

**Western Midstream – Chipeta Gas Plant
Full Compliance Evaluation (FCE)
On-Site Clean Air Act (CAA) Inspections**

Inspection Date: September 17, 2024

Inspection Report Date: October 7, 2024

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

Tribal Representatives: Lonnie Favel, Alverna Nelson

Company Representatives: Joel Kenyon, Ian Clary, John Sorenson

Company Contact: Joel Kenyon - HSSE Rockies Air Quality Manager
1099 18th Street | Denver, CO
Office: (720) 929-6135
Mobile: (517) 242-8803
Email: Joel.kenyon@westernmidstream.com

Inspection Report Prepared By: Michael Stovern

Inspection Report Reviewed By: Scott Patefield

Last CAA Inspection: June 22, 2022

Applicable Rules: Clean Air Act (CAA) Part 71 Title V Permit,
40 C.F.R. Part 60, Subpart Dc (NSPS Dc)
40 C.F.R. Part 60, Subpart Kb (NSPS Kb)
40 C.F.R. Part 60, Subpart KKK (NSPS KKK)
40 C.F.R. Part 60, Subpart LLL (NSPS LLL)
40 C.F.R. Part 63, Subpart DDDDD (MACT DDDDD)

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CAA Permit History:

Part 71 permit issue date: 6/1/2023 (V-UO-00023-2016.00)
Part 71 permit effective date: 6/1/2023 (V-UO-00023-2016.00)
Part 71 permit expiration date: 6/1/2028 (V-UO-00023-2016.00)

General Source Information

Parent Company name: Occidental Petroleum Corp
Facility Name: Chipeta Gas Plant
Facility Location: Latitude 40.038007, Longitude -109.420447
EPA Region: 8
County, State: Uintah, Utah
Reservation: Uintah & Ouray Reservation
Tribe: Ute Indian Tribe
Responsible Official: Mike DeHerrera
NAICS Code: 211112
ICIS-AIR ID Number: 080000004904701010
Source Designation: Major source subject to Title V

Overall Inspection Findings

NSPS Dc concerns

1. No concerns were identified through the on-site inspection and records review of the facility.

NSPS Kb concerns

1. No concerns were identified through the on-site inspection and records review of the facility.

NSPS KKK concerns

1. No concerns were identified through the on-site inspection and records review of the facility.

NSPS LLL concerns

1. No concerns were identified through the on-site inspection and records review of the facility.

MACT DDDDD concerns

1. No concerns were identified through the on-site inspection and records review of the facility.

Part 71 concerns

1. No concerns were identified through the on-site inspection and records review of the facility.

Previous Areas of Concern

No areas of concern were identified since the previous inspection.

Current Areas of Concern

Following the on-site inspection and records review, no areas of concern has been identified. Please be advised that this inspection report is finalized, but that the report is not a final determination of compliance.

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 Western Midstream staff met at the Chipeta gas plant facility at 7:40 am on 9/17/2024. The inspectors presented their credentials to the staff and made introductions. The inspectors started the opening meeting at 8:00 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 8:10 am.

Walk Through Inspection Observations

The EPA began its walkthrough of the facility at 8:10 am. The walkthrough started at the facility inlet and proceeded to follow each of the three process trains.

Table 1: Operating Specifics

Train 1 Capacity (MMscf/day)	250
Train 1 Operating Load (MMscf/day)	33
Train 2 Capacity (MMscf/day)	250
Train 2 Operating Load (MMscf/day)	250.5
Train 3 Capacity (MMscf/day)	300
Train 3 Operating Load (MMscf/day)	No Operating
Pressure Inlet (psi)	890 psi
From	Multiple compressor stations
Outlet Gas to	QEP and Kinder Morgan pipelines
Outlet Products	Condensate (Trucked), NGLs (Pipeline) and Methane/Ethane (Pipeline)

The inspection started with the main pipeline discharge, inlet pig receivers and the NGL bullet tanks. No emissions were detected with the IR camera.

Three 10,000 BBL Kb tanks were observed with all three tanks decommissioned and blind flanged. No emissions were detected from the three tanks when observed using the IR camera.

Process Train 1 walkthrough identified, four propane storage tanks for the refrigeration process, one TEG dehydration unit with reboiler and flash tank vapors routed to the heater fuel gas header, six storage tanks for holding a variety of hydrocarbon containing liquids. One leak was identified from a needle valve in the train 1 process unit using an OGI camera.

