

SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: WARRIOR MET COAL GAS, LLC
FACILITY NAME: CASSIDY SALES NO. 2 COMPRESSOR STATION
LOCATION: NORTHPORT, TUSCALOOSA COUNTY, ALABAMA

| <u>PERMIT NUMBER</u> | <u>DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE</u> |
|----------------------|---|
| 413-0065-X016 | 1,380 hp Caterpillar G3516ULB, 4-)Stroke, Lean-Burn Natural Gas-Fired Reciprocating Internal Combustion Engine w/Oxidation Catalytic Converter and Air to Fuel Ratio Controller |

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.
6. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shutdown as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events **that exceed 1 hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five years. These records shall be available for inspection.
7. This process, including all air pollution control devices and capture systems for which this permit is issued, shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
8. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
9. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.

- 10. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
- 11. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
- 12. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
- 13. Prior to a date to be specified by the Chief of the Air Division in the authorization to operate, emission tests are to be conducted by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, for the following pollutants. Written tests results are to be reported to the Air Division within 30 days of completion of testing.

| | | | |
|----------------------------------|-----|-----------------------|-----|
| Particulates..... | () | Carbon Monoxide | (X) |
| Sulfur Dioxide..... | () | Nitrogen Oxides | (X) |
| Volatile Organic Compounds | (X) | Formaldehyde | (X) |

- 14. Emissions tests are to be conducted for the following pollutants at intervals not to exceed 8,760 hours of following the date of initial compliance testing. All test reports must be submitted to the Air Division within 30 days of completion of testing.

| | | | |
|-----------------------------------|------------|-----------------------|------------|
| Particulates..... | () | Carbon Monoxide | () |
| Sulfur Dioxide..... | () | Nitrogen Oxides | () |
| <i>Volatile Organic Compounds</i> | <i>()</i> | <i>Formaldehyde</i> | <i>()</i> |

- 15. Unless otherwise stated in this permit or an applicable regulation, the Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- (a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- (b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).

- (c) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- (d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 30 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

16. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.
17. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.
18. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

- (a) by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;
- (b) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- (c) by paving;
- (d) by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust

- will not become airborne. Alternative methods shall be approved by the Department prior to utilization.
19. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
 20. In accordance with ADEM Admin. Code. r. 335-3-4-.01(1), any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.
 21. Should this facility, at any time, exceed the limits for NO_x, CO, or VOC, the permittee shall notify the Air Division within two (2) working days of determining that the exceedance occurred.
 22. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
 23. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

Synthetic Minor Source Requirements

24. The permittee shall not cause or allow combined formaldehyde (CH₂O) emissions from the three engines operating under SMOP Nos. X016, X017, and X018 to exceed 9.0 TPY as measured by EPA Reference Method 323. Alternate methods may be used provided prior approval is granted by the Air Division.
25. This unit shall be equipped and operated at all times with an oxidation catalyst in order to comply with the applicable emission limitations of this permit. The permittee shall not operate the engine without an active oxidation catalyst installed.
26. The permittee shall conduct an initial performance test for CH₂O using the appropriate EPA Reference Method or an alternative method approved in advance by the Air Division within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup to demonstrate compliance with the applicable emission limitations.
27. The permittee shall maintain the catalyst such that the pressure drop across the catalyst does not change by more than 2 inches of water at 100% load ($\pm 10\%$) from the pressure drop across the catalyst that is measured during the initial performance test. The permittee shall monitor and record the pressure differential across the catalyst at least once during any calendar month that the engine is operated.

28. The temperature of the engine's exhaust must be maintained such that the catalyst inlet temperature is ≥ 750 °F and ≤ 1350 °F. The permittee shall monitor and record the catalyst temperature at least once during any day that the engine is operated.
29. The permittee shall conduct a performance test and reestablish the operating limitation for the pressure drop across the catalyst within 90 days of restarting the engine after completing a replacement of the catalyst for an engine. The permittee shall continue to monitor and record all operating parameters in accordance with the previously established compliance ranges until new ranges are established.
30. The permittee shall maintain records of the pressure drop across the catalyst and the catalyst inlet temperature. The permittee shall maintain these records on-site and make these records available for inspection upon request. These records shall be retained for a period of five (5) years from the date of generation of each record.
31. Should this engine exceed any emission standard or operational limitation, at any time, the permittee shall notify the Air Division within two working days of determining that the exceedance occurred.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

