

FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO

Enbridge G & P (North Texas) L.P.

AUTHORIZING THE OPERATION OF

Huckabay Gas Plant
Natural Gas Liquids

LOCATED AT

Erath County, Texas

Latitude 32° 18' 50" Longitude 98° 23' 2"

Regulated Entity Number: RN100226885

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No: 0789 Issuance Date: _____

For the Commission

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General Terms and Conditions

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

Special Terms and Conditions: Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

1. Permit holder shall comply with the following requirements:
 - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
 - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.

- C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
 - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
 - E. Emission units subject to 40 CFR Part 63, Subpart HH as identified in the attached Applicable Requirements Summary table are subject to 30 TAC Chapter 113, Subchapter C, § 113.390 which incorporates the 40 CFR Part 63 Subpart by reference.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
 - B. Title 30 TAC § 101.3 (relating to Circumvention)
 - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
 - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
 - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
 - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
 - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
 - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
 - I. Title 30 TAC § 101.222 (relating to Demonstrations)
 - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)

3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed either before or after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
- (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
 - (ii) Title 30 TAC § 111.111(a)(1)(E)
 - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
 - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the “Applicable Requirements Summary” attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:
 - (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
 - (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum

required value does not constitute creation of an alternative fuel.

- (3) Records of all observations shall be maintained.
- (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (5) Compliance Certification:
 - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
 - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement.

However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.
- B. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
- C. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
 - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
 - (ii) Sources with an effective stack height (h_e) less than the standard effective stack height (H_e), must reduce the allowable emission level by multiplying it by $[h_e/H_e]^2$ as required in 30 TAC § 111.151(b)
 - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
- D. Outdoor burning, as stated in 30 TAC § 111.201, shall not be authorized unless the following requirements are satisfied:
 - (i) Title 30 TAC § 111.205 (relating to Exception for Fire Training)
 - (ii) Title 30 TAC § 111.207 (relating to Exception for Recreation, Ceremony, Cooking, and Warmth)
 - (iii) Title 30 TAC § 111.209 (relating to Exception for Disposal Fires)
 - (iv) Title 30 TAC § 111.219 (relating to General Requirements for Allowable Outdoor Burning)
 - (v) Title 30 TAC § 111.221 (relating to Responsibility for Consequences of Outdoor Burning)

4. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
5. For oil and natural gas production facilities as specified in 40 CFR Part 63, Subpart HH, the permit holder shall comply with the following requirements (Title 30 TAC Chapter 113, Subchapter C, § 113.390 incorporated by reference):
 - A. Title 40 CFR § 63.760(a)(1)(i) - (iii) (relating to Applicability and Designation of Affected Source)
 - B. Title 40 CFR § 63.775(d)(9) (relating to Reporting Requirements)

New Source Review Authorization Requirements

6. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule, standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
 - A. Are incorporated by reference into this permit as applicable requirements
 - B. Shall be located with this operating permit
 - C. Are not eligible for a permit shield
7. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
8. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

9. The permit holder shall comply with the following requirements for Air Quality Standard Permits:
 - A. Registration requirements listed in 30 TAC § 116.611, unless otherwise provided for in an Air Quality Standard Permit
 - B. General Conditions listed in 30 TAC § 116.615, unless otherwise provided for in an Air Quality Standard Permit
 - C. Applicable requirements of 30 TAC § 116.617 for Pollution Control Projects based on the information contained in the registration application.

Compliance Requirements

10. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
11. Use of Discrete Emission Credits to comply with the applicable requirements:
 - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
 - (i) Title 30 TAC Chapter 115
 - (ii) Title 30 TAC Chapter 117
 - (iii) If applicable, offsets for Title 30 TAC Chapter 116
 - (iv) Temporarily exceed state NSR permit allowables
 - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
 - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
 - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
 - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)

- (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
- (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

Risk Management Plan

- 12. For processes subject to 40 CFR Part 68 and specified in 40 CFR § 68.10, the permit holder shall comply with the requirements of the Accidental Release Prevention Provisions in 40 CFR Part 68. The permit holder shall submit to the appropriate agency either a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR § 68.10(a), or as part of the compliance certification submitted under this permit, a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of a risk management plan.

Protection of Stratospheric Ozone

- 13. Permit holders at a site subject to Title VI of the FCAA Amendments shall meet the following requirements for protection of stratospheric ozone:
 - A. Any on site servicing, maintenance, and repair on refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants or non-exempt substitutes shall be conducted in accordance with 40 CFR Part 82, Subpart F. Permit holders shall ensure that repairs on or refrigerant removal from refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants are performed only by properly certified technicians using certified equipment. Records shall be maintained as required by 40 CFR Part 82, Subpart F.

Alternative Requirements

- 14. The permit holder shall comply with the approved alternative means of control (AMOC); alternative monitoring, recordkeeping, or reporting requirements; or requirements determined to be equivalent to an otherwise applicable requirement contained in the Alternative Requirements attachment of this permit. Units complying with an approved alternative requirement have reference to the approval in the Applicable Requirements summary listing for the unit. The permit holder shall maintain the original documentation, from the EPA Administrator, demonstrating the method or limitation utilized. Documentation shall be maintained and made available in accordance with 30 TAC § 122.144.

Permit Location

15. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.

Permit Shield (30 TAC § 122.148)

16. A permit shield is granted for the emission units, groups, or processes specified in the attached “Permit Shield.” Compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment “Permit Shield.” Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

