitoring and recordkeeping. The opening meeting was completed at 8:22 am.

Walk Through Inspection Observations

The EPA began its walkthrough of the facility at 8:22 am. The walkthrough started at the Antelope Flats facility and was followed by the Sand Wash facility.

Table 1: Operating Specifics

Plant Capacity (MMscf/day)	32
Low Pressure Inlet (psi)	50
From	Wellhead gas gathering
Outlet Gas to	Natural Buttes prior to being sent Chipeta Gas Plant.
Outlet Pressure (psi)	300
Dehydration Requirement	5 lbs

The inspection started with the three condensate tanks. The operator stated that the liquids are either trucked out of the facility or pumped into a liquid gathering pipeline. At the time of the inspection the liquid gathering system was down and the facility is currently using trucks. One of the tanks had audible hissing and emissions were observed using an OGI camera (see video MOV_3577). We requested that the operator address the issues and provide verification of repairs.

The blowdown stack for the facility was also observed to have continuous emissions (see video MOV_3578). We requested that the operator address the issues and provide verification of repairs.

Three engines were located on site and operational during the facility walkthrough (engine units 2, 4 and 6). Engine unit 4's crank case rod packing was observed to have noticeable emissions as observed with the OGI camera (see video MOV_3579). When asked about the emissions, the operator stated that the company observes the packing vents at least every quarter and measures their emission rates to determine if rod packing replacement is needed before the regulatory required timeframes require it. Two leaks were identified on the compressors for engine unit 2 (see video MOV_3580).

The inspectors left Antelope Flats at 9:00 am and arrived at Sand wash at 9:05 am.

The sandwash facility was shut-in at the time of the inspection due to too low of gas volumes.

The inspectors noted that the sand wash engine unit SND-1 was removed from the facility in 2019.

Two dehydration units and associated VRU units along with 6 sulfur removal liquid beds and multiple tanks for methanol, dehydrator TEG fluid, H2S scavenger liquid, condensed water and lube oil. The dehydration units had their flash tank and reboiler emissions routed to either the fuel gas skid or station inlet.

Three electric compressors were identified on site: compressors 330, 340 and 350.

One leaking bull plug was identified on the inlet pigging equipment via an OGI camera (see video MOV_3581). The leak was repaired when on-site and verified with the OGI camera.

The close out meeting began at 9:30 am and the inspectors discussed follow-up on the emission sources identified during the inspection as well as the timeframe for completing the inspection report and providing a copy to the operator as well as the tribe.

The inspectors left the facility at 9:35 am.

Table 2 - Emissions Units and Emissions Generating Activities

Unit I.D.	Description	Control Equipment
ATF 2	Caterpillar G3516TALE, 1,340 hp 4-Stroke Lean-Burn (4SLB) RICE Natural Gas-Fired Serial No. 4EK01191 Installed: 5/19/2022 Reconditioned: 4/23/2014 Manufactured: 12/13/96	Oxidation Catalyst
ATF 4	Serial No. 3RC01189 Installed: 6/3/2019 Reconditioned: 5/17/2013 Manufactured: 4/5/96	
ATF 6	Serial No. 4EK00587 Installed: 7/21/2022 Reconditioned: 3/1/2014 Manufactured: 8/1/95	
FLARE	4.0 MMBtu/hr 24" Enclosed Flare Installed: 5/2007	None
HTR 1	5 MMBtu/hr Natural Gas Fired Heater Installed: 05/2007	None
DEHY 1	70 MMscfd Triethylene Glycol (TEG) Dehydration Unit Installed: 7/2008	None
DEHY 2	100 MMscfd TEG Dehydration Unit Installed: 8/20/2010	None
AF Tanks	Three – 400 bbl Produced Water/Condensate Tanks	None

Unit I.D.	Description	Control Equipment
AF Load	Produced Water/Condensate Truck Loadout	None
SC Tanks	Two – 750 bbl Condensate/Produced Water Tanks Six – 650 bbl Condensate/Produced Water Tanks Four – 500 bbl Condensate/Produced Water Tanks	None
SC Load	Condensate Loadout	None
FUG	Fugitive Emissions	None
Misc. Tanks, Boilers, and Heaters	Ten – 500 gal Lube Oil Storage Tanks Eleven – 500 gal Antifreeze Storage Tanks One – 200 bbl Methanol Tank Two – 500 bbl Methanol Tanks Three – 200 bbl Lube Oil Storage Tanks One – 200 bbl TEG Storage Tank One – 2.0 MMBtu/hr Reboiler One – 1.2 MMBtu/hr Reboiler One – 0.75 MMBtu/hr Heater Two – 300 gal Hydrogen Sulfide Chemical Scavenger Tanks One – Pigging Emissions Two – 2.5 MMBtu/hr Line Heaters	None (insignificant emissions unit)

* TEG = triethylene glycol; hp = horsepower; bbl = barrel; gal = gallon; MMscfd = million standard cubic feet per day; MMBtu/hr = million British thermal units per hour.