Process trains 2 and 3 are cryogenic plants that include amine systems for CO₂ removal and electric compressors. The operator identified it as a carbon dioxide unit for trains 2 and 3 and it is not used for sulfur removal. Train 3 was down for maintenance at the time of the inspection.

Five process heaters that are subject to NSPS Dc were identified on site: H-3701, H-3711, H-782, H-2170, E-2590.

The facility walkthrough was completed at 9:30 am.

Closing Meeting

Following the onsite walkthrough at Chipeta Gas Plant, the inspectors and company representatives returned to the facility offices to conduct a brief exit meeting. During the exit meeting, the inspector discussed the process to complete the inspection report including requesting additional information via email in the following weeks. Joel Kenyon agreed to provide the inspector with any additional information. The exit meeting concluded at 9:40 am.

Title V Operating Permit Conditions (V-UO-00023-2009.00)

Source Emission Points

Table 2 - Significant Emission Units

Emissions Unit ID	Description	Control Equipment
H-781	Thomas Russell, 8.0 MMBtu/hr Train I HMO Heater, Natural Gas Fired Serial No.: H106-153 Installed: December 7, 2007	None
DEHY-LO	Low Emission Ethylene Glycol Dehydration Unit – Train I	Low-Emissions Certified Dehydration Unit
H-782	7.7 MMBtu/hr Train II HMO Heater	None
H-2170	Heatech , 12.591 MMBtu/hr Train II Regen Gas Heater, Natural Gas Fired Serial No.: 07-0572 Installed: April 7, 2009	None
E-2590	Propak, 7.5 MMBtu/hr Train II Amine Reboiler Heater, Natural Gas Fired Serial No.: W070572 Installed: April 7, 2009	None
FL-991	Train 1 and 2 Flare	NA (unit is a control device)

TK-1601	10,000-bbl Condensate Storage Tank	Internal Floating Roof
TK-1611	10,000-bbl DNG Storage Tank	Internal Floating Roof
TK-1621	10,000-bbl DNG Storage Tank	Internal Floating Room
TK-1151	300-bbl Methanol Tank	None
TK-1101 TK-1111 TK-1121	Three – 400 bbl Produced Water Tanks	None
TK-5050	Train II CO ₂ Vent	None
L-1	Condensate Loadout	None
L-2	DNG Loadout	None
H-3701	31.5 MMBtu/hr Train III Amine Hot Oil Heater Installed: 10/3/2012	None
H-3711	26.62 MMBtu/hr Train III Regeneration Gas Heater Installed: Post 6/4/2010	None
Amine Unit	Train III Amine Treating Unit	Thermal Oxidizer
Flare 2	Train III Non-Emergency Flare, Natural-Gas Fired	NA (unit is a control device)
FUG	Facility-wide Fugitive Emissions	Leak Detection and Repair
TO	Train III Amine Unit Thermal Oxidizer	NA (unit is a control device)

I. Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units – 40 CFR Part 60, Subpart Dc

A. Applicability [40 CFR 60.40c(a)]

40 CFR part 60, subpart Dc applies to the following hot oil heaters:

1. Emissions Unit H-781 in Table 2 of this permit;
2. Emissions Unit H-2170 in Table 2 of this permit;
3. Emissions Unit H-3701 in Table 2 of this permit: and
4. Emissions Unit H-3711 in Table 2 of this permit.

The source is subject to the requirements of 40 CFR part 60, subpart Dc. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart Dc.

There is nothing to evaluate with this general condition.

B. General Provisions [40 CFR 60.4218]

1. The General Provisions at 40 CFR part 60, subpart A apply. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart A.
2. The Permittee shall pay an annual permit fee in accordance with the procedures outlined below. [40 CFR 71.9(a)]
3. The Permittee shall submit an annual report of its actual emissions for the preceding calendar year, a fee calculation work sheet (based on the report), and full payment of the annual fee each year. The Permittee shall submit the annual report and pay the annual fee each year on or before the anniversary date of its initial fee calculation work sheet.

The Permittee shall pay the annual permit fee each year no later than April 1st. The fee shall cover the previous calendar year. [40 CFR 71.9(h)(1)]

4. The Permittee shall submit the annual report electronically via EPA's Compliance and Emissions Data Reporting Interface (CEDRI) at <https://cdx.epa.gov>. First-time users will need to register with CDX. Select the reporting option "Part 71" available in CEDRI. If that specific reporting option is not available, select "Other Reports."