Attachments

Applicable Requirements Summary

Permit Shield

New Source Review Authorization References

Alternative Requirement

Applicable Requirements Summary

Unit Summary 12

Applicable Requirements Summary13

Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
GS-01	GLYCOL DEHYDRATION	N/A	63HH	40 CFR Part 63, Subpart HH	No changing attributes.
JW-01	FUGITIVE EMISSION UNITS	N/A	63HH	40 CFR Part 63, Subpart HH	No changing attributes.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GS-01	EU	63HH	112(B) HAPS	40 CFR Part 63, Subpart HH	§ 63.765(b)(1)(ii) § 63.764(a) § 63.764(j) § 63.765(b)(2) § 63.765(c)(3) § 63.771(c)(1) § 63.771(c)(2) § 63.771(d)(1) § 63.771(d)(4)(i) [G]§ 63.773(c)(3) § 63.773(c)(4)	The owner or operator of a large glycol dehydration unit shall connect the process vent to a control device or combination of control devices through a closed-vent system and the outlet benzene emissions from the control device(s) shall be reduced to a level less than 0.90 megagrams per year.	§ 63.771(d)(3) [G]§ 63.772(c) § 63.772(e) § 63.772(h)(1) [G]§ 63.772(h)(2) § 63.772(h)(3) [G]§ 63.772(h)(4) [G]§ 63.772(h)(5) [G]§ 63.772(h)(6) [G]§ 63.772(h)(7) [G]§ 63.772(i) § 63.773(b) [G]§ 63.773(c)(2)(ii) [G]§ 63.773(d)(1) § 63.773(d)(3) § 63.773(d)(3)(i)(A) § 63.773(d)(3)(i)(H)(1) § 63.773(d)(3)(i)(H)(2) § 63.773(d)(3)(ii) § 63.773(d)(3)(iii) § 63.773(d)(4) [G]§ 63.773(d)(5)(i) § 63.773(d)(6) § 63.773(d)(6)(i) § 63.773(d)(6)(iv) § 63.773(d)(6)(vi) § 63.773(d)(6)(vi)(A) § 63.773(d)(6)(vi)(B) § 63.773(d)(7)	[G]§ 63.774(b)(1) § 63.774(b)(2) [G]§ 63.774(b)(3) § 63.774(b)(4) § 63.774(b)(4)(i) § 63.774(b)(4)(ii) § 63.774(b)(4)(ii)(C) § 63.774(b)(7) § 63.774(b)(7)(i) § 63.774(b)(7)(ii) § 63.774(b)(7)(ii) § 63.774(b)(7)(iv) § 63.774(b)(7)(v) § 63.774(b)(7)(vi) § 63.774(b)(7)(vii) § 63.774(b)(8) [G]§ 63.774(c) § 63.774(g) [G]§ 63.774(h) § 63.774(i)	§ 63.764(b) [G]§ 63.772(h)(8) [G]§ 63.773(c)(2)(ii) [G]§ 63.775(b)(1) § 63.775(b)(2) § 63.775(b)(3) § 63.775(b)(4) § 63.775(b)(5) § 63.775(b)(6) § 63.775(d) [G]§ 63.775(d)(1) [G]§ 63.775(d)(5) § 63.775(d)(6) § 63.775(d)(7) § 63.775(d)(8) § 63.775(d)(10) § 63.775(d)(13) [G]§ 63.775(d)(14) § 63.775(e) § 63.775(e)(1) § 63.775(e)(2) § 63.775(e)(2)(i) § 63.775(e)(2)(ii) § 63.775(e)(2)(ii)(A) § 63.775(e)(2)(ii)(D) § 63.775(e)(2)(ii)(E) § 63.775(e)(2)(ii)(F) § 63.775(e)(2)(iii) § 63.775(e)(2)(vi) [G]§ 63.775(e)(2)(vii) § 63.775(e)(2)(viii) § 63.775(e)(2)(xi) § 63.775(e)(2)(xiii) [G]§ 63.775(f) § 63.775(g)(1)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
JW-01	EU	63HH	112(B) HAPS	40 CFR Part 63, Subpart HH	§ 63.769(c) [G]§ 61.242-1(c) [G]§ 61.244 § 63.764(j)	Owner or operator may request a determination for an alternative means of emission limitation and must comply with requirements of determination if request is granted in accordance with §61.242-1(c)(1)-(2).	[G]§ 61.242-1(c) [G]§ 61.245(b) [G]§ 61.245(c) [G]§ 61.245(d) **See Alternative Requirements	[G]§ 61.246(a) [G]§ 61.246(i) § 61.246(j)	[G]§ 61.247(a) [G]§ 61.247(b) § 61.247(c) [G]§ 61.247(e)
JW-01	EU	63HH	112(B) HAPS	40 CFR Part 63, Subpart HH	§ 63.769(c) § 61.242-1(a) § 61.242-1(b) § 61.242-1(d) [G]§ 61.242-10 § 61.242-2(a)(1) § 61.242-2(a)(2) [G]§ 61.242-2(b) [G]§ 61.242-2(c) [G]§ 61.242-2(d) [G]§ 61.242-2(e) § 61.242-2(f) [G]§ 61.242-2(g) § 61.242-2(h) § 63.764(a) § 63.764(j)	Comply with the requirements of §61.242-2 of Subpart V for pumps.	§ 61.242-2(a)(1) [G]§ 61.242-2(d) § 61.242-2(f) § 61.242-2(h) [G]§ 61.245(b) [G]§ 61.245(c) [G]§ 61.245(d) **See Alternative Requirements	[G]§ 61.246(a) [G]§ 61.246(b) [G]§ 61.246(c) [G]§ 61.246(e) [G]§ 61.246(h) [G]§ 61.246(i) § 61.246(j) [G]§ 63.774(b)(1) § 63.774(b)(2)	[G]§ 61.247(a) [G]§ 61.247(b) § 61.247(c) [G]§ 61.247(e) § 63.764(b) § 63.775(d) [G]§ 63.775(d)(3) § 63.775(e) § 63.775(e)(1) § 63.775(e)(2)(iv)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
JW-01	EU	63HH	112(B) HAPS	40 CFR Part 63, Subpart HH	§ 63.769(c) § 61.242-1(a) § 61.242-1(b) § 61.242-1(d) [G]§ 61.242-10 § 61.242-7(a) § 61.242-7(b) [G]§ 61.242-7(c) [G]§ 61.242-7(d) [G]§ 61.242-7(e) [G]§ 61.242-7(f) [G]§ 61.242-7(g) [G]§ 61.242-7(h) [G]§ 61.243-1 [G]§ 61.243-2 § 63.764(a) § 63.764(j)	Comply with the requirements of §61.242-7 of Subpart V for valves.	§ 61.242-7(a) [G]§ 61.242-7(c) [G]§ 61.242-7(g) [G]§ 61.242-7(h) [G]§ 61.243-1 [G]§ 61.245(b) [G]§ 61.245(c) [G]§ 61.245(d) **See Alternative Requirements	[G]§ 61.246(a) [G]§ 61.246(b) [G]§ 61.246(c) [G]§ 61.246(e) [G]§ 61.246(f) [G]§ 61.246(g) [G]§ 61.246(i) § 61.246(j) [G]§ 63.774(b)(1) § 63.774(b)(2)	[G]§ 61.247(a) [G]§ 61.247(b) § 61.247(c) § 61.247(d) [G]§ 61.247(e) § 63.764(b) § 63.775(d) [G]§ 63.775(d)(3) § 63.775(e) § 63.775(e)(1) § 63.775(e)(2)(iv)
JW-01	EU	63HH	112(B) HAPS	40 CFR Part 63, Subpart HH	§ 63.769(c) § 61.242-1(a) § 61.242-1(b) § 61.242-1(d) [G]§ 61.242-10 [G]§ 61.242-8 § 63.764(a) § 63.764(j)	Comply with the requirements of §61.242-8 of Subpart V for pressure relief devices in liquid service.	[G]§ 61.242-8 [G]§ 61.245(b) [G]§ 61.245(c) [G]§ 61.245(d) **See Alternative Requirements	[G]§ 61.246(a) [G]§ 61.246(b) [G]§ 61.246(c) [G]§ 61.246(e) [G]§ 61.246(i) § 61.246(j) [G]§ 63.774(b)(1) § 63.774(b)(2)	[G]§ 61.247(a) [G]§ 61.247(b) § 61.247(c) [G]§ 61.247(e) § 63.764(b) § 63.775(d) [G]§ 63.775(d)(3) § 63.775(e) § 63.775(e)(1) § 63.775(e)(2)(iv)
JW-01	EU	63HH	112(B) HAPS	40 CFR Part 63, Subpart HH	§ 63.769(c) § 61.242-1(a) § 61.242-1(b) § 61.242-1(d) [G]§ 61.242-10 [G]§ 61.242-8 § 63.764(a) § 63.764(j)	Comply with the requirements of §61.242-8 of Subpart V for flanges and other connectors.	[G]§ 61.242-8 [G]§ 61.245(b) [G]§ 61.245(c) [G]§ 61.245(d) **See Alternative Requirements	[G]§ 61.246(a) [G]§ 61.246(b) [G]§ 61.246(c) [G]§ 61.246(e) [G]§ 61.246(i) § 61.246(j) [G]§ 63.774(b)(1) § 63.774(b)(2)	[G]§ 61.247(a) [G]§ 61.247(b) [G]§ 61.247(c) [G]§ 61.247(e) § 63.764(b) § 63.775(d) [G]§ 63.775(d)(3) § 63.775(e) § 63.775(e)(1) § 63.775(e)(2)(iv)