Standards of Performance for Stationary Spark Ignition Internal Combustion Engines - 40 CFR Part 60, Subpart JJJJ

A. Applicability [40 CFR 60.4230]

40 CFR part 60, subpart JJJJ applies to the following emissions units:

1. Caterpillar G3608TALE 4SLB RICE identified as ATF 5; and
2. Caterpillar G3608TALE 4SLB RICE identified as ATF 6.

Both ATF 5 and ATF 6 have been removed from the facility. ATF 5 was not replaced but ATF 6 was replaced. The replacement engine for ATF 6 is manufactured in 1995 and not subject to NSPS JJJJ. ATF 2 and 4 also have manufacture dates in 1996 and are not subject to NSPS JJJJ. However, it should be noted that these engines have been 'reconditioned' in 2013 and 2014 but have not met the definition of 'reconstructed'.

B. Emission Standards [40 CFR 60.4233(e), 60.4234, and Table 1]

The Permittee, as an owner and operator of a non-emergency spark ignition internal combustion engine (SI ICE) with a maximum engine power greater than or equal to 100 hp, shall comply with the emission standards in Table 1 of Subpart JJJJ over the entire life of the engine:

1. Emission Standards for Non-Emergency, Natural Gas-Fired SI ICE affected units with maximum engine hp greater than 500 hp.
 - (a) 1.0 gram per horsepower-hour (g/HP-hr) for nitrogen oxides (NO_x);
 - (b) 2.0 g/HP-hr for carbon monoxide (CO); and

- (c) 0.7 g/HP-hr for volatile organic compounds (VOC).

ATF 2, ATF 4 and AFT 6 are manufactured in 1995 and is not subject to NSPS JJJJ.

D. Compliance Requirements [40 CFR 60.4243(b)]

The Permittee, as the owner and operator of stationary SI ICE that must comply with the emission standards specified in Section II.C. of this permit, shall demonstrate compliance according to one of the methods specified in paragraphs 1 or 2 of this section, as applicable:

1. Purchasing an engine certified according to the procedures specified in Subpart JJJJ for the same model year and demonstrating compliance according to one of the methods specified in paragraphs 1. (a) or (b) of this section:
 - (a) If the Permittee operates and maintains the certified stationary SI ICE and control device according to the manufacturer's emission-related written instructions, the Permittee shall keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. The Permittee shall also meet requirements as specified in 40 CFR 1068 subparts A through D, as applicable. If the Permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the stationary SI ICE will not be considered out of compliance; or
 - (b) If the Permittee does not operate and maintain the certified stationary SI ICE and control device according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine and the Permittee shall demonstrate compliance according to §§60.4243(a)(2)(iii); or
2. Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in Section II.C. of this permit and according to the test methods and other procedures specified in §60.4244, and according to the following:

As an owner or operator of a stationary SI ICE greater than 500 hp, the Permittee shall 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 shall conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter, to demonstrate compliance.

ATF 2, ATF 4 and AFT 6 are manufactured in 1995 and is not subject to NSPS JJJJ.

E. Testing Requirements [40 CFR 60.4244]

For each performance test required, the Permittee shall comply with the procedures as specified in §60.4244(a)-(f).

ATF 2, ATF 4 and AFT 6 are manufactured in 1995 and is not subject to NSPS JJJJ.

F. Notifications, Reports and Records for Owners and Operators [40 CFR 60.4245]

1. The permittee shall keep records according to §60.4245(a);

2. The Permittee shall submit initial notification as required in §60.7(a)(1) and §60.4245(c); and
3. The Permittee shall submit a copy of each performance test as conducted in §60.4244 within 60 days after the test has been completed according to §60.4245(d).

ATF 2, ATF 4 and AFT 6 are manufactured in 1995 and is not subject to NSPS JJJJ.

National Emissions Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities - 40 CFR Part 63, Subpart HH

A. Applicability [40 CFR 63.760] [40 CFR part 63, subpart A and 63.764]

40 CFR part 63, subpart HH applies to the following emissions units:¹

1. 70 MMscfd TEG Dehydration Unit identified as DEHY 1 in this permit; and
2. 100 MMscfd TEG Dehydration Unit identified as DEHY 2 in this permit.

During the on-site inspection, two dehydration units meeting the requirements of this section were identified on site.

B. General Provisions [40 CFR part 63, subpart A and 63.764]

1. The General Provisions at 40 CFR part 63, subpart A apply as specified in Appendix A of 40 CFR part 63, subpart HH. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 63, subpart A.
2. All reports required under 40 CFR part 63, subpart A shall be sent to the EPA at the following address as listed in §63.13:

Chief, Air and Toxics Enforcement Branch, 8ENF-AT
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, Colorado 80202-1129

Reports may be submitted on electronic media or via email to: r8airreportenforcement@epa.gov.