If the system is unavailable, contact the EPA Region 8 at R8AirReportenforcement@epa.gov and R8AirPermitting@epa.gov. If electronic submittal is not possible, such documents can be submitted to:

Part 71 Permit Contact, Air Permitting and Monitoring Branch, 8ARD-PM
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, Colorado 80202

There is nothing to evaluate with this general condition.

C. Reporting and Recordkeeping Requirements [40 CFR 60.48c]

The Permittee shall:

1. Submit notification of the date of construction or reconstruction and actual startup, and notifications as specified in § 60.48c(a);

The construction and startup notifications were not evaluated in this inspection since they occurred more than five (5) years prior and the facility is not required to maintain records for more than five years.

2. Record and maintain fuel supplier certification information for other fuels as specified in § 60.48c(f)(4), and records of each fuel combusted during each operating day as specified in § 60.48c(g); and

The facility submitted the 2023 and 2024 analyses of fuel gas as well as monthly fuel consumption logs and fuel source for use with the heaters.

3. Maintain all records required for a period of 2 years following the date of such record as specified in § 60.48c(i); and submit reports as specified in § 60.48c(j).

The facility provided all requested records

II. Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 – 40 CFR Part 60, Subpart Kb

A. Applicability [40 CFR 60.110b(a)]

40 CFR part 60, subpart Kb applies to the following storage vessel:

1. Emissions Unit TK-1601 in Table 2 of this permit.
2. Emissions Unit TK-1611 in Table 2 of this permit.
3. Emissions Unit TK-1621 in Table 2 of this permit.

There is nothing to evaluate with this general condition.

B. Standard for VOC [40 CFR 60.112b(a) or (b)]

The Permittee of each storage vessel with a design capacity greater than or equal to 75 m³ which contains a VOL shall comply with the requirements for Standards for VOC by complying with either 40 CFR 60.112b(a) or (b), depending on maximum true vapor pressure.

The facility's three tanks that are subject to this subpart have a fixed roof and an internal floating roof that meet the requirements of 60.112b(a)(1).

C. Testing and Procedures [40 CFR 60.113b(a)-(c)]

The Permittee of each storage vessel as specified in § 60.112b(a) shall meet the requirements of paragraph § 60.113b(a), (b), or (c). The applicable paragraph for a particular storage vessel depends on the control equipment installed to meet the requirements of § 60.112b.

The facility's three tanks that are subject to this subpart have a fixed roof and an internal floating roof that are subject to the requirements of 60.113b(a).

60.113b(a)(1) requires "Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL". This requirement was not evaluated because the facility tanks were filled in 2007 and the facility is only required to maintain records for five (5) years.

60.113b(a)(2) requires “visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill”.

60.113b(a)(4) requires “A visual inspection of the internal floating roof, primary seal, secondary seal (if present), gaskets, slotted membranes, and sleeve seals (if any) shall be performed each time the storage vessel is emptied and degassed. This inspection shall occur at a minimum of every 10 years except for the following: This inspection shall occur at a minimum of every 5 years for vessels equipped with two-continuous seals (double seal system)”.

60.113b(a)(5) requires “Notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a)(1) and (a)(4) of this section to afford the Administrator the opportunity to have an observer present”.

All three tanks (1601, 1611 and 1621) have been out of service since the previous inspection and are not subject to annual inspection. Additionally, two of the three tanks have been degassed and blind flanged.

D. Monitoring, Reporting and Recordkeeping Requirements [40 CFR 60.115b-60.116b]

1. The Permittee of each storage vessel as specified in § 60.112b(a) shall keep records and furnish reports as required by paragraphs (a), (b), or (c) of this section depending upon the control equipment installed to meet the requirements of § 60.112b. The owner or operator shall keep copies of all reports and records required by this section, except for the record required by (c)(1), for at least 2 years. The record required by (c)(1) will be kept for the life of the control equipment as specified in § 60.115b.

The facility provided all requested documents as applicable.

2. After installing a closed vent system and flare to comply with § 60.112b, the owner or operator shall meet the following requirements:
 - a. A report containing the measurements required by § 60.18(f) (1), (2), (3), (4), (5) and (6) shall be furnished to the Administrator as required by § 60.8 of the General Provisions. This report shall be submitted within 6 months of the initial start-up date;
 - b. Records shall be kept of all periods of operation during which the flare pilot flame is absent; and
 - c. Semiannual reports of all periods recorded under § 60.115b(d)(2) in which the pilot flame was absent shall be furnished to the Administrator.

