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1000 SW Jackson St., Suite 400  
Topeka, KS 66612-1367



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www.kdheks.gov

Lee A. Norman, M.D., Secretary

Laura Kelly, Governor

DATE, 2020

Source ID No. 1890008

Bob Stewart  
WTG Hugoton, L.P.  
211 N. Colorado Street  
Midland, Texas 79701

Re: Class I Air Emission Source Operating Permit Renewal – Hugoton Compressor Station

Dear Mr. Stewart:

Enclosed is the Class I Operating Permit Renewal for the Hugoton Compressor Station located in Stevens County, Kansas. The annual certification must be submitted to the Kansas Department of Health and Environment (KDHE) on or before January 31 of each year. The annual certification form is available in KEIMS (<https://www.kdheks.gov/bar/keims-BOA.html>).

Please note the due date of your annual certification has been changed from July 12<sup>th</sup> to January 31<sup>st</sup> for the period of January 1 to December 31. For the transition period between the previous permit and the enclosed renewal permit, please comply with the following requirements. The annual certification due on January 31, 2021 shall site both the previous permit issued on April 13, 2016 (Modified) and the enclosed permit.

**Please review the enclosed operating permit carefully since it obligates WTG Hugoton, L.P. to certain requirements.**

As provided for in K.S.A. 65-3008b(e), an owner or operator may request a hearing within 15 days after affirmations, modification or reversal of a permit decision pursuant to subsection (b) of K.S.A. 65-3008a. In the Request for Hearing, the owner or operator shall specify the provision of this act or rule and regulation allegedly violated, the facts constituting the alleged violation and secretary's intended action. Such request must be submitted to: Director, Office of Administrative Hearings, 1020 S. Kansas Avenue, Topeka, Kansas 66612-1327. Failure to submit a timely request shall result in a waiver of the right to hearing.

The enclosed Class I Operating Permit does not relieve the permittee of the responsibility to obtain an air construction permit for future modifications that increase the facility's potential-to-emit of any regulated air pollutants as specified in K.A.R. 28-19-300, or any other modifications that may trigger other applicable air emission requirements.

Mr. Stewart  
DATE, 2020  
Page 2

Please include the source ID number listed above in all communications with KDHE in reference to this permitted facility. If you have any questions about the enclosed permit, or need any additional information, please contact me at (785) 296-1947.

Sincerely,

Cathy Richardson  
Environmental Specialist  
Air Permitting Section

CLR  
Enclosure  
C: SWDO  
OP100333v5.0

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## AIR EMISSION SOURCE CLASS I OPERATING PERMIT

**Source ID No.:** 1890008

**Initial Date:** June 12, 1997

**Renewal Dates:** July 21, 2004  
March 2, 2010  
October 19, 2015  
April 13, 2016 (Modified)  
DATE, 2020

**Expiration Date:** DATE, 2025

**Source Name:** WTG Hugoton, L.P. – Hugoton Compressor Station

**SIC Code:** 4922, Natural Gas Transmission and Compression

**NAICS Code:** 486210, Natural Gas Transmission

**Source Location:** Section 6, Township 33 South, Range 35 West  
Stevens County, Kansas

**Mailing Address:** 211 N. Colorado Street  
Midland, Texas 79701

**Contact Person:** Bob Stewart  
Environmental Coordinator  
Telephone: (432) 682-6311  
Email: bstewart@westtexasgas.com

### I. **Authority**

This permit, developed in accordance with the provisions of K.A.R. 28-19-500 et seq., "Operating Permit," meets the requirements of K.A.R. 28-19-510 et seq., Class I Operating Permits and Title V of the federal Clean Air Act.

Bureau of Air  
Permitting Section  
Curtis State Office Building, Suite 310  
Topeka, KS 66612-1366

Phone 785-296-1947  
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Attachment A: List of Acronyms and Symbols

Attachment B: Site Diagram

Attachment C: CAM Plan

**II. Permit Intent**

The purpose of this Class I Air Operating Permit is to identify the emission sources, types of regulated air pollutants emitted from the facility, the emission limitations, standards and requirements applicable to each emission source, and the monitoring, record keeping and reporting requirements applicable to each source as of the effective date of this permit. At the time of permit issuance, a Class I Air Emission Source Operating Permit was required because the potential to emit for nitrogen oxides (NOx) and carbon monoxide (CO), volatile organic compounds (VOC), the individual hazardous air pollutant (HAP) formaldehyde, and combined HAPs were above the major source threshold levels.

**III. Facility Description**

WTG Hugoton, L.P. operates fourteen (14) natural gas-fired compressor engines and four (4) auxiliary/generator engines at their Hugoton Compressor Station located in Stevens County, Kansas. The vapor combustion unit (VCU) is used to control emissions from the main glycol dehydration unit. The facility also has various insignificant activities including twenty-seven (27) storage tanks and fugitive and truck loading emissions. No changes have been made at this facility since the last permit renewal.

**IV. Emission Source Information:**

Emission Source ID No.	Emission Source Description	Stack/Vent ID	Control Equipment ID No.	Applicable Regulations
EU-1	Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine	SV-1	None	K.A.R. 28-19-650(a)(2) 40 CFR Part 63 Subpart ZZZZ
EU-2	Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine	SV-2	None	K.A.R. 28-19-650(a)(2) 40 CFR Part 63 Subpart ZZZZ
EU-3	Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine	SV-3	None	K.A.R. 28-19-650(a)(2) 40 CFR Part 63 Subpart ZZZZ
EU-4	Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine	SV-4	None	K.A.R. 28-19-650(a)(2) 40 CFR Part 63 Subpart ZZZZ
EU-5	Ingersoll-Rand 123 KVG, 1234-hp, 4-stroke lean burn, natural gas-fired engine	SV-5	None	K.A.R. 28-19-650(a)(2) 40 CFR Part 63 Subpart ZZZZ
EU-6	Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine	SV-6	None	K.A.R. 28-19-650(a)(2) 40 CFR Part 63 Subpart ZZZZ
EU-7	Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine	SV-7	None	K.A.R. 28-19-650(a)(2) 40 CFR Part 63 Subpart ZZZZ

Emission Source ID No.	Emission Source Description	Stack/Vent ID	Control Equipment ID No.	Applicable Regulations
EU-8	Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine	SV-8	None	K.A.R. 28-19-650(a)(2) 40 CFR Part 63 Subpart ZZZZ
EU-9	Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine	SV-9	None	K.A.R. 28-19-650(a)(2) 40 CFR Part 63 Subpart ZZZZ
EU-10	Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine	SV-10	None	K.A.R. 28-19-650(a)(2) 40 CFR Part 63 Subpart ZZZZ
EU-11	Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine	SV-11	None	K.A.R. 28-19-650(a)(2) 40 CFR Part 63 Subpart ZZZZ
EU-15	Cooper-Bessemer GMVC-10, 1800 hp, 2-stroke lean burn, natural gas-fired engine	SV-15	None	K.A.R. 28-19-650(a)(3) 40 CFR Part 63 Subpart ZZZZ
EU-16	Cooper-Bessemer GMVC-10, 1800 hp, 2-stroke lean burn, natural gas-fired engine	SV-16	None	K.A.R. 28-19-650(a)(3) 40 CFR Part 63 Subpart ZZZZ
EU-17	Cooper-Bessemer GMVC-10, 1800 hp, 2-stroke lean burn, natural gas-fired engine	SV-17	None	K.A.R. 28-19-650(a)(3) 40 CFR Part 63 Subpart ZZZZ
EU-A1	Ingersoll-Rand PVG-8, 408 hp, 4-stroke rich burn, natural gas-fired engine	SV-A1	None	K.A.R. 28-19-650(a)(2) 40 CFR Part 63 Subpart ZZZZ
EU-A2	Ingersoll-Rand PVG-8, 408 hp, 4-stroke rich burn, natural gas-fired engine	SV-A2	None	K.A.R. 28-19-650(a)(2) 40 CFR Part 63 Subpart ZZZZ
EU-A3	Ingersoll-Rand PVG-8, 408 hp, 4-stroke rich burn, natural gas-fired engine	SV-A3	None	K.A.R. 28-19-650(a)(2) 40 CFR Part 63 Subpart ZZZZ
EU-A4	Waukesha H-2475, 375 hp, 4-stroke rich burn, natural gas-fired engine	SV-A4	None	K.A.R. 28-19-650(a)(3) 40 CFR Part 63 Subpart ZZZZ
EU-Dehy-N	3.0 MMBtu/hr north glycol reboiler	SV-Dehy-N	None	K.A.R. 28-19-31(a) & (b)(2)
EU-NRegen	North glycol dehydrator generator vent	SV-NRegen	None	K.A.R. 28-19-650(a)(3) 40 CFR Part 63 Subpart HH Construction Approval dated March 22, 2005

