

Schwartz, Colin

From: Schwartz, Colin
Sent: Tuesday, November 01, 2016 4:23 PM
Subject: Notice of Issuance of Permit to Construct on the Uintah and Ouray Indian Reservation

This is to notify you that the EPA has issued a final Clean Air Act (CAA) synthetic minor source permit to construct for the existing Questar Pipeline Company Fidler Compressor Station pursuant to the Tribal Minor New Source Review (MNSR) Permit Program at 40 CFR Part 49. The final MNSR permit and administrative permit record can be accessed in PDF format on our website at: <http://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-8>.

In accordance with the regulations at §49.159(a), the permit is effective as of the date of this notice, on November 1, 2016. Within 30 days after a final permit decision has been issued, any person who filed comments on the proposed permit or participated in a public hearing may petition the Environmental Appeals Board (EAB) to review any condition of the permit decision. The 30-day period within which a person may request review under this section begins when we have fulfilled the notice requirements for the final permit decision. Motions to reconsider a final order by the EAB must be filed within 10 days after service of the final order. A petition to the EAB is under Section 307(b) of the CAA, a prerequisite to seeking judicial review of the final agency action. For purposes of judicial review, final agency action occurs when we issue or deny a final permit and agency review procedures are exhausted.

Thank you,

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

Schwartz, Colin

From: Schwartz, Colin
Sent: Tuesday, November 01, 2016 4:14 PM
To: 'scott.bassett@questar.com'
Cc: Daly, Carl; Smith, Claudia; 'BPargeets@utetribe.com'; minnieg@utetribe.com; Reynolds, Cynthia
Subject: Final SMNSR Permit for Fidler Compressor Station
Attachments: FinalCoverLetter_and_Permit_signed.pdf

Mr. Bassett,

I have attached the final requested permit for the Fidler Compressor Station issued pursuant to the Tribal Minor New Source Review (MNSR) Program at 40 CFR Part 49. We will also be posting the final MNSR permit and response to comments in PDF format on our website at: <http://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-8>.

In accordance with the regulations at §49.159(a), because no comments were received on the proposed permit during the public comment period, the final permit is effective as of the date of this notice, on November 1, 2016. Within 30 days after a final permit decision has been issued, any person who filed comments on the proposed permit or participated in a public hearing may petition the Environmental Appeals Board (EAB) to review any condition of the permit decision. The 30-day period within which a person may request review under this section begins when we have fulfilled the notice requirements for the final permit decision. Motions to reconsider a final order by the EAB must be filed within 10 days after service of the final order. A petition to the EAB is under Section 307(b) of the CAA, a prerequisite to seeking judicial review of the final agency action. For purposes of judicial review, final agency action occurs when we issue or deny a final permit and agency review procedures are exhausted.

If you have any questions or concerns regarding this final permit action, or would like a paper copy, please contact me.

Thank you,

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

Schwartz, Colin

From: Schwartz, Colin
Sent: Thursday, September 01, 2016 4:27 PM
Subject: Notice of Public Comment Period – Proposed Synthetic Minor New Source Review Permit on the Uintah and Ouray Indian Reservation
Attachments: Bulletin Board Notice - QPC Fidler CS SMNSR.docx

In accordance with the regulations at 40 CFR 49.157 and 49.158, the EPA is hereby providing notification of the availability for public comment of the proposed Clean Air Act synthetic minor New Source Review permit for the following existing source located on the Uintah and Ouray Indian Reservation:

Questar Pipeline Company – Fidler Compressor Station

Electronic copies of the proposed permit, technical support document, application and other supporting permit information may be viewed online at <http://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8>.

Paper copies of the proposed permit, technical support document, application, and other supporting permit information may be reviewed by contacting the Federal and/or Tribal contacts identified on the attached public notice bulletin.

Comments may be sent by mail to:

US EPA Region 8
Air Program Office
1595 Wynkoop Street, 8P-AR
Denver, CO 80202
Attn: Tribal NSR Coordinator

or

Electronically to R8AirPermitting@epa.gov

In accordance with the regulations at §49.157, the Agency is providing a 30-day period from September 2, 2016 to October 2, 2016, for public comment on this proposed permit. Comments must be received by 5:00 p.m. MT October 2, 2016, to be considered in the issuance of the final permit. If a public hearing is held regarding this permit, you will be sent a copy of the public hearing notice at least 30 days in advance of the hearing date.

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

Schwartz, Colin

From: Schwartz, Colin
Sent: Thursday, September 01, 2016 4:27 PM
To: 'scott.bassett@questar.com'
Cc: Morales, Monica; Smith, Claudia; 'BPargeets@utetribe.com'; minnieg@utetribe.com; Reynolds, Cynthia
Subject: Proposed Synthetic Minor NSR Permit for Fidlar Compressor Station
Attachments: Bulletin Board Notice - QPC Fidler CS SMNSR.docx; QPC Fidler CS Proposed Permit SMNSR-UO-000002-2013 001.pdf; Cover Letter with Dates and Stamp.pdf; QPC Fidler CS TSD SMNSR-UO-000002-2013 001.pdf

Mr. Bassett,

I have attached the requested proposed permit, the accompanying technical support document, and the public notice bulletin for the Fidler Compressor Station. We will also be posting the proposed permit, technical support document, public notice bulletin, application and other supporting permit information in PDF format on our website at <http://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8> by the start of the public comment period.

In accordance with the regulations at 40 CFR 49.157 and 49.158, we are providing a 30-day period from September 2, 2016 to October 2, 2016 for public comment on this proposed permit. Comments must be received by 5:00pm MT October 2, 2016, to be considered in the issuance of the final permit.

Please submit any written comments you may have concerning the terms and conditions of this permit. You can send them directly to me at schwartz.com@epa.gov, or to r8airpermitting@epa.gov. Should the EPA not accept any or all of these comments, you will be notified in writing and will be provided with the reasons for not accepting them.

Thank you,

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

Public Notice: Request For Comments

Proposed Air Quality Permit to Construct Questar Pipeline Company Fidlar Compressor Station

Notice issued: September 2, 2016

Written comments due:
5 p.m., October 2, 2016

Where is the facility located?

Fidlar Compressor Station: Uintah and Ouray Indian Reservation
Uintah County, Utah
SW/NW Sec. 16, NW/NW Sec. 32,
NE/NE Sec. 3, T9S, R22E
Latitude 40.039722 N
Longitude -109.456944W

What is being proposed?

This permit action will apply to an existing facility operating on the Uintah and Ouray Indian Reservation in Utah.

The Fidlar Compressor Station is a natural gas transmission compressor station designed to boost pipeline pressure on four transmission pipelines that flow north, east, and west from the station designed to compress and dehydrate a comingled liquid stream received from nearby field production wells.

Questar Pipeline Company (QPC) currently holds a Federal operating permit issued by the United States Environmental Protection Agency, pursuant to the Title V Operating Permit Program at 40 CFR part 71 (Part 71). The permit contains emission limits created by the EPA. The creation of the emission limits in Part 71 permits was a temporary, gap-filling measure for those sources operating in Indian country that did not have the ability to obtain these limits through pre-construction permitting programs, such as exists in state jurisdictions.

Upon promulgation of the Tribal Minor New Source Review (MNSR) Program at 40 CFR part 49, it became necessary to transfer these limits to the appropriate MNSR permit.

The facility currently operates two natural gas-fired turbines and two (2) 4-stroke

rich-burn (4SRB) reciprocating internal combustion engines to compress and boost the pressure of pipeline natural gas from the four interstate pipelines.

QPC has requested enforceable limits on nitrogen oxide (NO_x) emissions for one of the 4SRB compressor engines. QPC operates a non-selective catalytic reduction (NSCR) system and air-to-fuel ratio (AFR) controller on the engine to control emissions in compliance with control requirements originally established in a July 12, 2011 Part 71 operating permit. The permit the EPA is proposing to issue reflects the incorporation of the requested requirements, which are based on the requirements in the Part 71 permit.

What are the effects on air quality?

This action will have no adverse air quality impacts. The emissions at this existing facility will not be increasing due to this permit action. In addition, this action does not authorize the construction of any new emission sources, or emission increases from existing sources, nor does it otherwise authorize any other physical modifications to the facility or its operations.

Where can I send comments?

EPA accepts comments by mail, fax and e-mail.

US EPA Region 8 Air Program, 8P-AR
Attn: Federal Minor NSR Coordinator
1595 Wynkoop Street,
Denver, CO 80202
R8AirPermitting@epa.gov
Fax: 303-312-6064

How can I review documents?

You can review a paper or electronic copy of the proposed permits and related documents at the following locations:

Ute Indian Tribe Energy and Minerals
Department Office
988 South 7500 East, Annex Building
Fort Duchesne, Utah 84026

Contact: Minnie Grant, Air Coordinator,
at (435) 725-4900
or minnieg@utetribe.com

US EPA Region 8 Office:
1595 Wynkoop Street, Denver, CO 80202
Hours: Mon-Fri 8:00 a.m. – 5:00 p.m.
Contact: Colin Schwartz, Environmental
Scientist, at 303-312-6043
or schwartz.colin@epa.gov

US EPA Region 8 Website:
<https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8>

Permit number:
SMNSR-UO-000002-2013.001

What happens next?

The EPA will review and consider all comments received during the comment period. Following this review, the EPA may issue the permits as proposed, issue modified permits based on comments, or deny the permits.

Tribal Minor New Source Review in Indian Country



United States Environmental Protection Agency

Region 8
Air Program
1595 Wynkoop Street
Denver, CO 80202
Phone 800-227-8917

<https://www.epa.gov/caa-permitting/tribal-nsr-permits-region-8>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

Ref: 8P-AR

Scott Bassett
Senior Environmental Coordinator
Questar Pipeline Company
P.O Box 45360
Salt Lake City, Utah 84145-0360

AUG 25 2016

Re: Questar Pipeline Company Fidlar Compressor Station
Permit # SMNSR-UO-000002-2013.001
Proposed Synthetic Minor New Source Review Permit

Dear Mr. Bassett:

The U.S. Environmental Protection Agency Region 8 has completed its review of Questar Pipeline Company's application requesting a synthetic minor permit pursuant to the Tribal Minor New Source Review (MNSR) Permit Program at 40 CFR part 49 for the Fidlar Compressor Station.

Enclosed are the proposed permit and the corresponding technical support document. The regulations at 40 CFR 49.157 require that the affected community and the general public have the opportunity to submit written comments on any proposed MNSR permit. All written comments submitted within thirty (30) calendar days after the public notice is published will be considered by the EPA in making its final permit decision. Enclosed is a copy of the public notice which will be published on the EPA's website located at: <https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8>, on September 2, 2016. The public comment period will end at 5:00 p.m. on October 2, 2016.

The conditions contained in the proposed permit will become effective and enforceable by the EPA if the permit is issued final. If you are unable to accept any term or condition of the draft permit, please submit your written comments, along with the reason(s) for non-acceptance to:

Tribal NSR Permit Contact
c/o Air Program (8P-AR)
U.S. EPA, Region 8
1595 Wynkoop Street
Denver, Colorado 80202

or

R8AirPermitting@epa.gov



If you have any questions concerning the enclosed proposed permit or technical support document, please contact Colin Schwartz of my staff at (303) 312-6043.

Sincerely,



Monica Morales
Acting Director
Air Program

Enclosures

Cc:

Bruce Pargeets, Director, Energy, Minerals and Air, Ute Indian Tribe
Minnie Grant, Air Coordinator, Energy, Minerals, and Air, Ute Indian Tribe
Honorable Shaun Champoos, Chairman, Ute Indian Business Committee (w/o enclosures)
Edred Secakuku, Vice Chairman, Ute Indian Business Committee (w/o enclosures)
Reannin Tapoof, Executive Assistant, Ute Indian Business Committee (w/o enclosures)

United States Environmental Protection Agency
Region 8 Air Program
1595 Wynkoop Street
Denver, CO 80202



**Air Pollution Control
Synthetic Minor Source Permit to Construct**

40 CFR 49.151

SMNSR-UO-000002-2013.001

*Permit to Construct to establish legally and practically enforceable
limitations and requirements on sources at an existing facility*

Permittee:

Questar Pipeline Company

Permitted Facility:

Fidlar Compressor Station
Uintah and Ouray Indian Reservation
Uintah County, Utah

Summary

On November 1, 2013, the EPA received an application from Questar Pipeline Company (QPC) requesting a synthetic minor permit for the Fidlar Compressor Station in accordance with the requirements of the Tribal Minor New Source Review (MNSR) Permit Program at 40 CFR part 49.

This proposed permit action applies to an existing facility operating on the Uintah and Ouray Indian Reservation in Utah. This proposed permit would not authorize the construction of any new emission sources, or emission increases from existing units nor would it otherwise authorize any other physical modifications to the facility or its operations. This permit is only intended to incorporate required and requested enforceable emission limits and operational restrictions from a July 15, 2011 operating permit issued in accordance with the Title V Operating Permit Program at 40 CFR part 71 (Part 71). The permit established emission limits for one (1) of the four (4) compressor engines operating at the station, a 1,061 horsepower (hp) spark ignition 4-stroke rich-burn (4SRB) natural gas-fired reciprocating internal combustion engine used for natural gas compression.

The proposed MNSR permit reflects the incorporation of requirements created in the Part 71 permit issued by the EPA at the request of QPC to recognize an emission control system that was voluntarily installed and operated on the engine. The Part 71 permit contains conditions to limit nitrogen oxides (NO_x) from the 1,061 hp 4SRB compressor engine installed and operating at the facility. In addition, associated testing, monitoring, recordkeeping and reporting requirements were established in order to ensure that the limits were legally and practically enforceable.

The creation of the legally and practically enforceable limits in a Part 71 permit was a temporary, gap-filling measure for those sources operating in Indian country that did not have the ability to obtain these limits through other programs, such as exists in state jurisdictions.

Section 49.153(a)(3)(iv) of the MNSR regulation provides us with the authority to transfer such limits to a MNSR permit, effectively creating legally and practically enforceable requirements without the use of the emission limits in the Part 71 permit. The regulations at §§ 49.158(c)(2)(ii) and (iii) also provide us with the discretion to require any additional requirements necessary to protect the National Ambient Air Quality Standards (NAAQS), including monitoring and testing requirements, based on the specific circumstances of the source. The EPA is proposing some additional requirements in accordance with this provision.

Upon compliance with this permit, QPC will have legally and practically enforceable restrictions on emissions that can be used when determining the applicability of other Clean Air Act (CAA) permitting requirements, such as under the Prevention of Significant Deterioration (PSD) Permit Program at 40 CFR part 52 and the Part 71 Permit Program.

The EPA has determined that issuance of this MNSR permit will not contribute to NAAQS violations, or have potentially adverse effects on ambient air quality.

Table of Contents

I. Conditional Permit to Construct..... 4

A. General Information..... 4

B. Applicability..... 4

C. Requirements for Engines 4

D. Requirements for Records Retention 11

E. Requirements for Reporting 11

II. General Provisions..... 13

A. Conditional Approval..... 13

B. Authorization..... 15

PROPOSED

I. Conditional Permit to Construct

A. General Information

Facility: Questar Pipeline Company - Fidlar Compressor Station
Permit number: SMNSR-UO-000002-2013.001
SIC Code and SIC Description: 4922 – Natural Gas Transmission

Site Location:
Fidlar Compressor Station
SW ¼, NW ¼ Sec 16 T9S R22E
Uintah and Ouray Indian Reservation
Uintah County, Utah
Latitude 40.039722, Longitude -109.456944

Corporate Office Location
Questar Pipeline Company
DNR 206, P.O. Box 45360
Salt Lake City, Utah 84145

The equipment listed in this permit shall be operated by Questar Pipeline Company at the location described above.

B. Applicability

1. This permit to construct is being issued under authority of the MNSR Permit Program.
2. The requirements in this permit have been created, at the Permittee's request, to establish legally and practically enforceable restrictions for limiting NO_x engine emissions.
3. Any conditions established for this facility or any specific units at this facility pursuant to any permit issued under the authority of the PSD Permit Program or the MNSR Permit Program shall continue to apply.
4. By issuing this permit, EPA does not assume any risk of loss which may occur as a result of the operation of the permitted facility by the Permittee, Owner and/or Operator, if the conditions of this permit are not met by the Permittee, Owner and/or Operator.

C. Requirements for Engines

1. Construction and Operational Limits
 - (a) The Permittee shall install, operate and maintain emission controls as specified in this permit on one (1) reciprocating internal combustion engine used for compression, meeting the following specifications:
 - (i) Operated as a 4-stroke rich-burn (4SRB) engine;
 - (ii) Fired with natural gas; and
 - (iii) Limited to a maximum site rating of 1,061 site rated (hp).
 - (b) Only the engine that is operated and controlled as specified in this permit is approved for installation under this permit.

2. Emission Limits

- (a) NO_x emissions from the 1,061 hp 4SRB engine shall not exceed:
 - (i) 4.68 pounds per hour (lb/hr); and
 - (ii) 2.0 grams per horsepower-hour (g/hp-hr).
- (b) Emission limits specified in this permit shall apply at all times unless otherwise specified in this permit.

3. Control and Operational Requirements

- (a) The Permittee shall ensure that the 1,061 hp 4SRB engine is equipped with an air-to-fuel ratio (AFR) control system and a non-selective catalytic reduction (NSCR) system capable of reducing uncontrolled NO_x emissions to meet the emission limits specified in this permit.
- (b) The Permittee shall replace the oxygen (O₂) sensor on the AFR controller on the 1,061 hp 4SRB engine within every 2,190 hours of engine run time.
- (d) The Permittee shall install, operate and maintain a temperature-sensing device (i.e., thermocouple or resistance temperature detectors) before the NSCR control system to continuously monitor the exhaust temperature at the inlet of the NSCR control system. The temperature-sensing device shall be calibrated and operated by the Permittee according to manufacturer specifications or equivalent specifications developed by the Permittee or vendor. The temperature-sensing device shall be accurate to within 0.75% of span.
- (e) Except during startups, which shall not exceed 30 minutes, the engine exhaust temperature at the inlet to the NSCR control system shall be maintained and at all times the engine operates in accordance with the NSCR manufacturer's specifications for optimum performance.
- (f) During operation, the pressure drop across the NSCR control system on the engine shall be maintained to within ± 2 inches of water from the baseline pressure drop measured during the most recent performance test. The baseline pressure drop across the NSCR control system shall be determined at 100% \pm 10% of the engine load measured during the most recent performance test.
- (g) The Permittee shall only fire the engine with natural gas. The natural gas shall be pipeline quality in all respects except that the carbon dioxide (CO₂) concentration in the gas is not required to be within pipeline quality.
- (h) The Permittee shall follow, for the engine and respective NSCR control system, the manufacturer recommended maintenance schedule and procedures, or equivalent maintenance schedule and procedures developed by the Permittee or vendor, to ensure optimum performance of the engine and its respective catalytic control system.

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

4. Performance Testing Requirements

- (a) Performance tests shall be conducted on the 1,061 hp 4SRB engine for measuring NO_x emissions to demonstrate compliance with each emission limitation in this permit. The performance tests shall be conducted in accordance with appropriate reference methods specified in 40 CFR part 60, Appendix A and 40 CFR part 63, Appendix A or an EPA approved American Society for Testing and Materials (ASTM) method. The Permittee may submit to the EPA a written request for approval of an alternate test method, but shall only use that alternate test method after obtaining approval from the EPA.
 - (i) An initial performance test shall be conducted within 45 calendar days of the effective date of this permit.
 - (ii) Subsequent performance tests shall be conducted within 12 consecutive months after the most recent performance test.
 - (iii) Performance tests shall be conducted within 45 calendar days of startup of the engine after cleaning or replacement of the NSCR control system catalyst.
 - (iv) Performance tests shall be conducted within 45 calendar days of startup of each rebuilt or replaced engine.
- (b) The Permittee shall not perform engine tuning or make any adjustments to engine settings, NSCR control system settings, processes or operational parameters the day of or during the engine testing. Any such tuning or adjustments may result in a determination by the EPA that the test is invalid. Artificially increasing an engine load to meet test requirements is not considered engine tuning or adjustments.
- (c) The Permittee shall not abort any engine tests that demonstrate non-compliance with any NO_x emission limits in this permit.
- (d) Performance tests conducted on the 1,061 hp 4SRB engine for measuring NO_x emissions shall meet the following requirements:
 - (i) The pressure drop across the NSCR control system and the inlet temperature to the NSCR control system shall be measured and recorded at least once per test during all performance tests.
 - (ii) The Permittee shall measure CO emissions from the 1,061 hp 4SRB engine simultaneously with all performance tests for NO_x emissions. CO emissions shall be measured using a portable analyzer and protocol approved in writing by the EPA. *[Note to Permittee: Although the permit does not contain CO emission limits for this engine, NO_x measurement requirements have been included as an*

indicator to ensure compliance with Condition C.4(b) above.]