Permit Shield

Permit Shield17

Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
AFT-1	N/A	40 CFR Part 60, Subpart Kb	Capacity is less than 75 m ³ (19,800 gallons).
AT-1	N/A	40 CFR Part 60, Subpart Kb	Capacity is less than 75 m ³ (19,800 gallons).
GRP-ENG	E-13, E-14, E-18, E-19	40 CFR Part 60, Subpart JJJJ	The engine is 2 stroke lean burn with greater than 500 HP but was manufactured prior to July 1, 2007.
GRP-ENG	E-13, E-14, E-18, E-19	40 CFR Part 63, Subpart ZZZZ	Existing 2-stroke lean burn stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions are exempt from Subpart ZZZZ and Subpart A.
GT-1	N/A	40 CFR Part 60, Subpart Kb	Capacity is less than 75 m ³ (19,800 gallons).
JW-01	N/A	40 CFR Part 60, Subpart KKK	No construction, reconstruction or modification after January 20, 1984.
LOT-1	N/A	40 CFR Part 60, Subpart Kb	Capacity is less than 75 m ³ (19,800 gallons).
PWT-1	N/A	40 CFR Part 60, Subpart Kb	Capacity is less than 75 m ³ (19,800 gallons).
PWT-2	N/A	40 CFR Part 60, Subpart Kb	Capacity is less than 75 m ³ (19,800 gallons).
SCT-1	N/A	40 CFR Part 60, Subpart Kb	Capacity is less than 75 m ³ (19,800 gallons).
SCT-2	N/A	40 CFR Part 60, Subpart Kb	Capacity is less than 75 m ³ (19,800 gallons).
SF-01	N/A	40 CFR Part 60, Subpart KKK	No construction, reconstruction or modification after January 20, 1984.
SF-01	N/A	40 CFR Part 63, Subpart HH	No fugitive sources in VHAP service; analysis available to document.
WOT-1	N/A	40 CFR Part 60, Subpart Kb	Capacity is less than 75 m ³ (19,800 gallons).

New Source Review Authorization References

New Source Review Authorization References 19

New Source Review Authorization References by Emission Unit..... 20

New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Prevention of Significant Deterioration (PSD) Permits	
PSD Permit No.: PSDTX448	Issuance Date: 09/14/2009
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 78523	Issuance Date: 03/14/2014
Authorization No.: 8935	Issuance Date: 09/14/2009
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.352	Version No./Date: 09/04/2000
Number: 106.355	Version No./Date: 11/01/2001
Number: 106.359	Version No./Date: 09/10/2013
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.533	Version No./Date: 06/30/2004
Number: 7	Version No./Date: 11/25/1985
Number: 66	Version No./Date: 11/25/1985
Number: 71	Version No./Date: 05/05/1976
Number: 72	Version No./Date: 09/23/1982

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
AFT-1	ANTIFREEZE TANK	106.352/09/04/2000
AT-1	AMINE TANK	106.352/09/04/2000
E-13	COMPRESSOR ENGINE #160	8935
E-14	COMPRESSOR ENGINE #161	8935
E-18	COMPRESSOR ENGINE #61	8935, PSDTX448
E-19	COMPRESSOR ENGINE #159	8935, PSDTX448
GS-01	GLYCOL STILL VENT	78523, 72/09/23/1982
GT-1	GLYCOL TANK	106.352/09/04/2000
JW-01	ANTIFREEZE SYSTEM FUGITIVES NOT SUBJECT TO KKK	66/11/25/1985
LOT-1	LUBE OIL TANK	106.352/09/04/2000
PWT-1	PRODUCED WATER TANK	71/05/05/1976
PWT-2	PRODECED WATER TANK	71/05/05/1976
SCT-1	STABILIZED CONDENSATE TANK	106.352/09/04/2000
SCT-2	STABILIZED CONDENSATE TANK	106.352/09/04/2000
SF-01	SITE FUGITIVES (INCLUDING THE AMINE UNIT)	8935
WOT-1	WASTE OIL TANK	106.352/09/04/2000