Emission Source ID No.	Emission Source Description	Stack/Vent ID	Control Equipment ID No.	Applicable Regulations
EU-Dehy-NATCO	7.8 MMBtu/hr main glycol reboiler	SV-Dehy-Natco	None	K.A.R. 28-19-31(a) & (b)(2) 40 CFR Part 63 Subpart DDDDD Construction Approval dated March 22, 2005
EU-Stillstk	Main glycol dehydrator regenerator bypass vent	SV-Stillstk	CE-Dehy-VCU	K.A.R. 28-19-650(a)(3) 40 CFR Part 64 Compliance Assurance Monitoring (CAM) Construction Permit dated March 22, 2005 and Modified January 4, 2010
EU-TK7-Htr	0.25 MMBtu/hr boiler for TK-7	SV-TK7-htr	None	K.A.R. 28-19-31(a) & (b)(2) 40 CFR Part 63 Subpart DDDDD
TK-Tank-23	2000 gallon Condensate Tank	SV-Tank-6	None	K.A.R. 28-19-650(a)(3)
TK-Tank-21	16,800 gallon Condensate Tank	SV-Tank-21	None	K.A.R. 28-19-650(a)(3)
TK-Tank-22	12,600 gallon Condensate Tank	SV-Tank-22	None	K.A.R. 28-19-650(a)(3)

**V. Summary of Applicable Requirements**

K.A.R. 28-19-30 through K.A.R. 28-19-32, Indirect Heating Equipment Emission Limitations ..... 13  
K.A.R. 28-19-55 through K.A.R. 28-19-58, Emergency Episode Plans ..... 13  
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K.A.R. 28-19-650, Emissions Opacity Limits ..... 13  
K.A.R. 28-19-735, Which Adopts by Reference 40 CFR Part 61, Subpart A and Subpart M ..... 14  
K.A.R. 28-19-750, Which Adopts by Reference 40 CFR Part 63, Subpart A and Subpart ZZZZ-NESHAP Standards for Stationary Reciprocating Internal Combustion Engines..... 7  
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**VI. Applicable Requirements:**

**A. The following emission sources are subject to the requirements listed below:**

- EU-1 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-2 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-3 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-4 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-5 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-6 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-7 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-8 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-9 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-10 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-11 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-A1 Ingersoll-Rand PVG-8, 408 hp, 4-stroke rich burn, natural gas-fired engine
- EU-A2 Ingersoll-Rand PVG-8, 408 hp, 4-stroke rich burn, natural gas-fired engine
- EU-A3 Ingersoll-Rand PVG-8, 408 hp, 4-stroke rich burn, natural gas-fired engine

1. Limitation or Standard

Opacity shall not exceed 40 percent except as provided at K.A.R. 28-19-11. [K.A.R. 28-650(a)(2)].

a. Monitoring

Periodic monitoring will be as provided in the Opacity Limitations and Monitoring Section of the Facility Wide Applicable Requirements.

b. Recordkeeping and Recording

Recordkeeping and Reporting will be as provided in the Opacity Limitations and Monitoring section of the Facility Wide Applicable Requirements.

**B. The following emission sources are subject to the requirements listed below:**

- EU-1 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-2 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-3 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-4 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-5 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-6 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-7 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-8 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-9 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-10 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-11 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine
- EU-15 Cooper-Bessemer GMVC-10, 1800 hp, 2-stroke lean burn, natural gas-fired engine
- EU-16 Cooper-Bessemer GMVC-10, 1800 hp, 2-stroke lean burn, natural gas-fired engine
- EU-17 Cooper-Bessemer GMVC-10, 1800 hp, 2-stroke lean burn, natural gas-fired engine

1. Limitation or Standard

The Hugoton Compressor Station is subject to the RICE MACT because it operates stationary RICE at a major source of HAP emissions. Since these engines are 4-stroke lean burn and 2-stroke lean burn over 500 hp, there are no applicable requirements under 40 CFR Subpart ZZZZ or 40 CFR Part 63 Subpart A.

**C. The following emission source is subject to the requirements listed below:**

- EU-A1 Ingersoll-Rand PVG-8, 408 hp, 4-stroke rich burn, natural gas-fired engine
- EU-A2 Ingersoll-Rand PVG-8, 408 hp, 4-stroke rich burn, natural gas-fired engine
- EU-A3 Ingersoll-Rand PVG-8, 408 hp, 4-stroke rich burn, natural gas-fired engine
- EU-A4 Waukesha H-2475, 375 hp, 4-stroke rich burn, natural gas-fired engine

1. Limitation or Standard

The owner or operator shall comply with the requirements for existing 4-stroke rich burn engines  $\leq 500$  hp at major source of HAP emissions specified in 40 CFR Part 63 Subpart ZZZZ, *Stationary Reciprocating Internal Combustion Engines* (MACT ZZZZ), as applicable.

- a. The owner or operator shall comply with the emission limitations specified in Table 2c of MACT ZZZZ, as applicable. [40 CFR 63.6602]
- b. The owner or operator shall be in compliance with the applicable emission limitations and operating limitations in this subpart at all times. [40 CFR 63.6605(a)]
- c. The owner or operator shall maintain the engines in a manner consistent with safety and good air pollution control practices for minimizing emissions. [40 CFR 63.6605(b)]
- d. The owner or operator must minimize the engine's time spent at idle during startup and minimize the engine's startup time to period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2c to this subpart apply. [40 CFR 63.6625(h)]
- e. The owner or operator has the option to use an oil analysis program as specified in 40 CFR 63.6625(j).
- f. The owner or operator shall demonstrate continuous compliance in accordance with 40 CFR 63.6640.
- g. The owner or operator shall comply with the applicable general provisions as specified in 40 CFR 63.6665.
- h. Recordkeeping
  - i. The owner or operator shall comply with the applicable recordkeeping requirements as specified in 40 CFR 63.6655.

- ii. The owner or operator must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 63.10(b)(1). [40 CFR 63.6660(c)]

**D. The following emission source is subject to the requirements listed below:**

EU-Dehy-N	3.0 MMBtu/hr north glycol reboiler
EU-Dehy-NATCO	7.8 MMBtu/hr main glycol reboiler
EU-TK7-Htr	0.25 MMBtu/hr boiler for TK-7

1. Limitations and Standards

Particulate matter emissions are limited to the amount determined by the following equation:

$$A = \frac{1.026}{I^{0.233}}$$

Where:

A = the allowable emission rate in lb/10<sup>6</sup> BTU  
I = the total heat input in 10<sup>6</sup> BTU

[K.A.R. 28-19-31(a)]

a. Monitoring

The owner or operator shall re-evaluate the particular emission rate limitation when either the process changes or an emission factor changes.

b. Recordkeeping and Recording

Records shall be maintained of any re-calculations and evaluations. These records shall include the design rate capacity of the unit, emission factors used in calculations and potential/allowable emission rates.

2. Limitation or Standard

Except as provided in K.A.R. 28-19-11, a person shall not cause or permit visible contaminant emissions from any indirect heating equipment which equals or exceeds 20 percent opacity. [K.A.R. 28-19-31(b)(2)]

a. Monitoring

As described in the Opacity Limitations and Monitoring section of the permit, no monitoring is required at the time of permit issuance.

b. Recordkeeping and Recording

As described in the Opacity Limitations and Monitoring section of this permit, no recordkeeping is required at the time of permit issuance.