- (iii) All performance tests shall be conducted at maximum operating rate (90% to 110% of the maximum achievable load available at the time of the test). The Permittee may submit to the EPA a written request for approval of an alternate load level for testing, but shall only test at that alternate load level after obtaining written approval from the EPA.
- (iv) During each test run, data shall be collected on all parameters necessary to document how emissions were measured and calculated (such as test run length, minimum sample volume, volumetric flow rate, moisture and oxygen corrections, etc.).
- (v) Each test shall consist of at least three 1 hour or longer valid test runs. Emission results shall be reported as the arithmetic average of all valid test runs and shall be in terms of the emission limits in this permit.
- (vi) A performance test plan shall be submitted to the EPA for approval within 30 calendar days of the effective date of this permit.
- (vii) Performance test plans that have already been approved by the EPA for the emission unit approved in this permit may be used in lieu of new test plans unless the EPA requires the submittal and approval of new test plans. The Permittee may submit new plans for EPA approval at any time.
- (viii) The test plans shall include and address the following elements:
 - (A) Purpose of the test;
 - (B) Engine and NSCR control system to be tested;
 - (C) Expected engine operating rate during the test;
 - (D) Sampling and analysis procedures (sampling locations, test methods, laboratory identification);
 - (E) Quality assurance plan (calibration procedures and frequency, sample recovery and field documentation, chain of custody procedures); and
 - (F) Data processing and reporting (description of data handling and quality control procedures, report content).
- (e) The Permittee shall notify the EPA at least 30 calendar days prior to scheduled performance testing. The Permittee shall notify the EPA at least 1 week prior to scheduled performance testing if the testing cannot be performed.
- (f) If the results of a complete and valid performance test of the emissions from the permitted engine demonstrate noncompliance with the emission limits in this permit, the engine shall be shut down as soon as safely possible and appropriate corrective action shall be taken (e.g., repairs, catalyst cleaning, catalyst replacement). The Permittee shall notify the EPA in writing within 24 hours of each such shut down. The engine must be retested within 7 days of being restarted and the emissions must meet the applicable limits in this permit. If the retest shows that the emissions continue to exceed the limits in this permit, the engine shall again be shut down as soon as safely possible, and the engine

may not operate, except for purposes of startup and testing, until the Permittee demonstrates through testing that the emissions do not exceed the emission limits in this permit.

- (g) If a permitted engine is not operating, the Permittee does not need to start up the engine solely to conduct a performance test. The Permittee may conduct the performance test when the engine is started up again.

5. Monitoring Requirements

- (a) The Permittee shall continuously measure the engine exhaust temperature at the inlet to the NSCR control system at all times the engine operates.
- (b) Except during startups, which shall not exceed 30 minutes, if the engine's exhaust temperature at the inlet to the NSCR control system deviates from the acceptable range specified by the manufacturer then the following actions shall be taken. The Permittee's completion of any or all of these actions shall not constitute, nor qualify as, an exemption from the NO_x emission limits in this permit.
 - (i) Within 24 hours of determining a deviation of the engine exhaust temperature at the inlet to the NSCR control system, the Permittee shall investigate. The investigation shall include testing the temperature sensing device, inspecting the engine for performance problems and assessing the NSCR control system for possible damage that could affect NSCR control system effectiveness (including, but not limited to, catalyst housing damage and fouled, destroyed or poisoned catalyst).
 - (ii) If the engine exhaust temperature at the inlet to the NSCR control system can be corrected by following the engine manufacturer recommended procedures or equivalent procedures developed by the Permittee or vendor and the NSCR control system has not been damaged, then the Permittee shall correct the engine exhaust temperature at the inlet to the NSCR control system within 24 hours of inspecting the engine and NSCR control system.
 - (iii) If the engine exhaust temperature at the inlet to the NSCR control system cannot be corrected using the engine manufacturer recommended procedures or equivalent procedures developed by the Permittee or vendor, or the NSCR control system has been damaged, then the affected engine shall cease operating immediately and shall not be returned to routine service until the following has been met:
 - (A) The engine exhaust temperature at the inlet to the NSCR control system is measured and found to be within the acceptable temperature range for that engine; and
 - (B) The NSCR control system has been repaired or replaced, if necessary.
- (c) The Permittee shall monitor the pressure drop across the NSCR control system on the engine at least once every hour that the engine operates, beginning with the effective day of this permit, using pressure sensing devices before and after the NSCR control system to obtain a direct reading of the pressure drop (also referred to as the differential pressure). *[Note to Permittee: Differential pressure measurements, in general, are used*

to show the pressure across the filter elements. This information will determine when the elements in the NSCR control system are fouling, blocked or blown out and thus require cleaning or replacement.]

- (d) If the pressure drop reading exceeds ± 2 inches of water from the baseline pressure drop reading taken during the most recent performance test, then the following actions shall be taken. The Permittee's completion of any or all of these actions shall not constitute, nor qualify as, an exemption from any other emission limits in this permit:
 - (i) Within 24 hours of determining a deviation of the pressure drop across the NSCR control system, the Permittee shall investigate. The investigation shall include testing the pressure transducers and assessing the NSCR control system for possible damage that could affect catalytic system effectiveness (including, but not limited to, catalyst housing damage and plugged, fouled, destroyed or poisoned catalyst).
 - (ii) If the pressure drop across the NSCR control system can be corrected by following the NSCR control system manufacturer recommended procedures or equivalent procedures developed by the Permittee or vendor, and the NSCR control system has not been damaged, then the Permittee shall correct the problem within 24 hours of inspecting the NSCR control system.
 - (iii) If the pressure drop across the NSCR control system cannot be corrected using the NSCR control system manufacturer recommended procedures or equivalent procedures developed by the Permittee or vendor, or the NSCR control system is damaged, then the Permittee shall do one of the following:
 - (A) Conduct a performance test within 45 calendar days, as specified in this permit, to ensure that the emission limits are being met and to re-establish the pressure drop across the NSCR control system. The Permittee shall perform a portable analyzer test for CO and NO_x to establish a new temporary pressure drop baseline until a performance test can be scheduled and completed; or
 - (B) Cease operating the affected engine immediately. The engine shall not be returned to routine service until the pressure drop is measured and found to be within the acceptable pressure range for that engine as determined from the most recent performance test. Corrective action may include removal and cleaning of the catalyst or replacement of the catalyst.
- (e) The Permittee shall monitor NO_x and CO emissions from the exhaust of the NSCR control system on the engine at least quarterly to demonstrate compliance with the engines NO_x emission limits in this permit. To meet this requirement, the Permittee shall:
 - (i) Measure NO_x and CO emissions at the normal operating load using a portable analyzer and a monitoring protocol approved by the EPA or conduct a performance test as specified in this permit;
 - (ii) Measure the NO_x and CO emissions simultaneously; and
 - (iii) Commence monitoring for NO_x and CO emissions within 45 calendar days of the Permittee's submittal of the initial performance test results for NO_x emissions, as appropriate, to the EPA.

- (f) The Permittee shall not perform engine tuning or make any adjustments to engine settings, NSCR control system settings, processes or operational parameters the day of or during measurements. Any such tuning or adjustments may result in a determination by the EPA that the result is invalid. Artificially increasing an engine load to meet monitoring requirements is not considered engine tuning or adjustments.
- (g) If the results of 2 consecutive quarterly portable analyzer measurements demonstrate compliance with NO_x emission limits, the required monitoring frequency may change from quarterly to semi-annually.
- (h) If the results of any semi-annual portable analyzer measurement demonstrates non-compliance with the NO_x emission limits, the required test frequency shall revert back to quarterly.
- (i) The Permittee shall submit portable analyzer specifications and NO_x and CO monitoring protocols to the EPA at the following address for approval at least 45 calendar days prior to the date of initial portable analyzer monitoring:

U.S. Environmental Protection Agency, Region 8
Office of Enforcement, Compliance & Environmental Justice
Air Toxics and Technical Enforcement Program, 8ENF-AT
1595 Wynkoop Street
Denver, Colorado 80202
- (j) Portable analyzer specifications and monitoring protocols that have already been approved by the EPA for the emission units approved in this permit may be used in lieu of new protocols unless the EPA determines it is necessary to require the submittal and approval of a new protocol. The Permittee may submit a new protocol for EPA approval at any time.
- (k) The Permittee is not required to conduct emissions monitoring and parametric monitoring of exhaust temperature and NSCR control system differential pressure on the engine if it has not operated during the monitoring period. The Permittee shall certify that the engine did not operate during the monitoring period in the annual report specified in Condition I.E.1.

6. Recordkeeping Requirements

- (a) Records shall be kept of manufacturer and/or vendor specifications and maintenance requirements developed by the manufacturer, vendor or Permittee for the engine, AFR control system, NSCR control system, temperature-sensing device and pressure-measuring devices.
- (b) Records shall be kept of all calibration and maintenance conducted for the engine, catalytic control system, temperature-sensing device and pressure-measuring device.
- (c) Records shall be kept that are sufficient to demonstrate that the fuel for the engine is pipeline quality natural gas in all respects, with the exception of CO₂ concentrations.

- (d) Records shall be kept of all temperature measurements required in this permit, as well as a description of any corrective actions taken pursuant to this permit.
- (e) Records shall be kept of all pressure drop measurements required in this permit, as well as a description of any corrective actions taken pursuant to this permit.
- (f) Records shall be kept of all required testing and monitoring in this permit. The records shall include the following:
 - (i) The date, place, and time of sampling or measurements;
 - (ii) The dates analyses were performed;
 - (iii) The company or entity that performed the analyses;
 - (iv) The analytical techniques or methods used;
 - (v) The results of such analyses or measurements; and
 - (vi) The operating conditions as existing at the time of sampling or measurement.
- (g) Records shall be kept of all NSCR control system catalyst replacements or repairs, AFR control system replacements, engine rebuilds and replacements.
- (h) Records shall be kept of each rebuilt or replacement engine break-in period, pursuant to the requirements of this permit, where an existing engine that has been rebuilt or replaced resumes operation without the NSCR control system, for a period not to exceed 200 hours.
- (i) Records shall be kept of each time the engine is shut down due to a deviation in the inlet temperature to the NSCR control system or pressure drop across a NSCR control system. The Permittee shall include in the record the cause of the problem, the corrective action taken and the timeframe for bringing the pressure drop and inlet temperature range into compliance.

D. Requirements for Records Retention

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

E. Requirements for Reporting

1. Annual Emission Reports

- (a) The Permittee shall submit a written annual report of the actual annual emissions from the 1,061 hp 4SRB engine each year no later than April 1st. The annual report shall cover the period for the previous calendar year. All reports shall be certified to truth and accuracy by the responsible official.

(b) The report shall include NO_x emissions.

(c) The report shall be submitted to:

U.S. Environmental Protection Agency, Region 8
Office of Partnerships and Regulatory Assistance
Tribal Air Permitting Program, 8P-AR
1595 Wynkoop Street
Denver, Colorado 80202

The report may be submitted via electronic mail to R8AirPermitting@epa.gov.

2. All other documents required to be submitted under this permit, with the exception of the Annual Emission Reports, shall be submitted to:

U.S. Environmental Protection Agency, Region 8
Office of Enforcement, Compliance & Environmental Justice
Air Toxics and Technical Enforcement Program, 8ENF-AT
1595 Wynkoop Street
Denver, Colorado 80202

Documents may be submitted via electronic mail to R8AirReportEnforcement@epa.gov.

3. The Permittee shall promptly submit to the EPA a written report of any deviations of emission or operational limits specified in this permit and a description of any corrective actions or preventative measures taken. A “prompt” deviation report is one that is post marked or submitted via electronic mail to r8airreportenforcement@epa.gov as follows:

- (a) Within 30 days from the discovery of a deviation that would cause the Permittee to exceed the emission limits or operational limits if left un-corrected for more than 5 days after discovering the deviation; and
- (b) By April 1st for the discovery of a deviation of recordkeeping or other permit conditions during the preceding calendar year that do not affect the Permittee’s ability to meet the emission limits.

4. The Permittee shall submit a written report for any required performance tests to the EPA Regional Office within 60 days after completing the tests.

5. The Permittee shall submit any record or report required by this permit upon EPA request.

II. General Provisions

A. Conditional Approval

Pursuant to the authority of 40 CFR 49.151, the EPA hereby conditionally grants this permit to construct. This authorization is expressly conditioned as follows:

1. *Document Retention and Availability:* This permit and any required attachments shall be retained and made available for inspection upon request at the location set forth herein.
2. *Permit Application:* The Permittee shall abide by all representations, statements of intent and agreements contained in the application submitted by the Permittee. The EPA shall be notified 10 days in advance of any significant deviation from this permit application as well as any plans, specifications or supporting data furnished.
3. *Permit Deviations:* The issuance of this permit may be suspended or revoked if the EPA determines that a significant deviation from the permit application, specifications and supporting data furnished has been or is to be made. If the proposed source is constructed, operated or modified not in accordance with the terms of this permit, the Permittee will be subject to appropriate enforcement action.
4. *Compliance with Permit:* The Permittee shall comply with all conditions of this permit, including emission limitations that apply to the affected emissions units at the permitted facility/source. Noncompliance with any permit term or condition is a violation of this permit and may constitute a violation of the CAA and is grounds for enforcement action and for a permit termination or revocation.
5. *Fugitive Emissions:* The Permittee shall take all reasonable precautions to prevent and/or minimize fugitive emissions during the construction period.
6. *NAAQS and PSD Increments:* The permitted source shall not cause or contribute to a NAAQS violation or a PSD increment violation.
7. *Compliance with Federal and Tribal Rules, Regulations, and Orders:* Issuance of this permit does not relieve the Permittee of the responsibility to comply fully with all other applicable federal and tribal rules, regulations and orders now or hereafter in effect.
8. *Enforcement:* It is not a defense, for the Permittee, in an enforcement action, to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
9. *Modifications of Existing Emissions Units/Limits:* For proposed modifications, as defined at 40 CFR 49.152(d), that would increase an emissions unit allowable emissions of pollutants above its existing permitted annual allowable emissions limit, the Permittee shall first obtain a permit modification pursuant to the MNSR regulations approving the increase. For a proposed modification that is not otherwise subject to review under the PSD or MNSR regulations, such proposed increase in the annual allowable emissions limit shall be approved through an administrative permit revision as provided at 40 CFR 49.159(f).

10. *Relaxation of Legally and Practically Enforceable Limits:* At such time that a new or modified source within this permitted facility/source or modification of this permitted facility/source becomes a major stationary source or major modification solely by virtue of a relaxation in any legally and practically enforceable limitation which was established after August 7, 1980, on the capacity of the permitted facility/source to otherwise emit a pollutant, such as a restriction on hours of operation, then the requirements of the PSD regulations shall apply to the source or modification as though construction had not yet commenced on the source or modification.
11. *Revise, Reopen, Revoke and Reissue, or Terminate for Cause:* This permit may be revised, reopened, revoked and reissued or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, termination or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. The EPA may reopen this permit for a cause on its own initiative, e.g., if this permit contains a material mistake or the Permittee fails to assure compliance with the applicable requirements.
12. *Severability Clause:* The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.
13. *Property Rights:* This permit does not convey any property rights of any sort or any exclusive privilege.
14. *Information Requests:* The Permittee shall furnish to the EPA, within a reasonable time, any information that the EPA may request in writing to determine whether cause exists for revising, revoking and reissuing, terminating or determining compliance with this permit. For any such information claimed to be confidential, the Permittee shall also submit a claim of confidentiality in accordance with 40 CFR part 2, subpart B.
15. *Inspection and Entry:* The EPA or its authorized representatives may inspect this permitted facility/source during normal business hours for the purpose of ascertaining compliance with all conditions of this permit. Upon presentation of proper credentials, the Permittee shall allow the EPA or its authorized representative to:
 - (a) Enter upon the premises where this permitted facility/source is located or emissions-related activity is conducted or where records are required to be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of this permit;
 - (c) Inspect, during normal business hours or while this permitted facility/source is in operation, any facilities, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements; and
 - (e) Record any inspection by use of written, electronic, magnetic and photographic media.

16. *Permit Effective Date:* This permit is effective immediately upon issuance unless comments resulted in a change in the proposed permit, in which case the permit is effective 30 days after issuance. The Permittee may notify the EPA, in writing, that this permit or a term or condition of it is rejected. Such notice should be made within 30 days of receipt of this permit and should include the reason or reasons for rejection.
17. *Permit Transfers:* Permit transfers shall be made in accordance with 40 CFR 49.159(f). The Air Program Director shall be notified in writing at the following address if the company is sold or changes its name:
- U.S. Environmental Protection Agency, Region 8
Office of Partnerships and Regulatory Assistance
Tribal Air Permitting Program, 8P-AR
1595 Wynkoop Street
Denver, Colorado 80202
18. *Invalidation of Permit:* Unless this permitted source of emissions is an existing source, this permit becomes invalid if construction is not commenced within 18 months after the effective date of this permit, construction is discontinued for 18 months or more or construction is not completed within a reasonable time. The EPA may extend the 18 month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between the constructions of the approved phases of a phased construction project. The Permittee shall commence construction of each such phase within 18 months of the projected and approved commencement date.
19. *Notification of Start-Up:* The Permittee shall submit a notification of the anticipated date of initial start-up of this permitted source to the EPA within 60 days of such date, unless this permitted source of emissions is an existing source.

B. Authorization

Authorized by the United States Environmental Protection Agency, Region 8

Monica Morales
Acting Director
Air Program

Date

**United States Environmental Protection Agency
Region 8 Air Program
Air Pollution Control Synthetic Minor Source Permit to Construct
Technical Support Document for
Proposed Permit #SMNSR-UO-000002-2013.001**



Questar Pipeline Company
Fidlar Compressor Station
Uintah and Ouray Indian Reservation
Uintah County, Utah

In accordance with the requirements of the Tribal Minor New Source Review (MNSR) Permit Program at 40 CFR part 49, this federal permit to construct is being issued under authority of the Clean Air Act (CAA). The EPA has prepared this technical support document describing the conditions of this permit and presents information that is germane to this permit action.

Table of Contents

| | | |
|-------|--|----|
| I. | Introduction..... | 3 |
| II. | Facility Description..... | 4 |
| III. | Proposed Synthetic Minor Permit Action..... | 7 |
| IV. | Air Quality Review..... | 9 |
| V. | Tribal Consultations and Communications..... | 9 |
| VI. | Environmental Justice..... | 10 |
| VII. | Authority..... | 11 |
| VIII. | Public Notice..... | 12 |

I. Introduction

On November 1, 2013, we received an application from Questar Pipeline Company (QPC), requesting a synthetic minor permit for the Fidler Compressor Station in accordance with the requirements of the MNSR Permit Program.

This proposed permit action applies to an existing facility operating on the Uintah and Ouray Indian Reservation in Utah.