32. This unit is subject to the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

New Source Performance Standards (NSPS) Requirements

33. This unit is subject to the applicable requirements of 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and the applicable requirements of 40 CFR Part 60, Subpart A, General Provisions. The applicable requirements include, **but may not be limited to:**
 - a. The permittee shall not cause or allow emissions from this engine to exceed 1.0 g/hp-hr or 82 ppmvd at 15% O₂ of NO_x; 2.0 g/hp-hr or 270 ppmvd at 15% O₂ of CO; and/or 0.7 g/hp-hr or 60 ppmvd at 15% O₂ of VOC as measured by the appropriate EPA Reference Method or an alternative method approved in advance by the Air Division [40 CFR §60.4233(e)];
 - b. The permittee shall submit notifications as to the date construction is commenced on this engine postmarked no later than 30 days after such date and the actual date of initial startup of this engine postmarked within 15 days after such date [40 CFR §60.7(a)(1) and (3)];
 - c. The permittee shall maintain a maintenance plan on file, records of all maintenance conducted on this engine, and to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practices for minimizing emission. These records shall be maintained on site for a period of two years and made available for inspection upon request [40 CFR §60.4243(b)];

- d. The permittee shall conduct an initial performance test and subsequent performance testing every 8,760 hours of operation of this engine or every three years, whichever comes first using the appropriate EPA Reference Method or an alternative method approved in advance by the Air Division within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup while operating within 10% of 100% peak (or the highest achievable) load, to demonstrate compliance with the applicable NO_x, CO, and VOC standards [40 CFR §60.4243(b)];
 - e. The permittee shall notify the Air Division in writing at least 30 days in advance of all performance tests to be conducted and submitted as proof of compliance with the applicable emission standards specified in 40 CFR 60, Subpart JJJJ. [40 CFR §60.8(d)];
 - f. The permittee shall submit the results of each performance test within 60 days after the test has been completed [40 CFR §60.4245(d)];
 - g. The permittee shall maintain the applicable records specified in 40 CFR §60.4245(a), which include, but may not be limited to the following:
 - i. All notifications submitted to comply with this subpart and all documentation supporting any notification,
 - ii. Maintenance conducted on the engine, and
 - iii. Documentation that the engine meets the emission standards.
34. This unit is subject to the applicable requirements of 40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015, and the applicable requirements of 40 CFR Part 60, Subpart A, General Provisions. The applicable requirements include, but may not be limited to:
- a. The permittee must replace the reciprocating compressor rod packing according to either of the following [40 CFR §60.5385(a)]:
 - i. Before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of the permittee's reciprocating compressor affected facility, or October 15, 2012, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later [40 CFR §60.5385(a)(1)], or
 - ii. Prior to 36 months from the date of the most recent rod packing replacement, or 36 months from the date of startup for a new reciprocating compressor for which the rod packing has not yet been replaced [40 CFR §60.5385(a)(2)], or
 - iii. Collect the emissions from the rod packing using a rod packing emissions collection system which operates under negative pressure and route the rod

- packing emissions to a process through a closed vent system that meets the requirements of 40 CFR §60.5411(a).
- b. The permittee must demonstrate initial compliance with the following standards that apply to reciprocating compressor affected facilities [40 CFR §60.5410(c)]:
 - i. If complying with 40 CFR §60.5385(a)(1) or (2), during the initial compliance period, the permittee must continuously monitor the number of hours of operation or track the number of months since the last rod packing replacement.
 - ii. If complying with 40 CFR §60.5385(a)(3), the permittee must operate the rod packing emissions collection system under negative pressure and route emissions to a process through a closed vent system that meets the requirements of 40 CFR §60.5411(a).
 - c. The permittee must demonstrate continuous compliance with the following standards that apply to reciprocating compressor affected facilities [40 CFR §60.5415(c)]:
 - i. If complying with 40 CFR §60.5385(a)(1), the permittee must continuously monitor the number of hours of operation for each reciprocating compressor affected facility or track the number of months since initial startup, or October 15, 2012, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later.
 - ii. If complying with 40 CFR §60.5385(a)(2), the permittee must replace the reciprocating compressor rod packing before the total number of hours of operation reaches 26,000 hours or the number of months since the most recent rod packing replacement reaches 36 months.
 - iii. If complying with 40 CFR §60.5385(a)(3), the permittee must operate the rod packing emissions collection system under negative pressure and continuously comply with the closed vent requirements in 40 CFR §60.5416(a) and (b).
 - d. The permittee must perform the required notification, recordkeeping, and reporting requirements in accordance with 40 CFR §60.5420, which include but not limited to:
 - i. Initial Annual Report as specified in 40 CFR §60.5420(b);
 - ii. Annual Reports as specified in 40 CFR §60.5420(b); and
 - iii. Recordkeeping Requirements as specified in 40 CFR §60.5420(c)(3).
35. This compressor station is subject to the applicable requirements of 40 CFR Part 60, Subpart OOOOa, Standards of Performance for Crude Oil and Natural Gas Facilities For Which Construction, Modification, Or Reconstruction Commenced After September 18, 2015, and the applicable requirements of 40 CFR Part 60, Subpart A, General Provisions. The applicable requirements include, but may not be limited to:

Fugitive Equipment Component Requirements:

- a. The permittee must demonstrate initial and continuous compliance with the following standards that apply to fugitive equipment components affected facilities [40 CFR §60.5410a(j) and §60.5415(h)]:
 - i. The permittee shall develop a fugitive emissions monitoring plan as required by 40 CFR §60.5397a(b)(c), and (d) [40 CFR §60.5410a(j)];
 - ii. The permittee shall conduct an initial and subsequent periodic monitoring surveys as required by 40 CFR §60.5397a(f)(2) and (g) [40 CFR §60.5410a(j) and §60.5415(h)]; and
 - iii. The permittee must repair each identified source of fugitive emissions for each affected facility as required by 40 CFR §60.5397a(h) [40 CFR §60.5410a(j) and §60.5415(h)].
- b. The permittee must perform the required notification, recordkeeping, and reporting requirements in accordance with 40 CFR §60.5420a, which include, but may not be limited to:
 - i. Initial Annual Report as specified in 40 CFR §60.5420a(b);
 - ii. Annual reports as specified in 40 CFR §60.5420a(b); and
 - iii. Recordkeeping Requirements as specified in 40 CFR §60.5420a(c)(15).

SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: WARRIOR MET COAL GAS, LLC
FACILITY NAME: CASSIDY SALES NO. 2 COMPRESSOR STATION
LOCATION: NORTHPORT, TUSCALOOSA COUNTY, ALABAMA

| PERMIT NUMBER | DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE |
|---------------|--|
| 413-0065-X017 | 1,380 hp Caterpillar G3516ULB, 4-)Stroke, Lean-Burn Natural Gas-Fired Reciprocating Internal Combustion Engine w/Oxidation Catalytic Converter and Air to Fuel Ratio Controller (40 CFR Part 60, Subpart JJJJ, Subpart OOOO) |

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

Alabama Department of Environmental Management

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.
6. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shutdown as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events **that exceed 1 hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five years. These records shall be available for inspection.
7. This process, including all air pollution control devices and capture systems for which this permit is issued, shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
8. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
9. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.

- 10. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
- 11. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
- 12. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
- 13. Prior to a date to be specified by the Chief of the Air Division in the authorization to operate, emission tests are to be conducted by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, for the following pollutants. Written tests results are to be reported to the Air Division within 30 days of completion of testing.

| | | | |
|----------------------------------|-----|-----------------------|-----|
| Particulates..... | () | Carbon Monoxide | (X) |
| Sulfur Dioxide..... | () | Nitrogen Oxides | (X) |
| Volatile Organic Compounds | (X) | Formaldehyde | (X) |

- 14. Emissions tests are to be conducted for the following pollutants at intervals not to exceed 8,760 hours of following the date of initial compliance testing. All test reports must be submitted to the Air Division within 30 days of completion of testing.

| | | | |
|-----------------------------------|------------|-----------------------|------------|
| Particulates..... | () | Carbon Monoxide | () |
| Sulfur Dioxide..... | () | Nitrogen Oxides | () |
| <i>Volatile Organic Compounds</i> | <i>()</i> | <i>Formaldehyde</i> | <i>()</i> |

- 15. Unless otherwise stated in this permit or an applicable regulation, the Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- (a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- (b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).

- (c) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- (d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 30 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

16. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.
17. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.
18. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

- (a) by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;
- (b) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- (c) by paving;
- (d) by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust

- will not become airborne. Alternative methods shall be approved by the Department prior to utilization.
19. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
 20. In accordance with ADEM Admin. Code. r. 335-3-4-.01(1), any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.
 21. Should this facility, at any time, exceed the limits for NO_x, CO, or VOC, the permittee shall notify the Air Division within two (2) working days of determining that the exceedance occurred.
 22. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
 23. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

Synthetic Minor Source Requirements

24. The permittee shall not cause or allow combined formaldehyde (CH₂O) emissions from X016, X017, and X018 to exceed 9.0 YPY as measured by EPA Reference Method 323. Alternate methods may be used provided prior approval is granted by the Air Division.
25. This unit shall be equipped and operated at all times with a oxidizing catalytic converter in order to comply with the applicable emission limits of this permit. The permittee shall not operate the engine without an active catalytic converter installed.
26. The permittee shall conduct an initial performance test for CH₂O using the appropriate EPA Reference Method or an alternative method approved in advance by the Air Division within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup to demonstrate compliance with the applicable emission limits.
27. The permittee shall maintain the catalyst such that the pressure drop across the catalyst does not change by more than 2 inches of water at 100% load ($\pm 10\%$) from the pressure drop across the catalyst that is measured during the initial performance test. The permittee shall monitor and record the pressure differential across the catalyst at least once during any calendar month that the engine is operated.