**E. The following emission source is subject to the requirements listed below:**

EU-Dehy-Natco Main glycol dehydrator regenerator controlled with a vapor combustion unit  
(Air Construction Permit dated 11/22/2003)

EU-Stillstk Main glycol dehydrator regenerator bypass vent  
(Air Construction Permit dated 3/22/2005 and modified 1/4/2010)

1. Limitation or Standard

The purpose of the following limitation is to restrict individual HAP emissions from the glycol dehydrator/regenerator vent/vapor combustion unit and any storage vessels (with the potential for flash emissions) to below 10 tons per each consecutive 12 month period and to restrict combined HAP emissions from that equipment to below 25 tons per each consecutive 12 month period. Storage vessels with the potential for flash emissions shall be included in the limitation if the storage vessel meets the definition as stated in the MACT (40 CFR 63.761-Subpart HH). The HAPs to be evaluated with regards to this limitation are listed in Table 1 of the Subpart HH Appendix (40 CFR 63 Subpart HH Appendix)

a. Monitoring

- i. The owner or operator of the facility shall not cause to be discharged into the atmosphere from the glycol dehydrator/regenerator vent/vapor combustion unit and any storage vessels (with the potential for flash emissions):
- ii. any individual hazardous air pollutant (HAP) equal to or greater than 10 tons during any consecutive 12 month period.
- iii. any combination of HAPs equal to or greater than 25 tons during any consecutive 12 month period.
- iv. Exhaust from the glycol dehydrator/regenerator vent shall be directed to the vapor combustion unit except during times of bypass as addressed in paragraph 5, below.
- v. The vapor removal unit must be continuously operating whenever the glycol dehydrator/regenerator vent is operated.
- vi. As a result of the glycol dehydrator/regenerator vent/vapor recovery unit and associated emission limitations listed above, the overall emissions from these units will be below the major source thresholds for HAPs under Title V.
- vii. As long as the vapor removal unit is maintained at or above 760° C (1400° F), the HAP emissions will be presumed to be less than 10 tons per year individually and 25 tons per year combined. If the monitored vapor removal unit outlet temperature drops below 760° C (1400° F), actual GRI-GLYCALC Version 3.0 or greater will be utilized (for the month during which the incinerator temperature was below the minimum required) to determine the HAP emission rate. In the event that the vapor removal unit is bypassed, the owner or operator shall recalculate the HAP emission rate including the time of uncontrolled emissions, using GRI-GLYCALC Version 3.0 or greater.

The monitoring approach is based on monitoring process inputs used in the GRI-GlyCalc program to predict HAP emissions from the glycol dehydrator. As long as the process inputs are less than those used in the GlyCalc model and the model predicts HAPs emissions less than the threshold values, compliance is shown.

b. Testing

A performance test using Method 18 (40 CFR Part 60, Appendix A-6) or other Department approved method shall be performed. The purpose of the test will be to determine the emissions of benzene, individual and combined HAPs directed to the vapor removal unit. WTG submitted a GlyCalc test report to KDHE on 5-12-03 and KDHE approved the results on 8-12-03.

c. Recordkeeping

- i. The owner or operator shall maintain a log showing the date of all routine or other maintenance, malfunction or repair of the pollution control equipment, the nature of the action taken on such date and any corrective action or preventative measures taken. These records shall be kept at a minimum of five years from the date of occurrence.
- ii. Records of the times of vapor removal unit operation shall be kept for a minimum of five years from the date of the record.
- iii. The owner or operator shall maintain records of any performance test data. These records shall be kept a minimum of five years from the date of the activity.
- iv. The vapor removal unit outlet temperature is measured continuously using an in-line thermocouple and recorded continuously. The minimum accuracy is +/- 2%. The value will be averaged daily and must be greater than 1400<sup>o</sup> F.
- v. The glycol flow rate will be recorded weekly and once a flow rate is set it cannot vary. The indicator range must be less than 60 gpm.
- vi. The gas throughput will be measured continuously and recorded daily. The indicator range must be less than 150 MMSCF.

2. Limitation or Compliance

The owner or operator shall comply with the Compliance Assurance Monitoring Plan (CAM) 40 CFR Part 64 and follow all monitoring and recordkeeping procedures listed in the plan. The purpose of the CAM plan is to ensure proper operation of the BTEX unit for the glycol dehydrator/regenerator vent. This plan will identify problems in a timely manner and avoid situations that could cause damage to the control equipment. (Attachment C)

**F. The following emission source is subject to the requirements listed below:**

EU-NRegen North glycol dehydrator regenerator 3.0 MMBtu/hr reboiler with operating conditions of 55° F, a glycol circulation rate of 2.1 gal/lb water removed and a gas throughput rate of 150 MMScfd. The waste stream is controlled by the 3.0 MMBtu/hr reboiler. (Air

Construction Permit dated March 22, 2005 and Revised January 4, 2010)

1. Limitations and Standards

The purpose of the standard is to restrict the potential to emit for individual hazardous air pollutants (HAP) and combined hazardous air pollutants (HAPs) to below Title V major source thresholds.

a. Monitoring

The hours of operation of the 3.0 MMBtu/hr triethylene glycol dehydration reboiler shall be no greater than 2500 during any consecutive twelve (12) month period. The daily average dry gas flow rate shall be limited to no more than 150 MMScf/day.

b. Recordkeeping and Reporting

Records of the hours of operation of the 3.0 MMBtu/hr triethylene glycol dehydration reboiler, and average daily gas flow/throughput rate shall be kept for a minimum of two years from the date of the record. Within 30 days of the last day of each month, the hours of operation for the previous month shall be recorded as well as the total hours of operation for the 12 month period ending with such month.

**G. The following emission source is subject to the requirements listed below:**

EU-Dehy-Natco	Main glycol dehydrator regenerator controlled with a vapor removal unit (Air Construction Permit dated 11/22/2003)
EU-Stillstk	Main glycol dehydrator regenerator bypass vent controlled with a vapor combustion unit (Air Construction Permit dated 3/22/2005 and modified 1/4/2010)
EU-NRegen	North glycol dehydrator generator vent controlled by 3.0 MMBtu/hr north glycol reboiler (EU-Dehy-N).

1. Limitation or Standard

a. WTG Hugoton, L.P. has elected to comply with MACT HH by limiting the actual average benzene emissions from the dehydration unit to less than 1 ton per year (0.9 Mg/yr), as determined by the procedures specified in 40 CFR 63.772(b)(2) of 40 CFR Part 63 Subpart HH. [40 CFR 63.764(e)(1)(ii)]

b. As specified in Section 63.772(b)(2)(i) of 40 CFR Part 63 Subpart HH, the owner or operator shall determine the actual average benzene emissions using the model GRI-GLYCalc™, Version 3.0 or higher. Input to the model shall be representative of actual operating conditions of the dehydration unit. [40 CFR 63.772(b)(2)]

c. Recordkeeping and Reporting

The owner or operator of a glycol dehydration unit that meets the exemption criteria in 40 CFR 63.764(e)(1)(ii) shall maintain records of actual average benzene emissions as

specified in 40 CFR 63.774(d)(1)(ii).

- d. Any required documentation shall be readily available on-site or electronically available for five (5) years from the date of record.

**H. The following emission source is subject to the requirements listed below:**

EU-TK7-Htr	0.25 MMBtu/hr boiler for TK-7
EU-Dehy-NATCO	7.8 MMBtu/hr main glycol reboiler

1. Limitation or Standard

The owner or operator shall comply with the applicable requirements for existing natural gas fired boilers (gas 1 fuel) located at a major source of HAP emissions specified in 40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters (MACT DDDDD).

- a. The owner or operator shall comply with all applicable requirements specified in this subpart by the date specified in 40 CFR 63.7495(b).
- b. The owner or operator shall comply with the work practice standards specified in Table 3, which includes an initial tune-up and subsequent tune-ups every 5 years as specified in 40 CFR 63.7540 and a one-time energy assessment. [40 CFR 63.7500(a) and (e)]
- c. The owner or operator shall operate and maintain the boilers in a manner consistent with safety and good air pollution control practices for minimizing emissions. [40 CFR 63.7500(a)(3)]
- d. The owner or operator shall be in compliance with the work practice standards in this subpart at all times. [40 CFR 63.7505(a)]
- e. Subsequent tune-ups shall be conducted no more than 61 months after the previous tune-up. [40 CFR 63.7515(d)].
- f. Initial and subsequent tune-ups shall be conducted as specified in 40 CFR 63.7540(a)(10)(i) through (vi). [40 CFR 63.7540(a)(12)]
- g. Recordkeeping and Reporting
  - i. The owner or operator shall submit a 5-year compliance report as specified in 40 CFR 63.7550.
  - ii. The owner or operator shall maintain records as specified in 40 CFR 63.7555.
  - iii. The owner or operator shall keep records for a minimum of 5 years, records shall be kept on-site or readily accessible for at least 2 years, they may be kept off-site for the remaining 3 years. [40 CFR 63.7560]

Since monitoring/recordkeeping requirements are required in **Section VI. Applicable Requirements** section of this permit, the facility is required to submit a semi-annual report every six months. Refer to **Section XII. Testing, Monitoring, Record keeping and Reporting** section of this permit for the submittal dates of these

reports.