This proposed permit would not authorize the construction of any new emission sources, or emission increases from existing units, nor would it otherwise authorize any other physical modifications to the facility or its operations. This permit is only intended to incorporate required and requested emission limits and provisions from the following documents:

- A. On July 15, 2011, we issued an operating permit to QPC for the Fidler Compressor Station in accordance with the Title V Operating Permit Program at 40 CFR part 71 (Part 71). The permit established emission limits for one (1) of the four (4) compressor engines operating at the station, a 1,061 horsepower (hp) spark ignition 4-stroke rich-burn (4SRB) natural gas-fired reciprocating internal combustion engine used for natural gas compression.

The proposed MNSR permit reflects the incorporation of requirements created in the Part 71 permit issued by the EPA at the request of QPC. QPC requested these requirements to recognize an emission control system that was voluntarily installed and operated on the engine. The Part 71 permit contains conditions to limit nitrogen oxides (NO_x) from the 1,061 hp 4SRB compressor engine installed and operating at the facility. In addition, associated testing, monitoring, recordkeeping, and reporting requirements were established in order to ensure that the limits were legally and practically enforceable.

The creation of the legally and practically enforceable limits in a Part 71 permit was a temporary, gap-filling measure for those sources operating in Indian country that did not have the ability to obtain these limits through other programs, such as exists in state jurisdictions.

Section 49.153(a)(3)(iv) of the MNSR regulation provides us with the authority to transfer such limits to a MNSR permit, effectively creating legally and practically enforceable requirements without the use of the emission limits in the Part 71 permit. The regulations at §§49.158(c)(2)(ii) and (iii) also provide us with the discretion to require any additional requirements necessary to protect the National Ambient Air Quality Standards, including monitoring and testing requirements, based on the specific circumstances of the source.

- B. We received an application from QPC requesting a synthetic minor MNSR permit for the Fidler Compressor Station on November 1, 2013.

The application contained a request to transfer the limits on the 1,061 hp 4SRB compressor engine that were established in the Part 71 permit issued on July 15, 2011. This proposed permit reflects the incorporation of NO_x emission limits on the engine. These proposed limits, if made legally and practically enforceable, would allow QPC to use the controlled NO_x emission rates in determining potential to emit and applicability of other CAA requirements, such as the Prevention of Significant Deterioration (PSD), MNSR and Part 71 Permit Programs.

Upon compliance with this permit, QPC will have maintained legally and practically enforceable requirements to reduce emissions that can be accounted for when determining the applicability of other CAA requirements, such as permitting requirements under the PSD Permit Program and the Part 71 Permit Program.

II. Facility Description

Process Description

The Fidler Compressor Station is a natural gas transmission compressor station capable of boosting pipeline pressure on four transmission pipelines owned and operated by QPC that flow north, east, and west from the station. The 4SRB compressor engine for which QPC is requesting enforceable emissions limitations under the MNSR Permit Program is one of four (4) compressor engines operating at the station. The 4SRB compressor engine proposed to be permitted is capable of compressing natural gas by drawing gas from the Fidler Compressor Station suction piping header, mechanically compressing the gas in a piston, and discharging the gas to the discharge piping header. Since the gas heats up during compression, the gas may flow through a discharge gas cooler before flowing back into a transmission pipeline. The discharge gas cooler is a simple process whereby fans circulate ambient air across fins containing the pressurized gas. Heat from the process is radiated to atmosphere. There is no contact between the gas and the air; the pressurized gas simply flows through the cooler before being discharged to the transmission pipeline. A fuel gas system routes gas from the natural gas pipeline to the engine for combustion. Mechanical work created in the engine drives the compressor pistons.

Source Description

The MNSR Permit Program at Section 49.152(d) defines synthetic minor source as a source that otherwise has the potential to emit regulated NSR pollutants in amounts that are at or above those for major sources in §49.167, §52.21 or §71.2 of that chapter, as applicable, but that has taken a restriction so that its potential to emit is less than such amounts for major sources. The Fidler Compressor Station took such restrictions as originally established in the Part 71 permit issued prior to promulgation of the MNSR Permit Program. The PSD Permit Program and the Part 71 permit program identify regulatory criteria for identifying emissions activities that belong to the same "building," "structure," "facility," or "installation" (the source) to determine applicability to CAA stationary source permitting requirements. These criteria are: (1) whether the activities are under the control of the same person (or person under common control); (2) whether the activities are located on one or more contiguous or adjacent properties; and (3) whether the activities belong to the same industrial grouping. [See 40 CFR 71.2, and 40 CFR 52.21 (b)(6).]

On June 3, 2016, the EPA published a final rule clarifying when oil and natural gas sector equipment and activities must be deemed a single source when determining whether major source permitting programs (PSD and New Source Review preconstruction Permit Programs, and the Part 71 Permit Program) apply (81 FR 35622). By defining the term "adjacent," the rule specifies that equipment and activities in the oil and natural gas sector that are under common control will be considered part of the same source if they are located on the same surface site or on individual surface sites that share equipment and are within ¼ mile of each other. The EPA had previously defined adjacent through policy interpretation and guidance.

Information used to determine the source for the Fidler Compressor Station came from QPC's MNSR permit application dated November 1, 2013, and QPC's November 1, 2013 response¹ to an additional

information request from the EPA for the Part 71 Renewal application on July 11, 2013. The emission units and activities listed on Table 1 in this Technical Support Document are all part of the stationary source addressed by this permit action, as they meet all of the three criteria in the PSD and Part 71 regulations. All of the emission units and activities at the facility are under the common control of QPC, provide natural gas compression and pipeline transmission under the same industrial grouping, Standard Industrial Classification code 4922, and are located on one contiguous and adjacent property. There are no air emission points owned and operated by QPC in the natural gas transmission industrial grouping (SIC code 4922) within ¼ mile of the Fidlar Compressor Station that share equipment located at the Fidlar Compressor Station (or vice versa). The nearest natural gas transmission facility owned and operated by QPC is the Blind Canyon Compressor Station, located approximately 40 miles west of the Fidlar Compressor Station in Utah. Additionally, all natural gas transmission pipelines and stations owned and operated by QPC are capable of operating independently. Further, QPC does not own or operate any natural gas production air emission components in the production industrial grouping (SIC code 1311). The Fidlar Compressor Station can deliver/receive natural gas to/from two (2) third party gas processing plants: the Chipeta Processing, LLC Chipeta Gas Plant, located approximately 2 miles away; and the QEP Resources Stagecoach/Ironhorse Gas Processing Complex located approximately ¼ mile away. QPC can receive gas for transportation from both processing plants either through the Fidlar Compressor Station or directly into the main transportation pipelines without passing through the station. The preamble to the August 7, 1980 promulgation of the PSD regulations (45 FR 52676, pages 52694-95) discusses that the EPA does not intend a source to encompass activities that would be many miles apart along a long-line operation. Consistent with this stated intent, the EPA determined that an emission source 40 miles from the Fidlar Compressor Station with no intermediary emission points is not contiguous or adjacent to the Fidlar Compressor Station. As there are no other emission points in the same industrial grouping that are under the common control of QPC and located within ¼ mile of the Fidlar Compressor Station, the EPA has determined that the Fidlar Compressor Station is not contiguous or adjacent any other QPC owned and operated transmission compressor stations.

The emission units identified in Table 1 are currently installed and operating at the facility. The information provided in this table is for informational purposes only and is not intended to be viewed as enforceable restrictions or open for public comment. The units and control requirements identified here either existed prior to any pre-construction permitting requirements or were approved/required through the mechanism identified. Table 2, Facility-wide Emissions, provides an accounting of uncontrolled emissions and controlled allowable emissions in tons per year (tpy).

Table 1. Existing Emission Units

| Unit Description | Controls | Original Preconstruction &/or Required Emissions Control Details |
|---|------------|--|
| Two (2) 11.6 MMBtu/hr each, 1,019 hp each, natural gas fired turbines for natural gas compression. | None | No pre-construction approval required for the installation of the turbines. Installed prior to the promulgation of the MNSR Permit Program. Subject to the New Source Performance Standards (NSPS) for Stationary Gas Turbines at 40 CFR, part 60, subpart GG. |
| One (1) 37.05 MMBtu/hr, 4,028 hp, natural gas fired turbine for natural gas compression. | None | No pre-construction approval required for the installation of the engine. Installed prior to the promulgation of the MNSR Permit Program. Subject to the New Source Performance Standards (NSPS) for Stationary Gas Turbines at 40 CFR, part 60, subpart GG. |
| One (1) 10.79 MMBtu/hr, 1,061 hp, natural gas fired, 4SRB engine for natural gas compression | AFR & NSCR | No pre-construction approval required for the installation of the storage tanks. Installed prior to the promulgation of the MNSR Permit Program. Control requirements established in the July 15, 2011 Part 71 Significant Permit Modification, Permit # V-UO-00002-05.01. Control requirements requested and proposed to be established through this MNSR permit action. |
| One (1) 6.54 MMBtu/hr, 643 hp, natural gas fired stand by 4SRB engine for emergency power generation | AFR & NSCR | No pre-construction approval required for the installation of the engine. Installed prior to the promulgation of the MNSR Permit Program. Subject to the New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines at 40 CFR part 60, subpart JJJJ. |
| One (1) 400 barrel condensate sludge storage tank, 42,000 gallons/year (gal/yr) throughput | None | No pre-construction approval required for the installation of the tank. Installed prior to the promulgation of the MNSR Permit Program. |
| 42,000 gal/yr condensate sludge tank truck loading rack | None | No pre-construction approval required for the tank truck loading rack. Installed prior to the promulgation of the MNSR Permit Program. |
| Fugitive Emissions from valves, seals, pumps, etc. | None | No pre-construction approval required for the fugitive emissions. Valves, seals, pumps, etc., installed prior to the promulgation of the MNSR Permit Program. |
| Insignificant Emission Units:** Maintenance cabinet, battery banks (2), natural gas fuel line heater (0.75 MMBtu/hr), electric air compressor, two (2) space heaters, two (2) diesel storage tanks (500 gal each), natural gas building heat boiler (1.7 MMBtu/hr), bench grinder, two (2) lubrication oil tanks (500 gal each), ambitol storage tank (678 gal), two (2) glycol storage tanks (6,300 gal and 3,755 gal), compressor blowdown. | None | No pre-construction approval required for the insignificant emission units. Installed prior to the promulgation of the MNSR Permit Program. |

* bbl = barrel; MMBtu/hr = million British thermal units per hour; MMscfd = million standard cubic feet per day.

** As defined in 40 CFR 71.5(c)(11).

Table 2. Facility-wide Emissions

| Pollutant | Uncontrolled Emissions (tpy) | Controlled Allowable Emissions (tpy) | |
|---------------------------------------|------------------------------|--------------------------------------|--|
| PM | 2.90 | 2.90 | PM – Particulate Matter |
| PM₁₀ | 2.90 | 2.90 | PM ₁₀ – Particulate Matter less than 10 microns in size |
| PM_{2.5} | 2.90 | 2.90 | PM _{2.5} – Particulate Matter less than 2.5 microns in size |
| SO₂ | 0.45 | 0.45 | SO ₂ – Sulfur Dioxide |
| NO_x | 238.58* | 105.38 | NO _x – Nitrogen Oxides |
| CO | 137.46 | 137.46 | CO – Carbon Monoxide |
| VOC | 19.02 | 19.02 | VOC – Volatile Organic Compounds |
| Greenhouse Gases | | | CO ₂ – Carbon dioxide |
| CO ₂ (mass basis) | 22,564.77 | 22,564.77 | CH ₄ – Methane |
| CH ₄ (mass basis) | 0.64 | 0.64 | N ₂ O – Nitrous oxide |
| N ₂ O (mass basis) | 0.06 | 0.06 | HFCs – Hydrofluorocarbons |
| HFCs (mass basis) | - | - | PFCs – Perfluorocarbons |
| PFCs (mass basis) | - | - | SF ₆ – Sulfur hexafluoride |
| SF ₆ (mass basis) | - | - | CO _{2e} – Equivalent CO ₂ . A measure used to compare the emissions from various greenhouse gases based upon their global warming potential (GWP) |
| GHG _{total} (mass basis) | 22,565.47 | 22,565.47 | |
| CO_{2e} (Total) | 32,792.00 | 32,792.00 | <i>HFCs, PFCs, and SF₆ emissions are not created during oil and natural gas production operations.</i> |
| Hazardous Air Pollutants (HAP) | | | NA – Not Available |
| Acetaldehyde | 0.15 | 0.15 | |
| Acrolein | 0.14 | 0.14 | |
| Benzene | 0.10 | 0.10 | |
| Ethylbenzene | 0.00 | 0.00 | |
| Toluene | 0.04 | 0.04 | |
| n-Hexane | 0.11 | 0.11 | |
| Xylene | 0.01 | 0.01 | |
| Formaldehyde | 1.26 | 1.26 | |
| 2,2,4-Trimethylpentane | 0.01 | 0.01 | |
| Cyclohexane | - | - | |
| Total HAP** | 1.82 | 1.82 | *For the purposes of this illustration, does not account for the federally enforceable control requirements established in the current effective Part 71 permit and requested in this proposed permit for the 1,061 hp 4SRB compressor engine, but does account for federally enforceable emissions control standards that apply to other units at the facility. **Total HAPs is inclusive of, but not limited to the individual HAPs listed above. |

III. Proposed Synthetic Minor Permit Action

A. 1,061 hp 4SRB Natural Gas-Fired Compressor Engine and Controls

The natural gas industry uses engines to compress natural gas as it is transported via pipelines. QPC uses a combination of three (3) natural gas-fired, 4SLB compressor engines and one (1) natural gas-fired, 1,061 hp 4SRB compressor engine. The engine proposed to be permitted under this permit action is the 1,061 hp 4SRB compressor engine.

Rich-burn engines produce NO_x, CO, small amounts of VOC, and very small amounts of formaldehyde emissions (formaldehyde is the primary hazardous air pollutant (HAP)). The primary form of emission control for rich-burn engines is non-selective catalytic reduction (NSCR). NSCR is most effective for reducing NO_x and CO emissions. With respect to NO_x and CO, the NSCR enhances the rate of the reduction of NO_x to N₂, oxidation of CO to CO₂, and oxidation of any remaining hydrocarbons to CO₂ and H₂O. Because these reactions take place

only in low-oxygen, or reducing, atmospheres, the exhaust must contain less than 0.5% O₂. This means that NSCR control systems can function only on stoichiometric or rich-burn engines, and they require precise control of the air-to-fuel ratio (AFR) in order to maintain satisfactory catalysis.

We are proposing the use of NSCR with an AFR controller on the 1,061 hp 4SRB engine, which is capable of reducing uncontrolled NO_x emissions to meet the emission limits in the permit at a maximum operating rate, and NO_x pounds per hour (lb/hr) and grams per horsepower-hour (g/hp-hr) emission limits. The 1,061 hp 4SRB compressor engine must meet NO_x emission limits of 4.68 lb/hr and 2.00 g/hp-hr. We are also proposing emissions control operation and maintenance restrictions consisting of a limit on the temperature of the engine exhaust entering the catalyst and a limit on the pressure drop across the catalyst.

We are incorporating the engine requirements from the Part 71 permit and the synthetic minor permit application into this permit. The following necessary changes to the transferred Part 71 permit requirements should be noted:

1. **Modified the requirement to maintain pressure drop across the NSCR system catalyst bed from within ± 4 inches of water to within ± 2 inches of water.** We made this change for consistency with federal engine standards and other synthetic minor NSR permits issued by the EPA for sources on Indian country lands.
2. **Increased the frequency of monitoring engine exhaust temperature at the inlet to the catalyst control system from once per hour to continuous.** Catalyst operating efficiency is greatly affected by the temperature of the engine exhaust to be controlled. As such, the Part 71 permit has the requirement to maintain the optimal temperature range at all times, but the frequency of monitoring is only once per hour. Thus, to ensure compliance with the acceptable temperature range in the permit, the monitoring requirement has been changed from hourly to continuous.
3. **Added a series of actions to be taken in the event of a deviation from the required temperature range of the engine exhaust to the NSCR control system catalyst bed or in the event of a deviation from the required pressure drop range of the engine exhaust across the NSCR control system catalyst bed.** The actions are to ensure that there is not a complete failure of the NSCR control system due to plugging, fouling, destruction, poisoning, etc. The required actions begin with equipment inspections and end with the possible removal and cleaning of the catalyst or catalyst replacement.
4. **Added a maximum 200-hour period for which each overhauled and replaced engine can operate without the NSCR control system, accompanied by a recordkeeping provision to track break-in periods.** This provision takes into account the time needed for engine “break-in” before putting it into full-time, continuous operation. Engine “break-in” can damage the catalyst.
5. **Added requirements to monitor CO emissions using a portable analyzer simultaneously with testing of NO_x emissions, to monitor both CO and NO_x emissions simultaneously at least quarterly using a portable analyzer, and to restrict the adjustment of engines prior to and during emission testing and monitoring.** We are proposing that QPC conduct performance testing and quarterly portable monitoring of

CO emissions from the engine at the same time as measuring NO_x emissions. While we understand that the 4SRB engine does not have CO emission limits, we are proposing additional CO monitoring requirements that were not previously established in the Part 71 permit. We are proposing this additional monitoring using the authority at 40 CFR 49.151(ii)(C).

These provisions have been added to ensure that the NO_x emission limits for the 4SRB engine are being met under normal operating conditions.

In general, there is a fundamental relationship between engine operating parameters and exhaust emissions. According to standard stoichiometric principles, emission levels of NO_x and CO from natural gas combustion are only independent to a point; thereafter, they are inversely proportional. Therefore, as NO_x emissions in a 4SRB engine are reduced through AFR and NSCR emission controls, CO emissions will increase after a certain point. It is feasible for owners and operators of engines to adjust or tune certain engine operating parameters prior to testing for particular pollutant emissions to assure compliance with an emission limit. However, if a 4SRB engine equipped with AFR and NSCR is even slightly below or above the stoichiometric ratios, testing data available to the EPA has shown that NO_x or CO (depending on the direction from stoichiometric ratio) can increase significantly because the NSCR has difficulty adjusting to non-stoichiometric conditions. Requiring CO monitoring encourages the operator to test and monitor a rich burn engine at as close to normal operating conditions as possible and ensure that operating settings are not adjusted prior to a test such that the CO emission rates increase to a level that may lead to exceedances of major source emission thresholds if the engine were operated at those settings for an entire year.

6. **Added a requirement to replace the oxygen sensors, used as part of the AFR control system, within 2,190 hours of engine run-time for the engine.** This provision has been added to ensure optimal performance of the AFR control system.

IV. Air Quality Review

The MNSR regulations at 40 CFR 49.154(d) require that an Air Quality Impact Assessment (AQIA) modeling analysis be performed if there is reason to be concerned that new construction would cause or contribute to a National Ambient Air Quality Standard (NAAQS) or PSD increment violation. If an AQIA reveals that the proposed construction could cause or contribute to a NAAQS or PSD increment violation, such impacts must be addressed before a pre-construction permit can be issued.

The emissions at this existing facility will not be increasing due to this permit action and the emissions will continue to be well controlled at all times. In addition, this permit action does not authorize the construction of any new emission sources, or emission increases from existing units, nor does it otherwise authorize any other physical modifications to the facility or its operations. In short, this action will have no adverse air quality impacts; therefore, we have determined that an AQIA modeling analysis is not required for this action.

V. Tribal Consultations and Communications

We offer tribal government leaders an opportunity to consult on each permit action. We ask the tribal government leaders to respond to our offer to consult within 30 days of receiving the offer. We invited

the Chairperson of the Ute Tribe to consult on this permit action via letter dated July 18, 2016. To date, the EPA has not received a request for such consultation.

All minor source applications (synthetic minor, minor modification to an existing facility, new true minor, and general permit) are submitted to both the tribe and the EPA per the application instructions (see <http://www2.epa.gov/region8/tribal-minor-new-source-review-permitting>). The tribe has 10 business days from the receipt of the application to communicate to the EPA any preliminary questions and comments on the application. In the event an AQIA is triggered, we email a copy of that document to the tribe within 5 business days from the date that we receive it.