3. Pursuant to §63.764(e)(1)(ii), DEHY 1 and DEHY 2 are exempt from emissions and operating limitation in 40 CFR part 63, subpart HH because Antelope Flats is an area source located outside of an urbanized area (UA) plus offset urban cluster (UC) boundary (defined in §63.761) and has benzene emissions less than 0.9 megagrams per year.

Nothing to evaluate with this general condition.

¹ The TEG dehydration units, emissions units DEHY 1 and DEHY 2, are subject to the requirements of the synthetic Minor New Source Review (MNSR) permit SMNSR-UO-000027-2019.002, issued by the EPA on January 14, 2020, in accordance with the requirements at 40 CFR 49.158. The MNSR permit requirements establish legally and practically enforceable emissions restrictions for DEHY 1 and DEHY 2. Notwithstanding conditions in this section, the permittee shall comply with all applicable requirements in Section VI.A of this permit.

C. Recordkeeping Requirements [40 CFR 63.774]

1. For DEHY 1 and DEHY 2, which meet the exemption criteria in §63.764(e)(1)(ii), the Permittee shall maintain records as specified in §63.774(d)(1).

The source provided all requested records.

National Emissions Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines - 40 CFR Part 63, Subpart ZZZZ

A. Applicability [40 CFR 63.6585] [40 CFR part 63, subpart A and 63.764]

40 CFR part 63, subpart ZZZZ applies to the following emissions units:

1. Caterpillar G3516TALE 4SLB RICE identified as ATF 2;
2. Caterpillar G3516TALE 4SLB RICE identified as ATF 4;
3. Caterpillar G3516TALE 4SLB RICE identified as ATF 6.

The only engines remaining on site are ATF 2, 4 and 6. These engines are now located at an area source of emissions and based on their manufacture date would be “existing” engines and are subject to MACT ZZZZ requirements.

B. General Provisions [40 CFR 63.6665]

1. The General Provisions at 40 CFR part 63, subpart A apply as specified in Table 8 of 40 CFR part 63, subpart ZZZZ. The Permittee shall comply with all applicable requirements of 40 CFR part 63, subpart A.
2. All reports required under 40 CFR part 63, subpart A shall be sent to the EPA at the following address as listed in §63.13:

Chief, Air and Toxics Enforcement Branch, 8ENF-AT
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, Colorado 80202–1129

Reports may be submitted on electronic media or via email to: r8airreportenforcement@epa.gov.

Nothing to evaluate with this general condition.

C. Emission and Operating Limitations [40 CFR 63.6603(a) and (f)]

1. Emissions from the affected RICE shall meet the following operating requirements according to Table 2d to 40 CFR part 63, subpart ZZZZ for Non-emergency, non-black start 4SLB remote stationary RICE greater than 500 hp:

- (a) Change oil and filter every 2,160 hours of operation or annually, whichever comes first;
- (b) Inspect spark plugs every 2,160 hours of operation or annually, and replace as necessary;
- (c) Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replaces as necessary; and
- (d) 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, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

The source provided the following engine maintenance records information on AFT 2, 4, 6. ATF-2 records show engine maintenance was conducted quarterly from the date of start up of the engine, May 2022, until August 2024. AFT-4 records show engine maintenance was conducted at least quarterly from June 2021 until September 2024. ATF-6 records show engine maintenance was conducted at least quarterly from March 2021 through January 2022 and April 2023 through August 2024. Reviewing the engine hours show that then engine ran for less than 2,160 hours between March 2022 and January 2023.

- 2. Evaluate the status of each affected RICE every 12 months that the engine meets the definition of remote stationary RICE according to §63.6603(f). If the evaluation indicates that the stationary RICE no longer meets the definition of remote stationary RICE in §63.6675 of this subpart, the owner or operator must comply with the requirements for existing non-emergency SI 4SRB stationary RICE with a site rating of more than 500 hp located at area sources of hazardous air pollutants (HAPs) that are not remote stationary RICE within 1 year of the evaluation.

Nothing to evaluate with this general condition.

D. General Compliance Requirements [40 CFR 63.6605(a) and (b)]

At all times, including periods of startup, shutdown and malfunction, owners and operators 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, and be in compliance with the emission limitations, operating limitations and other requirements in this subpart that apply. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA which may include but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

Nothing to evaluate with this general condition.

E. Continuous Compliance Requirements [40 CFR 63.6640(a), and Table 6]

- 1. The Permittee, as the owner and operator of an existing non-emergency 4SLB stationary RICE greater than 500 hp located at an area source of HAP that is remote stationary RICE, shall demonstrate continuous compliance with each emission limitation, operating limitation and other requirements in Table 2d to this subpart that apply according to the either of following work or management practices as specified in Table 6, section 9:
 - (a) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or

- (b) Develop and follow a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

The source provided a maintenance plan for all of its Caterpillar 3400 and 3500 series engines during the previous inspection.