Alternative Requirement

Alternative Requirement 22



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

January 04, 2007

RECEIVED

JAN 12 2007

TCEQ FIELD OPERATIONS
AUSTIN REGION 11

Mr. Randall L. Burdorf
Senior Environmental Specialist
Enbridge Gathering (North Texas) L.P.
PO Box 429
Springtown, TX 76082

Re: 40C.F.R. Part 63, Subpart HH Affected Facility in Texas
Request for Alternative Monitoring of Ethylene Glycol in Cooling Jacket Water
Service for Leak Detection on Ancillary Equipment

Dear Mr. Burdorf:

This letter is in response to your February 10, 2005, request for alternative monitoring under the National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities (40 C.F.R. Part 63, Subpart HH). Additionally, the former owner-operator of the Huckabay Gas Plant, Devon Energy Corporation, made a similar request by letter dated September 27, 2004, in attention to Mr. Martin Brittain of EPA Region 6. Specifically, you are seeking approval for alternative monitoring of ethylene glycol in jacket water service at the Huckabay Gas Plant located on County Road 2303 in Huckabay, TX (AFS # 4814300011). You are also seeking the approval on a company-wide basis at similar gas plants because each such site utilizes cooling jacket water in the same manner.

Pursuant to definitions in 40 C.F.R. Part 63, §63.761, the jacket water service at the Huckabay Gas Plant is considered "ancillary equipment" that operates "in VHAP service" since ethylene glycol is used in concentrations equal to or greater than 10% by weight. Therefore, pursuant to 40 CFR §63.769(a), equipment leak standards apply to the jacket water service since it is located at a natural gas processing plant and operates in VHAP service equal to or greater than 300 hours per calendar year. In 40 CFR §63.769(c), it requires the Huckabay Gas Plant to follow the equipment, leak standards specified in 40 CFR Part 61, Subpart V, §§61.241 thru 61.247. These sections specify Method 21 as the monitoring method which to comply.

The jacket water at the Huckabay Gas Plant is a mixture of ethylene glycol/water, and it is used to cool various pieces of equipment throughout the plant. As stated in

your letter, although the jacket water becomes hot during this process, the mixture exists in the system as a liquid, not as a gas. Ethylene glycol's high boiling point of 198°C, also ensures that any leak would be visible as a liquid (or a solid if the ambient temperature in Texas were to fall below ethylene's glycol's melting point of -11.5°C). An accurate measurement cannot be made using the portable field analyzer due to ethylene glycol's low volatility (vapor pressure = 0.06 mm Hg at 20°C). Therefore it is difficult to obtain a reproducible and useful response factor as required in EPA Reference Method 21. This is described in EPA report EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates". Appendix D of this report provides a detailed listing of published Response Factors for ~190 compounds at actual concentrations of 10,000 ppmv and 500 ppmv for six (6) different analyzers. Due to its low volatility, no useable response factors could be developed for ethylene glycol (EPA Reference Method 21 §8.1.1.2 states that the response factor for each individual VOC to be measured shall be less than ten (10)). This issue is addressed by a previously approved request posted on EPA's Applicability Determination Index (Control Number: 0100078).

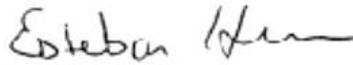
Due to the limitation in the application of Method 21 to ethylene glycol, you have proposed to substitute quarterly visual inspections of the equipment in jacket water service. Visual evidence of ethylene glycol liquid on/or dripping from the equipment in jacket water service would indicate an equipment leak, and repair would be conducted meeting the requirements of Part 61, Subpart V. This proposed alternative monitoring is consistent with a previously approved request that is posted on EPA's Applicability Determination Index (Control Number: 0100078), where quarterly visual monitoring was accepted as a substitute for Method 21 which was required under Part 60, Subpart VV for ethylene glycol service.

Pursuant to the General Provisions of 40 C.F.R. Section 63.8(b)(ii), monitoring shall be conducted as set forth in this section, and the relevant standards unless the Administrator approves the use of an intermediate or major change or alternative to any monitoring requirements or procedures. Based on EPA's review of Enbridge Gathering's request, the EPA has determined that the proposed alternative monitoring is acceptable as a substitute for Method 21 for the equipment in jacket water service at the Huckabay Gas Plant as well as on a company-wide basis at similar sites that utilize cooling jacket water in the same manner.

The EPA shall notify the Texas Commission on Environmental Quality (TCEQ) on its determination and approval of Enbridge Gathering's alternative monitoring plan. This alternative monitoring determination does not alter any of the other requirements of Part 61, Subpart V or Part 63, Subpart HH which may apply to Enbridge Gathering's facilities.

Should you have questions about this letter, please contact Mr. Himanshu Vyas of my staff at (214) 665-2709, or via-email at vyas.himanshu@epa.gov.

Sincerely yours,



(cc) David F. Garcia
Chief
Air /Toxics and Inspection
Coordination Branch

✓ ec: Dan Sims (TCEQ)

Control Number: 0100078

Category: NSPS
Region: Region 4
Date: 10/02/2001
Title: Alternative Monitoring Proposal for Ethylene Glycol Vapor
Recipient: Robert L. Barnes
Author: Winston A. Smith
Comments:

Subparts: Part 60 VV SOCOMI Equipment Leaks
References: 60.482-4
60.482-7
60.484

Abstract:

Q: A company has proposed to conduct quarterly visual inspections of equipment in ethylene glycol vapor service, instead of using Method 21. Since ethylene glycol has a boiling point of approximately 197 degrees centigrade, any vapor escaping from process equipment would quickly condense and form a liquid, making detection by Method 21 less accurate and reliable. Is the use of visual inspections acceptable?

A: Yes. The proposed alternative monitoring is acceptable as a substitute for Method 21.