**VII. Opacity Summary**

<u>Stack/Vent ID No.</u>	<u>Emission Source ID No.</u>	<u>Emission Source Opacity Requirement</u>
SV-1	EU-1	40%
SV-2	EU-2	40%
SV-3	EU-3	40%
SV-4	EU-4	40%
SV-5	EU-5	40%
SV-6	EU-6	40%
SV-7	EU-7	40%
SV-8	EU-8	40%
SV-9	EU-9	40%
SV-10	EU-10	40%
SV-11	EU-11	40%
SV-A1	EU-A1	40%
SV-A2	EU-A2	40%
SV-A3	EU-A3	40%

All other emission units are limited to 20% opacity. [K.A.R. 28-19-650 (a)(3)]

**VIII. Facility-Wide Applicable Requirements**

The permittee shall comply with the following when required by the relevant regulation:

**A. K.A.R. 28-19-30 through K.A.R. 28-19-32, Indirect Heating Equipment Emissions**

Except as provided in K.A.R. 28-19-32, aggregated emissions of particulate matter from indirect heating equipment shall not exceed those specified in table H-1 of K.A.R. 28-19-31(a), or for equipment having intermediate heat input between 10 MMBtu/hr and 10,000 MMBtu/hr, the allowable emission rate may be determined by the equation provided at K.A.R. 28-19-31(a).

Records shall be maintained of any recalculations and evaluations. These records shall include the design rate capacity of the unit, emission factors used in calculations and potential/allowable emission rates.

**B. K.A.R. 28-19-55 through K.A.R. 28-19-58, Air Pollution Emergency Episode Plans**

The permittee shall comply with the requirements of K.A.R. 28-19-55 through 28-19-58, Air Pollution Emergency Episode Plans, and shall maintain on site an emergency episode plan if the KDHE requires an emergency episode plan be developed pursuant to K.A.R. 28-19-58.

**C. K.A.R. 28-19-210, Calculation of Actual Emissions**

The following applies to emission control equipment not otherwise addressed in this permit:

If the owner or operator uses air emission control equipment, not otherwise addressed in this permit, to calculate actual emissions, the air emission control equipment shall be maintained in accordance with the

manufacturer's recommendation. The owner or operator shall keep a written log recording the date and type of action taken when performing preventive or other maintenance on the air emission control equipment.

**D. K.A.R. 28-19-517, Annual Emissions Inventory and Fees**

1. Annual Emissions Inventory:

The owner or operator shall submit all operating or relevant information to estimate emissions for the preceding year to the KDHE. This information shall be submitted on or before the date specified at K.A.R. 28-19-517 or amendments thereto.

2. Annual Emissions Fee:

The owner or operator of a permitted emissions unit or stationary source is required to pay fees to the permitting authority consistent with the fee schedule set out in the regulations pursuant to K.A.R. 28-19-517(b).

3. Submittal:

Each annual emissions inventory and each annual emissions fee shall be submitted through SLEIS as specified in K.A.R. 28-19-517(c). At the time of permit issuance, the due date for submittal of this information is on or before April 1 of each year.

4. Late Fee and Refund:

Each owner or operator who fails to submit the annual emission inventory and pay the annual emissions fee by the due date specified shall pay a late fee as specified in K.A.R. 28-19-517(d) and any overpayment of \$100.00 or more made by the owner or operator of a stationary source may be refunded.

**E. K.A.R. 28-19-645, Open Burning**

The permittee is prohibited from conducting open burning, except as allowed by K.A.R. 28-19-647 and K.A.R. 28-19-648.

**F. K.A.R. 28-19-735, Which Adopts by Reference 40 CFR Part 61 Subpart A, General Provisions, and Subpart M, NESHAP for Asbestos**

The permittee shall comply with the National Emission Standard for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61 Subpart A, General Provisions, and Subpart M, National Emission Standard for Asbestos, adopted by K.A.R. 28-19-735 and K.A.R. 28-50-1 et seq., when conducting any renovation or demolition activities at the facility.

**G. 40 CFR Part 68, Chemical Accident Prevention Provisions**

Chemical Accident Prevention Provisions, 40 CFR Part 68, is applicable to an owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined in 40 CFR 68.115.

If the stationary source is subject to 40 CFR Part 68, but is not required to comply with those requirements as of the effective date of this operating permit, the stationary source shall be in compliance with the requirements of 40 CFR Part 68 no later than the latest of the following dates:

1. Three years after the date on which a regulated substance is first listed in 40 CFR 68.130; or
2. The date on which a regulated substance is first present above a threshold quantity in a process.

#### **H. 40 CFR Part 82, Protection of Stratospheric Ozone**

The permittee shall comply with 40 CFR Part 82, Protection of Stratospheric Ozone. Affected controlled substances include, but are not limited to, chlorofluorocarbons, hydrochlorofluorocarbon refrigerants, halons, carbon tetrachloride, and methyl chloroform (specific affected controlled substances are listed in 40 CFR Part 82, Subpart A, appendices A {Class I} and B {Class II}).

The following subparts and sections of 40 CFR Part 82 are conditions of this permit:

- Subpart A - Production and Consumption Controls
- Subpart B - Servicing of Motor Vehicle Air Conditioners
- Subpart E - Labeling of Products Using Ozone-Depleting Substances: Section; 82.106 Warning statement requirements, 82.108 Placement of warning statement, 82.110 Form of label bearing warning statement, and 82.112 Removal of label bearing warning statement
- Subpart F - Recycling and Emissions Reduction: Sections; 82.156 Required practices, 82.158 Standards for recycling and recovery equipment, 82.161 Technician certification, and 82.166 Reporting and recordkeeping requirements
- Subpart G - Significant New Alternatives Policy Program

#### **IX. Opacity Limitations and Monitoring**

Except as otherwise provided in K.A.R. 28-19-9, K.A.R. 28-19-11, and K.A.R. 28-19-650(c) or as otherwise identified in the Applicable Requirements portion of this permit, K.A.R. 28-19-650(a)(3) limits visible air emissions from each emission unit to 20%. K.A.R. 28-19-31(b)(2) limits visible air emissions from any indirect heating equipment to less than 20%.

Except as otherwise provided in the applicable requirements portion of this permit, emissions from the following or similar activities do not require routine periodic monitoring: emissions vented inside an enclosed building or structure, from cooling towers, and from evaporative VOC sources; and emissions from turbines, reciprocating internal combustion engines, burners in indirect heating applications, and space heaters when burning natural gas, propane/LPG, or refinery gas.

Routine periodic monitoring requirements: Except as otherwise provided in the applicable requirements portion of this permit or as provided above, the owner or operator shall perform a qualitative assessment at least once per calendar month, with at least one week between assessments. The monthly qualitative assessment shall include each activity at the facility, which is operating at the time scheduled. For each activity from which the opacity of visible emissions appears to exceed the limit, the permittee shall take appropriate action to correct process operating parameters, after which the permittee shall perform an additional qualitative assessment for that unit. If, at the end of ten operating days from the date of the possible exceedance, opacity of visible emissions appears to continue to exceed the limit, the owner or operator shall notify the agency, within seven days of the end of the ten operating day period, and shall schedule a test utilizing EPA Method 9, of visible emissions from the unit appearing to exceed the limit, within 30 days of the end of the ten operating day period.

The person responsible for making qualitative opacity assessments shall be knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting and wind, and the presence of uncombined water in the plume.<sup>1</sup> The permittee shall keep records of each qualitative assessment, which shall include the time and date of the assessment, a description of the emission point from which any unusual emissions emanated, the steps taken to correct any abnormal emissions, and the name of the person conducting the assessment.

The KDHE Bureau of Air does not consider a qualitative assessment in which emissions appear to exceed the applicable opacity limits to be a violation or deviation subject to reporting in accordance with **Section XIII. Reporting of Deviations from Permit Terms**. A Method 9 evaluation that shows opacity exceeding the emission limit would be subject to reporting in accordance with **Section XIII. Reporting of Deviations from Permit Terms**.