Additionally, we notify the tribe of the public comment period for the proposed permit and provide copies of the application, proposed permit, technical support document, and other supporting information to be made available for public review, as well as a notice of public comment opportunity to post in various locations of their choosing on the Reservation. We also notify the tribe of the issuance of the final permit.

VI. Environmental Justice

On February 11, 1994, the President issued Executive Order 12898, entitled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." The Executive Order calls on each federal agency to make environmental justice a part of its mission by "identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations."

The EPA defines "Environmental Justice" as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. The EPA's goal with respect to Environmental Justice in permitting is to enable overburdened communities to have full and meaningful access to the permitting process and to develop permits that address environmental justice issues to the greatest extent practicable under existing environmental laws. *Overburdened* is used to describe the minority, low-income, tribal and indigenous populations or communities in the United States that potentially experience disproportionate environmental harms and risks as a result of greater vulnerability to environmental hazards.

This discussion describes our efforts to identify environmental justice communities and assess potential effects in connection with issuing this permit in Uintah County, Utah, on Indian country lands within the exterior boundaries of the Uintah and Ouray Indian Reservation.

A. Environmental Impacts to Potentially Overburdened Communities

This permit action does not authorize the construction of any new air emission sources, or air emission increases from existing units, nor does it otherwise authorize any other physical modifications to the associated facility or its operations. The air emissions at the existing facility will not increase due to the associated action and the emissions will continue to be well controlled at all times. We have determined that issuance of this MNSR permit will not cause or contribute to NAAQS violations, or have adverse effects on ambient air quality.

For purposes of Executive Order 12898 on environmental justice, the EPA has recognized that compliance with the NAAQS is “emblematic of achieving a level of public health protection that, based on the level of protection afforded by a primary NAAQS, demonstrates that minority or low-income populations will not experience disproportionately high and adverse human health or environmental effects due to the exposure to relevant criteria pollutants.” *in re Shell Gulf of Mexico, Inc. & Shell Offshore, Inc.*, 15 E.A.D., slip op. at 74 (EAB 2010). This is because the NAAQS are health-based standards, designed to protect public health with an adequate margin of safety, including sensitive populations such as children, the elderly, and asthmatics.

Therefore, we conclude that issuance of the aforementioned permit will not have disproportionately high or adverse human health effects on communities in the vicinity of the Uintah and Ouray Indian Reservation.

B. Enhanced Public Participation

Given the presence of potentially overburdened communities in the vicinity of the facility, we are providing an enhanced public participation process for this permit.

1. Interested parties can subscribe to an EPA email list that notifies them of public comment opportunities on the Indian country lands within the Uintah and Ouray Indian Reservation for proposed air pollution control permits by visiting <https://www.epa.gov/caa-permitting/caa-permitting-epas-mountains-and-plains-region>, and clicking the link to “sign up to be notified by email of Region 8 CAA permit public comment opportunities.”
2. All minor source applications (synthetic minor, modification to an existing facility, new true minor or general permit) are submitted to both the tribe and the EPA per the application instructions (see <https://www.epa.gov/caa-permitting/tribal-nsr-permits-region-8>).
3. The tribe has 10 business days to communicate to the EPA any preliminary questions and comments on the application.
4. In the event an AQIA is submitted (voluntarily or at our request), we email a copy of that document to the tribe within 5 business days from the date we receive it.
5. We notify the tribe of the public comment period for the proposed permit and provide copies of the notice of public comment opportunity to post in various locations of their choosing on the Reservation. We also notify the tribe of the issuance of the final permit.
6. We offer the tribal government leaders an opportunity to consult on each proposed permit action. The tribal government leaders are asked to respond to the EPA’s offer to consult within 30 days of receiving the letter.

VII. Authority

Requirements under 40 CFR part 49 to obtain a permit apply to new and modified minor stationary sources, and minor modifications at existing major stationary sources (“major” as defined in 40 CFR 52.21). In addition, the MNSR permitting program provides a mechanism for an otherwise major stationary source to voluntarily accept restrictions on its potential to emit to become a synthetic minor source. We are charged with direct implementation of these provisions where there is no approved

tribal implementation plan for implementation of the MNSR regulations. Pursuant to Section 301(d)(4) of the CAA (42 U.S.C. Section 7601(d)), we are authorized to implement the MNSR regulations at 40 CFR part 49 in Indian country. The Fidlar Compressor Station is located on Indian country lands within the exterior boundaries of the Uintah and Ouray Indian Reservation in Utah. The exact location is Latitude 40.039722, Longitude -109.456944, in Uintah County, Utah.

VIII. Public Notice

A. Public Comment Period

In accordance with 40 CFR 49.157, we must provide public notice and a 30-day public comment period to ensure that the affected community and the general public have reasonable access to the application and proposed permit information. The application, the proposed permit, this technical support document, and all supporting materials for the proposed permit are available at:

Ute Indian Tribe
Energy and Minerals Department
P.O. Box 70
988 South 7500 East, Annex Building
Fort Duchesne, Utah 84026
Contact: Minnie Grant, Air Coordinator, 435-725-4900 or minnieg@utetribe.com

and

U.S. EPA
Region 8 Air Program Office
1595 Wynkoop Street (8P-AR)
Denver, Colorado 80202-1129
Contact: Colin Schwartz, Environmental Scientist, 303-312-6043 or schwartz.colin@epa.gov

All documents are available for review at our office Monday through Friday from 8:00 a.m. to 4:00 p.m. (excluding federal holidays). Additionally, the proposed permit and technical support document can be reviewed on our website at: <https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8>.

Any person may submit written comments on the proposed permit and may request a public hearing during the public comment period. These comments must raise any reasonably ascertainable issues with supporting arguments by the close of the public comment period (including any public hearing). Comment may be sent to the EPA address above, or sent via an email to r8airpermitting@epa.gov, with the topic "Comments on SMNSR Permit for the QPC Fidlar Compressor Station."

B. Public Hearing

A request for a public hearing must be in writing and must state the nature of the issues proposed to be raised at the hearing. We will hold a hearing whenever there is, on the basis of requests, a significant degree of public interest in a proposed permit. We may also hold a public hearing at our discretion, whenever, for instance, such a hearing might clarify one or more issues involved in the permit decision.

C. Final Permit Action

In accordance with 40 CFR 49.159, a final permit becomes effective 30 days after permit issuance, unless: (1) a later effective date is specified in the permit; (2) appeal of the final permit is made as detailed in the next section; or (3) we may make the permit effective immediately upon issuance if no comments resulted in a change or denial of the proposed permit. We will send notice of the final permit action to any individual who commented on the proposed permit during the public comment period. In addition, the source will be added to a list of final permit actions which is posted on our website at: <https://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-8>. Anyone may request a copy of the final permit at any time by contacting the Tribal Air Permit Program at (800) 227-8917 or by sending an email to r8airpermitting@epa.gov.

D. Appeals to the Environmental Appeals Board

In accordance with 40 CFR 49.159, within 30 days after a final permit decision has been issued, any person who filed comments on the proposed permit or participated in the public hearing may petition the Environmental Appeals Board (EAB) to review any condition of the permit decision. The 30-day period within which a person may request review under this section begins when we have fulfilled the notice requirements for the final permit decision. Motions to reconsider a final order by the EAB must be filed within 10 days after service of the final order. A petition to the EAB is under Section 307(b) of the CAA, a prerequisite to seeking judicial review of the final agency action. For purposes of judicial review, final agency action occurs when we issue or deny a final permit and agency review procedures are exhausted.

MEMO TO FILE

DATE: August 26, 2016

SUBJECT: Uintah and Ouray Indian Reservation, Fidlar Compressor Station; Questar Pipeline Company, Environmental Justice

FROM: Colin Schwartz, EPA Region 8 Air Program

TO: Source Files:
205c AirTribal, UO, Questar Pipeline Company- Fidlar CS
SMNSR-UO-000002-2013.001, 9/1/2013
FRED # 105469

On February 11, 1994, the President issued Executive Order 12898, entitled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." The Executive Order calls on each federal agency to make environmental justice a part of its mission by "identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations."

The EPA defines "Environmental Justice" as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. The EPA's goal with respect to Environmental Justice in permitting is to enable overburdened communities to have full and meaningful access to the permitting process and to develop permits that address environmental justice issues to the greatest extent practicable under existing environmental laws. *Overburdened* is used to describe the minority, low-income, tribal and indigenous populations or communities in the United States that potentially experience disproportionate environmental harms and risks as a result of greater vulnerability to environmental hazards.

This discussion describes our efforts to identify environmental justice communities and assess potential effects in connection with issuing this permit in Uintah County, Utah, on Indian country lands within the Uintah and Ouray Indian Reservation.

Region 8 Air Program Determination

Based on the findings described in the following sections of this memorandum, we conclude that issuance of the aforementioned permit is not expected to have disproportionately high or adverse human health effects on overburdened communities in the vicinity of the facility.

Permit Request

The EPA received an application from Questar Pipeline Company (QPC) requesting a synthetic minor MNSR permit for the Fidlar Compressor Station on November 1, 2013.

The application contained a request to transfer the limits on the 1,061 hp 4SRB compressor engine that were established in the Part 71 permit issued on July 15, 2011. This proposed permit reflects the incorporation of NO_x emission limits on the engine. These proposed limits, if made legally and practically enforceable, would allow QPC to use the controlled NO_x emission rates in determining potential to emit and applicability of other CAA requirements, such as the Prevention of Significant Deterioration (PSD), MNSR and Part 71 Permit Programs.

Upon compliance with this permit, QPC will have maintained legally and practically enforceable requirements to reduce emissions that can be accounted for when determining the applicability of other CAA requirements, such as permitting requirements under the PSD Permit Program and the Part 71 Permit Program.

The facility is located at:

SW1/4, NW1/4 Sec 16 T9S R22E
Latitude 40.039722, Longitude -109.456944

Air Quality Review

The MNSR regulations at 40 CFR 49.154(d) require that an Air Quality Impact Assessment (AQIA) modeling analysis be performed if there is reason to be concerned that new construction would cause or contribute to a National Ambient Air Quality Standard (NAAQS) or PSD increment violation. If an AQIA reveals that the proposed construction could cause or contribute to a NAAQS or PSD increment violation, such impacts must be addressed before a pre-construction permit can be issued.

The emissions at this existing facility will not be increasing due to this permit action and the emissions will continue to be well controlled at all times. In addition, this permit action does not authorize the construction of any new emission sources, or emission increases from existing units, nor does it otherwise authorize any other physical modifications to the facility or its operations. In short, this action will have no adverse air quality impacts; therefore, we have determined that an AQIA modeling analysis is not required for this action.

Environmental Impacts to Potentially Overburdened Communities

This permit action does not authorize the construction of any new air emission sources, or air emission increases from existing units, nor does it otherwise authorize any other physical modifications to the associated facility or its operations. The air emissions at the existing facility will not increase due to the associated action and the emissions will continue to be well controlled at all times. We have determined that issuance of this MNSR permit will not cause or contribute to NAAQS violations, or have adverse effects on ambient air quality.

For purposes of Executive Order 12898 on environmental justice, the EPA has recognized that compliance with the NAAQS is “emblematic of achieving a level of public health protection

that, based on the level of protection afforded by a primary NAAQS, demonstrates that minority or low-income populations will not experience disproportionately high and adverse human health or environmental effects due to the exposure to relevant criteria pollutants.” *in re Shell Gulf of Mexico, Inc. & Shell Offshore, Inc.*, 15 E.A.D., slip op. at 74 (EAB 2010). This is because the NAAQS are health-based standards, designed to protect public health with an adequate margin of safety, including sensitive populations such as children, the elderly, and asthmatics.

Therefore, we conclude that issuance of the aforementioned permit will not have disproportionately high or adverse human health effects on communities in the vicinity of the Uintah and Ouray Indian Reservation.

Tribal Consultation and Enhanced Public Participation

Given the presence of potentially overburdened communities in the vicinity of the facility, we are providing an enhanced public participation process for this permit.

1. Interested parties can subscribe to an EPA email list that notifies them of public comment opportunities on the Indian country lands within the Uintah and Ouray Indian Reservation for proposed air pollution control permits by visiting <https://www.epa.gov/caa-permitting/caa-permitting-epas-mountains-and-plains-region>, and clicking the link to “sign up to be notified by email of Region 8 CAA permit public comment opportunities.”
2. All minor source applications (synthetic minor, modification to an existing facility, new true minor or general permit) are submitted to both the tribe and the EPA per the application instructions (see <https://www.epa.gov/caa-permitting/tribal-nsr-permits-region-8>).
3. The tribe has 10 business days to communicate to the EPA any preliminary questions and comments on the application.
4. In the event an AQIA is submitted (voluntarily or at our request), we email a copy of that document to the tribe within 5 business days from the date we receive it.
5. We notify the tribe of the public comment period for the proposed permit and provide copies of the notice of public comment opportunity to post in various locations of their choosing on the Reservation. We also notify the tribe of the issuance of the final permit.
6. We offer the tribal government leaders an opportunity to consult on each proposed permit action. The tribal government leaders are asked to respond to the EPA’s offer to consult within 30 days of receiving the letter.

MEMO TO FILE

DATE: August 26, 2016

SUBJECT: Uintah and Ouray Indian Reservation, Fidlar Compressor Station; Questar Pipeline Company, Environmental Justice

FROM: Colin Schwartz, EPA Region 8 Air Program

TO: Source Files:
205c AirTribal, UO, Questar Pipeline Company- Fidlar CS
SMNSR-UO-000002-2013.001, 9/1/2013
FRED # 105469

Pursuant to Section 7 of the Endangered Species Act (ESA), 16 U.S.C. §1536, and its implementing regulations at 50 CFR, part 402, the EPA is required to ensure that any action authorized, funded, or carried out by the Agency is not likely to jeopardize the continued existence of any Federally-listed endangered or threatened species or result in the destruction or adverse modification of such species' designated critical habitat. Under ESA, those agencies that authorize, fund, or carry out the federal action are commonly known as "action agencies." If an action agency determines that its federal action "may affect" listed species or critical habitat, it must consult with the U.S. Fish and Wildlife Service (FWS). If an action agency determines that the federal action will have no effect on listed species or critical habitat, the agency will make a "no effect" determination. In that case, the action agency does not initiate consultation with the FWS and its obligations under Section 7 are complete.

In complying with its duty under ESA, the EPA, as the action agency, examined the potential effects on listed species and designated critical habitat relating to issuing this Clean Air Act (CAA) synthetic minor New Source Review permit in Uintah County, Utah, on Indian country lands within the Uintah and Ouray Indian Reservation.

Region 8 Air Program Determination

The EPA has concluded that the proposed synthetic minor NSR permit actions will have "*No effect*" on listed species or critical habitat. This proposed permit action does not authorize the construction of any new air emission sources, or air emission increases from existing units, nor does it otherwise authorize any other physical modifications to the associated facility or its operations. Because the EPA has determined that the federal action will have no effect, the agency made a "*No effect*" determination, did not initiate consultation with the FWS and its obligations under Section 7 are complete.

Permit Request

The EPA received an application from Questar Pipeline Company (QPC) requesting a synthetic minor MNSR permit for the Fidlar Compressor Station on November 1, 2013.

The application contained a request to transfer the limits on the 1,061 hp 4SRB compressor engine that were established in the Part 71 permit issued on July 15, 2011. This proposed permit reflects the

incorporation of NO_x emission limits on the engine. These proposed limits, if made legally and practically enforceable, would allow QPC to use the controlled NO_x emission rates in determining potential to emit and applicability of other CAA requirements, such as the Prevention of Significant Deterioration (PSD), MNSR and Part 71 Permit Programs.

Upon compliance with this permit, QPC will have maintained legally and practically enforceable requirements to reduce emissions that can be accounted for when determining the applicability of other CAA requirements, such as permitting requirements under the PSD Permit Program and the Part 71 Permit Program.

The facility is located at:

SW1/4, NW1/4 Sec 16 T9S R22E
Latitude 40.039722, Longitude -109.456944

Conclusion

The EPA has concluded that the proposed synthetic minor NSR permit action will have “*No effect*” on listed species or critical habitat. This proposed permit action does not authorize the construction of any new air emission sources, or air emission increases from existing units, nor does it otherwise authorize any other physical modifications to the associated facility or its operations. The emissions, approved at present, from each existing facility will not increase due to the associated permit action. Because the EPA has determined that the federal action will have no effect, the agency will make a “*No effect*” determination. In that case, the EPA does not initiate consultation with the FWS and its obligations under Section 7 are complete.

MEMO TO FILE

DATE: August 26, 2016

SUBJECT: Uintah and Ouray Indian Reservation, Fidlar Compressor Station; Questar Pipeline Company, Environmental Justice

FROM: Colin Schwartz, EPA Region 8 Air Program

TO: Source Files:
205c AirTribal, UO, Questar Pipeline Company- Fidlar CS
SMNSR-UO-000002-2013.001, 9/1/2013
FRED # 105469

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to take into account the effects of their undertakings on historic properties and afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment with regard to such undertakings. Under the ACHP's implementing regulations at 36 C.F.R. Part 800, Section 106 consultation is generally with state and tribal historic preservation officials in the first instance, with opportunities for the ACHP to become directly involved in certain cases. An "undertaking" is "a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval." 36 C.F.R. § 800.16(y).

Under the NHPA Section 106 implementing regulations, if an undertaking is a type of activity that has the potential to cause effects on historic properties, assuming any are present, then federal agencies consult with relevant historic preservation partners to determine the area of potential effect (APE) of the undertaking, to identify historic properties that may exist in that area, and to assess and address any adverse effects that may be caused on historic properties by the undertaking. If an undertaking is a type of activity that does not have the potential to cause effects on historic properties, the federal agency has no further obligations. 36 C.F.R. § 800.3(a)(1).

This memorandum describes EPA's efforts to assess potential effects on historic properties in connection with to issuing this Clean Air Act (CAA) synthetic minor New Source Review permit in Uintah County, Utah, on Indian country lands within the Uintah and Ouray Indian Reservation. As explained further below, EPA is finding that the proposed action does not have the potential to cause effects on historic properties, even assuming such historic properties are present.

Permit Request

The EPA received an application from Questar Pipeline Company (QPC) requesting a synthetic minor MNSR permit for the Fidlar Compressor Station on November 1, 2013.

The application contained a request to transfer the limits on the 1,061 hp 4SRB compressor engine that were established in the Part 71 permit issued on July 15, 2011. This proposed permit reflects the

incorporation of NO_x emission limits on the engine. These proposed limits, if made legally and practically enforceable, would allow QPC to use the controlled NO_x emission rates in determining potential to emit and applicability of other CAA requirements, such as the Prevention of Significant Deterioration (PSD), MNSR and Part 71 Permit Programs.

Upon compliance with this permit, QPC will have maintained legally and practically enforceable requirements to reduce emissions that can be accounted for when determining the applicability of other CAA requirements, such as permitting requirements under the PSD Permit Program and the Part 71 Permit Program.

The facility is located at:

SW1/4, NW1/4 Sec 16 T9S R22E
Latitude 40.039722, Longitude -109.456944

Finding of No Potential to Cause Effects

The EPA has reviewed the proposed actions for potential impacts on historic properties. Because the activities authorized by the EPA permits does not authorize the construction of any new air emission sources, or air emission increases from existing units, nor does it otherwise authorize any other physical modifications to the facility or its operations, the Agency finds that this project does not have the potential to cause effects on historic properties, even assuming any are present.