F. Notifications, Reports and Records [40 CFR 63.6645, 63.6650, 63.6655, 63.6660]

- 1. The Permittee must submit notifications as specified in §63.6645.
- 2. The Permittee must submit reports as specified in §63.6650.
- 3. The Permittee must keep records as specified in §63.6655.
- 4. The Permittee must keep the records in the format and for the duration as specified in §63.6660.

The source provided all requested records.

Synthetic Minor New Source Review Permit Modified January 14, 2020 [40 CFR 49.151]

This source is subject to the requirements of the synthetic Minor New Source Review (MNSR) permit SMNSR-UO-000027-2019.002 herein referred to as MNSR permit, issued by the EPA on January 14, 2020, in accordance with the requirements at 40 CFR 49.158. The MNSR permit requirements establish legally and practically enforceable emissions restrictions for a TEG dehydration system and pneumatic controllers and control of CO emissions from field gas-fired engines. Notwithstanding conditions in the MNSR permit, the permittee shall comply with all applicable requirements of the MNSR permit.

Nothing to evaluate with this general condition.

A. Requirements for the Low-Emission Dehydrators - DEHY 1 and DEHY 2

1. Construction and Operational Limits

- (a) The Permittee shall install, operate and maintain no more than two TEG Low- Emission Dehydration units that each meet the specifications set forth in Appendix A of the MNSR permit and shall mean a dehydration unit that:
 - (i) Incorporates an integral vapor recovery function such that the dehydrator cannot operate independent of the vapor recovery function;
 - (ii) Either returns the captured vapors to the inlet of the facility where the dehydrator is located or routes the captured vapors to the facility's fuel gas supply header; and
 - (iii) Is designed and operated to emit less than 1.0 ton of VOC in any consecutive 12- month period, inclusive of VOC emissions from the reboiler burner.
- (b) Only the dehydration units that are designed and operated as specified in the MNSR permit are approved for installation and operation under the MNSR permit.

The source identified no equipment changes associated with the dehydration units since the previous inspection in 2021.

2. Recordkeeping Requirements: Records shall be kept of the manufacturer specifications for each TEG Low-Emission Dehydration unit, and a certification that it meets the specifications in the MNSR permit for a Low-Emission Dehydration unit. The certification shall be signed by the person the Permittee has designated as primarily responsible for CAA compliance for the source and shall include the following: “I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete.”

The source provided all requested records.

3. Requirements under Section VI.A. shall be effective upon termination of the March 27, 2008, federal CD between the United States of America (Plaintiff), and the State of Colorado, the Rocky Mountain Clean Air Action and the Natural Resources Defense Council (Plaintiff-Intervenors), and Kerr-McGee Corporation (Civil Action No. 07-CV-01034-EWN-KMT).

The consent decree was officially terminated as of June 24, 2021.

B. Requirements for the 4SLB Compressor Engines

1. Construction and Operational Limits

- (a) The Permittee shall install and operate emission controls as specified in the MNSR permit on seven existing engines used for field gas compression, all meeting the following specifications:
 - (i) Operated as a 4-stroke lean-burn engine;
 - (ii) Fired with field gas; and
 - (iii) Five engines limited to a maximum site rating of 1,340 hp per engine and two engines limited to a maximum site rating of 2,370 hp per engine.
- (b) Only the engines that are operated and controlled as specified in the MNSR permit are approved for installation under the MNSR permit.

The facility provided records showing only ATF-2, 4 and 6 remain at this facility and are 1340 hp, fired with field gas and are 4-stroke lean-burn engines.

2. Control, Operation and Maintenance Requirements

- (a) The Permittee shall install, continuously operate and maintain a catalytic control system on each engine that is capable of reducing the uncontrolled emissions of CO by at least 93.0% by weight when the engine is operating at a 90% load or higher.
- (b) The Permittee shall follow, for each engine and its respective catalytic control system, the manufacturer’s recommended maintenance schedule and procedures or equivalent procedures developed by the Permittee or vendor, to ensure optimum performance of each engine and its respective catalytic control system to ensure compliance with the CO control efficiency requirement in the MNSR permit.

- (c) The Permittee may rebuild an existing permitted engine or replace an existing permitted engine with an engine of the same hp rating and configured to operate in the same manner as the engine being rebuilt or replaced. Any operational requirements, control technologies, testing or other provisions that apply to the engines that are rebuilt or replaced shall also apply to the replacement engines.
- (d) The Permittee may resume operation without the catalytic control system during an engine break-in period, not to exceed 200 operating hours, for any rebuilt or replaced engines.

The source provided a copy of their maintenance schedule for their Caterpillar 3500 and 3600 engines during the previous inspection.