**X. Requirements Which Will Become Applicable During the Permit Term**

The owner or operator, in accordance with the provisions of K.A.R. 28-19-511(b)(16)(C)(ii) and K.A.R. 28-19-512(a)(23) shall comply in a timely manner with those applicable requirements that become effective during the permit term.

On June 3, 2016, the United States Environmental Protection Agency (EPA) issued new regulations under **40 CFR Part 60, Subpart OOOOa**, Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution for Which Construction, Modification, or Reconstruction Commenced After September 18, 2015. Currently, some requirements of this rule are under reconsideration and is expected to be revised in the future. The facility does not have any affected sources at this time. However, the owner or operator shall comply with all requirements of this rule as they become applicable. Future emission unit modification, construction, reconstructions may trigger 40 CFR Part 60, Subpart OOOOa applicability.

**XI. Permit Shield**

Compliance with the conditions of this permit shall be deemed in compliance with the applicable requirements of the Kansas air quality program as of the date of permit issuance. This shield applies only to:

- A. Applicable requirements included, and specifically identified in the permit; and
- B. Applicable requirements that the KDHE has specifically identified in writing as not being applicable to the emissions unit or stationary sources and the determination or a concise summary thereof is included in the permit.

Nothing in this permit shall alter or affect:

- A. The liability of a permittee for any violation of an applicable requirement occurring prior to or at the time of issuance of this permit;
- B. U.S. EPA's ability to obtain information under Section 114 of the federal Clean Air Act

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<sup>1</sup> For basic information about opacity observations, refer to 40 CFR Part 60 Appendix A, Method 9.

- C. The provisions of Section 303, Emergency orders, of the federal Clean Air Act, including the authority of the administrator of the U.S. EPA under that section or the air pollution emergency provisions of the Kansas air quality program regulations, K.A.R. 28-19-55 through 28-19-58; or
- D. The applicable requirements of the acid rain program, consistent with section 408(a) of the Act. [K.A.R. 28-19-512(b)]

**XII. Testing, Monitoring, Recordkeeping and Reporting**

Testing, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with the terms and conditions of the permit are required. [K.A.R. 28-19-512(a)(21)]

In addition to any testing, monitoring, recordkeeping, or reporting requirement contained in **Section VI. Applicable Requirements**, monitoring and reporting may be required under the provisions of K.A.R. 28-19-12, Measurement of Emissions, or as required by any other provision of the federal Clean Air Act.

Records to support all monitoring and copies of all reports required by the permit must be maintained for a period of at least five years from the date of the activity. [K.A.R. 28-19-512(a)(10)(G)]

Summary reports of any routine, continuous, or periodic monitoring must continue to be submitted at six-month intervals for the duration of the permit. The reporting period and due date for the annual certification is identified in **Section XIV. G. Compliance Certification**. All instances of deviations from permit requirements, **including perceived opacity exceedances**, shall be clearly identified in the report. The report shall be certified by a responsible official. [K.A.R. 28-19-512(a)(26)]

Records of required monitoring shall include:

- A. The date, place, and time of sampling or measurement;
- B. The date(s) analyses were performed;
- C. The company or entity which performed the analyses;
- D. The analytical techniques or methods used;
- E. The results of the analyses;
- F. The operating conditions that existed at the time of sampling or measurement; and
- G. The retention of records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [K.A.R. 28-19-512(a)(10)]

**XIII. Reporting of Deviations from Permit Terms**

Unless a different time period is specified in this permit, deviations from the requirements of this permit shall be reported to the KDHE as follows:

- A. Deviations which result in emissions exceeding those allowed in this permit shall be reported the next business day following the discovery of the release, with follow-up written notice within five business days following discovery of the release. The report shall include the probable cause of such deviations and any corrective actions or preventive measures taken.
- B. Deviations which do not result in emissions exceeding those allowed in this permit shall be reported in writing within ten business days following discovery of the deviation.

Oral notification shall be made to the air program compliance staff in the KDHE central office in Topeka. Written notifications shall also be made to the KDHE central office through KEIMS at <https://www.kdheks.gov/bar/keims-BOA.html>. [K.A.R. 28-19-512(a)(11)]

#### **XIV. General Provisions**

##### **A. K.A.R. 28-19-11, Enforcement Discretion Due to Startup, Shutdown, Malfunctions, or Scheduled Maintenance**

An emission source having emissions that are in excess of the applicable emission limitation and standard specified at K.A.R. 28-19-30 through 32, and K.A.R. 28-19-650, and result from startup, shutdown, malfunctions, or scheduled maintenance of control or processing equipment and appurtenances may be exempt from enforcement action at the secretary's discretion if both of the following conditions are met:

1. The person responsible for the operation of the emission source notifies the KDHE of the occurrence and nature of the excess emissions resulting from startup, shutdown, malfunctions, or scheduled maintenance, in writing, within ten (10) days of discovery of the excess emissions.
2. Reasonable action is taken regarding the occurrence specified in paragraph (a)(1) to initiate and complete any necessary repairs and place the equipment back in operation as quickly as possible.

Emissions that are in excess of the applicable emission source emission limitation and standard specified at K.A.R. 28-19-30 through 32 and K.A.R. 28-19-650, and result from startup, shutdown, or malfunctions shall be evaluated by the secretary for potential enforcement action based on the frequency and severity of the excess emissions.

Emissions that are in excess of the applicable emission source emission limitation and standard and result from scheduled maintenance of control or processing equipment and appurtenances shall be evaluated by the secretary for potential enforcement action based on the following: (1) the severity of the excess emissions; (2) any prior approval for scheduled maintenance by the secretary; and (3) demonstration that the scheduled maintenance cannot be accomplished by maximum reasonable effort, including off-shift labor where required, during periods of shutdown of any related control or processing equipment.

Any exemption granted under this regulation may be rescinded if the secretary obtains additional information and deems enforcement action necessary based upon this information.

Lack of enforcement for excess emissions under this regulation shall not preclude the taking of enforcement action by USEPA or through private citizen lawsuits.

##### **B. K.A.R. 28-19-752a, Hazardous Air Pollutants; Limitations Applicable to Construction of New Major Sources or Reconstruction of Existing Major Sources**

This regulation shall continue in effect for an emissions unit or stationary source until a standard has been promulgated which is applicable to such source pursuant to section 112(d) of the federal Clean Air Act.

This regulation shall apply whenever construction of a new major source or reconstruction of an existing major source of hazardous air pollutants is proposed.

**C. Permit Term and Renewal**

This permit has a term of five years unless otherwise stated in this permit. A complete application, as defined in K.A.R. 28-19-518, and any applicable fee must be submitted to the KDHE not less than six months and not more than 18 months prior to the expiration date. This operating permit shall not expire on the expiration date if a complete and timely application has been filed with the KDHE. [K.A.R. 28-19-512(a)(8) and K.A.R. 28-19-514]

**D. Severability**

The provisions of this permit are severable, and if any portion of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstance, and the remainder of this permit, shall not be affected thereby.  
[K.A.R. 28-19-512(a)(13)]

**E. Property Rights**

This permit does not convey any property rights of any sort or any exclusive privilege.  
[K.A.R. 28-19-512(a)(14)(D)]

**F. Compliance**

The owner or operator shall comply with all conditions of the permit and shall continue to comply with applicable requirements with which the owner or operator is in compliance, in accordance with K.A.R. 28-19-511(b)(16)(C)(i). Any permit noncompliance shall constitute a violation of the Kansas Air Quality Act and shall be grounds for enforcement action, for permit revocation or amendment, or for denial of a permit renewal application. All permit terms and conditions are federally enforceable.

It shall not be a defense for a permittee in an enforcement action to contend that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

This permit may contain provisions which require that data from specific test methods, monitoring, or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Sec. 51.212; 40 CFR Sec. 52.12; 40 CFR Sec. 60.11; 40 CFR Sec. 61.12; and incorporation of 40 CFR Sec. 52.33, that allow the use of any credible evidence to establish compliance with applicable requirements. At the issuance of this permit, the State of Kansas has incorporated these provisions in its air quality regulations K.A.R. 28-19-212(c) and (d), K.A.R. 28-19-350, K.A.R. 28-19-720 and K.A.R. 28-19-735.  
[K.A.R. 28-19-512(a)(14)]

**G. Compliance Certification**

The permittee shall annually submit to the Air Compliance and Enforcement Section of the KDHE, and a copy to the Air Branch-Enforcement and Compliance Assurance Division of the U.S. EPA, Region VII, a certification of compliance (Form CR-02, "Annual Certification"). The annual certification shall be

submitted through KEIMS at <https://www.kdheks.gov/bar/keims-BOA.html>. The due date of the certification will be January 31<sup>st</sup> of each year for the period from January 1 to December 31 of the previous year.