The facility provided all requested documents as applicable.

3. The Permittee shall maintain the monitoring of operations as specified in § 60.116b.

The facility provided all requested documents as applicable.

III. Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants for Which Construction, Reconstruction or Modification Commenced After January 20, 1984, and on or Before August 23, 2011 – 40 CFR Part 60, Subpart KKK

A. Applicability [40 CFR 60.630]

1. The following affected facilities at Chipeta, are subject to the provisions of 40 CFR part 60, subpart KKK (Subpart KKK):
 - (a) Each compressor in volatile organic compounds (VOC) service or wet gas service; and
 - (b) The group of all equipment except compressors within a process unit.

There is nothing to evaluate with this general condition.

2. A compressor station, dehydration unit, sweetening unit, underground storage tank, field gas gathering system or liquefied natural gas unit is covered under this subpart if it is located at Chipeta, per the definition of onshore natural gas processing plant in § 60.631.
3. Chipeta is subject to the requirements of 40 CFR part 60, subpart KKK. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart KKK.

There is nothing to evaluate with this general condition.

B. General Provisions [40 CFR 60.1-19]

1. The General Provisions at 40 CFR part 60, subpart A apply. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of CFR part 60, subpart A.
2. The Permittee shall pay an annual permit fee in accordance with the procedures outlined below. [40 CFR 71.9(a)]
3. The Permittee shall submit an annual report of its actual emissions for the preceding calendar year, a fee calculation work sheet (based on the report), and full payment of the annual fee each year. The Permittee shall submit the annual report and pay the annual fee each year on or before the anniversary date of its initial fee calculation work sheet. The Permittee shall pay the annual permit fee each year no later than April 1st. The fee shall cover the previous calendar year. [40 CFR 71.9(h)(1)]
4. The Permittee shall submit the annual report electronically via EPA's Compliance and Emissions Data Reporting Interface (CEDRI) at <https://cdx.epa.gov>. First-time users will need to register with CDX. Select the reporting option "Part 71" available in CEDRI. If that specific reporting option is not available, select "Other Reports."

If the system is unavailable, contact the EPA Region 8 at R8AirReportenforcement@epa.gov and R8AirPermitting@epa.gov. If electronic submittal is not possible, such documents can be submitted to:

There is nothing to evaluate with this general condition.

C. Standards [40 CFR 60.632]

1. The Permittee shall comply with the requirements of § 60.482-1(a), (b) and (d) and § 60.482-2 through § 60.482-10, except as provided in § 60.633, as soon as practicable, but no later than 180 days after initial startup. A discussion of the general requirements of § 60.482-2 through § 60.482-10 are as follows:
 - (a) Pumps in light liquid service shall be monitored monthly to detect leaks as specified in § 60.482-2(a)-(h). Each pump in light liquid service shall be checked visually for liquids dripping from the pump seal each calendar week. For leaking pumps, a first attempt at repair shall be made no later than 5 days after detection of a leak. Leaking pumps shall be repaired no later than 15 days after detection of a leak. For pumps in light liquid service, an instrument reading of 10,000 parts per million (ppm) or greater is a detected leak. Pumps designated as no detectable emissions (NDE), as indicated by an instrument reading of less than 500 ppm above background, are exempt from monthly monitoring if § 60.482-2(e) is met. However, the NDE designated pumps must be tested annually for compliance with the 500 ppm above background value.
 - (b) Compressors shall meet the requirements as specified in § 60.482-3(a)-(j). Compressors are to be equipped with a seal system that includes a barrier fluid system that prevents leakage to the atmosphere or vented to a closed vent system (CVS). Other requirements regarding the seal and barrier systems or the CVS must be met including equipping the system with a sensor that detects leaks of the seal system, barrier fluid or both. If the sensor indicates failure of the seal system, the barrier system or both, a leak is detected. When a leak is detected, a first attempt at repair shall be made no later than 5 days after detection of a leak. Leaking compressors shall be repaired no later than 15 days after detection of a leak. Exemptions to the seal/barrier systems or CVS are allowed for compressors designated as NDE as indicated by an instrument reading of less than 500 ppm above background. The compressors must be tested annually for compliance with the 500 ppm above background value.
 - (c) Pressure relief devices in gas or vapor service shall be operated as specified in § 60.482-4(a)-(d). Each pressure relief device in gas or vapor service may be monitored quarterly and within 5 days after a pressure release. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. When a leak is detected, it shall be repaired as soon as practicable but no later than 15 calendar days after the leak is detected. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. Alternatively, except during pressure releases, each pressure relief device shall be operated as NDE, as indicated by an instrument reading of less than 500 ppm above background. No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored to confirm the condition of no detectable emissions as indicated by an instrument reading of less than 500 ppm above background.