State and Tribal Consultation

Because this undertaking is a type of activity that does not have the potential to cause effects on historic properties, the EPA has no further obligations under Section 106 of the National Historic Preservation Act or 36 C.F.R. part 800.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917

<http://www.epa.gov/aboutepa/epa-region-8-mountains-and-plains>

Ref: 8P-AR

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

JUL 18 2016

Honorable Shaun Champoos, Chairman
Ute Indian Tribe
P.O. Box 70
Fort Duchesne, Utah 84026

Re: Notification of Consultation and Coordination with Respect to the Issuance of Air Pollution Control Permit Pursuant to the Tribal Minor New Source Review (MNSR) Permit Program for an Existing Natural Gas Compressor Station on the Uintah and Ouray Indian Reservation

Dear Chairman Champoos:

The U.S. Environmental Protection Agency Region 8 is initiating consultation and coordination with the Ute Indian Tribe with respect to issuance of a Clean Air Act air pollution control MNSR permit for an existing natural gas compressor station on Indian country lands within the Uintah and Ouray Indian Reservation in Uintah County, Utah. In accordance with the MNSR Permit Program at 40 CFR Part 49, owner and operator Questar Pipeline Company (QPC), is requesting a MNSR permit with federally enforceable air pollutant emission limits for the existing Fidlar Compressor Station.

The Fidlar Compressor Station receives natural gas from and delivers it to any one of QPC's main lines that transport natural gas east, west and north to existing markets and interconnecting points with other interstate pipelines. QPC submitted a synthetic minor MNSR permit application to recognize the installation and operation of a non-selective catalytic reduction system on an existing rich-burn natural gas-fired compressor engine operating at the facility to control emissions. Synthetic minor emission limits were previously established for this engine in the operating permit (Permit # V-UO-0002-05.01, July 15, 2011) for the Fidlar Compressor Station issued pursuant to the Title V Operating Permit Program at 40 CFR Part 71 as a gap-filling measure until final promulgation of the MNSR Permit Program.

This consultation and coordination process is being conducted based on the *EPA Policy on Consultation and Coordination with Indian Tribes* (www.epa.gov/tribal/consultation/consult-policy.htm). The EPA invites you and your designated consultation representative(s) to participate in this process. In an effort to provide timely information to the Tribe, the EPA would like to schedule consultation and coordination within 30 days after you receive this letter.

In addition to offering government-to-government consultation, the EPA plans to regularly coordinate and communicate with the Ute Tribe's Acting Energy, Minerals and Air Director, Bruce Pargeets, for facilities located on Indian country lands within the Uintah and Ouray Indian Reservation. If you would prefer to designate an alternative representative for communication on air pollution control permitting

matters, please notify us of that person's name and contact information. We will keep the tribal government informed and will seek your input on these permits.

The EPA welcomes the opportunity to consult and coordinate with the Tribe. If you choose to consult about this permitting action, we will work with your tribal government to develop a consultation plan including a description of the process we would follow, opportunity for your input, and timeline for us to provide feedback and to complete the consultation. We will send a draft consultation plan for your review as soon as practical after we receive your reply to this letter. The agency's goal will be to ensure that you have an opportunity to provide tribal input into this permit action.

We request that you reply in writing to this letter within the next 30 days if the Tribe desires to consult on this permit action. The official EPA contact person for this consultation and coordination process is Claudia Smith, a permit engineer on my staff.

Thank you very much for your attention to this matter. Please contact me at (303) 312-6392 or your staff can contact Claudia Smith at (303) 312-6520 or smith.claudia@epa.gov should you have any questions on this action. We look forward to hearing from you on this important matter.

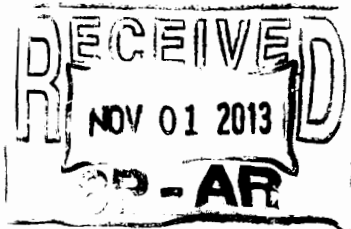
Sincerely,



Darcy O'Connor
Acting Assistant Regional Administrator
Office of Partnerships and Regulatory Assistance

cc:

Edred Secakuku, Vice Chairman, Uintah and Ouray Business Committee
Tony Small, Councilman, Uintah and Ouray Business Committee
Ronald Wopsock, Councilman, Uintah and Ouray Business Committee
Justin Cummings Vanberhoop, Councilman, Uintah and Ouray Business Committee
Bruce Ignacio, Councilman, Uintah and Ouray Business Committee
Reannin Tapoof, Executive Assistant, Uintah and Ouray Business Committee
Tom Fredericks, Esq., Fredericks Peebles & Morgan LLP
Bruce Pargeets, Acting Director, Energy, Minerals and Air, Ute Indian Tribe
Minnie Grant, Air Coordinator, Energy, Minerals, and Air, Ute Indian Tribe

QUESTAR**Questar Pipeline Company**

1140 West 200 South

P.O. Box 45360

Salt Lake City, UT 84145-0360

Tel 801 324 5555

October 30, 2013

U.S. EPA, Region VIII
Attn: Federal Minor NSR Permit Coordinator
Air & Radiation Program (8P-AR)
1595 Wynkoop Street
Denver, CO 80202-1129

Re: Tribal Minor New Source Review Permit Application

Dear Sir or Madam:

Please find attached an application for a synthetic minor permit for equipment located in Indian Country. Questar Pipeline Company (QPC) is requesting enforceable limits for NOx on an existing reciprocating engine (Unit FS02) at the Fidlar Compressor Station on the Uintah and Ouray Indian Reservation in Utah. Fidlar currently operates under Part 71 Permit number V-UO-0002-05.01.

QPC has prepared an application consisting of Form NEW, Form SYNMIN, and supporting documentation. In addition, a signed form CTAC is enclosed since the existing unit operates at a Part 71 source.

Questions or requests for additional information should be directed to me at (801) 324-3820 or via electronic mail: scott.bassett@questar.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott R. Bassett".

Scott R. Bassett
Sr. Environmental Coordinator

Attachments

cc: Ute Tribe Environmental Contact

**Questar Pipeline Company
Fidlar Compressor Station
Part 71 Permit #V-UO-0002-05.01**

Application for Tribal Minor New Source Review – Existing Unit FS02

Narrative Description

Unit FS02 is a natural gas transmission compressor driven by a spark ignition, four-stroke, rich burn, reciprocating internal combustion engine (RICE). The engine is equipped with non-selective catalytic reduction (NSCR) pollution control equipment and an air-fuel ratio combustion control system. Unit FS02 is one of four compressor units at the Fidlar Compressor Station. Fidlar Compressor Station is a natural gas transmission compressor station situated on four interconnecting, interstate pipelines owned and operated by the applicant. Fidlar Station is capable of boosting pipeline pressure on the four transmission pipelines flowing north, east, and west.

Operating Schedule

Unit FS02 is proposed to operate a full 8760 hours per year.

Fuel Information

Unit FS02 uses pipeline quality natural gas as the sole source of fuel.

Process Flow Information

Unit FS02 is capable compressing natural gas by drawing gas from the Fidlar Station suction piping header, mechanically compressing the gas in a piston, and discharging the gas to the discharge piping header. Since the gas heats up during compression, the gas may flow through a discharge gas cooler before flowing back into a transmission pipeline. The discharge gas cooler is a simple process whereby fans circulate ambient air across fins containing the pressurized gas. Heat from the process is radiated to atmosphere. There is no contact between the gas and the air, the pressurized gas simply flows through the cooler before being discharged to the transmission pipeline. A fuel gas system routes gas from the natural gas pipeline to the engine for combustion. Mechanical work created in the engine drives the compressor pistons.

Proposed Emission Units

Existing Unit FS02 – Reciprocating Compressor Engine
Manufacturer: White Superior
Model: 12G-825
Serial Number: 299499
Fuel: Pipeline Quality Natural Gas
Combustion: Four-stroke, Rich Burn
Horsepower: 1061

Equivalent Heat Rate: 10.79 MMBtu/Hour

Installation Date: 12/3/1983

Pollution Controls: NSCR and AFRC

Controls Installed: 1995

Part 71 Enforceable Limit Effective Date: July 25, 2011

Regulatory Status: Engine was not constructed, reconstructed, or modified after June 12, 2006 and is not subject to 40 CFR Part 60 Subpart JJJJ. Engine is subject to the area source requirements of 40 CFR 63 Subpart ZZZZ.

Criteria Pollutant Emission Estimates

Please see form NEW emission table E(ii) and the emission calculation spreadsheet attached to Form SYNMIN for reciprocating Unit FS02.

Air Quality Review

The unit is an existing unit that has been in operation at the subject location since 1983. The unit has complied with the enforceable limits being requested since 2011. It reasons that the pollution control equipment can only help to improve local air quality. The Uintah Basin is currently a study area for ground level ozone. Upgrading control equipment and adding enforceable limits to existing equipment are likely solutions to some of the issues facing the region. In this regard, it would appear that the source is ahead of the curve.

Endangered Species Act

Since the subject equipment has been in existence since 1983 and the compressor station itself in operation since 1969, it doesn't appear the proposed action (enforceable limit on existing equipment) would likely affect any listed species in the area.

National Historic Preservation Act

Since the proposed action doesn't involve construction of new facilities, it is not likely to affect any cultural resources in the area (i.e., the proposed action is limiting emissions from an existing source located in an existing fenced facility. No ground disturbance is proposed).



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
FEDERAL MINOR NEW SOURCE REVIEW PROGRAM IN INDIAN COUNTRY
40 CFR 49.151**

**Application For Synthetic Minor Limit
(Form SYNMIN)**

Use of this information request form is voluntary and not yet approved by the Office of Management and Budget. The following is a check list of the type of information that Region 8 will use to process information on your proposed project. While submittal of this form is not required, it does offer details on the information we will use to complete your requested approval and providing the information requested may help expedite the process. Use of application forms for this program is currently under Office of Management and Budget review and these information request forms will be replaced/updated after that review is completed.

Please submit information to following two entities:

Federal Minor NSR Permit Coordinator
U.S. EPA, Region 8
1595 Wynkoop Street, 8P-AR
Denver, CO 80202-1129
R8airpermitting@epa.gov

For more information, visit:
<http://www2.epa.gov/region8/tribal-minor-new-source-review-permitting>

The Tribal Environmental Contact for the specific reservation:

If you need assistance in identifying the appropriate Tribal Environmental Contact and address, please contact:

R8airpermitting@epa.gov

A. GENERAL INFORMATION

| | | | |
|--|--|---|--------------------------------------|
| Company Name Questar Pipeline Company | | Source Name Fidlar Compressor Station – Unit FS02 | |
| Company Contact or Owner Name Scott Bassett | | | Title Sr. Env. Coordinator |
| Mailing Address Mailstop: DNR 206, P.O. Box 45360, Salt Lake City, UT 84145-0360 | | | |
| Email Address scott.bassett@questar.com | | | |
| Telephone Number (801) 324-3820 | | Facsimile Number (801) 324-3883 | |

B. ATTACHMENTS

For each criteria air pollutant, hazardous air pollutant and for all emission units and air pollutant-generating activities to be covered by a limitation, include the following:

- Item 1** - The proposed limitation and a description of its effect on current actual, allowable and the potential to emit.
- Item 2** - The proposed testing, monitoring, recordkeeping, and reporting requirements to be used to demonstrate and assure compliance with the proposed limitation.
- Item 3** - A description of estimated efficiency of air pollution control equipment under present or anticipated operating conditions, including documentation of the manufacturer specifications and guarantees.
- Item 4** - Estimates of the Post-Change Allowable Emissions that would result from compliance with the proposed limitation, including all calculations for the estimates.
- Item 5** - Estimates of the potential emissions of Greenhouse Gas (GHG) pollutants:

**Questar Pipeline Company
Fidlar Compressor Station
Part 71 Permit #V-UO-0002-05.01**

Application for Tribal Minor New Source Review – Existing Unit FS02

Form SYNMIN Part B Narrative and Attachments:

Item 1 – The proposed limitation and a description of its effect on current actual, allowable, and the potential-to-emit.

The applicant is proposing to limit emissions of NO_x from an existing RICE unit at a Part 71 source located on the Uinta and Ouray Indian Reservation in eastern Utah. The proposed NO_x limit is already enforceable under the existing Part 71 permit as a “stop gap” measure adopted during development of the Indian Country permitting rules. The applicant intends to obtain an underlying synthetic minor permit to support this limit in the Part 71 permit that is currently under review for renewal.

Specifically, the applicant intends to make NO_x emission reductions from existing NSCR equipment enforceable. Historically, an uncontrolled NO_x emission rate of 35.09 lb/hr (153.69 tons/year) was used in calculating potential-to-emit from unit FS02. The applicant is requesting an enforceable limit of 4.68 lb/hr (20.50 tons/year) NO_x.

The proposed limitation will not affect current actual, allowable, or PTE since the Part 71 limit has been enforceable since 2011. Periodic testing and monitoring requirements (discussed below) have demonstrated compliance with the proposed enforceable limit.

Item 2 – The proposed testing, monitoring, recordkeeping, and reporting requirements to be used to demonstrate and ensure compliance with the proposed limitation.

The applicant is proposing the same monitoring, recordkeeping, and reporting requirements that are currently stated in Part 71 permit V-UO-0002-05.01 Section V. Requested Emission Limits – Engine FS02 (see attached permit excerpt).

Item 3 – A description of the estimated efficiency of air pollution control equipment under present or anticipated operating conditions, including documentation of the manufacturer specifications and guarantees.

Historic PTE numbers from the initial Part 71 permit application for Fidlar Station assign an uncontrolled NO_x emission rate of 15.0 grams/horsepower-hour (35.09 lb/hr) for unit FS02. Based on the maximum uncontrolled PTE of 35.09 lb/hr, the proposed limit of 4.68 lb/hr represents a NO_x control efficiency of at least 87%. Because the original NSCR catalyst element was installed in 1995, the applicant does not have documentation of expected pollution control efficiency. A replacement element was ordered and installed in 2010 (see attached purchase order); however, we were unable to obtain a specification sheet since the replacement was simply warehouse stock and not a new element from a

specialized vendor. Annual performance testing of the engine with the replacement catalyst has demonstrated NOx control effectiveness in excess of 87% (see attached test summary sheets from 2011, 2012, and 2013).

Item 4 – Estimates of the Post-Change Allowable Emissions that would result from compliance with proposed limitation, including all calculations of the estimates.

The proposed limitation is to limit Unit FS02 to 2.0 grams/horsepower-hour and 4.68 pounds/hour NOx emissions. The resulting annual allowable emissions are 20.49 tons/year NOx, compared with an historic worst case uncontrolled potential-to-emit of 153.69 tons/year. Please see attached calculations prepared previously for the Part 71 permit modification that show the proposed allowable emissions for all pollutants from Unit FS02. Emissions from unit FS07 (standby generator) have not been removed from the calculation spreadsheet and are for information purposes only as this application only addresses unit FS02.

Item 5 – Estimates of the potential emissions of Greenhouse Gas (GHG) pollutants.

Greenhouse gas emissions from combustion have been calculated for all major equipment at Fidlar Compressor Station and total 32,792 tons/year of CO₂ equivalent (including CO₂, CH₄, and N₂O). Specifically, Unit FS02 has a GHG potential-to-emit of 5,016 tons/year CO₂e. As such, neither Unit FS02 nor Fidlar Station is subject to PSD review (see attached calculations). Please note: Unit FS02 is not a source of HFC's, PFC's, or SF₆.

ITEM 2 ATTACHMENT
PART 71 PERMIT EXCERPT

V. Requested Emission Limits – Engine FS02

V.A. Applicability

The following requirements have been created, at the permittee's request, to recognize the non-selective catalytic reduction (NSCR) controls on engine FS02, a 1,061 hp, natural gas fired, White Superior 12G-825 compression engine; serial number 299499. The requirements are intended to establish enforceable restrictions on the PTE of NO_x from engine FS02.

V.B. Emission Limits

Emissions from engine FS02 equipped with NSCR catalyst shall not exceed:

1. 2.0 grams per horse power-hour (g/hp-hr) of NO_x emissions; and
2. 4.68 pounds per hour (lbs/hr) of NO_x emissions.

V.C. Work Practice and Operational Requirements

1. Engine FS02 shall be equipped with an AFR and NSCR system for the control of NO_x.
2. The permittee shall follow, for engine FS02 and associated AFR and NSCR systems, the manufacturer's recommended maintenance schedule and procedures to ensure optimum performance of the unit and control system.
3. The permittee shall install a temperature-sensing device before the NSCR system on engine FS02 in order to monitor the inlet temperature to the NSCR. The temperature-sensing device shall be accurate to within 0.75% of span.
4. The inlet temperature to the NSCR system shall be maintained at all times engine FS02 operates in accordance with manufacturer's specifications.
5. The inlet temperature to the NSCR system shall be measured at least hourly during the operation of engine FS02.
6. If the inlet temperature to the NSCR system deviates from the acceptable range according to manufacturer specifications, then the following actions shall be taken:
 - (a) Immediately upon determining a deviation of the NSCR inlet temperature, the cause will be investigated. Investigation may include monitoring of NO_x emissions to ensure the NSCR system is functioning and testing the temperature sensing device. If the cause is determined to be the NSCR system, then the catalyst shall be inspected and cleaned or replaced, if necessary.
 - (b) If the problem can be corrected by following the engine and/or the NSCR manufacturer's recommended procedures, then the permittee shall correct the problem within 24 hours of inspecting the engine and NSCR.

- (c) If the problem can not be corrected using the manufacturer's recommended procedures, then the engine shall not be returned to operation until the NSCR inlet temperature is measured and found to be within the acceptable temperature range for the engine. The permittee shall also notify EPA in writing of the problem within 10 working days of observing the problem and include in the notification the cause of the problem and a corrective action plan that outlines the steps and timeframe for bringing the NSCR inlet temperature range into compliance. (The corrective action may include removal and cleaning of the catalyst according to the manufacturer's methods or replacement of the catalyst.)
7. A baseline pressure drop across the NSCR system shall be established during the initial performance test. A new baseline pressure drop across the NSCR system shall be established each time the catalyst is cleaned or replaced.
 8. The pressure drop across an NSCR system shall be measured at least hourly during the operation of the engine.
 9. During operation the pressure drop across the NSCR system shall be maintained to within four (4) inches of water from the baseline pressure drop reading taken during the most recent performance test.
 10. If the pressure drop exceeds four (4) inches of water from the baseline pressure drop reading taken during the most recent performance test, the cause will be investigated. Investigation may include monitoring of NO_x emissions to ensure the NSCR system is functioning and testing the pressure transducers. If the cause is determined to be the NSCR system, then the catalyst shall be inspected and cleaned or replaced, if necessary.
 11. The permittee's completion of any or all of the actions prescribed by this permit shall not constitute, nor qualify as, an exemption from the NO_x emission limit in this permit.
 12. Engine FS02 shall be fired only with natural gas. The natural gas shall be pipeline-quality in all respects except that the CO₂ concentration in the gas shall not be required to be within pipeline-quality.

[Note to Permittee: The purpose of permit condition 12, above, is to ensure that there are no contaminants in the fuel that might foul the catalyst. In general, pipeline-quality natural gas is (1) within $\pm 5\%$ of the heating value of pure methane, or 1,010 Btu/per cubic foot under standard atmospheric conditions, and (2) free of water and toxic or corrosive contaminants. However, CO₂ is not a potential foulant of the catalyst and has therefore been excluded from the requirement.]

V.D. Testing Requirements

1. An initial performance test shall be conducted for engine FS02 for measuring NO_x emissions to demonstrate compliance with the emission limits in this section. The initial performance test for NO_x shall be conducted within forty-five (45) calendar days of the effective date of this permit.