The semi-annual summary reports required by **Section XII. Testing, Monitoring, Recordkeeping and Reporting** shall be submitted by the dates specified below for each subsequent reporting period:

- The reporting covering the period from July 1 to December 31 shall be submitted by January 31 of each year, and
- The report covering the period from January 1 to June 30 shall be submitted by July 31 of each year.

The certification shall include the permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the method or methods used for determining the compliance, currently and over the reporting period; and such other facts as the KDHE may require to determine the compliance status of the source. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate and complete.

[K.A.R. 28-19-512(a)(26) and K.A.R. 28-19-512(a)(27)]

#### **H. Emergency**

An “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

An emergency shall constitute an affirmative defense to an action brought for noncompliance with such technology-based emission limitation if the conditions below are met. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or relevant evidence that:

1. An emergency occurred and that the permittee can identify the cause or causes of the emergency;
2. The permitted facility was at the time being properly operated;
3. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in the permit; and
4. The permittee submitted notice of the emergency, containing a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken, to the KDHE within two working days of the time when emission limitations were exceeded due to the emergency.

In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof.

These emergency provisions are in addition to any emergency or upset provisions contained in any applicable requirement. Whenever these emergency provisions conflict with the provisions of K.A.R. 28-19-11, these emergency provisions shall control.

[K.A.R. 28-19-512(d)]

**I. Inspection and Entry**

Upon presentation of credentials and other documents as may be required by law, representatives of the KDHE, including authorized contractors of the KDHE, shall be allowed by the permittee to:

1. enter upon the premises where a regulated facility or activity is located or conducted or where records are kept under conditions of this document;
2. have access to and copies of, at reasonable times, any records that must be kept under conditions of this document;
3. inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this document; and
4. as authorized by the Kansas Air Quality Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

[K.A.R. 28-19-512(a)(22)]

**J. Permit Amendment, Modification, Reopening, and Changes Not Requiring a Permit Action**

The permit may be modified, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

The permitting authority will reopen and revise or revoke this permit as necessary to remedy deficiencies in the following circumstances:

1. Additional requirements under the federal Clean Air Act become applicable to the source three or more years prior to the expiration date of this permit. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
2. It is determined by the KDHE that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
3. It is determined by the KDHE that it is necessary to revise or revoke this permit in order to assure compliance with applicable requirements.

This document is subject to periodic review and amending as deemed necessary to fulfill the intent and purpose of the Kansas Air Quality Statutes and the Kansas Air Quality Regulations.

No permit revision shall be required under any approved economic incentives, pollution prevention incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[K.A.R. 28-19-513]

**K. Duty to Provide Information**

Unless a different time frame is specified in this permit, the permittee shall furnish to the KDHE any information that the KDHE may request in writing within 60 days of the request, unless the KDHE specifies another time period. Submittal of confidential business information must be in accordance with the KDHE procedures. [K.A.R. 28-19-518(c) and K.A.R. 28-19-512(a)(14)(E)]

**L. Duty to Supplement**

The permittee, upon becoming aware that any relevant facts were omitted from or incorrect information was included in any submittal, shall promptly submit such supplementary facts or corrected information. [K.A.R. 28-19-518(e)]

**M. Other Permits and Approvals; Applicability**

A construction permit or approval must be obtained from the KDHE prior to commencing any construction or modification of equipment or processes which results in potential emission increases equal to or greater than the thresholds specified at K.A.R. 28-19-300.

This document does not relieve the permittee of the obligation to obtain any approvals, permits, licenses, or documents of sanction which may be required by other federal, state, or local government agencies. [K.A.R. 28-19-512(a)(29)]

**N. Submissions**

Written notification of malfunctions, exceedances, and deviations shall be submitted through KEIMS. Questions regarding submission may be sent to the following email address:  
[KDHE.BOAKEIMS@ks.gov](mailto:KDHE.BOAKEIMS@ks.gov).

EPA regulations codified in 40 CFR Part 60, 62, and 63 require affected sources to electronically submit performance test reports, notification reports, and periodic reports to EPA, as specified in the affected regulations. As a result, the EPA has developed the Compliance and Emissions Data Reporting Interface (CEDRI), which is accessed through the EPA's **Central Data Exchange (CDX)** (<https://cdx.epa.gov/>). The CDX Web is the application used by EPA programs and various stakeholders to manage environmental data transmitted to EPA in order to meet EPA's electronic reporting requirements. **The source must begin submitting required reports via CEDRI no later than 90 days after the form becomes available in CEDRI.** However, if the reporting form is not available in CEDRI at the time that the report is due, the source must submit the report to the Administrator [address listed in 40 CFR 63.13]:

Kansas Compliance Officer  
Air Branch  
Enforcement and Compliance Assurance Division  
U.S. EPA, Region 7  
11201 Renner Blvd.  
Lenexa, Kansas 66219

**All other reports, notifications, information, and other correspondence (including submission of the Annual Certification Form CR-02) shall be submitted through the Kansas Environmental Information Management System (KEIMS):**

<http://www.kdheks.gov/bar/keims-BOA.html>

A copy of each Annual Certification Form CR-02 shall be submitted to either CEDRI, unless it contains confidential business information, or the address below:

Kansas Compliance Officer  
Air Branch  
Enforcement and Compliance Assurance Division  
U.S. EPA, Region 7  
11201 Renner Blvd.  
Lenexa, Kansas 66219

The Annual Certification shall be certified by a responsible official. This certification shall state that, based on the information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete.  
[K.A.R. 28-19-512(a)(21) and K.A.R. 28-19-512(a)(27)]

When specified in the permit, contact the Southwest District office at:

Southwest District Office  
313 Oklahoma Terrace  
Ulysses, Kansas 67880  
(620) 356-1075 – Ulysses Office  
(620) 225-0596 – Dodge City Office

**Permit Writer**

Cathy Richardson  
Environmental Specialist  
Air Permitting Section

CLR  
c: Ethel Evans – SWDO  
OP100333v5.0

# ATTACHMENT A

## LIST OF ACRONYMS AND SYMBOLS

<u>ACRONYM or SYMBOL</u>	<u>DESCRIPTION</u>
2SLB	2-stroke lean burn
4SLB	4-stroke lean burn
4SRB	4-stroke rich burn
µm	micrometer (or micron, 10 <sup>-6</sup> meter)
acfm	actual cubic feet per minute
ANSI	American National Standards Institute
AP-42	compilation of air pollutant emission factors (U.S. EPA)
AQI	Air Quality Index
ASTM	American Society for Testing and Materials (now ASTM International)
BACT	best available control technology
BOA	KDHE Bureau of Air
Btu	British thermal unit
CAA	Clean Air Act (1970)
CAAA	Clean Air Act Amendments (1990)
CAS	Chemical Abstracts Service
CBSA	Core-Based Statistical Area
CD	compliance demonstration (form)
CDE	control device efficiency
CE	capture efficiency
CEM	continuous emission monitor(ing)
CEMS	continuous emission monitoring system
CFC	chlorofluorocarbon
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CISWI	commercial/industrial solid waste incinerator
CMS	continuous monitoring system
CO	carbon monoxide
COM	continuous opacity monitor(ing)
COMS	continuous opacity monitoring system
CPM	continuous parameter monitor(ing)
CPMS	continuous parameter monitoring system
CR	certification (form)
CSAPR	Cross-State Air Pollution Rule
CTG	Control Techniques Guideline (U.S. EPA)
DDGS	distillers dry grain solubles
dscf	dry standard cubic foot
dscm	dry standard cubic meter