Letter:

October 2, 2001

4APT-ARB

Mr. Robert L. Barnes
Environmental Affairs
Eastman Chemical Company
P.O. Box 511
Kingsport, Tennessee 37662

Dear Mr. Barnes:

We have received your August 29, 2001, letter requesting a determination of equivalent means of emission limitation for equipment subject to New Source Performance Standards (NSPS) Subpart VV - "Standards of Performance for Equipment Leaks of Volatile Organic Compounds (VOC) in the Synthetic Organic Chemicals Manufacturing Industry." As indicated in your request, process emission source B-226P-1 at Eastman Chemical will be subject to subpart VV which requires monitoring of equipment in ethylene glycol vapor service by using Method 21 to comply with Sec. 60.482-4 (pressure relief devices in gas/vapor service) and Sec. 60.482-7 (valves in gas/vapor service and in light liquid service). Due to the limitation in the application of Method 21 to ethylene glycol vapor, you have proposed to substitute quarterly visual inspections of equipment in ethylene glycol vapor service for process unit B-226P-1, instead of using Method 21. We have reviewed your request and have determined that the proposed alternative monitoring is acceptable. Since your request constitutes a proposed

adi[1].txt

alternative monitoring procedure instead of an equivalent emission limit, the requirements of Sec. 60.484 will not be applicable.

As you have described in your letter, since ethylene glycol has a boiling point of approximately 197 degrees centigrade, any vapor escaping from the process equipment would quickly condense and form a liquid. You have indicated that this would make detection by Method 21 less accurate and reliable than sensory monitoring, since ethylene glycol vapor would condense in the probe of the monitoring device and would not reach the flame ionization detector. You have indicated that calibration adjustments would serve little or no purpose, and there would be a high probability that leaks that are detectable through sensory monitoring would not be detected by Method 21.

In addition to the issues addressed in the Eastman Chemical request, we have found documentation indicating that Method 21 would not be suitable for detecting leaks from equipment in ethylene glycol vapor service. As indicated in Appendix D of the document entitled "Protocol for Equipment Leak Emission Estimates" (EPA 453/R-95-017), a response factor was not determined for ethylene glycol at a concentration of 10,000 ppmv for use in Method 21, due to its low volatility. As stated in Sec. 60.482-7, an instrument reading of 10,000 ppm or greater is an indication of a leak.

As an alternative to Method 21, Eastman Chemical has proposed to conduct quarterly visual inspections of equipment in ethylene glycol service for process unit R-226P-1. Visual evidence of ethylene glycol liquid on or dripping from the equipment in ethylene glycol vapor service would indicate an equipment leak, and repair would be conducted as required by Sec. 60.482-4 and Sec. 60.482-7. You have indicated in your letter that the proposed alternative would qualify for a determination of equivalent means of emission limitation under Sec. 60.484.

Based on our review of Eastman Chemical's request, we have determined that the proposed alternative monitoring is acceptable as a substitute for Method 21 for process unit B- 226P-1. While you have indicated that your request is for an equivalent emission limit, it is actually a request for an alternative monitoring procedure and will not be required to meet the requirements of Sec. 60.484.

If there are any questions regarding this letter, please contact Mr. Keith Goff of the Environmental Protection Agency Region 4 staff at (404)562-9137.

Sincerely yours,

Winston A. Smith
Director
Air, Pesticides, and Toxics
Management Division

cc: Barry Stephens
Tennessee Division of Air Pollution Control

Appendix A

Acronym List 28

Acronym List

The following abbreviations or acronyms may be used in this permit:

ACFM	actual cubic feet per minute
AMOC	alternate means of control
ARP	Acid Rain Program
ASTM	American Society of Testing and Materials
B/PA	Beaumont/Port Arthur (nonattainment area)
CAM	Compliance Assurance Monitoring
CD	control device
COMS	continuous opacity monitoring system
CVS	closed-vent system
D/FW	Dallas/Fort Worth (nonattainment area)
DR	Designated Representative
EIP	El Paso (nonattainment area)
EP	emission point
EPA	U.S. Environmental Protection Agency
EU	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
GF	grandfathered
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
H ₂ S	hydrogen sulfide
ID No.	identification number
lb/hr	pound(s) per hour
MMBtu/hr	Million British thermal units per hour
MRRT	monitoring, recordkeeping, reporting, and testing
NA	nonattainment
N/A	not applicable
NADB	National Allowance Data Base
NO _x	nitrogen oxides
NSPS	New Source Performance Standard (40 CFR Part 60)
NSR	New Source Review
ORIS	Office of Regulatory Information Systems
Pb	lead
PBR	Permit By Rule
PM	particulate matter
ppmv	parts per million by volume
PSD	prevention of significant deterioration
RO	Responsible Official
SO ₂	sulfur dioxide
TCEQ	Texas Commission on Environmental Quality
TSP	total suspended particulate
TVP	true vapor pressure
U.S.C.	United States Code
VOC	volatile organic compound

Appendix B

Major NSR Summary Table.....30

Major NSR Summary Table

Permit Number: 8935 PSDTX448			Issuance Date: 09/14/2009				
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY**	Spec. Cond.	Spec. Cond.	Spec. Cond.
E-13	Compressor Engine 160	VOC	1.68	7.36			
		CH ₂ O	0.78	3.42			
		NOX	25.79	112.96			
		CO	5.95	26.06			
		SO ₂	0.01	0.04			
		PM	0.68	2.98			
E-14	Compressor Engine 161	VOC	1.68	7.36			
		CH ₂ O	0.78	3.42			
		NOX	25.79	112.96			
		CO	5.95	26.06			
		SO ₂	0.01	0.04			
		PM	0.68	2.98			
E-18	Compressor Engine 61	VOC	1.10	4.82			
		CH ₂ O	0.53	2.32			
		NOX (5)	17.64	77.26			
		CO	8.82	38.63			
		SO ₂	0.01	0.04			
		PM	0.75	3.29			
E-19	Compressor Engine 159	VOC	1.10	4.82			
		CH ₂ O	0.53	2.32			
		NOX (5)	17.64	77.26			
		CO	8.82	38.63			
		SO ₂	0.01	0.04			
		PM	0.75	3.29			