2. Upon change out of engine FS02, a performance test shall be conducted for measuring NO_x emissions from the unit to demonstrate compliance with the emission limits in V.B. The performance test for NO_x for each unit shall be conducted within forty-five (45) calendar days of initial startup of the replacement engine.
3. Upon the cleaning or replacement of the NSCR catalyst, a performance test shall be conducted for measuring NO_x emissions from the unit to demonstrate compliance with the emission limits and to establish a new baseline pressure drop. The performance test shall be conducted within forty-five (45) calendar days of startup of the engine with the new catalyst.
4. The performance test for NO_x emissions shall be conducted in accordance with the appropriate test methods specified in 40 CFR part 60, Appendix A. The permittee may submit to EPA a written request for approval of an alternate testing method, but shall only use that alternate test method after obtaining written approval from EPA.
5. The inlet temperature to the NSCR system and the pressure drop across the NSCR system shall both be measured during the performance test for measuring NO_x emissions.
6. All tests for NO_x emissions for engine FS02 must meet the following requirements:
 - (a) All tests shall be performed at a maximum operating rate (90% to 110% of engine design capacity).
 - (b) During each test run, data shall be collected on all parameters necessary to document how NO_x emissions were measured or calculated (such as test run length, minimum sample volume, volumetric flow rate, moisture and oxygen corrections, etc.).
 - (c) Each test shall consist of at least three (3) 1-hour or longer valid test runs. Emission results shall be reported as the arithmetic average of all valid test runs and shall be in terms of g/hp-hr and lbs/hr.
 - (d) A source test plan for NO_x emissions shall be submitted to EPA for approval within thirty (30) calendar days of the effective date of this permit. The source test plan shall include and address the following elements:
 - (i) Purpose of the test;
 - (ii) Unit and NSCR system to be tested;
 - (iii) Expected engine operating rate during test;
 - (iv) Schedule/dates for the test;
 - (v) Sampling and analysis procedures (sampling locations, test methods, laboratory identification);
 - (vi) Quality assurance plan (calibration procedures and frequency, sample recovery and field documentation, chain of custody procedures); and
 - (vii) Data processing and reporting (description of data handling and quality control procedures, report content).

V.E. Monitoring Requirements

1. The permittee shall conduct annual performance tests for engine FS02 for measuring NO_x emissions to demonstrate compliance with the emission limit. The performance tests for NO_x shall be conducted in accordance with the test methods specified in 40 CFR Part 60, Appendix A. The permittee may submit to EPA a written request for approval of an alternate testing method, but shall only use that alternate test method after obtaining written approval from EPA.
2. The permittee shall measure NO_x emissions from engine FS02 quarterly to demonstrate compliance with the NO_x emission limit.
3. The permittee shall measure the quarterly NO_x emissions using a portable analyzer and a monitoring protocol approved by EPA. Monitoring for NO_x emissions from engine FS02 shall commence during the first complete calendar quarter following the permittee's submittal of the initial performance test results for NO_x to EPA. The annual performance test required in this section, shall meet the monitoring requirement for that quarter.

V.F. Recordkeeping Requirements

The permittee shall comply with the following recordkeeping requirements:

1. Record shall be kept of the results of all NO_x performance tests and monitoring required in this permit.
2. Records shall be kept of all temperature measurements requirements of this permit, as well as a description of any corrective actions taken pursuant to this section.
3. Records shall be kept of all pressure drop measurements required by this permit, as well as a description of any corrective actions taken.
4. Records shall be kept of vendor specifications to demonstrate that the accuracy of the temperature-sensing devices on the NSCR system is at least as accurate as that required in this permit.
5. Records shall be kept of vendor specifications to demonstrate that the accuracy of the pressure-sensing devices on the NSCR system is at least as accurate as that required in this permit.

V.G. Reporting Requirements

1. The permittee shall submit to EPA a written report of the results of the NO_x performance tests and temperature and pressure drop measurements required in this permit. This report shall be submitted within 60 (sixty) calendar days of the date of testing completion.
2. The permittee shall submit to EPA, as part of the semi-annual monitoring reports, a report of any instances where the NSCR system inlet temperature deviates from the acceptable range

and where the pressure drop across the NSCR system deviates from the acceptable reading, as well as a description of any corrective actions. If no such instances have been detected, then a statement shall be provided to say so.

ITEM 3 ATTACHMENTS

CATALYST ELEMENT PURCHASE ORDER
&
PERFORMANCE TEST RESULTS

**Table 2: Summary of Results, Runs 1-3
 (Unit FS02, Test Summary)
 Operational Data, Concentrations, Exhaust Flow Rates,
 Mass Emission Rates**

Client: Questar Pipeline
 Plant Name: Fidlar Compressor Station
 Source: Superior 12G-825 (FS02)
 Date: 06/30/11
 Technicians: WM & JC

| Test Number | 1 | 2 | 3 | |
|--|-----------|-----------|-----------|-----------------|
| Date | 6/30/11 | 6/30/11 | 6/30/11 | |
| Start Time | 10:05 AM | 12:18 PM | 1:58 PM | |
| Stop Time | 11:13 AM | 1:45 PM | 3:06 PM | |
| Engine/Generator Operation | | | | |
| Engine Speed (rpm) | 902 | 905 | 901 | |
| Timing (° BTDC) | 35 | 35 | 35 | |
| Manifold Temperature (°F, L/R) | 72 / 71 | 61 / 59 | 64 / 63 | |
| Manifold Pressure (psi, L/R) | 298 / 293 | 305 / 300 | 304 / 301 | |
| Catalyst pressure differential (psi) | 0.4 | 0.5 | 0.5 | |
| Catalyst inlet temp (°F) | 1191 | 1198 | 1198 | |
| Catalyst outlet temp (°F) | 1237 | 1236 | 1248 | |
| Measured BSFC (Btu/hp-hr) | 8416 | 8353 | 8511 | |
| Horsepower (hp) | 1008 | 1075 | 1058 | |
| Fuel Data | | | | |
| Fuel Heating Value (Gross Btu/scf) | 1040 | 1040 | 1040 | |
| Fuel O2 F-Factor (DSCFH/MMBTU) | 8710 | 8710 | 8710 | |
| Fuel Flow Rate (scfh/hr) | 8157.0 | 8634.0 | 8658.0 | |
| Ambient Conditions | | | | |
| Atmospheric Pressure (in. Hg) | 25.16 | 25.16 | 25.16 | |
| Temperature (°F dry) | 73.0 | 68.0 | 61.0 | |
| Temperature (°F wet) | 56.0 | 59.0 | 53.0 | |
| Humidity (lbs/lb of air) | 0.0073 | 0.0104 | 0.0082 | |
| Measured Emissions (dry) (corrected for instrument drift) | | | | Averages |
| NOx (ppmv) | 182.2 | 243.0 | 238.7 | 221.3 |
| O2 (%) | 0.00 | 0.00 | 0.00 | 0.00 |
| CO2 (%) | 11.97 | 12.06 | 11.98 | 12.00 |
| Fo Factor | 1.75 | 1.73 | 1.74 | 1.74 |
| Exhaust Flow Rates | | | | |
| via EPA Methods 1-4 (SCFH, dry) | 8.27E+04 | 8.92E+04 | 8.14E+04 | 8.45E+04 |
| via EPA Method 19 (SCFH, dry) | 7.39E+04 | 7.82E+04 | 7.84E+04 | 7.68E+04 |
| Mass Emission Rates (Based on Methods 1-4) | | | | |
| NOx (lbs/hr) {Limit = 4.68} | 1.80 | 2.59 | 2.32 | 2.24 |
| NOx (g/hp-hr) {Limit = 2.0} | 0.81 | 1.17 | 1.05 | 1.01 |
| NOx (tons/yr) | 7.88 | 11.34 | 10.17 | 9.80 |

Testing by TRC, Albuquerque, New Mexico

July 3, 2012

Mr. Scott Bassett
Questar Corporation
PO Box 45360
Salt Lake City, UT 84145

Dear Mr. Bassett:

Re: Engine Emission Testing For OPL, Fidlar 2 Facility, Permit V-OU-0002-05.01.

Oasis Emission Consultants, Inc. was requested to perform an engine emission test on a Superior 12G-825 rich burn engine (Permit V-OU-0002-05.01) located in Utah.

Emission Levels

The average recorded levels were found to comply with emission levels stipulated in the permit, as shown in the attached report, and summarized below.

| Emission Unit | Avg NOx | Permit NOx |
|---------------|---------|------------|
| gr/BHP-hr | 1.00 | 2.00 |
| lbs/hr | 2.34 | 4.68 |

Catalyst Parameters (Averaged Over 3 Test Runs)

| Inlet Temp (deg F) | DP (in H2O) |
|--------------------|-------------|
| 1199.3 | 0.5" |

Testing Protocol

The attached report was generated using standard CEMS equipment and methodologies as required by EPA 40 CFR 60(A) Methods 1-4 & 7E.

July 10, 2013

Mr. Scott Bassett
Questar Corporation
PO Box 45360
Salt Lake City, UT 84145

Dear Mr. Bassett:

Re: Engine Emission Testing For OPL, Fidlar 2 Facility, Permit V-OU-0002-05.01.

Oasis Emission Consultants, Inc. was requested to perform an engine emission test on a White Superior 12G-825 rich burn engine (Permit V-OU-0002-05.01) located in Utah.

Emission Levels

The average recorded levels were found to comply with emission levels stipulated in the permit, as shown in the attached report, and summarized below.

| Emission Unit | Avg NOx | Permit NOx |
|---------------|---------|------------|
| gr/BHP-hr | 1.02 | 2.00 |
| lbs/hr | 2.03 | 4.68 |

Catalyst Parameters (Averaged Over 3 Test Runs)

| Inlet Temp (deg F) | DP (in H2O) |
|--------------------|-------------|
| 1180.3 | 0.4" |

Testing Protocol

The attached report was generated using standard CEMS equipment and methodologies as required by EPA 40 CFR 60(A) Methods 1-4 & 7E.

ITEM 4 ATTACHMENT
UNIT FS02 EMISSION CALCULATIONS

Fidlar Compressor Station Potential Emissions for Reciprocating Engines

Table A-3(a). Reciprocating Engines Emission Factors

| Emission Unit ID | Source Description | Engine Rating (hp) EHP ¹ | Maximum Annual Operating Hours (hr/yr) AOP ² | Load Factor (%) LF ³ | Equivalent Hourly Heat Input (MMBtu/hr) HHI ⁴ | Emission Factors | | | | | | | | | | | | | |
|------------------|---|-------------------------------------|---|---------------------------------|--|---|--|---|------------------------------|--------------------------------|---|---|-------------------------------------|------------------------------------|------------------------------------|--|-----------------------------------|--|----------|
| | | | | | | PM ₁₀ (lb/MMBtu) EF ⁵ | SO ₂ (lb/MMBtu) EF ⁶ | NO _x (g/hp-hr) EF ⁷ | CO (g/hp-hr) EF ⁷ | VOC (lb/MMBtu) EF ⁸ | Formaldehyde (lb/MMBtu) EF ⁴ | Acetaldehyde (lb/MMBtu) EF ⁴ | Acrolein (lb/MMBtu) EF ⁴ | Benzene (lb/MMBtu) EF ⁴ | Toluene (lb/MMBtu) EF ⁴ | Ethyl Benzene (lb/MMBtu) EF ⁴ | Xylene (lb/MMBtu) EF ⁴ | Naphthalene (lb/MMBtu) EF ⁴ | |
| FS02 | White Superior, 12G-825, Reciprocating Gas Engine | 1,061 | 8,760 | 100 | 10.79 | 2.06E-02 | 1.45E-03 | 2.0 | 2.0 | 1.0 | -- | 2.17E-02 | 2.95E-03 | 2.78E-03 | 1.67E-03 | 5.91E-04 | 2.63E-05 | 2.06E-04 | 1.03E-04 |
| FS07 | Cummins GTA28CC Stand-By Engine | 643 | 500 | 100 | 6.54 | 2.06E-02 | 1.45E-03 | 2.0 | 4.0 | 1.0 | -- | 2.17E-02 | 2.95E-03 | 2.78E-03 | 1.67E-03 | 5.91E-04 | 2.63E-05 | 2.06E-04 | 1.03E-04 |

¹ Engine rating based on equipment design. Cummins GTA28CC derated 7.2% for elevation based on manufacturer's literature.

² Annual operating hours assumed to be 8,760 hours per year except for stand-by units, which are assumed to operate no more than 500 hours per year.

³ Load factor based on operator estimate.

⁴ Equivalent hourly heat input calculated based on the engine rating in hp, AP-42 hp to Btu/hr conversion factor, and assumed fuel efficiency of 25%.

⁵ PM₁₀ and VOC (for FS07 only) emission factors are taken from AP-42, Table 3.2-3 (July 2000). PM₁₀ emission factor is a sum of the filterable and condensable portions. Emission factors adjusted for natural gas heat content of 1,080 Btu/scf.

⁶ SO₂ emission factor is determined based on maximum sulfur in fuel (FERC Tariff), assuming all sulfur is converted to SO₂.

⁷ NO_x, CO, and VOC emission factors to be used for enforceable permit limits for FS02 requested by Questar in 2010 modification. NO_x, CO, and VOC emission factors for unit FS07 from 40 CFR 60, subpart JJJJ, Table 4.

⁸ HAP emission factors are taken from AP-42 Table 3.2-3 (July 2000). Emission factors adjusted for natural gas heat content of 1,080 Btu/scf.

Table A-3(b). Potential Criteria Pollutant Emissions from Reciprocating Engines

| Emission Unit ID | Source Description | Engine Rating (hp) EHP | Maximum Annual Operating Hours (hr/yr) ADP | Load Factor (%) LF | Equivalent Hourly Heat Input (MMBtu/hr) HHI | Hourly Emission Rates | | | | | Annual Potential Emissions | | | | |
|------------------|---|------------------------|--|--------------------|---|------------------------------|-----------------------------|-----------------------------|----------------|-----------------|----------------------------|---------------------------|---------------------------|--------------|---------------|
| | | | | | | PM ₁₀ (lb/hr) HER | SO ₂ (lb/hr) HER | NO _x (lb/hr) HER | CO (lb/hr) HER | VOC (lb/hr) HER | PM ₁₀ (tpy) AER | SO ₂ (tpy) AER | NO _x (tpy) AER | CO (tpy) AER | VOC (tpy) AER |
| FS02 | White Superior, 12G-825, Reciprocating Gas Engine | 1,061 | 8,760 | 100 | 10.79 | 0.22 | 0.02 | 4.68 | 4.68 | 2.34 | 0.97 | 0.07 | 20.49 | 20.49 | 10.25 |
| FS07 | Cummins GTA28CC Stand-By Engine | 643 | 500 | 100 | 6.54 | 0.13 | 9.46E-03 | 2.84 | 5.67 | 1.42 | 0.03 | 2.36E-03 | 0.71 | 1.42 | 0.36 |

Table A-3(c). Potential Hazardous Air Pollutant (HAP) Emissions from Reciprocating Engines

| Emission Unit ID | Source Description | Engine Rating (hp) EHP | Maximum Annual Operating Hours (hr/yr) ADP | Load Factor (%) LF | Equivalent Hourly Heat Input (MMBtu/hr) HHI | Hourly Emission Rates | | | | | | | Annual Potential Emissions | | | | | | | | |
|------------------|---|------------------------|--|--------------------|---|--------------------------|--------------------------|----------------------|---------------------|---------------------|---------------------------|--------------------|----------------------------|------------------------|------------------------|--------------------|-------------------|-------------------|-------------------------|------------------|-----------------------|
| | | | | | | Formaldehyde (lb/hr) HER | Acetaldehyde (lb/hr) HER | Acrolein (lb/hr) HER | Benzene (lb/hr) HER | Toluene (lb/hr) HER | Ethyl Benzene (lb/hr) HER | Xylene (lb/hr) HER | Naphthalene (lb/hr) HER | Formaldehyde (tpy) AER | Acetaldehyde (tpy) AER | Acrolein (tpy) AER | Benzene (tpy) AER | Toluene (tpy) AER | Ethyl Benzene (tpy) AER | Xylene (tpy) AER | Naphthalene (tpy) AER |
| FS02 | White Superior, 12G-825, Reciprocating Gas Engine | 1,061 | 8,760 | 100 | 10.79 | 2.34E-01 | 3.19E-02 | 3.01E-02 | 1.81E-02 | 6.38E-03 | 2.83E-04 | 2.23E-03 | 1.11E-03 | 1.03E+00 | 1.40E-01 | 1.32E-01 | 7.91E-02 | 2.79E-02 | 1.24E-03 | 9.76E-03 | 4.86E-03 |
| FS07 | Cummins GTA28CC Stand-By Engine | 643 | 500 | 100 | 6.54 | 1.42E-01 | 1.93E-02 | 1.82E-02 | 1.09E-02 | 3.86E-03 | 1.72E-04 | 1.35E-03 | 6.72E-04 | 3.55E-02 | 4.83E-03 | 4.55E-03 | 2.74E-03 | 9.66E-04 | 4.29E-05 | 3.38E-04 | 1.68E-04 |

Example Calculations for Unit ID FS02

Hourly Heat Input (HHI):

1. $HHI = (EHP)(C.F.)(1/fuel\ eff)(1\ MMBtu/10^6\ Btu) =$

10.79 MMBtu/hr
 EHP = Engine Rating 1,061 HP
 C.F. = Conversion Factor, HP to Btu/hr 2,543 Btu/hr
 fuel eff = Fuel Efficiency 0.25

Source of Data:

Calculated
 Equipment Design
 AP-42, Appendix A, Conversion Factors (9/85)
 Engineering Estimate

SO₂ Emission Factor:

2. $EF = (S)(MW)(lb\ mol/385.1\ scf)(1\ scf/1000\ Btu)(10^6\ Btu/MMBtu) =$

1.45E-03 lb/MMBtu
 S = Sulfur in Fuel 8.7 ppmv
 MW = Molecular Weight of SO₂ 64 lb/lb-mol

Source of Data:

Calculated
 Based on max Sulfur from FERC tariff
 Periodic Table

PM₁₀ Hourly Emission Rates (HER):

3. $HER_{hr} = (EF)(HHI)(LF/100) =$

0.22 lbs/hr
 EF = Emission Factor 2.06E-02 lb/MMBtu
 HHI = Hourly Heat Input 10.79 MMBtu/hr
 LF = Load Factor 100 %

Source of Data:

Calculated, PM₁₀ line item
 AP-42, Fifth Edition, Table 3.2-3, (7/00)
 Equipment Design
 Operator Estimate

NO_x Hourly Emission Rates (HER):

4. $HER_{hr} = (EF)(THP)(1\ lb/453.5924\ g)(LF/100) =$

4.68 lbs/hr
 EF = Emission Factor 2.0 g/hp-hr
 THP = Turbine Rating 1,061 HP
 LF = Load Factor 100 %

Source of Data:

Calculated, NO_x line item
 Vendor Data
 Equipment Design
 Operator Estimate

PM₁₀ Annual Emission Rates (AER):

5. $AER_{hr} = (HER)(AOP)(1\ ton/2000\ lbs) =$

0.97 tpy
 HER = Hourly Emission Rate 0.22 lbs/hr
 AOP = Annual Operating Hours 8,760 (hr/yr)

Source of Data:

Calculated, PM₁₀ line item
 Calculated, see example calc 3
 Continuous Operation

ITEM 5 ATTACHMENT
GREENHOUSE GAS CALCULATIONS

Questar Pipeline Company**Fidlar Compressor Station****² Calculating source specific heat input (mmBtu)**

Engine/Turbines

hp = average operating horsepower or maximum rated
 Btu/hp-hr = BSFC, manufacturer specified or assumed conservative estimate
 hrs = operating hours per year; actual or max 8760

$$\text{mmBtu} = \frac{\text{hp}}{\text{Btu/hp-hr}} \times \text{hrs}$$

Heater/Boilers

mmBtu/hr = rated capacity of equipment
 hrs = operating hours per year; actual or max 8760

$$\text{mmBtu} = \frac{\text{mmBtu}}{\text{hr}} \times \text{hrs}$$

³ Calculating mass emissions (metric tons) of GHGs using source specific heat input (mmBtu)

Tier 1 Methodology

$$\text{tonne GHG} = 1 \times 10^{-3} \times \text{EF}_{\text{GHG}} \times \text{mmBtu}$$

0.001 tonne/kg Conversion factor from kilograms to metric tons.