<u>ACRONYM or SYMBOL</u>	<u>DESCRIPTION</u>
DSI	dry sorbent injection
E10	10% ethanol blend (10% ethanol, 90% gasoline by volume)
EF	emission factor
EG	emission guideline
EGU	electric generating unit
EI	emissions inventory
EM	emission calculations (form)
EPA	Environmental Protection Agency (or U.S. EPA)
EU	emission unit
FE	fugitive emission
FESOP	federally enforceable state operating permit
FGD	flue gas desulfurization
FGR	flue gas recirculation
FIP	federal implementation plan
g	gram
GDF	gasoline dispensing facility
GDV	gasoline delivery vessel
GEP	good engineering practice
GI	general information (form)
GOP	General Operating Permit
gph	gallons per hour
gpm	gallons per minute
gr	grain (1/7000 lb avoirdupois)
HAP	hazardous air pollutant
HC	hydrocarbon
HCFC	hydrochlorofluorocarbon
HMIWI	hospital/medical/infectious waste incinerator
HON	hazardous organic NESHAP
hp	horsepower
IA	insignificant activity
ICE	internal combustion engine
JCDHE	Johnson County Department of Health and Environment
K.A.R.	Kansas Administrative Regulation
KDHE	Kansas Department of Health and Environment
K.S.A.	Kansas Statutes Annotated
kW	kilowatt
LAER	lowest achievable emission rate
LFGE	landfill gas-to-energy
LNB	low NO <sub>x</sub> burner
MACT	maximum achievable control technology
MATS	Mercury and Air Toxics Standards (rule)

<u>ACRONYM or SYMBOL</u>	<u>DESCRIPTION</u>
MBtu	thousand Btu
ME	monitoring equipment (form)
Mg	megagram (10 <sup>6</sup> grams, 1 metric ton, 1 tonne)
MMBtu	million Btu
MOD	modification (form)
MON	miscellaneous organic NESHAP
MSDS	material safety data sheet
MSW	municipal solid waste
MWC	municipal waste combustor
MWI	medical waste incinerator
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industry Classification System
NCDO	North Central District Office (KDHE)
NEDO	Northeast District Office (KDHE)
NESHAP	national emission standard(s) for hazardous air pollutants
NMOC	non-methane organic compound
NO <sub>x</sub> , NOX	nitrogen oxides
NSPS	new source performance standard
NSR	new source review
NWDO	Northwest District Office (KDHE)
OAQPS	Office of Air Quality Planning and Standards (U.S. EPA)
OM&M	operation, maintenance, and monitoring
OSHA	Occupational Safety and Health Administration (U.S. Dept. of Labor)
P2	pollution prevention
PAL	plant-wide applicability limitation
PCB	polychlorinated biphenyl
PCD	pollution control device
PM	particulate matter
PM <sub>10</sub> , PM10	PM with an aerodynamic diameter of less than or equal to 10 μm
PM <sub>2.5</sub> , PM2.5	PM with an aerodynamic diameter of less than or equal to 2.5 μm
PMD	portable monitoring device
ppmv	parts per million, volumetric basis
ppmw	parts per million, weight basis
PSD	prevention of significant deterioration
psia	pounds per square inch, absolute
psig	pounds per square inch, gauge or gage
PTE	potential to emit, potential-to-emit
QA/QC	quality assurance / quality control
RACM	reasonably available control measure(s)
RACT	reasonable available control technology
RATA	relative accuracy test audit

**ACRONYM or SYMBOL    DESCRIPTION**

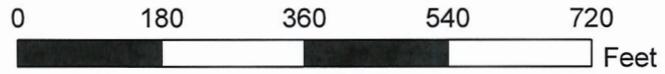
RICE	reciprocating internal combustion engine
RMP	risk management plan
RTO	regenerative thermal oxidizer
RVP	Reid vapor pressure (psia at 100 °F)
SBEAP	(Kansas) Small Business Environmental Assistance Program
SCDO	South Central District Office (KDHE)
scfm	standard cubic feet per minute
SCR	selective catalytic reduction
SEDO	Southeast District Office (KDHE)
SEP	supplemental environmental project
SIC	Standard Industrial Classification (code)
SIP	state implementation plan
SLEIS	State and Local Emissions Inventory System (emissions inventory database)
SNCR	selective non-catalytic reduction
SOCMI	synthetic organic chemical manufacturing industry
SO <sub>x</sub> , SOX	sulfur oxides (typically measured as sulfur dioxide, SO <sub>2</sub> )
SPP	Southwest Power Pool (electric grid operator for Kansas)
SWDO	Southwest District Office (KDHE)
TCO	thermal catalytic oxidizer
TDF	tire-derived fuel
THC	total hydrocarbons
TO	thermal oxidizer
TOC	total organic carbon; total organic compounds
TOG	total organic gases
tph	tons per hour
tpy	tons per year
TR	Transport Rule
TRS	total reduced sulfur
TSP	total suspended particulate(s)
ULSD	ultra low sulfur diesel
U.S. EPA, USEPA	United States Environmental Protection Agency
USC	United States Code
VOC	volatile organic compound
VOL	volatile organic liquid
VRU	vapor recovery unit
WDEH	Wichita Department of Environmental Health
WDF	waste-derived fuel
WDGS	wet distiller's grains with solubles
WTE	waste to energy
WYCO-KCK	Unified Government of Wyandotte County and Kansas City, Kansas Health Department

# ATTACHMENT B

## Site Diagram



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNRS/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



**WTG Hugoton, L.P.  
Hugoton Compressor Station**

# ATTACHMENT C

## CAM Plan

## Compliance Assurance Monitoring Plan Non-Catalytic Incinerator for the BTEX Unit for Glycol Dehydrators

### I. Background

#### a. Emission Unit

Description: BTEX Unit for Glycol Dehydrator  
Unit ID: EU-Stillvent  
Facility: Hugoton Compressor Station

#### b. Applicable Regulation, Emission Limits and Monitoring Requirements

Individual HAP: < 10 tons/year  
Total HAPs: <25 tons/year  
Monitoring requirements: Outlet temperature of incinerator, glycol flow rate; gas flow through contactor

#### c. Control Technology

Non-catalytic incinerator

### II. Monitoring Approach

The monitoring approach is based on monitoring process inputs used in the GRI GlyCalc program to predict HAP emissions from glycol dehydrators. As long as the process inputs are less than those used in GRI GlyCalc model and the model predicts HAP emissions less than the threshold values, compliance is shown.

### Monitoring Approach Justification

#### I. Background

The vent from the glycol reboiler is routed to a non-catalytic incinerator. The liquid removed by an inline scrubber (including hydrocarbons and water) is routed to a storage tank for disposition. The uncondensed vapors are destroyed in the non-catalytic incinerator.

#### II. Rationale for Selection of Performance Indicators

These input variables have the most impact on GRI GlyCalc results.

#### III. Rationale for Selection of Indicator Ranges

Variable	Range
Incinerator Temperature	>1,400 F
Glycol Flow Rate	< 60 gpm
Gas Throughput, MMscfd	≤ 150 MMSCF

Refer to the attached GRI Glycalc calculations and Table 1.

**TABLE 1. MONITORING APPROACH**

	<b>Indicator No. 1</b>	<b>Indicator No. 2</b>	<b>Indicator No. 3</b>
<b>I. Indicator Measurement Approach</b>	Incinerator outlet temperature is measured continuously using an in-line thermocouple and recorded continuously. The value will be averaged daily.	Glycol flow Rate The glycol flow rate will be recorded weekly. (Once the flow rate is set it cannot vary.)	Gas Throughput The gas throughput will be measured continuously and recorded daily.
<b>II. Indicator Range</b>	The indicator range is greater than 1,400 F., averaged daily.	The indicator range is less than 60 gpm.	The indicator range is less than or equal to 150 MMSCF.
<b>III. Performance Range</b>	Temperature is measured at the incinerator by a thermocouple. The minimum accuracy is +/-2%.		
<b>A. Data Representativeness</b>	Guarantee from thermocouple manufacture.		
<b>B. Verification of Operational Status</b>	Thermocouple scanner or other end device is calibrated annually.		
<b>C. QA/QC Practices and Criteria</b>	Temperature measured continuously.		
<b>D. Monitoring Frequency</b>	Average daily temperature recorded on log sheet.	Flow rate is recorded on log sheet once a week during normal I/M check.	
<b>Data Collection Procedures</b>	Daily.	None, not to exceed maximum.	None, not to exceed maximum.
<b>Averaging period</b>			

**STATEMENT OF BASIS**  
by  
**Kansas Department of Health and Environment**  
for  
**WTG Hugoton, LP**  
**Hugoton Compressor Station**  
**Source ID: 1890008**  
**OP100333v5.0**  
**DRAFT, 2020**

This statement of basis sets forth the legal and factual basis for the proposed permit conditions, including references to the applicable statutory or regulatory provisions. Determinations were made based upon the application submitted, file review and reasonable inquiry.