- (d) Open-ended valves or lines shall be equipped to the standards as specified in § 60.482-6(a)-(e).
 - (e) Valves in gas/vapor and in light liquid service shall be monitored to detect leaks according to the schedule as specified in § 60.482-7(a)-(h). For leaking valves, a first attempt at repair shall be made no later than 5 days after detection of a leak. Leaking valves shall be repaired no later than 15 days after detection of a leak. For valves in gas/vapor and in light liquid service, an instrument reading of 10,000 ppm or greater is a detected leak. Valves designated as NDE as indicated by an instrument reading of less than 500 ppm above background, are exempt from monthly and quarterly monitoring if the criteria as specified in § 60.482-7(f) are met. However, the valves must be tested annually for compliance with the 500 ppm above background value.
 - (f) If evidence of a potential leak at pumps, valves and connectors in heavy liquid service and pressure relief devices in light liquid or heavy liquid service is found by audio, visual, olfactory (AVO) or any other detection method, the potential leak shall be eliminated as specified by the standards of § 60.482-8(a)-(d). Owner/operators shall, no later than 5 days after detection of the potential leak, either remove the indication of the potential leak or monitor the potential leak using Method 21. If an instrument reading of 10,000 ppm or greater is detected, a leak is detected. For leaking pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors, a first attempt at repair shall be made no later than 5 days after detection of a leak. Leaking equipment shall be repaired no later than 15 days after detection of a leak.
 - (g) Closed vent systems and control devices shall be operated as specified by the standards as specified in § 60.482-10(a)-(m) by reducing VOC emissions vented to them with an efficiency of 95% or greater, or to an exit concentration of 20 ppm by volume, whichever is less stringent. Closed vent systems shall be inspected annually by AVO or using Method 21, depending upon the construction of the closed vent system. AVO indication of a leak or a Method 21 reading greater than 500 ppm is a detected leak. For leaking closed vent system equipment, a first attempt at repair shall be made no later than 5 days after detection of a leak. Leaking closed vent system equipment shall be repaired no later than 15 days after detection of a leak.
- 2. The Permittee shall comply with the test methods and procedures as specified in § 60.485 except as provided in § 60.633(f).
 - 3. The Permittee shall comply with the recordkeeping and reporting requirements of § 60.486 and § 60.487, except as provided in § 60.633, § 60.635 and § 60.636.
 - 4. The Permittee shall use the following provision instead of § 60.485(d)(1): Each piece of equipment is presumed to be in VOC service or in wet gas service unless the Permittee demonstrates that the piece of equipment is not in VOC service or in wet gas service. For a piece of equipment to be considered not in VOC service, it must be determined that the VOC content can be reasonably expected never to exceed 10.0% by weight. For a piece of equipment to be considered not in wet gas service, it must be determined that it does not contain or contact the field gas before the extraction step in the process. For purposes of determining the percent VOC content of the process fluid that is contained in or contacts a piece of equipment, procedures that conform to the methods described in ASTM E169–63, 77, or 93, E168–67, 77, or 92, or E260–73, 91, or 96 (incorporated by reference as specified in § 60.17) shall be used.

The facility provided notice on July 15, 2019, that the facility has elected to comply with NSPS OOOOa LDAR requirements. As such the facility has been submitting semi-annual NSPS OOOOa reports electronically to CEDRI since 2019. These reports indicate that the facility is meeting and exceeding the requirements of NSPS KKK.

D. Exceptions [40 CFR 60.633]

The Permittee may comply with the following exceptions to the provisions of 40 CFR part 60, subpart VV:

1. For each pressure relief device in gas/vapor service, the leak detection and repair requirements specified in § 60.633(b);
2. For sampling connection systems, the exemption specified in § 60.633(c);
3. For pumps in light liquid service, valves in gas/vapor and light liquid service, and pressure relief devices in gas/vapor service that are located at a nonfractionating plant that does not have the design capacity to process 283,200 standard cubic meters per day (scmd) (10 million standard cubic feet per day) or more of field gas, the exemptions specified in § 60.633(d);
4. For reciprocating compressors in wet gas service, the exemption specified in § 60.633(f);
5. For flares used to comply with Subpart KKK, the requirements specified in § 60.633(g); and
6. For determining whether equipment is in heavy or light liquid service, the provisions specified in § 60.633(h).