3. Performance Test Requirements

- (a) Performance tests shall be conducted on each engine and catalytic control system for measuring CO to demonstrate compliance with the control efficiency requirement specified in the MNSR permit. The performance tests shall be conducted in accordance with the Carbon Monoxide Control Efficiency Portable Analyzer Monitoring Protocol in Appendix B of the MNSR permit to measure the oxygen (O₂) and CO concentrations at the inlet (pre-catalyst) and outlet (post-catalyst) of the catalytic control system.
 - (i) Initial performance tests shall be conducted no later than 60 calendar days after installation of the catalytic control system, including installation of the catalytic control system on engines that are rebuilt or replaced. The results of initial performance tests conducted prior to the effective date of the MNSR permit may be used to demonstrate compliance with the initial performance test requirements, provided the tests were conducted in an equivalent manner as the performance test requirements in the MNSR permit.
 - (ii) Subsequent performance tests shall be conducted semi-annually on each engine. After compliance is demonstrated for two consecutive tests, the testing frequency may be reduced to annually. If an annual test indicates non-compliance, then the Permittee shall resume semi-annual testing.
- (b) The Permittee may submit to the EPA a written request for approval of alternate test methods but shall only use the alternate test methods after obtaining written approval from the EPA.
- (c) The Permittee shall not perform engine tuning or make any adjustments to engine settings, catalytic control system settings, processes or operational parameters immediately prior to the engine testing or during the engine testing. Any such tuning or adjustments may result in a determination by the EPA that the test is invalid.
- (d) The Permittee shall not abort any engine tests that demonstrate non-compliance with the CO control efficiency requirement specified in the MNSR permit.
- (e) All performance tests conducted on the engines shall meet the following requirements:
 - (i) Each test shall consist of at least two consecutive 21-minute or longer valid test runs, one pre-catalyst run and one post-catalyst run;
 - (ii) The CO control efficiency shall be determined based on the pre- and post-catalyst CO measurements;

- (iii) If the catalyst fails to meet the CO control efficiency requirement specified in the MNSR permit, appropriate steps shall be taken to correct the deficiency and the catalyst shall be retested within 30 days after the failed test;
- (iv) Performance test plans for alternate test methods shall be submitted to the EPA for approval at least 60 calendar days prior to the date the test is planned; and
- (v) Alternate test plans shall include and address the following elements:
 - (A) Purpose of the test;
 - (B) Engines and catalytic control systems to be tested;
 - (C) Expected engine operating rate(s) during the test;
 - (D) Sampling and analysis procedures (sampling locations and test methods);
 - (E) Quality assurance plan (calibration procedures and frequency and field documentation; and
 - (F) Data processing and reporting (description of data handling and quality control procedures, report content).
- (f) The Permittee shall notify the EPA at least 30 calendar days prior to scheduled performance testing. The Permittee shall notify the EPA at least 1 week prior to scheduled performance testing if the testing cannot be performed.
- (g) If a permitted engine is not operating, the Permittee does not need to start up the engine solely to conduct the subsequent performance test. The subsequent performance test requirements apply when the engine is restarted and operates more than 720 consecutive hours (or 30 consecutive days) in a given semi-annual period. If an engine for which the EPA has been notified of a scheduled test is permanently shut down prior to testing, the Permittee does not need to start up the engine solely to conduct the performance test.
- (h) The Permittee shall follow, for each engine and its respective catalytic control system, the manufacturer's recommended maintenance schedule and procedures or equivalent procedures developed by the Permittee or vendor, to ensure optimum performance of each engine and its respective catalytic control system to ensure compliance with the CO control efficiency requirement in the MNSR permit.
- (i) The Permittee may rebuild an existing permitted engine or replace an existing permitted engine with an engine of the same hp rating and configured to operate in the same manner as the engine being rebuilt or replaced. Any operational requirements, control technologies, testing or other provisions that apply to the engines that are rebuilt or replaced shall also apply to the replacement engines.
- (j) The Permittee may resume operation without the catalytic control system during an engine break-in period, not to exceed 200 operating hours, for any rebuilt or replaced engines.

The source provided the following records regarding the semi-annual performance test requirements for the following engines:

- *AFT-2 4EK01191 (12/13/2022, 7/18/2023, 7/31/2024)*
 - *Note: The engine was installed and started up in May 2022.*
- *AFT-4 3RC01189 (4/26/2021, 5/3/2022, 7/18/2023, 7/31/2024)*
- *AFT-6 4EK00363 (12/13/2022, 7/18/2023, 7/31/2024).*
 - *Note: The engine was installed and started up in July 2022.*

4. Recordkeeping Requirements

- (a) Records shall be kept of manufacturer and/or vendor specifications for each engine, catalytic control system and portable analyzer.
- (b) Records shall be kept of all calibration and maintenance conducted for each engine, catalytic control system and portable analyzer.
- (c) Records shall be kept of all required testing in the MNSR permit. The records shall include the following:
 - (i) The date, place and time of portable analyzer measurements;
 - (ii) The company or entity that performed the portable analyzer measurement;
 - (iii) The portable analyzer measurement techniques or methods used;
 - (iv) The results of such measurements; and
 - (v) The operating conditions as existing at the time of measurement.
- (d) Records shall be kept of all engine rebuilds and engine replacements.
- (e) Records shall be kept of each rebuilt or replaced engine break-in period, pursuant to the requirements of the MNSR permit, where the existing engine that has been rebuilt resumes operation without the catalyst control system for a period not to exceed 200 hours.
- (f) Records shall be kept of each time a deviation in the CO control efficiency required in the MNSR permit is detected for an engine. The Permittee shall include in the record the cause of the problem, the corrective action taken and the timeframe for bringing the CO control efficiency into compliance.