53.02 kg CO₂ / mmBtu Default CO₂ emission factor (EF); [Table C-1] - fuel type: natural gas

1.00E-03 kg CH₄ / mmBtu Default CH₄ emission factor (EF); [Table C-2] - fuel type: natural gas

1.00E-04 kg N₂O / mmBtu Default N₂O emission factor (EF); [Table C-2] - fuel type: natural gas

110 CO₂ lb/mmbtu AP-42 Table 3.1-2a - turbines

0.003 N₂O lb/mmbtu AP-42 Table 3.1-2a - turbines

⁴ Calculating Carbon Dioxide Equivalent for each GHG

$$\text{tonne CO}_2\text{e}_{\text{GHG}} = \text{tonne GHG} \times \text{GWP}_{\text{GHG}}$$

From Table A-1 of Subpart A - Global Warming Potential (100 year time horizon)

1 GWP_{CO₂}

21 GWP_{CH₄}

310 GWP_{N₂O}

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Heimsath (First) Kim (MI)

Title Vice President, Environment, Health, and Safety

Street or P.O. Box P.O. Box 45360

City Salt Lake City State UT ZIP 84145 - 0360

Telephone (801) 324 - 3412 Ext. Facsimile (801) 324 - 3883

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) *Kim Heimsath* *KB*

Name (typed) Ms. Kim Heimsath Date: 10 / 30 / 2013



Questar Pipeline Company

1140 West 200 South

P.O. Box 45360

Salt Lake City, UT 84145-0360

Tel 801 324 5555

October 30, 2013

U.S. EPA, Region VIII
Attn: Eric Wortman, Part 71 Permit Contact
Air & Radiation Program (8P-AR)
1595 Wynkoop Street
Denver, CO 80202-1129

Re: Follow Up for Title V Permit Renewal V-UO-000002-2013.00

Dear Eric Wortman:

The purpose of this correspondence is to provide additional information for the Fidler Compressor Station (FCS) as requested in your completeness determination letter dated July 11, 2013.

1. As discussed via email after receipt of your letter, Questar did indeed calculate flashing losses from emission unit QPC Tank with API E&P Tanks 2.0. Unit QPC Tank does not typically receive pipeline liquids and therefore throughput was conservatively modeled at one turnover per year (400 bbls). Working and breathing losses were also accounted for in the potential-to-emit calculations.
2. Here is an applicability review of the federal regulations listed in bullet #2 of your letter:
 - **40 CFR 52 – PSD** – The potential-to-emit for all criteria pollutants and greenhouse gases from the FCS is below the respective regulatory thresholds for the federal Prevention of Significant Deterioration program (see table 3-1 located in section 3 of the renewal application binder). **Not applicable.**
 - **40 CFR 60 – NSPS Subpart Db – Industrial, Commercial, Institutional Steam Generating Units** – The Fidler Compressor Station (FCS) does not contain any steam generating units with a heat input of greater than 100 million Btu per hour. **Not applicable.**
 - **40 CFR 60 – NSPS Subpart Dc – Small Industrial, Commercial, Institutional Steam Generating Units** - The FCS does not contain any steam generating units with a heat input of greater than 10 million Btu per hour, but less than 100 million Btu per hour. **Not applicable.**
 - **40 CFR 60 – NSPS Subparts K, Ka, Kb – Petroleum Liquid Storage Vessels (VOC)** – The FCS does not contain any petroleum liquids or VOC storage vessels with capacity in excess of 75 cubic meters. **Not applicable.**

- **40 CFR 60 – NSPS Subpart GG – Stationary Gas Turbines** – FCS units FS01, FS03, and FS05 are all stationary gas turbines with applicable requirements under subpart GG. **Regulation is applicable.**
- **40 CFR 60 – NSPS Subpart IIII – Stationary Compression Ignition Combustion Engines** – The FCS does not contain any compression ignition reciprocating engines. **Not applicable.**
- **40 CFR 60 – NSPS Subpart JJJJ – Stationary Spark Ignition Combustion Engines** – FCS units FS02 and FS07 are spark ignition engines. Unit FS02 was constructed prior to June 12, 2006 and has not been modified or reconstructed. Unit FS07 is subject to NSPS JJJJ as an emergency engine. **Regulation is applicable for Unit FS07.**
- **40 CFR 60 – NSPS Subpart KKKK – Stationary Combustion Turbines** – The FCS does not contain any combustion turbines that commenced construction, reconstruction, or modification after February 18, 2005. **Not applicable.**
- **40 CFR 60 – NSPS Subpart OOOO – Oil and Gas Sector** – The FCS operates in the gas transmission sector (SIC Code 4922) and does not contain any condensate tanks constructed, reconstructed, or modified after August 23, 2011 with VOC emissions greater than or equal to 6 tons per year. **Not applicable.**
- **40 CFR 61 – NESHAPS Subpart V- Equipment Leaks** – The FCS is not a listed source of the hazardous air pollutants listed in 61.01. **Not applicable.**
- **40 CFR 63 – NESHAP – Subpart HH – Oil and Natural Gas Production** – The FCS is not a production sector facility. **Not applicable.**
- **40 CFR 63 – NESHAP – Subpart HHH – Oil and Natural Gas Transmission, Storage, and Distribution** – The FCS is not a major source of HAP emissions and does not contain any of the affected equipment listed under subpart HHH. **Not applicable.**
- **40 CFR 63 – NESHAP Subpart IIII – Surface Coating of Automobiles and Light Duty Trucks** – Listed by mistake - See Subpart ZZZZ.
- **40 CFR 63 – NESHAP Subpart JJJJ – Paper and other Web Coating** – Listed by mistake. See Subpart ZZZZ.
- **40 CFR 63 – NESHAP Subpart ZZZZ – Reciprocating Internal Combustion Engines** – The FCS contains two (2) RICE engines (units FS02 and FS07) that are subject to area source requirements under Subpart ZZZZ. **Regulation is applicable.**
- **40 CFR 63 – NESHAP Subpart EEEE – Organic Liquids Distribution (non-gasoline)** – The FCS is a natural gas transmission and storage facility as defined in Subpart HHH and, therefore, is not an OLD facility as specified in 63.2334 (c)(2). **Not applicable.**
- **40 CFR 63 – NESHAP Subpart DDDDD – Major Source Boiler MACT** – The FCS is not a major source of HAPs. **Not applicable.**
- **40 CFR 63 – NESHAP Subpart JJJJJJ – Area Source Boiler MACT** – The 1.7 MMBtu/hour boiler at the FCS is fired solely by natural gas and is not subject to Subpart JJJJJJ as stated in 63.11195(e). **Not applicable.**

- **40 CFR 63 – NESHAP Subpart YYYYY – Stationary Combustion Turbines** – The FCS is not a major source of HAP emissions. Furthermore, the requirements for gas-fired turbines have been stayed indefinitely – **Not applicable.**
- **40 CFR 64 – Compliance Assurance Monitoring (CAM)** – Unit FS02 at the FCS has uncontrolled emissions of NOx greater than 100 tons/year and is controlled by add-on equipment, therefore, CAM applies. **Regulation is applicable.**
- **40 CFR 68 – Chemical Accident Prevention** – The FCS is a natural gas transmission facility regulated by the U.S. Department of Transportation under 49 CFR Part 192 and therefore does not meet the definition of a CAA Section 112(r) *stationary source* under 68.3. **Not applicable.**
- **40 CFR 82 – Stratospheric Ozone and Climate Protection** – The FCS contains small appliances and MVAC equipment subject to regulation under Part 82. **Regulation is applicable.**

Questar submitted a Tribal Minor New Source Review synthetic minor permit application for Unit FS02 on October 30, 2013 (see attachment I).

Questar prepared a response to Attachment A of your letter – EPA Region 8 Oil and Gas Part 71 Source Determination Screening Information Request. Our response is attached as Attachment II.

Finally, a Form CTAC is attached, certifying the information contained in this submittal.

Questions or requests for additional information should be directed to me at (801) 324-3820 or via electronic mail: scott.bassett@questar.com.

Sincerely,



Scott R. Bassett
Sr. Environmental Coordinator

Attachments

ATTACHMENT I



Questar Pipeline Company

1140 West 200 South

P.O. Box 45360

Salt Lake City, UT 84145-0360

Tel 801 324 5555

October 30, 2013

U.S. EPA, Region VIII
Attn: Federal Minor NSR Permit Coordinator
Air & Radiation Program (8P-AR)
1595 Wynkoop Street
Denver, CO 80202-1129

Re: Tribal Minor New Source Review Permit Application

Dear Sir or Madam:

Please find attached an application for a synthetic minor permit for equipment located in Indian Country. Questar Pipeline Company (QPC) is requesting enforceable limits for NOx on an existing reciprocating engine (Unit FS02) at the Fidler Compressor Station on the Uintah and Ouray Indian Reservation in Utah. Fidler currently operates under Part 71 Permit number V-UO-0002-05.01.

QPC has prepared an application consisting of Form NEW, Form SYNMIN, and supporting documentation. In addition, a signed form CTAC is enclosed since the existing unit operates at a Part 71 source.

Questions or requests for additional information should be directed to me at (801) 324-3820 or via electronic mail: scott.bassett@questar.com.

Sincerely,

Scott R. Bassett
Sr. Environmental Coordinator

Attachments

cc: Ute Tribe Environmental Contact

ATTACHMENT II

**Questar Pipeline Company
Fidlar Compressor Station
Part 71 Permit #V-UO-0002-05.01**

Response to:

EPA Region 8 Oil and Gas Part 71 Source Determination Screening Information Request

1. Please respond to the following questions, as applicable, in regards to operations at the facility under consideration for an initial or renewed Clean Air Act (CAA) Title V Operating Permit under 40 CFR Part 71.
 - a. Does the facility to be permitted receive and/or dispatch oil and/or natural gas from/to other oil and/or other natural gas production components, owned or operated by the applicant, such as well sites, compressor stations, tank batteries, gas plants, etc. If yes, please explain.

The Fidlar Compressor Station (FCS) is a main line gas transmission facility (SIC Code 4922). Questar Pipeline Company (QPC) does not own or operate any natural gas production components.

- b. Does the facility to be permitted receive and/or dispatch oil and/or natural gas from/to other oil and/or other natural gas production components, owned or operated by third parties, such as well sites, compressor stations, tank batteries, gas plants, etc. If yes, please explain.

The FCS can deliver/receive gas to/from the Chapeta Processing, LLC gas plant located approximately 2 miles from Fidlar Station. The FCS can receive processed gas from QEP Resources Stagecoach/Ironhorse gas processing complex located approximately 0.25 miles from Fidlar Station.

- c. What components owned and/or operated by the applicant are capable of operating independently from other components owned and/or operated by the applicant? If any please explain.

QPC does not own any natural gas production components. All gas transmission pipelines and stations owned by QPC are capable of operating independently.

- d. In regard to any pipeline system(s) utilized by the facility to be permitted, is it (are they) owned and operated exclusively by the applicant?

Four (4) FERC jurisdictional pipelines (main lines 40, 80, 103, & 104) owned and operated by QPC interconnect at FCS and are capable of bi-directional flow. Two (2) third party pipelines interconnect FCS with the Chapeta Processing, LLC plant. One (1) pipeline owned and operated by QEP Resources delivers processed gas to FCS for transportation.

- e. If the pipeline system(s) is not exclusively owned and/or operated by the applicant, is it (are they) a shared resource(s) with third party companies? Please identify any third party companies and describe the nature of the interactions.

The gas processing interconnects mentioned above are not shared resources. They are owned and operated exclusively by third parties. Questar Pipeline Company is a FERC/DOT regulated natural gas transmission company with myriad receipt points along its pipelines. Some of QPC's transportation customers also contract with third parties to process their gas. Two (2) third party gas processing plants are located near the FCS: 1) Chapeta Processing, LLC, and 2) QEP Resources Stagecoach/Ironhorse. QPC can receive gas for transportation from both processing plants either through the FCS or directly into the main lines without passing through the compressor station.

2. Please submit the following information for oil and/or natural gas components operating in the same system as the facility to be permitted:

Please note that QPC does not own, operate, or partner on any natural gas production or processing assets in the Uinta Basin. QPC's southern transmission system stretches from Rifle, Colorado to a pipeline interconnect with Kern River Gas Transmission near Goshen, Utah. The nearest gas transmission facilities owned and operated by QPC in proximity to Fidler Station are: 1) Greasewood Compressor Station approximately 70 miles east in Colorado (UTM 12S 739492.03 E, 4420853.42 N), 2) Kastler Compressor Station approximately 70 miles north in Utah (UTM 12T 650409.15 E, 4539429.76 N), and 3) Blind Canyon Compressor Station approximately 40 miles west in Utah (UTM 12S 567943.24 E, 4411220.85 N). A general system map for QPC is included with this submittal. The attached system map along with the descriptions above should be sufficient in answering the remaining questions below should they be relevant. Please contact us if additional information is needed to make a source determination.

- a. A system map identifying the following:
- i. Components owned and/or operated by the applicant that receive or dispatch oil and/or natural gas from/to the facility to be permitted;
 - ii. Pipelines utilized by the facility to be permitted that are owned and/or operated by the applicant; and
 - iii. Pipelines utilized by the facility to be permitted that are shared with third party companies.
- b. The SIC codes for each component.
- c. A description of the activities for each component.
- d. The Latitude/Longitude for each component.
- e. The proximity of the component to facility to be permitted.
- f. A description of the siting factors for new and existing components owned and/or operated by the applicant (such as surface owner agreements, spacing orders, leases, NEPA requirements, terrain, and proximity to existing structures.).
- g. A flow diagram of the oil and/or natural gas flow among the components that are owned and/or operated by the applicant and utilized by the facility to be permitted.

- h. A general description of system redundancy, if present (i.e., What happens if a component in the system owned and/or operated by the applicant and utilized by the facility to be permitted goes offline? What emissions sources, if any, are capable of operating independently from other components?).
- i. A general description of the factors influencing the percentage of oil and/or natural gas flow to downstream compression and processing facilities such as, pressure, contractual obligations, gas custody, etc.

ATTACHMENT III

ATTACHMENT IV

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Heimsath (First) Kim (MI)

Title Vice President, Environment, Health, and Safety

Street or P.O. Box P.O. Box 45360

City Salt Lake City State UT ZIP 84145 - 0360

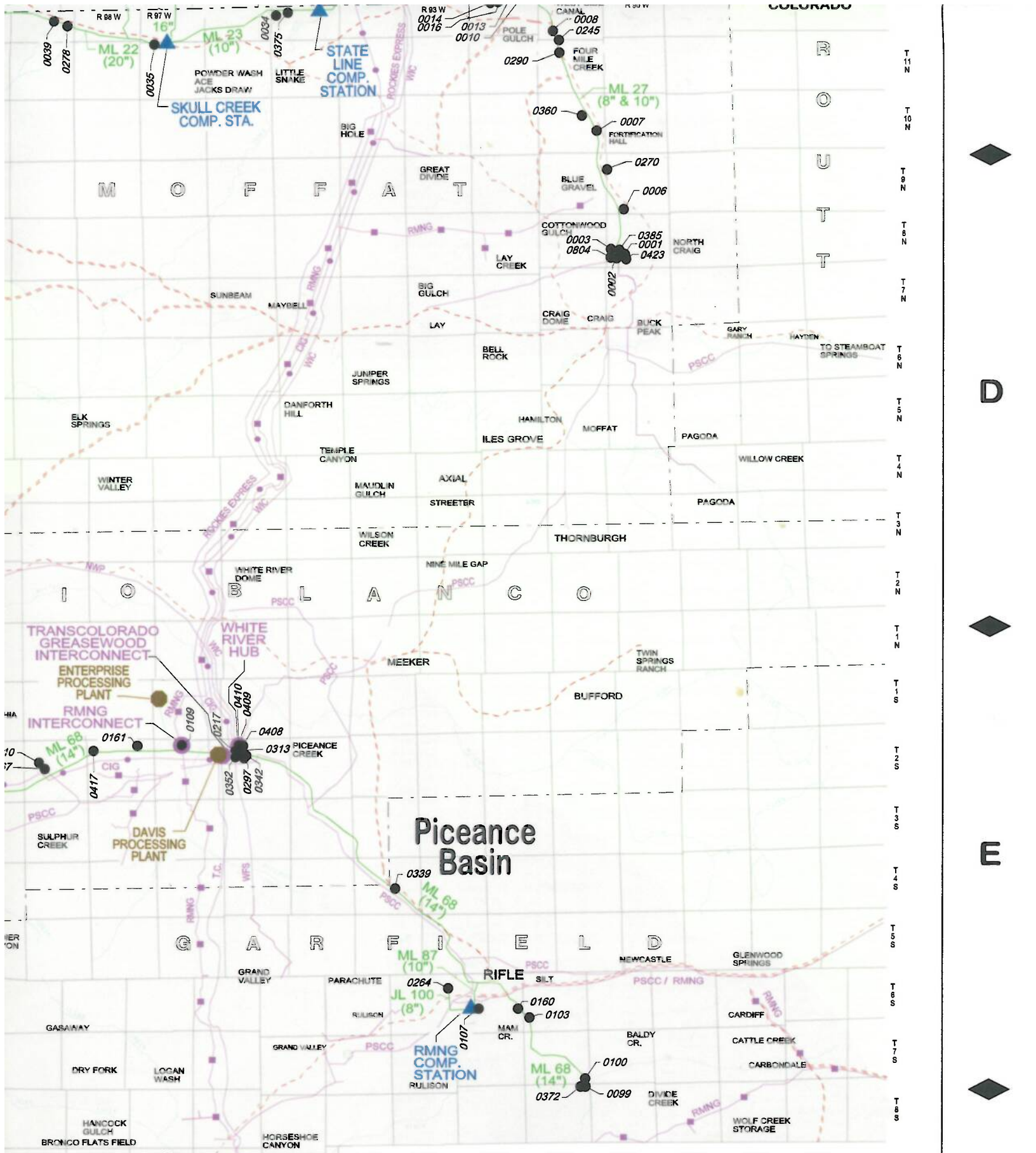
Telephone (801) 324 - 3412 Ext. Facsimile (801) 324 - 3883