The facility provided notice on July 15, 2019, that the facility has elected to comply with NSPS OOOOa LDAR requirements. As such the facility has been submitting semi-annual NSPS OOOOa reports electronically to CEDRI since 2019. These reports indicate that the facility is meeting and exceeding the requirements of NSPS KKK.

E. Recordkeeping Requirements [40 CFR 60.635(a)-(c)]

1. The Permittee shall comply with the requirements of paragraphs 2 and 3 of this section in addition to the recordkeeping requirements of § 60.486 of 40 CFR part 60, subpart VV as specified in § 60.635(a).
2. The Permittee shall comply with the record keeping requirements in § 60.635(b) for pressure relief devices subject to the requirements of § 60.633(b)(1).
3. The Permittee shall comply with the following requirement in addition to the requirement of § 60.486(j): information and data used to demonstrate that a reciprocating compressor is in wet gas service to apply for the exemption in § 60.633(f) shall be recorded in a log that is kept in a readily accessible location as specified in § 60.635(c).

The facility provided notice on July 15, 2019, that the facility has elected to comply with NSPS OOOOa LDAR requirements. As such the facility has been submitting semi-annual NSPS OOOOa reports electronically to CEDRI since 2019. These reports indicate that the facility is meeting and exceeding the requirements of NSPS KKK.

F. Reporting Requirements [40 CFR 60.636(a)-(c)]

1. The Permittee shall comply with the reporting requirements of § 60.487(a)-(f) of 40 CFR part 60, subpart VV.
2. The Permittee shall include in the initial semiannual report, in addition to the information required in §§ 60.487(b)(1) through 60.487(b)(4) of 40 CFR part 60, subpart VV, the information as specified in § 60.636(b).
3. The Permittee shall include in all semiannual reports, in addition to the information required in §§ 60.487(c)(2)(i) through 60.487(c)(2)(vi) of 40 CFR part 60, subpart VV, the following information as specified in § 60.636(c):
 - a. The number of pressure relief devices for which leaks were detected as required in § 60.633(b)(2); and
 - b. The number of pressure relief devices for which leaks were not repaired as required in § 60.633(b)(3).

The facility provided notice on July 15, 2019, that the facility has elected to comply with NSPS OOOOa LDAR requirements. As such the facility has been submitting semi-annual NSPS OOOOa reports electronically to CEDRI since 2019. These reports indicate that the facility is meeting and exceeding the requirements of NSPS KKK.

V. Standards of Performance for SO₂ Emissions From Onshore Natural Gas Processing for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011 – 40 CFR Part 60, Subpart LLL

A. Applicability [40 CFR 60.640]

1. The following affected facilities at Chipeta, are subject to the provisions of 40 CFR part 60, subpart LLL (Subpart LLL):
 - (a) The sweetening unit associated with Train III.
 - (b) Facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H₂S) in the acid gas (expressed as sulfur) are required to comply with [§ 60.647\(c\)](#) but are not required to comply with [§§ 60.642](#) through [60.646](#).

Based on the records provided by the source, the facility have a design capacity of 1.3 LT/D.

2. Chipeta is subject to the requirements of 40 CFR part 60, subpart LLL. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart LLL.

There is nothing to evaluate with this general condition.

B. General Provisions [40 CFR 60.1-19]

1. The General Provisions at 40 CFR part 60, subpart A apply. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart A.
2. The Permittee shall pay an annual permit fee in accordance with the procedures outlined below. [40 CFR 71.9(a)]
3. The Permittee shall submit an annual report of its actual emissions for the preceding calendar year, a fee calculation work sheet (based on the report), and full payment of the annual fee each year. The Permittee shall submit the annual report and pay the annual fee each year on or before the anniversary date of its initial fee calculation work sheet. The Permittee shall pay the annual permit fee each year no later than April 1st. The fee shall cover the previous calendar year. [40 CFR 71.9(h)(1)]
4. The Permittee shall submit the annual report electronically via EPA's Compliance and Emissions Data Reporting Interface (CEDRI) at <https://cdx.epa.gov>.

First-time users will need to register with CDX. Select the reporting option "Part 71" available in CEDRI. If that specific reporting option is not available, select "Other Reports."