The performance test results met the requirements of this section.

- 5. Requirements under Section VI.B. shall be effective upon termination of the March 27, 2008, federal CD between the United States of America (Plaintiff), and the State of Colorado, the Rocky Mountain Clean Air Action and the Natural Resources Defense Council (Plaintiff-Intervenors), and Kerr-McGee Corporation (Civil Action No. 07-CV-01034-EWN-KMT).

A petition to terminate the consent decree has been lodged with the court and the consent decree was officially terminated as of June 24, 2021.

C. Requirements for Pneumatic Controllers

- 1. The Permittee shall not operate any high-bleed pneumatic controllers. High-bleed controllers are defined as any controller with the capacity to bleed in excess of 6 standard cubic feet of gas (scf) per hour (50,000 scf per year) in normal operation. The Permittee is not required to install low or no-bleed pneumatic controllers if the use of low or no-bleed pneumatic devices is not technically or operationally feasible.
- 2. Records shall be kept of manufacturer's and/or vendor's specifications for each pneumatic controller that is not operated using instrument air.
- 3. Records shall be kept of the determination for each high-bleed pneumatic controller that is installed and operated if the use of low or no-bleed pneumatic devices is not technically or operationally feasible.

4. Requirements under Section VI.C. shall be effective upon termination of the March 27, 2008, federal CD between the United States of America (Plaintiff), and the State of Colorado, the Rocky Mountain Clean Air Action and the Natural Resources Defense Council (Plaintiff-Intervenors), and Kerr-McGee Corporation (Civil Action No. 07-CV-01034-EWN-KMT).

The source has stated that they do not operate pneumatic controllers using natural gas. The facility's pneumatics are powered using instrument air.

A petition to terminate the consent decree has been lodged with the court and the consent decree was officially terminated as of June 24, 2021.

D. Requirements for Record Retention

1. The Permittee shall retain all records required by the MNSR permit for a period of at least 5 years from the date the record was created.
2. Records shall be kept in the vicinity of the facility, such as at the facility, the location that has day-to-day operational control over the facility or the location that has day-to-day responsibility for compliance of the facility.

The source provided all requested records.

E. Requirements for Reporting

1. Test reports shall be submitted within 60 days after each required initial engine and catalytic control system performance test.
2. The Permittee shall submit a report to the EPA no later than 30 days after each retest after a failed initial test. The retest report shall include a summary of the steps taken to comply and the retest results.

3. Annual Reports

- (a) The Permittee shall submit a written annual report of all required monitoring and testing conducted on emission units at the facility covered under the MNSR permit each year no later than March 1st. The annual report shall cover the period for the previous calendar year. All reports shall be certified to truth and accuracy by the person designated by the Permittee as responsible for CAA compliance for the facility.
- (b) The report shall include:
 - (i) A summary of the results of each required initial engine and catalytic control system performance test;
 - (ii) Test reports for all required subsequent engine and catalytic control system performance tests; and
 - (iii) A summary of all deviations of permit conditions and corrective actions taken, per paragraph I.G.5. of the MNSR permit.

4. All documents required to be submitted under the MNSR permit shall be submitted to:

Chief, Air and Toxics Enforcement Branch, 8ENF-AT

Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, Colorado 80202-1129

Documents may be submitted via electronic mail to r8airreportenforcement@epa.gov.

5. The Permittee shall promptly submit to the EPA a written report of any deviations of control or operational limits specified in the MNSR permit and a description of any corrective actions or preventative measures taken. A “prompt” deviation report is one that is post marked or submitted via electronic mail to r8airreportenforcement@epa.gov as follows.
 - (a) Within 30 days from the discovery of a deviation that would cause the Permittee to exceed the control or operational limits in the MNSR permit if left uncorrected for more than 5 days after discovering the deviation; and
 - (b) By March 1st for the discovery of a deviation of recordkeeping or other permit conditions during the preceding calendar year that do not affect the Permittee’s ability to meet the control or operational limits, included as part of the Annual Reports required in the MNSR permit.
6. The Permittee shall submit any record or report required by the MNSR permit upon EPA request.

The source submitted the initial MNSR permit annual report on 1/27/2021. The report included a CTAC and did not identify any deviations. The annual report for calendar year 2021 was not identified. The annual report for 2022 was submitted on 2/27/2023 and included a CTAC and did not identify any deviations. The annual report for 2023 was submitted on 2/12/2024 and included a CTAC and did not identify any deviations.