Permit Number: 8935 PSDTX448			Issuance Date: 09/14/2009				
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY**	Spec. Cond.	Spec. Cond.	Spec. Cond.
SF-01	Site Fugitives (4)	VOC	1.62	6.58	9	9, 10, 12	
H-17	Glycol Reboiler (6)	VOC	0.28	1.21	2	2, 12	2
		NOX	0.10	0.44			
		CO	0.08	0.35			
		SO2	0.01	0.01			
		PM	0.01	0.04			
H-20	Amine Reboiler (7)	VOC	0.01	0.02			
		NOX	0.07	0.31			
		CO	0.06	0.26			
		SO2	0.01	0.01			
		PM	0.01	0.04			
EAV-1	Amine Vent (7)	VOC	0.20	0.86			
SCT-1	Stabilized Condensate Storage Tank (7)	VOC	0.84	0.65	7	7, 12	
SCT-2	Stabilized Condensate Storage Tank (7)	VOC	0.84	0.65	7	7, 12	
PWT-1	Produced Water Tank (7)	VOC	0.03	0.02	7	7, 12	
PWT-2	Produced Water Tank (7)	VOC	0.03	0.02	7	7, 12	
LOT-1	Lube Oil Tank (7)	VOC	0.01	0.01	7	7, 12	
WOT-1	Waste Oil Tank (7)	VOC	0.01	0.01	7	7, 12	
AFT-1	Antifreeze Tank (7)	VOC	0.01	0.01	7	7, 12	
GT-1	Glycol Tanks (7)	VOC	0.01	0.01	7	7, 12	
AT-1	Amine Tanks (7)	VOC	0.01	0.01	7	7, 12	

Permit Number: 8935 PSDTX448			Issuance Date: 09/14/2009				
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY**	Spec. Cond.	Spec. Cond.	Spec. Cond.
L-01	Produced Water Loading Rack (7)	VOC	0.12	0.01	8	8, 12	
L-02	Stabilized Condensate Loading Rack (7)	VOC	12.00	0.92	8	8, 12	
L-03	Pressurized Condensate Loading Rack (7)	VOC	0.06	0.01			
L-04	Waste Oil Loading Rack (7)	VOC	0.01	0.01			

Footnotes:

- (1) Emission point identification – either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources use area name or fugitive source name.
- (3) VOC – volatile organic compounds as defined in Title 30 Texas Administrative Code §101.1 CH₂O – formaldehyde NOX – total oxides of nitrogen CO – carbon monoxide PM – particulate matter, suspended in the atmosphere, including PM₁₀. PM₁₀ – particulate matter equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no particulate matter greater than 10 microns is emitted. SO₂ – sulfur dioxide
- (4) Emission rate is an estimate and compliance is demonstrated by meeting the requirements of the applicable special conditions and permit application representations.
- (5) The NOX emissions from Engines E-18 and E-19 are also authorized by Permit Number PSDTX448.
- (6) Emissions are from the combustion of natural gas and the process vapors from the Glycol Dehydrator Still Vent (FIN GS-01). Standard Exemption 72 dated September 23, 1982, authorized the routing of the process vapors to the Glycol Reboiler, and Standard Permit Number 78523 dated September 16, 1982, authorized additional process vapors from the Glycol Dehydrator Still Vent. The emissions from these permits, shown on Attachment A in the permit's special conditions, are incorporated by reference only into this permit.
- (7) The emissions for these facilities were authorized under Permit by Rule and Standard Exemption shown on the Attachment B in the permit's special conditions. They are incorporated by reference only into this permit.

Bryan W. Shaw, Ph.D., *Commissioner*
Buddy Garcia, *Chairman*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

September 14, 2009

MR RANDY BURDORF
EHS MANAGER
ENBRIDGE G & P (NORTH TEXAS) LP
PO BOX 429
SPRINGTOWN TX 76082-0429

Re: Permit Alteration
Permit Numbers: 8935 and PSDTX448
Compressor Engine 60 Changed to 61-Alteration
Huckabay, Erath County
Regulated Entity Number: RN100226885
Customer Reference Number: CN603042623
Account Number: EF-0025-Q

Dear Mr. Burdorf:

This is in response to your letter received July 29, 2009, requesting alteration of the representations of the above-referenced permit. We understand that you want to rename the existing Compressor Engine 60 to Compressor Engine 61 in the Special Condition No. 3 and in the maximum allowable emission rates table (MAERT) of the above-referenced permit.

As indicated in Title 30 Texas Administrative Code § 116.116(c) [30 TAC § 116.116(c)], and based on our review, Permit Numbers 8935 and PSDTX448 are altered. Enclosed are the altered permit conditions and MAERT to replace those currently attached to your permit. Please attach these to your permit.

No planned maintenance, start-up, and shutdown emissions have been reviewed or represented in this application and none are authorized by this permit.

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC §§ 25.4 and 25.6.

Mr. Randy Burdorf
Page 2
September 14, 2009

Re: Permit Numbers 8935 and PSDTX448

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

http://www.tceq.state.tx.us/compliance/compliance_support/qa/env_lab_accreditation.html

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at labprgms@tceq.state.tx.us.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Hai Truong, P.E., at (512) 239-1446 or write to the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,



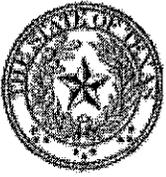
Steve Hagle, P.E., Director
Air Permits Division
Office of Permitting and Registration
Texas Commission on Environmental Quality

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Enclosures

cc: Air Section Manager, Region 4 - Fort Worth
Chief, New Source Review, Section (6PD-R), Environmental Protection Agency, Region 6,
Dallas

Project Number: 149564



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY AIR QUALITY PERMIT

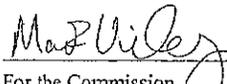


*A PERMIT IS HEREBY ISSUED TO
Enbridge G & P North (Texas) L.P.
AUTHORIZING THE CONSTRUCTION AND OPERATION OF
Natural Gas Processing Plant
LOCATED AT Huckabay, Erath County, Texas
LATITUDE 32° 18' 20" LONGITUDE 98° 22' 30"*

1. Facilities covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code § 116.116 (30 TAC § 116.116)]
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120(a), (b) and (c)]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting and Registration the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]
6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]
8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with §§ 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC § 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]
11. This permit may be appealed pursuant to 30 TAC § 50.139.
12. This permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
13. There may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(e)]
14. **Emissions from this facility must not cause or contribute to a condition of "air pollution" as defined in TCAA § 382.003(3) or violate TCAA § 382.085, as codified in the Texas Health and Safety Code. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.**