If the system is unavailable, contact the EPA Region 8 at R8AirReportenforcement@epa.gov and R8AirPermitting@epa.gov. If electronic submittal is not possible, such documents can be submitted to:

Part 71 Permit Contact, Air Permitting and Monitoring Branch, 8ARD-PM
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, Colorado 80202

There is nothing to evaluate with this general condition.

C. Recordkeeping and Reporting Requirements [40 CFR 60.647]

1. To certify that a Train III is exempt from the control requirements of these standards, the Permittee of a facility with a design capacity less than 2 LT/D of H₂S in the acid gas (expressed as sulfur) shall keep, for the life of the facility, an analysis demonstrating that the facility's design capacity is less than 2 LT/D of H₂S expressed as sulfur.

The source provided a copy of their analysis which demonstrates that the facility's design capacity is less than 2 LT/D.

VI. National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters - 40 CFR 63, Subpart DDDDD

A. Applicability [40 CFR 63.7485-.7495]

40 CFR part 63, subpart DDDDD (Subpart DDDDD) applies to the following emissions units: H-781, H-782, H-2170, H-3701, H-3711, E-2590

The Permittee has determined that the facility, as described in the subpart, is a major source of HAP with potential emissions of 10.8 tpy hexane and 170.1 tpy total HAP.

The source is subject to the requirements of Subpart DDDDD. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of Subpart DDDDD.

There is nothing to evaluate with this general condition.

B. Work Practice Standards [40 CFR 63.7540]

1. Tune up frequencies for process heaters [40 CFR 63.7540(a)(10)]:

- (a) The following emissions units shall conduct annual tune ups per paragraphs 2(a) through (f) of this section: H-781, H-2170, H-3701 and H-3711.
- (b) The following emissions units shall conduct biennial tune ups per paragraphs 2(a) through (f) of this section: H-782 and E-2590.
- (c) If a unit is not operating on the required date for a tune up, the tune up must be conducted within 30 calendar days of startup [40 CFR 63.7540(a)(13)].

Based on the records provided by the source, tune ups were conducted on the heaters based on the frequencies identified above.

2. The Permittee shall comply with the following tune up requirements for the process heaters as specified in 40 CFR 63.7540(a)(10):

- (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may perform the burner inspection any time prior to the tune up or delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
- (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);

- (d) Optimize total emissions of carbon monoxide (CO). This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxides (NO_x) requirement to which the unit is subject;
- (e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
- (f) Maintain on-site and submit, if requested by the EPA, a report containing the following information:
 - (i) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune up of the boiler or process heater;
 - (ii) A description of any corrective actions taken as a part of the tune up; and
 - (iii) The type and amount of fuel used over the 12 months prior to the tune up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

Based on the records provided by the source, tune ups met the requirements listed above.

C. Reporting Requirements [40 CFR 63.7550]

1. A compliance report must contain the following information:
 - (a) As a source subject to the requirements for tune ups, the Permittee must submit a compliance report with the information listed below in paragraphs 1.a(i) through (v) of this section.
 - (i) Company and facility name and address.
 - (ii) Process unit information, emissions limitations and operating parameter limitations.
 - (iii) Date of report and beginning and ending dates of the reporting period.
 - (iv) Include the date of the most recent tune up for each unit subject to only the requirement to conduct an annual or biennial tune up according to 40 CFR 63.7540(a)(10) or (11), respectively. Include the date of the most recent burner inspection if it was not done annually or biennially and was delayed until the next scheduled or unscheduled unit shutdown.
 - (v) Statement by a responsible official with the official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
2. Annual reports submitted in accordance with Section VIII.C.3. of this permit meet the compliance reporting requirements of Subpart DDDDD.

Based on the records provided by the source, tune ups reports met the requirements listed above.

VII. 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 hazardous air pollutants (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.

There is nothing to evaluate with this general condition.

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, 2021. 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.
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.
 - (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.

Following a review of the semi-annual reports, no deviations were reports since June 2022.

VIII. 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:

U.S. Environmental Protection Agency
OCFO/OC/ACAD/FCB
Attn: Collections Team
1300 Pennsylvania Ave NW
Mail Code 2733R
Washington, D.C. 20004

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.

5. 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).
6. Fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official.

[Explanatory note: The fee calculation worksheet form already incorporates a section to help you meet this responsibility.]

7. 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).]

8. 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).
9. When notified by the EPA of underpayment of fees, the Permittee shall remit full payment within 30 days of receipt of notification.
10. 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 facility paid \$5,328.52 in fees for 2021, \$6,123.68 for 2022 and \$3,738.14 in fees for 2023.