Title V Facility-Wide Requirements [40 CFR 71.6(a)(1)]

Conditions in this section of this permit apply to all emissions units located at the source, including any units not specifically listed in this permit.

A. Recordkeeping Requirements [40 CFR 71.6(a)(3)(ii)]

The Permittee shall comply with the following generally applicable recordkeeping requirements:

1. If the Permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more HAPs is not subject to a relevant standard or other requirement established under 40 CFR part 63, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source). [40 CFR 63.10(b)(3)]
2. Records shall be kept of off permit changes, as required by the Off Permit Changes section of this permit.

B. Reporting Requirements [40 CFR 71.6(a)(3)(iii)]

1. The Permittee shall submit to the EPA all reports of any required monitoring under this permit semiannually. The first report shall cover the period from the effective date of this permit through December 31, 2020. Thereafter, the report shall be submitted semi-annually, by April 1st and October 1st of each year. The report due on April 1st shall cover the 6-month period ending on the last day of December before the report is due. The report due on October 1st shall cover the 6-month period ending on the last day of June before the report is due. All instances of deviations from permit requirements shall be clearly identified in such reports. All required reports shall be certified by a responsible official consistent with the Submissions section of this permit.

The source provided an initial Title V Semi-annual Monitoring report on 1/27/2021.

2. “Deviation” means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in accordance with §71.6(a)(3)(i) and (a)(3)(ii). For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:
 - (a) A situation where emissions exceed an emission limitation or standard;
 - (b) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met; or
 - (c) A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.
3. The Permittee shall promptly report to the EPA deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. “Prompt” is defined as follows:
 - (a) Any definition of “prompt” or a specific time frame for reporting deviations provided in an underlying applicable requirement as identified in this permit.
 - (b) Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:
 - (i) For emissions of a HAP or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence;
 - (ii) For emissions of any regulated air pollutant, excluding a HAP or a toxic air pollutant that continues for more than 2 hours in excess of permit requirements, the report shall be made within 48 hours; and
 - (iii) For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report.
 - (c) If any of the conditions in (i) or (ii) of paragraph (b) above are met, the Permittee shall notify the EPA by telephone (1-800-227-6312), facsimile (303-312-6409), or by email to r8airreportenforcement@epa.gov based on the timetables listed above. *[Notification shall specify that this notification is a deviation report for a Part 71 permit]*. A written notice, certified consistent with the Submissions section of this permit shall be submitted within ten working days

of the occurrence. All deviations reported under this section shall also be identified in the 6-month report required under Condition 1 in this section of this permit.

The source provided an initial Title V Semi-annual Monitoring report on 1/27/2021 and this semi-annual report did not identify any deviations. Subsequent semi-annual reports were submitted on 3/15/2022, 10/17/2022 and no deviations were reported. The facility canceled their Title V permit in February 2022.

Title V General Provisions

A. Annual Fee Payment [40 CFR 71.9]

1. The Permittee shall pay an annual permit fee in accordance with the procedures outlined below.
2. The Permittee shall pay the annual permit fee each year no later than April 1st. The fee shall cover the previous calendar year.
3. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the U.S. Environmental Protection Agency.
4. The Permittee shall send fee payment and a completed fee filing form to:

For regular U.S. Postal Service mail
(FedEx, Airborne, DHL, and UPS)

U.S. Environmental Protection Agency
FOIA and Miscellaneous Payments
Cincinnati Finance Center
P.O. Box 979078
St. Louis, Missouri 63197-9000

For non-U.S. Postal Service express mail

U.S. Bank
Government Lockbox 979078
U.S. EPA FOIA & Misc. Payments
1005 Convention Plaza
SL-MO-C2-GL
St. Louis, Missouri 63101

5. The Permittee shall send an updated fee calculation worksheet form and a photocopy of each fee payment check (or other confirmation of actual fee paid) submitted annually by the same deadline as required for fee payment to the address listed in the Submissions section of this permit.
6. Basis for calculating annual fee:
 - (a) The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all “regulated pollutants (for fee calculation)” emitted from the source by the presumptive emissions fee (in dollars per ton) in effect at the time of calculation.
 - (i) “Actual emissions” means the actual rate of emissions in tpy of any regulated pollutant (for fee calculation) emitted from a Part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit’s actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year.
 - (ii) Actual emissions shall be computed using methods required by the permit for

determining compliance, such as monitoring or source testing data.