PERMIT 8935

Date: June 29, 2009


For the Commission

SPECIAL CONDITIONS

Permit Numbers 8935 and PSDTX448

EMISSIONS STANDARDS

1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating conditions specified in the special conditions. **(6/09)**

FEDERAL PROGRAM APPLICABILITY

2. These facilities authorized in this permit shall comply with all applicable requirements of the U.S. Environmental Protection Agency regulations in 40 CFR Part 63, Subpart HH on Oil and Natural Gas Production Facilities, specifically from Glycol Dehydration Unit Process Vents. **(6/09)**

EMISSION CONTROLS AND OPERATIONAL LIMITATIONS

3. The Compressor Engines 160, 161, 61, and 159 Emission Point Nos. (EPNs E-13, E-14, E-18, and E-19) shall be operated in accordance with the following requirements: **(9/09)**
 - A. Fuel shall be limited to natural gas containing no more than 0.25 grain of hydrogen sulfide (H₂S) and 10 grains of sulfur per 100 dry standard cubic feet (dscf).
 - B. Emissions rates from the Compressor Engines 160 and 161 shall not exceed 1.0 gram per horsepower-hour (gr/hp-hr) for volatile organic compounds (VOC), 6.5 gr/hp-hr for oxides of nitrogen (NO_x), and 1.5 gr/hp-hr for carbon monoxide (CO).
 - C. Emissions rates from Compressor Engines 61 and 159 shall not exceed 1.0 gr/hp-hr for VOC, 4.0 gr/hp-hr for NO_x, and 2.0 gr/hp-hr for CO.
 - D. Turbochargers shall be operational and properly maintained at all times for the Compressor Engines 61 and 159.
 - E. All compressor engines shall be operated in accordance with Title 30 Texas Administrative Code § 111.111(a)(1)(B) [30 TAC § 111.111(a)(1)(B)].

SPECIAL CONDITIONS

Permit Numbers 8935 and PSDTX448

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- 4. All VOC vapors from the Glycol Dehydrator Still Vent (FIN GS-01) shall be routed to the Glycol Reboiler (EPN H-17). These emissions were authorized by Standard Exemption (SE) and Standard Permit Number 78523 shown on Attachment A. They are incorporated into this permit by reference only. **(6/09)**
- 5. Fuel for the Glycol Reboiler and the Amine Reboiler (EPN H-20) shall be sweet natural gas containing no more than 0.25 grain of H₂S and 10 grains of sulfur per 100 dry standard cubic feet (dscf). VOC vapors from the Glycol Dehydrator Still Vent are also burned by the Glycol Reboiler as specified in Special Condition No. 4. **(6/09)**
- 6. The Glycol Reboiler and the Amine Reboiler shall be operated in accordance with 30 TAC § 111.111(a)(1)(B). **(6/09)**
- 7. The storage tanks which were authorized by the Permit by Rule (PBR) and SE shown on the Attachment B, are incorporated into this permit by reference only. These tanks are subject to the following requirements: **(6/09)**
 - A. The fill or withdrawal rate and the annual throughput of each tank are limited as identified in the table below:

EPN	Source Name	Fill, Withdraw Rate (gpm)	Annual Throughput (gals/yr)
SCT-1	Stabilized Condensate Storage Tank 1	6,000	917,280 combined for both tanks
SCT-2	Stabilized Condensate Storage Tank 2	6,000	
PWT-1	Produced Water Storage Tank 1	6,000	917,280 combined for both tanks
PWT-2	Produced Water Storage Tank 2	6,000	

- B. The permit holder shall maintain a record of the throughput for the previous month and the rolling 12 month-period for the materials storing in these tanks.

LOADING OPERATIONS

- 8. Emissions from the loading operations of the materials identified in the Special Condition No. 7A, which were authorized by the PBR and SE shown in the Attachment B, are incorporated into this permit by reference only. The loading operations at this facility shall be subject to the following requirements: **(6/09)**

SPECIAL CONDITIONS

Permit Numbers 8935 and PSDTX448

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- A. All lines, connectors, and vapor recovery systems shall be visually inspected for any defects prior to hookup. Lines, connectors, and vapor recovery systems that are visibly damaged shall be removed from service until they are repaired to a leak-free state. Records of the inspection and repairs shall be maintained.
- B. The loading operations shall cease immediately upon detection, by sight, sound, or smell, of any liquid leaking from the lines or connections. Operations shall not be continued until the lines and connections are repaired to a leak-free state. Records of the inspection and repairs shall be maintained.
- C. The loading records shall be kept at the plant site to demonstrate compliance with the above requirements. The records shall include as a minimum:
 - (1) Date of loading.
 - (2) Material type.
 - (3) Material volume loaded.

PIPING, VALVES, PUMPS, AND COMPRESSORS IN ETHYLENE GLYCOL SERVICES

- 9. The facility shall perform the leak inspection of all equipments used for ethylene glycol services. **(6/09)**
 - A. Leak inspection within the operating area shall be made weekly.
 - B. Every reasonable effort shall be made to repair or replace a leaking component within 15 days after a leak is found. If the repair or replacement of a leaking component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired or replaced until a scheduled shutdown shall be identified in a list to be made available to representatives of the TCEQ upon request.
- 10. Records of the results of the fugitive monitoring and maintenance program shall be maintained at the facility. Records shall include the following: **(6/09)**
 - A. Date of each inspection.
 - B. Results of each inspection.
 - C. Date each leak is repaired and explanation if repair is delayed beyond 15 days.

SPECIAL CONDITIONS

Permit Numbers 8935 and PSDTX448

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- D. A list identifying those leaking components which cannot be repaired or replaced until a scheduled unit shutdown.
- E. Inspector's name and signature.