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 facility-wide emissions inventory for 2021, 2022 and 2023 are listed below.

	<i>NO_x</i>	<i>CO</i>	<i>VOC</i>	<i>Benzene</i>	<i>Toluene</i>	<i>Hexane</i>
<i>2021</i>	<i>7.0</i>	<i>10.0</i>	<i>87.1</i>	<i>2.28</i>	<i>2.05</i>	<i>0.45</i>
<i>2022</i>	<i>8.1</i>	<i>13.0</i>	<i>92.5</i>	<i>.78</i>	<i>5.35</i>	<i>1.58</i>
<i>2023</i>	<i>9.2</i>	<i>13.4</i>	<i>48.5</i>	<i>0.16</i>	<i>1.02</i>	<i>0.41</i>

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.

There is 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 facility provided compliance certifications with their Title V semi-annual monitoring reports.

D. Submissions [40 CFR 71.5(d), 71.6(c)(1) and 71.9(h)(2)]

- 1. Any document (application form, report, compliance certification, etc.) required to be submitted

under this permit shall be certified by a responsible official as to truth, accuracy, and completeness. Such certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

All fee calculation worksheets and applications for renewals and permit modifications shall be submitted to:

Part 71 Permit Contact, Air and Radiation Division, 8ARD-PM
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, Colorado 80202

2. Except where otherwise specified, all reports, test data, monitoring data, notifications, and compliance certifications shall be submitted to:

Branch Manager, 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

There is nothing to evaluate with this general condition.

E. Minor Permit Modifications [40 CFR 71.7(e)(1)]

1. The Permittee may request the use of minor permit modification procedures only for those modifications that:
 - (a) Do not violate any applicable requirement;
 - (b) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
 - (c) Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
 - (d) Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - (i) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I; and
 - (ii) An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA;
 - (e) Are not modifications under any provision of Title I of the CAA; and
 - (f) Are not required to be processed as a significant modification.

2. Notwithstanding the list of changes ineligible for minor permit modification procedures in 1 above, minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in an applicable implementation plan or in applicable requirements promulgated by the EPA.
3. An application requesting the use of minor permit modification procedures shall meet the requirements of 40 CFR 71.5(c) and shall include the following:
 - (a) A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
 - (b) The source's suggested draft permit;
 - (c) Certification by a responsible official, consistent with 40 CFR 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
 - (d) Completed forms for the permitting authority to use to notify affected states as required under 40 CFR 71.8.
4. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions authorized by 40 CFR 71.7(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.
5. The permit shield under 40 CFR 71.6(f) may not extend to minor permit modifications.

No minor permit modifications have occurred since the previous inspection.

F. Significant Permit Modifications [40 CFR 71.7(e)(3), 71.8(d), and 71.5(a)(2)]

1. The Permittee must request the use of significant permit modification procedures for those modifications that:
 - (a) Do not qualify as minor permit modifications or as administrative amendments;
 - (b) Are significant changes in existing monitoring permit terms or conditions; or
 - (c) Are relaxations of reporting or recordkeeping permit terms or conditions.
2. Nothing herein shall be construed to preclude the Permittee from making changes consistent with Part 71 that would render existing permit compliance terms and conditions irrelevant.
3. Permittees must meet all requirements of Part 71 for applications, public participation, and review by affected states and tribes for significant permit modifications. For the application to be determined

complete, the Permittee must supply all information that is required by 40 CFR 71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change.

No significant permit modifications have occurred since the previous inspection.

G. Inspection and Entry [40 CFR 71.6(c)(2)]

1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the EPA or an authorized representative to perform the following:
2. Enter upon the Permittee's premises where a Part 71 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
3. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
4. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
5. As authorized by the CAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

There is nothing to evaluate with this general condition.

Appendix A: Satellite Imagery of Facility



Appendix B: Photo and Video Log

<i>File Name</i>	<i>Location</i>	<i>Description</i>
<i>DC_3563</i>	<i>Kb Tanks</i>	<i>Tank 1601, Out of Service</i>
<i>DC_3564</i>	<i>Kb Tanks</i>	<i>Tank 1611, Out of Service</i>
<i>DC_3565</i>	<i>Kb Tanks</i>	<i>Tank 1621, Out of Service</i>
<i>MOV_3566</i>	<i>Process Train 1</i>	<i>Leaking needle valve</i>