- (iii) If actual emissions cannot be determined using the compliance methods in the permit, the Permittee shall use other federally recognized procedures.
 - (b) The annual emissions fee shall be increased by a greenhouse gas (GHG) fee adjustment for any source that has initiated an activity listed in table at §71.9(c)(8) since the fee was last paid. The GHG fee adjustment shall be equal to the set fee provided in the table at §71.9(c)(8) for each activity that has been initiated since the fee was last paid.
 - (c) The Permittee shall exclude the following emissions from the calculation of fees:
 - (i) The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tpy;
 - (ii) Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation; and
 - (iii) The quantity of actual emissions (for fee calculation) of insignificant activities [defined in 40 CFR 71.5(c)(11)(i)] or of insignificant emissions levels from emissions at the source identified in the Permittee's application pursuant to 40 CFR 71.5(c)(11)(ii).
- 7. Fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official.
 - 8. The Permittee shall retain fee calculation worksheets and other emissions-related data used to determine fee payment for 5 years following submittal of fee payment. [Emission-related data include, for example, emissions-related forms provided by the EPA and used by the Permittee for fee calculation purposes, emissions-related spreadsheets, and emissions-related data, such as records of emissions monitoring data and related support information required to be kept in accordance with 40 CFR 71.6(a)(3)(ii).]
 - 9. Failure of the Permittee to pay fees in a timely manner shall subject the Permittee to assessment of penalties and interest in accordance with 40 CFR 71.9(l).
 - 10. When notified by the EPA of underpayment of fees, the Permittee shall remit full payment within 30 days of receipt of notification.
 - 11. A Permittee who thinks an EPA-assessed fee is in error and who wishes to challenge such fee, shall provide a written explanation of the alleged error to the EPA along with full payment of the EPA assessed fee.

The source provided a copy of their annual fee payment for 2021.

- *2021 facility fees totaled \$3,190*

The source could not provide records of their emission fees for the period of 2022 while the Title V permit was effective.

B. Annual Emissions Inventory [40 CFR 71.9(h)(1) and (2)]

- 1. The Permittee shall submit an annual emissions report of its actual emissions for both criteria pollutants and regulated HAPs for this source for the preceding calendar year for fee assessment purposes. The annual emissions report shall be certified by a responsible official and shall be submitted each year to

the EPA by April 1st.

2. The annual emissions report shall be submitted to the EPA at the address listed in the Submissions section of this permit.

The source submitted the 2021 annual emission inventory on March 14th 2022. The deadline for submission is April 1st.

Reported Actual Emissions

<i>Pollutant</i>	<i>Actual Emission in Tons per Year</i>
	<i>2021</i>
<i>NO_x</i>	41.6
<i>VOC</i>	17.7
<i>CH₂O</i>	2.4

The source could not provide records of their annual emission inventory for the period of 2022 while the Title V permit was effective.

C. Compliance Requirements [40 CFR 71.6(a)(6), Section 113(a) and 113(e)(1) of the CAA, and 40 CFR 51.212, 52.12, 52.33, 60.11(g) and 61.12]

1. Compliance with the Permit
 - (a) The Permittee must comply with all conditions of this Part 71 permit. Any permit noncompliance constitutes a violation of the CAA and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
 - (b) It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
 - (c) For the purpose of submitting compliance certifications in accordance with §71.6(c)(5), or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.
2. Compliance Schedule [40 CFR 71.5(c)(8)(iii)]
 - (a) For applicable requirements with which the source is in compliance, the source will continue to comply with such requirements.
 - (b) For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis.

Nothing to evaluate with this general condition

3. Compliance Certifications [40 CFR 71.6(c)(5)]

- (a) The Permittee shall submit to the EPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices annually by April 1st, and shall cover the same 12-month period as the two consecutive semi-annual monitoring reports.
- (b) The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with 40 CFR 71.5(d).
- (c) The certification shall include the following:
 - (i) Identification of each permit term or condition that is the basis of the certification;
 - (ii) The identification of the method(s) or other means used for determining the compliance status of each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required in this permit. If necessary, the Permittee also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA, which prohibits knowingly making a false certification or omitting material information;
 - (iii) The status of compliance with each term and condition of the permit for the period covered by the certification based on the method or means designated in (ii) above. The certification shall identify each deviation and take it into account in the compliance certification;
 - (iv) Such other facts as the EPA may require to determine the compliance status of the source; and
 - (v) Whether compliance with each permit term was continuous or intermittent.

The source was not able to provide records of the Annual Compliance Certification for CY2021 that was due by April 1st 2022.

Appendix A: Satellite Imagery of Facility



Appendix B: Photo and Video Log

<i>File Name</i>	<i>Location</i>	<i>Description</i>
<i>MOV_3577</i>	<i>Condensate Tanks</i>	<i>Emissions from the condensate tanks</i>
<i>MOV_3578</i>	<i>Blowdown Vent</i>	<i>Emissions from the blowdown vent</i>
<i>MOV_3579</i>	<i>Crankcase Rod Packing Vent</i>	<i>Emissions from rod packing vent</i>
<i>MOV_3580</i>	<i>Compressor</i>	<i>Emissions from the compressor</i>
<i>MOV_3581</i>	<i>Bull Plug</i>	<i>Leaking emissions from bull plug</i>