RECORDKEEPING REQUIREMENTS

- 11. The permit holder shall keep a copy of this permit at the site. **(6/09)**
- 12. All records required in the above special conditions shall be kept at the site for at least two years, and be made available to the representatives of the EPA, TCEQ, or the local air pollution control agencies having jurisdiction, upon request. **(6/09)**

Dated September 14, 2009

Attachment A

Permit Numbers 8935 and PSDTX448

These facilities were authorized under Standard Exemption (SE) and Standard Permit (SP). They are incorporated by reference only into this permit. The Emission Point Number (EPN), source name, number, SE/SP claimed, and the claimed or issued date are listed below:

EPN	Source Name	Number	SE/SP Claimed	Claimed or Issued Date
H-17	Glycol Reboiler (Glycol Dehydrator Still Vent [GS-01])	NA	SE 72	09/23/1982
H-17	Glycol Reboiler (Glycol Dehydrator Still Vent [GS-01])	SP 78523	Pollution Control Project	09/19/2006

Dated September 14, 2009

Attachment B

Permit Numbers 8935 and PSDTX448

These facilities were authorized under Permit by Rule (PBR) and Standard Exemption (SE) and they are incorporated by reference only into this permit. The Emission Point Number (EPN), source name, registration number, PBR/SE claimed, and the claimed date are listed below:

EPN	Source Name	PBR/SE Registration No.	PBR/SE Claimed	PBR/SE Claimed Date
H-20	Amine Reboiler	Not required	SE 7	04/25/86
EAV-1	Amine Vent	Not required	SE 72	09/23/82
SCT-1	Stabilized Condensate Tank 1	Not required	PBR 106.352	09/04/2000
SCT-1	Stabilized Condensate Tank 2	Not required	PBR 106.352	09/04/2000
PWT-1	Produced Water Tank 1	Not required	SE 71	05/05/1976
PWT-2	Produced Water Tank 2	Not required	SE 71	05/05/1976
LOT-1	Lube Oil Tank 1	Not required	PBR 106.352	09/04/2000
WOT-1	Waste Oil Tank 1	Not required	PBR 106.352	09/04/2000
AFT-1	Antifreeze Tanks	Not required	PBR 106.352	09/04/2000
GT-1	Glycol Tanks	Not required	PBR 106.352	09/04/2000
AT-1	Amine Tanks	Not required	PBR 106.352	09/04/2000
L-01	Produced Water Loading Rack	Not required	SE 66	04/25/1986
L-02	Stabilized Condensate Loading Rack	Not required	SE 66	04/25/1986
L-03	Pressurized Condensate Loading Rack	Not required	PBR 106.352	09/04/2000
L-04	Waste Oil Loading Rack	Not required	PBR 106.352	09/04/2000

Dated September 14, 2009

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Numbers 8935 and PSDTX448

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY **
E-13	Compressor Engine 160	VOC	1.68	7.36
		CH ₂ O	0.78	3.42
		NO _x	25.79	112.96
		CO	5.95	26.06
		SO ₂	0.01	0.04
		PM	0.68	2.98
E-14	Compressor Engine 161	VOC	1.68	7.36
		CH ₂ O	0.78	3.42
		NO _x	25.79	112.96
		CO	5.95	26.06
		SO ₂	0.01	0.04
		PM	0.68	2.98
E-18	Compressor Engine 61	VOC	1.10	4.82
		CH ₂ O	0.53	2.32
		NO _x (5)	17.64	77.26
		CO	8.82	38.63
		SO ₂	0.01	0.04
		PM	0.75	3.29
E-19	Compressor Engine 159	VOC	1.10	4.82
		CH ₂ O	0.53	2.32
		NO _x (5)	17.64	77.26
		CO	8.82	38.63
		SO ₂	0.01	0.04
		PM	0.75	3.29
SF-01	Site Fugitives (4)	VOC	1.62	6.58

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY **
H-17	Glycol Reboiler (6)	VOC	0.28	1.21
		NO _x	0.10	0.44
		CO	0.08	0.35
		SO ₂	0.01	0.01
		PM	0.01	0.04
H-20	Amine Reboiler (7)	VOC	0.01	0.02
		NO _x	0.07	0.31
		CO	0.06	0.26
		SO ₂	0.01	0.01
		PM	0.01	0.04
EAV-1	Amine Vent (7)	VOC	0.20	0.86
SCT-1	Stabilized Condensate Tank 1 (7)	VOC	0.84	0.65
SCT-2	Stabilized Condensate Tank 2 (7)	VOC	0.84	0.65
PWT-1	Produced Water Tank 1 (7)	VOC	0.03	0.02
PWT-2	Produced Water Tank 2 (7)	VOC	0.03	0.02
LOT-1	Lube Oil Tank 1 (7)	VOC	0.01	0.01
WOT-1	Waste Oil Tank 1 (7)	VOC	0.01	0.01
AFT-1	Antifreeze Tanks (7)	VOC	0.01	0.01
GT-1	Glycol Tanks (7)	VOC	0.01	0.01
AT-1	Amine Tanks (7)	VOC	0.01	0.01
L-01	Produced Water Loading Rack (7)	VOC	0.12	0.01
L-02	Stabilized Condensate Loading Rack (7)	VOC	12.00	0.92

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY **
L-03	Pressurized Condensate Loading Rack (7)	VOC	0.06	0.01
L-04	Waste Oil Loading Rack (7)	VOC	0.01	0.01

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources use area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
 CH₂O - formaldehyde
 NO_x - total oxides of nitrogen
 CO - carbon monoxide
 PM - particulate matter, suspended in the atmosphere, including PM₁₀.
 PM₁₀ - particulate matter equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no particulate matter greater than 10 microns is emitted.
 SO₂ - sulfur dioxide
- (4) Emission rate is an estimate and compliance is demonstrated by meeting the requirements of the applicable special conditions and permit application representations.
- (5) The NO_x emissions from Engines E-18 and E-19 are also authorized by Permit Number PSDTX448.
- (6) Emissions are from the combustion of natural gas and the process vapors from the Glycol Dehydrator Still Vent (FIN GS-01). Standard Exemption 72 dated September 23, 1982, authorized the routing of the process vapors to the Glycol Reboiler; and Standard Permit Number 78523 dated September 16, 1982, authorized additional process vapors from the Glycol Dehydrator Still Vent. The emissions from these permits, shown on Attachment A in the permit's special conditions, are incorporated by reference only into this permit.
- (7) The emissions for these facilities were authorized under Permit by Rule and Standard Exemption shown on the Attachment B in the permit's special conditions. They are incorporated by reference only into this permit.

* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

8,760 Hours/year.

** Compliance with annual emission limits is based on a rolling 12-month period.

Dated September 14, 2009