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete. *Kim Heimsath*

Name (signed) *Kim Heimsath*

Name (typed) Ms. Kim Heimsath Date: 10 / 30 / 2013



QUESTAR
Pipeline













SYSTEM MAP - COLORADO, UTAH, & WYOMING

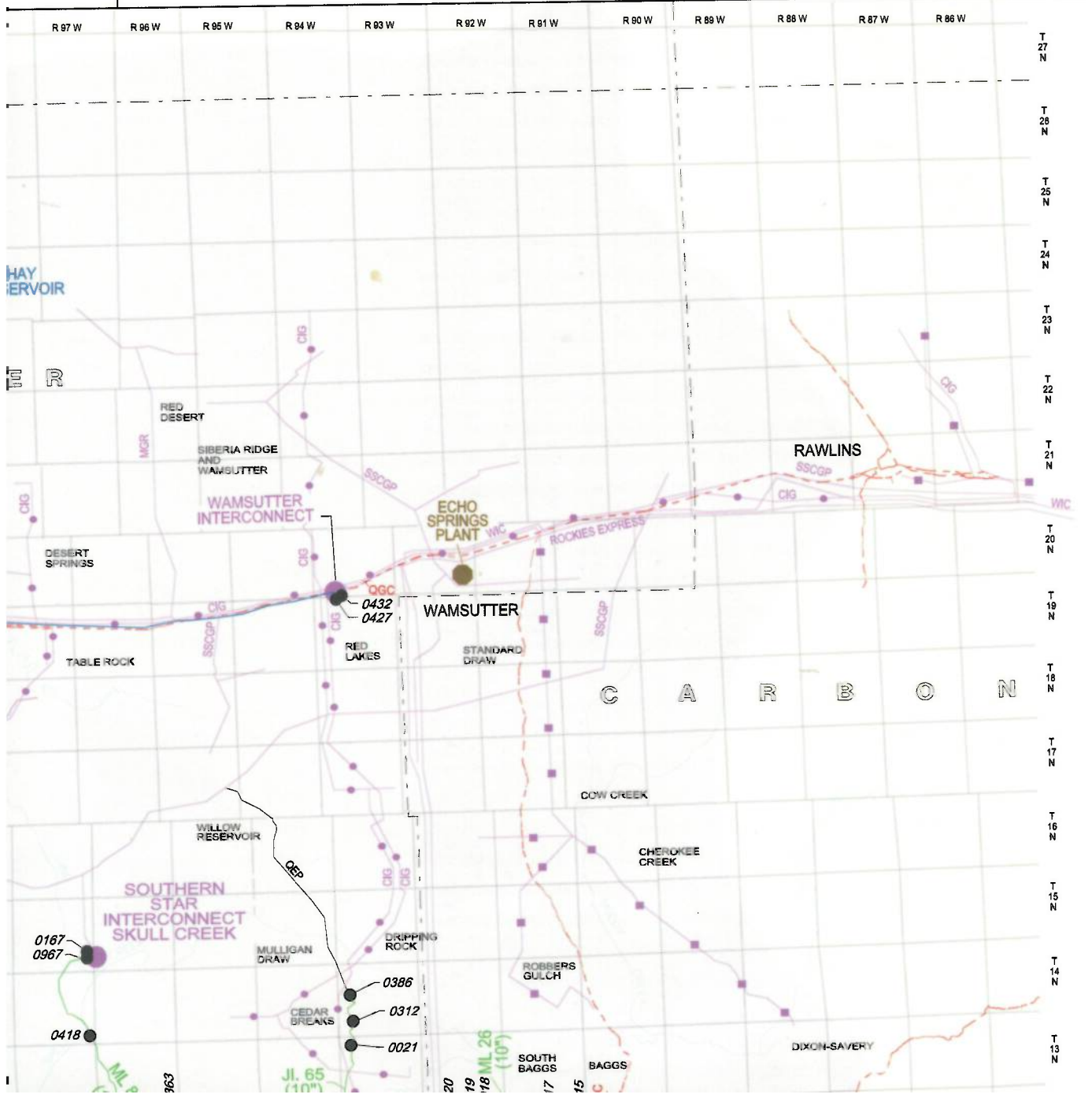
QPC Dwg. #8400

5 0 5 10
MILES

Rev. 8/21/2013

LEGEND

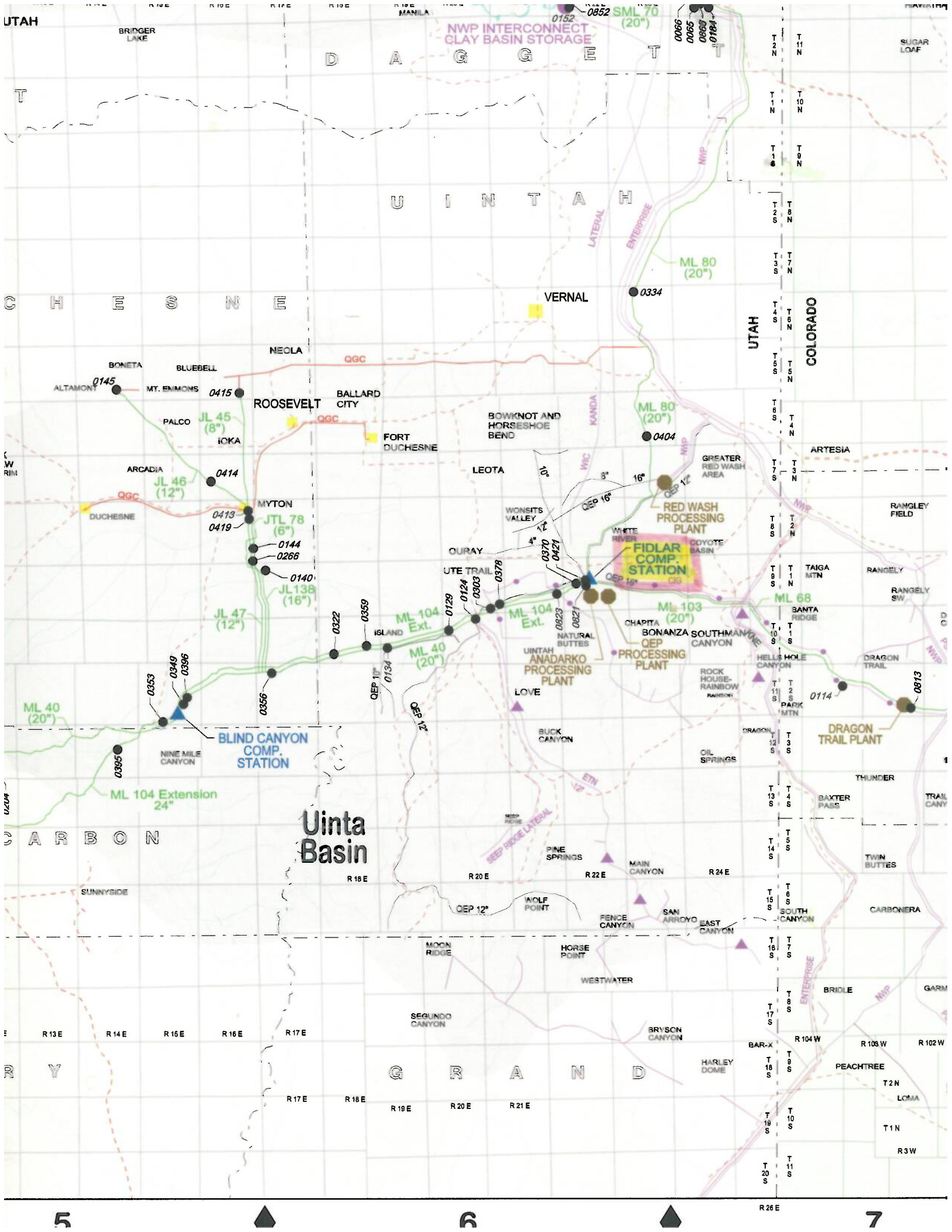
-  QUESTAR PIPELINE COMPANY
 -  QUESTAR GAS COMPANY
 -  QUESTAR OVERTHRUST PIPELINE COMPANY
 -  QEP FIELD SERVICES
 -  OTHER COMPANY PIPELINES
-
-  CITIES SERVED BY QUESTAR GAS
 -  GAS BASIN
 -  QUESTAR PIPELINE COMPANY TRANSMISSION & STORAGE COMPRESSORS
 -  QUESTAR PIPELINE COMPANY TRANSMISSION COMPRESSOR
 -  PROCESSING PLANTS
 -  PIPELINE INTERCONNECT
 -  CITY GATE STATIONS



A

B

C





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

1595 Wynkoop Street
Denver, Colorado 80202
Phone 800-227-8917

<http://www.epa.gov/region08>

Ref: 8P-AR

JUL 11 2013

Mr. Scott R. Bassett
Sr. Environmental Coordinator
Questar Pipeline Company
P.O. Box 45360
Salt Lake City, Utah 84145-0360

Re: Title V Permit Renewal
V-UO-000002-2013.00
Questar Pipeline Company
Fidlar Compressor Station

Dear Mr. Bassett:

The U.S. Environmental Protection Agency (EPA) has completed its review of Questar Pipeline Company's (QPC's) application for a renewal Title V Permit to Operate (Part 71 Permit) for the Fidlar Compressor Station located on the Uintah and Ouray Indian Reservation in Uintah County, Utah. The application was received by the EPA on June 7, 2013.

The EPA is sending QPC this letter to document the agency's completeness determination, and remind QPC of its continuing obligation to correct any misinformation and provide updated information to the EPA, as well as its continuing obligation to comply with all applicable EPA permitting and regulatory requirements. The EPA is also requesting additional information at this time and requiring QPC to submit a Part 49 application for the facility.

Completeness Determination: Pursuant to 40 CFR 71.5(a)(2), we have determined that the information submitted is administratively complete and sufficient to evaluate the Fidlar Compressor Station and its Part 71 permit renewal application. Therefore, the application is deemed administratively complete as of June 13, 2013.

Regulatory Requirements: Please be aware that this completeness determination does not mean we have already approved the requested permit, nor does it mean that we have determined whether Title V, Prevention of Significant Deterioration (PSD), National Emission Standards for Hazardous Air Pollutants (NESHAP), or New Source Performance Standard (NSPS) compliance concerns have been adequately addressed.

Duty to Correct/Update Application: If you find that you have omitted any relevant facts, or submitted incorrect information, you must promptly file corrections to your application with our office. In addition, if regulations become applicable before the draft operating permit for this facility is made

available for public comment, you must provide additional information to us addressing the new applicable requirements (See 40 CFR 71.5(b)).

Duty to Provide Additional Information: Please be advised that this application completeness determination does not constitute a thorough evaluation of the merits of the application. If we determine that additional information is necessary to evaluate the application or to take final action on it, we may request such information in writing and set a reasonable deadline for a response (See 40 CFR 71.5(a)(2)).

At this time we are requesting the following information and are asking that QPC provide the information by November 1, 2013:

1. The application identified one 400 bbl condensate tank as emission unit QPC Tank and provided the supporting EPA Tanks 4.0 model calculations. EPA Tanks 4.0 does not account for flash emissions and is only an acceptable method for calculating working and breathing losses. Please provide flash emissions estimates for unit QPC Tank using simulation software based on known properties of hydrocarbon liquid and vapors and accepted chemical equations of state. Some common and appropriate flashing model software programs include API E&P Tank V2, Prosim, Hysim, Hysys, ProMax and KFlash. Every hydrocarbon stream entering the vessel should have a separate flash emissions calculation and separate liquids lab analyses, including any liquid dropout points from interstage cooling between compression. The most recent laboratory analyses of liquid samples and any other supporting documentation should be provided with the emission calculations.
2. Please provide your review of all applicable and potentially applicable requirements as they may or may not apply to your facility now. For requirements that do not apply, state why. Requirements that apply or potentially apply to this facility include, but may not be limited to:
 - 40 CFR 52 - PSD
 - 40 CFR 60 – NSPS
 - Subpart Db – Industrial, Commercial, Institutional Steam Generating Units
 - Subpart Dc – Small Industrial, Commercial, Institutional Steam Generating Units
 - Subpart K - Petroleum Liquid Storage Vessels
 - Subpart Ka - Petroleum Liquid Storage Vessels
 - Subpart Kb – VOC (including petroleum liquid) Storage Vessels
 - Subpart GG – Stationary Gas Turbines
 - Subpart IIII- Stationary Compression Ignition Internal Combustion Engines
 - Subpart JJJJ- Stationary Spark Ignition Internal Combustion Engines
 - Subpart KKKK – Stationary Combustion Turbines
 - Subpart OOOO – Oil and Gas Sector
 - 40 CFR 61 – National Emission Standards for Hazardous Air Pollutants
 - Subpart V – Equipment Leaks (Fugitive Emission Sources)
 - 40 CFR 63 – NESHAP
 - Subpart HH – Oil and Natural Gas Production
 - Subpart HHH – Oil and Natural Gas Transmission, Storage and Distribution
 - Subpart IIII- Stationary Compression Ignition Internal Combustion Engines
 - Subpart JJJJ- Stationary Spark Ignition Internal Combustion Engines
 - Subpart ZZZZ – Reciprocating Internal Combustion Engines (RICE)
 - Subpart EEEE – Organic Liquids Distribution (non-gasoline)
 - Subpart DDDDD – Major Source Boiler MACT

- Subpart JJJJJ- Area Source Boiler MACT
- Subpart YYYYY – Stationary Combustion Turbines
- 40 CFR 64 – Compliance Assurance Monitoring (CAM)
- 40 CFR 68 – Chemical Accident Prevention
- 40 CFR 82 – Stratospheric Ozone and Climate Protection

3. On February 6, 2012, the EPA finalized a Settlement Agreement for Environmental Appeals Board Case No. CAA 10-04. A copy of the Settlement Agreement can be accessed on the EPA's website at <http://www2.epa.gov/sites/production/files/documents/BP-FloridaRiver-Settlement-Agreement.pdf>. The settlement agreement requires the EPA to develop and implement an Oil and Gas Part 71 Source Determination "pilot" program as outlined in Exhibit A of the Settlement Agreement. The renewal Part 71 permit application for the Fidler Compressor Station is subject to the pilot program because it is a renewal application for a Title V permit for which Region 8 is the permitting authority. Thus, we are asking QPC to submit the additional information requested in Attachment A of this letter regarding the source determination pilot program. Based on the information received, we will determine whether additional analysis is necessary.

Part 49 Application: On July 15, 2011, the EPA issued a significant modification to the Part 71 permit for Fidler Compressor Station (Permit # V-UO-0002-05.01) to establish federally enforceable emission limitations that recognize the beneficial emission reduction from the control equipment on the four stroke rich burn compressor engine operating at the facility. The creation of the legally and practically enforceable limits in a Part 71 permit was a temporary, gap-filling measure for those sources operating in Indian country that did not have the ability to obtain these limits through other programs, such as exists in state jurisdictions. The Federal Tribal Minor New Source Review Program in Indian Country (TMNSR), effective August 30, 2011, created a permanent mechanism for establishing legally and practically enforceable requirements in a preconstruction permit. Sections 49.153(a)(3)(iv) and 49.158(c)(2)(iii) of the TMNSR rule provide the EPA with the authority to transfer such limits that were previously established in a Part 71 permit to a TMNSR permit. Therefore, we are requiring QPC to submit an application for a synthetic minor source TMNSR permit for the Fidler Compressor Station.

At this time we are requesting that QPC submit a TMNSR synthetic minor permit application for the Fidler Compressor Station by November 1, 2013.

Please remember this completeness determination does not affect your obligation to obtain pre-construction permits for any activity which may be subject to PSD permitting requirements at 40 CFR 52.21, nor any obligation you may have for complying with NESHAP at 40 CFR Part 63 or NSPS at 40 CFR Part 60. Where Federal NESHAP and NSPS regulations do apply to the Fidler Compressor station, QPC has an ongoing obligation to comply with the standards and requirements in those regulations regardless of Part 71 Permit issuance. Furthermore, future changes at the facility, whether considered major or minor for construction permitting purposes, may necessitate updating your Part 71 Permit application.

Pursuant to 40 CFR Part 2, Subpart B, QPC is entitled to assert a business confidentiality claim covering any part of the submitted information. Attachment B specifies the assertion and substantiation requirements for business confidentiality claims. Failure to assert such a claim makes the submitted information subject to public disclosure upon request and without further notice to you, pursuant to the Freedom of Information Act, 5 USC Section 552. Information subject to a business confidentiality claim may only be made available to the public in accordance with 40 CFR Part 2, Subpart B.

If portions of your submittal have business confidentiality claims, then please provide a redacted version that would remove any confidential business information.

This permit action has been assigned to Mr. Eric Wortman and has been given permit number V-UO-000002-2013.00. If you have any questions, please contact him at 303-312-6649. We look forward to working with your company in preparing the renewal Part 71 Permit.

Sincerely,

A handwritten signature in black ink that reads "Carl Daly". The signature is written in a cursive style with a large, sweeping "C" and "D".

Carl Daly, Director
Air Program

Enclosure

Attachment A

EPA Region 8 Oil and Gas Part 71 Source Determination Screening Information Request

1. Please respond to the following questions, as applicable, in regards to operations at the facility under consideration for an initial or renewed Clean Air Act (CAA) Title V Operating Permit under 40 CFR Part 71.
 - a. Does the facility to be permitted receive and/or dispatch oil and/or natural gas from/to other oil and/or natural gas production components, owned or operated by the applicant, such as well sites, compressor stations, tank batteries, gas plants, etc.? If yes, please explain.
 - b. Does the facility to be permitted receive and/or dispatch oil and/or natural gas from/to other oil and/or natural gas production components, owned and/or operated by third parties, such as well sites, compressor stations, tank batteries, gas plants, etc.? If yes, please explain.
 - c. What components owned and/or operated by the applicant are capable of operating independently from other components owned and/or operated by the applicant? If any, please explain.
 - d. In regard to any pipeline system(s) utilized by the facility to be permitted, is it (are they) owned and operated exclusively by the applicant?
 - e. If the pipeline system(s) is not exclusively owned and/or operated by the applicant, is it (are they) a shared resource(s) with third party companies? Please identify any third party companies and describe the nature of interactions.

2. Please submit the following information for oil and/or natural gas components operating in the same system as the facility to be permitted:
 - a. A system map identifying;
 - i. Components owned and/or operated by the applicant that receive or dispatch oil and/or natural gas from/to the facility to be permitted;
 - ii. Pipelines utilized by the facility to be permitted that are owned and/or operated by the applicant; and
 - iii. Pipelines utilized by the facility to be permitted that are shared with third party companies.
 - b. The SIC codes for each component.
 - c. A description of activities for each component.
 - d. The Latitude/ Longitude for each component.
 - e. The proximity of the component to facility to be permitted.
 - f. A description of the siting factors for new and existing components owned and/or operated by the applicant (such as surface owner agreements, spacing orders, leases, NEPA requirements, terrain, and proximity to existing structures.).
 - g. A flow diagram of the oil and/or natural gas flow among the components that are owned and/or operated by the applicant and utilized by the facility to be permitted.

- h. A general description of system redundancy, if present. (i.e., What happens if a component in the system owned and/or operated by the applicant and utilized by the facility to be permitted goes offline? What emissions sources, if any, are capable of operating independently from other components?)
 - i. A general description of factors influencing the percentage of oil and/or natural gas flow to downstream compression and processing facilities such as, pressure, contractual obligations, gas custody, etc.
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Attachment B

Confidential Business Information (CBI) Assertion and Substantiation Requirements

1. Assertion Requirements

You may assert a business confidentiality claim covering all or part of the information requested in the attached letter, as provided in 40 CFR §2.203(b). If portions of a document have CBI claims, then please provide a redacted version that would remove any CBI information. To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document over which you make a claim of confidentiality should be marked by placing on or attaching to the information, at the time it is submitted to United States Environmental Protection Agency (U.S. EPA), a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret" or "proprietary" or "company confidential" and a date if any when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by the U.S. EPA only to the extent permitted and by means of the procedures set forth by Section 114(c) of the Clean Air Act (the Act), and 40 CFR Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. U.S. EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

Please segregate personnel, medical and similar files from your responses and include that information on separate sheet(s) marked as "Personal Privacy Information" given that disclosure of such information to the general public may constitute an invasion of privacy.

2. Substantiation Requirements

All confidentiality claims are subject to U.S. EPA verification and must be made in accordance with 40 CFR §2.208 which provides in part that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; and that the information is not and has not been reasonably obtainable by legitimate means without your consent.

As explained above, if you assert a CBI claim in responding to the attached letter, please specify which portions of the information you consider confidential. **You must be specific by page, paragraph, and sentence when identifying the information subject to your claim.** Any information not specifically identified as subject to confidentiality claim may be disclosed to the public and a requestor without further notice to you. For each item or class of information that you identify as being subject to CBI, please answer the following questions, giving as much detail as possible:

- a. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will create the need for confidentiality, please specify that event.
- b. Information submitted to U.S. EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
- c. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound

by an agreement not to disclose the information further? If so, why should the information still be considered confidential?

- d. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
- e. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
- f. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
- g. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to U.S. EPA of similar information in the future.
- h. Any other issue you deem relevant (including, if pertinent reasons why you believe that the information you claim to be CBI is not emission or effluent data.)

Please note that emission data, provided under Section 114 of the Act, 42 USC § 7414, is not entitled to confidential treatment under 40 CFR Part 2. "Emission data" means, with reference to any source of emission of any substance into the air.

Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

- a. Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and
- b. A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source). 40 CFR §§ 2.30 I(a)(2)(i)(A), (B) and (C).

Emission data includes, but is not limited to, service records stating the amount of refrigerant added to a unit or reclaimed from a unit.

You bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), U.S. EPA requires that you to bracket all text so claimed and mark it "CBI". Information so designated will be disclosed by U.S.

EPA only to the extent allowed by, and by means of the procedures set forth in, 40 CFR Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.