**I. Facility Description**

WTG Hugoton, L.P. operates fourteen (14) natural gas-fired compressor engines and four (4) auxiliary/generator engines at their Hugoton Compressor Station located in Stevens County, Kansas. The vapor combustion unit (VCU) is used to control emissions from the main glycol dehydration unit. The facility also has various insignificant activities including twenty-seven (27) storage tanks and fugitive and truck loading emissions. No changes have been made at this facility since the last permit renewal.

**II. Facility Equipment**

EU-1 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine  
EU-2 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine  
EU-3 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine  
EU-4 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine  
EU-5 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine  
EU-6 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine  
EU-7 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine  
EU-8 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine  
EU-9 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine  
EU-10 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine  
EU-11 Ingersoll-Rand 123 KVG, 1234 hp, 4-stroke lean burn, natural gas-fired engine  
EU-15 Cooper-Bessemer GMVC-10, 1800 hp, 2-stroke lean burn, natural gas-fired engine  
EU-16 Cooper-Bessemer GMVC-10, 1800 hp, 2-stroke lean burn, natural gas-fired engine  
EU-17 Cooper-Bessemer GMVC-10, 1800 hp, 2-stroke lean burn, natural gas-fired engine  
EU-A1 Ingersoll-Rand PVG-8, 408 hp, 4-stroke rich burn, natural gas-fired engine  
EU-A2 Ingersoll-Rand PVG-8, 408 hp, 4-stroke rich burn, natural gas-fired engine  
EU-A3 Ingersoll-Rand PVG-8, 408 hp, 4-stroke rich burn, natural gas-fired engine  
EU-A4 Waukesha H-2475, 375 hp, 4-stroke rich burn, natural gas-fired engine  
EU-Dehy-N - 3.0 MMBtu/hr north glycol reboiler  
EU-Dehy-NATCO - 7.8 MMBtu/hr main glycol reboiler  
EU-TK7-Htr - 0.25 MMBtu/hr boiler for TK-7  
EU-Stillstk Main - glycol dehydrator regenerator bypass vent  
EU-TK7-Htr - 0.25 MMBtu/hr boiler for TK-7  
TK-Tank-23 2000 gallon Condensate Tank  
TK-Tank-21 16,800 gallon Condensate Tank  
TK-Tank-22 12,600 gallon Condensate Tank

### III. Facility Emissions Summary

Pollutant	2019 Actual (tpy)	Potential (tpy)
NO <sub>x</sub>	683.70	2,706.12
VOC	28.54	117.85
CO	719.80	296.59
SO <sub>2</sub>	0.159	0.4816
PM/PM <sub>10</sub>	5.08	13.92
Acetaldehyde	1.18	5.949
Acrolein	1.15	4.316
Formaldehyde	8.54	37.16
Hexane	0.414	0.805
Benzene	0.456	0.69
Toluene	0.024	0.02
Ethylbenzene	0.041	0.011
Xylene	0.164	0.027
Total HAPs	13.25	48.97

### IV. Basis for permit renewal changes

- A. Incorporation of CFR Part 64, Compliance Assurance Monitoring (CAM) is applicable and required. The primary glycol dehydrator vent (EU-Stillstk) is subject to the regulation and is controlled with the Vapor Combustion Unit (VCU). No other units at this facility are subject to CAM.
- B. Permit wording has been updated to meet current standards.
- C. Insignificant activities have been revised in accordance with U.S. EPA permit streamlining guidance and current KDHE policy.
- D. Facility wide requirements including opacity monitoring have been revised in accordance with current KDHE policy.
- E. 40 CFR Part 63, Subpart HH. The MACT HH applies to the glycol dehydrator. WTG has elected to comply by limiting the actual average emissions of benzene from the dehy unit to less than 1 ton of benzene per year.
- F. The 0.25 MMBtu/hr boiler (EU-TK7-Htr) and the 7.8 MMBtu/hr primary glycol reboiler (EU-DEHY-NATCO) are subject to 40 CFR Part 63 Subpart DDDDD, NESHAP for boilers and process heaters at major sources. The 7.8 MMBtu/hr primary glycol reboiler is not subject to HH because the unit does not combust the waste gas from either of the glycol dehydration units. The 3.0 MMBTU/hr reboiler (EU-Dehy-N) associated with the

glycol dehydrator is considered to be a process heater under the definition of Subpart DDDDD, however, the reboiler is exempt from Subpart DDDDD under 63.7491(h) because it is part of the affected source subject to 40 CFR Part 63 Subpart HH.

- G. The facility does not currently have any units subject to NSPS OOOOa. The facility does not have any units that have been modified since the September 18, 2015 applicability date. Future modifications or installations may trigger NSPS OOOOa.
- H. The annual certification reporting date has been changed to calendar year reporting.
- I. For clarification, engines (EU-1 through EU-11) received guidance from KDHE on September 27, 2006 on accepted data regarding the designation of these engines as Rich Burn (per AP-42: exhaust O<sub>2</sub> of <4%) for emission inventory purposes, and as Lean Burn (per MACT definition: exhaust O<sub>2</sub> of >2%) for RICE MACT ZZZZ purposes.

Source ID No.: 1890008

Source Name: WTG Hugoton, LP – Hugoton  
Compressor Station

The period of time for which compliance is certified began at 12:01 a.m. on \_\_\_\_\_,  
\_\_\_\_\_ and ended at 11:59 p.m. on \_\_\_\_\_, \_\_\_\_\_.

Certifications of compliance are required to be submitted at least annually. The period of time covered by each certification document cannot exceed one year and there can be no period of time during the term of the permit for which compliance is not certified.

The terms or conditions of the permit that is the basis for this certification are those specified in the Class I Operating Permit issued and/or renewed by the Secretary of Health and Environment on \_\_\_\_\_, \_\_\_\_\_.

**Compliance status of each term or condition of the permit during the certification period:**

1.  In continuous compliance with all applicable requirements during the entire certification period.

2.  Not in continuous compliance with all applicable requirements during the entire certification period.

***If not in continuous compliance with all applicable requirements during the entire certification period, mark the applicable description below.***

One or more instances of non-compliance with any applicable requirement during the certification period.

Continuous non-compliance with any applicable requirement during the certification period.

***Provide a summary of the nature, duration, and frequency of the non-compliance that occurred, including the applicable requirement(s) and emission unit(s).***

**Compliance status of each term or condition of the permit at the time the certification is signed:**

1.  In compliance with all applicable requirements at the time of certification.

2.  Not in compliance with all applicable requirements at the time of certification.

***Provide a description of the nature, duration, and frequency of the non-compliance that occurred, including the applicable requirement(s) and emission unit(s).***

<b>Methods used to determine compliance during the certification period and at the time of signing the certification:</b>
1. ____ In accordance with compliance demonstration methods specified in the Class I Operating Permit.
2. ____ Other - In accordance with attachments.

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 information and belief formed after reasonable inquiry, including the person or persons who manage the system, or those persons directly responsible for gathering the information, the stated information in this document is true, accurate, and complete.

Name of Responsible Official (print or type):

Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

"Responsible official" means one of the following (From K.A.R. 28-19-200 General provisions; definitions):

- (1) For a corporation, a president, secretary, treasurer or vice-president in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production or operating facilities applying for or subject to permit or other relevant regulatory requirement and either:
  - (A) the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million, in second quarter, 1980 dollars; or
  - (B) the delegation of authority to such representative is approved in advance by the department;
- (2) for a partnership or sole proprietorship, a general partner or the proprietor, respectively;
- (3) for a municipality, or a state, federal or other public agency, a principal executive officer or ranking elected official. For purposes of this definition, a principal executive officer of a federal agency shall include the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency; or
- (4) for affected sources, the designated representative under title IV, acid deposition control, of the federal clean air act, 42 USC 7401 et seq.

Send certification with original signatures to:

Air Compliance & Enforcement Section  
Bureau of Air  
Kansas Department of Health and Environment  
1000 SW Jackson, Suite 310  
Topeka, KS 66612-1366

Send a copy of certification to:

Kansas Compliance Officer  
Air Branch  
Enforcement and Compliance Assurance Division  
U.S. EPA, Region 7  
11201 Renner Blvd.  
Lenexa, Kansas 66219