28. The temperature of the engine's exhaust must be maintained such that the catalyst inlet temperature is ≥ 750 °F and ≤ 1350 °F. The permittee shall monitor and record the catalyst temperature at least once during any daily that the engine is operated.
29. The permittee shall conduct a performance test and reestablish the operating limitation for the pressure drop across the catalyst within 90 days of restarting the engine after completing a replacement of the catalyst for an engine. The permittee shall continue to monitor and record all operating parameters in accordance with the previously established compliance ranges until new ranges are established.
30. The permittee shall maintain records of the pressure drop across the catalyst and the catalyst inlet temperature. The permittee shall maintain these records on-site and make these records available for inspection upon request. These records shall be retained for a period of five (5) years from the date of generation of each record.
31. Should this engine exceed any emission standard or operational limitation, at any time, the permittee shall notify the Air Division within two working days of determining that the exceedance occurred.

NESHAP Requirements

32. This unit is subject to the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

NSPS Requirements

33. This unit is subject to the applicable requirements of 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and the applicable requirements of 40 CFR Part 60, Subpart A, General Provisions. The applicable requirements include, **but may not be limited to:**
 - a. The permittee shall not cause or allow emissions from this engine to exceed 1.0 g/hp-hr or 82 ppmvd at 15% O₂ of NO_x; 2.0 g/hp-hr or 270 ppmvd at 15% O₂ of CO; and/or 0.7 g/hp-hr or 60 ppmvd at 15% O₂ of VOC as measured by the appropriate EPA Reference Method or an alternative method approved in advance by the Air Division [40 CFR §60.4233(e)];
 - b. The permittee shall submit notifications as to the date construction is commenced on this engine postmarked no later than 30 days after such date and the actual date of initial startup of this engine postmarked within 15 days after such date [40 CFR §60.7(a)(1) and (3)];
 - c. The permittee shall maintain a maintenance plan on file, records of all maintenance conducted on this engine, and to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practices for minimizing emission. These records shall be maintained on site for a period of two years and made available for inspection upon request [40 CFR §60.4243(b)];

- d. The permittee shall conduct an initial performance test and subsequent performance testing every 8,760 hours of operation of this engine or every three years, whichever comes first using the appropriate EPA Reference Method or an alternative method approved in advance by the Air Division within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup while operating within 10% of 100% peak (or the highest achievable) load, to demonstrate compliance with the applicable NO_x, CO, and VOC standards [40 CFR §60.4243(b)];
 - e. The permittee shall notify the Air Division in writing at least 30 days in advance of all performance tests to be conducted and submitted as proof of compliance with the applicable emission standards specified in 40 CFR 60, Subpart JJJJ. [40 CFR §60.8(d)];
 - f. The permittee shall submit the results of each performance test within 60 days after the test has been completed [40 CFR §60.4245(d)];
 - g. The permittee shall maintain the applicable records specified in 40 CFR §60.4245(a), which include, but may not be limited to the following:
 - i. All notifications submitted to comply with this subpart and all documentation supporting any notification,
 - ii. Maintenance conducted on the engine, and
 - iii. Documentation that the engine meets the emission standards.
34. This unit is subject to the applicable requirements of 40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015, and the applicable requirements of 40 CFR Part 60, Subpart A, General Provisions. The applicable requirements include, **but may not be limited to:**
- a. The permittee must replace the reciprocating compressor rod packing according to either of the following [40 CFR §60.5385(a)]:
 - i. Before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of the permittee's reciprocating compressor affected facility, or October 15, 2012, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later [40 CFR §60.5385(a)(1)], or
 - ii. Prior to 36 months from the date of the most recent rod packing replacement, or 36 months from the date of startup for a new reciprocating compressor for which the rod packing has not yet been replaced [40 CFR §60.5385(a)(2)], or
 - iii. Collect the emissions from the rod packing using a rod packing emissions collection system which operates under negative pressure and route the rod

- packing emissions to a process through a closed vent system that meets the requirements of 40 CFR §60.5411(a).
- b. The permittee must demonstrate initial compliance with the following standards that apply to reciprocating compressor affected facilities [40 CFR §60.5410(c)]:
- i. If complying with 40 CFR §60.5385(a)(1) or (2), during the initial compliance period, the permittee must continuously monitor the number of hours of operation or track the number of months since the last rod packing replacement.
 - ii. If complying with 40 CFR §60.5385(a)(3), the permittee must operate the rod packing emissions collection system under negative pressure and route emissions to a process through a closed vent system that meets the requirements of 40 CFR §60.5411(a).
- c. The permittee must demonstrate continuous compliance with the following standards that apply to reciprocating compressor affected facilities [40 CFR §60.5415(c)]:
- i. If complying with 40 CFR §60.5385(a)(1), the permittee must continuously monitor the number of hours of operation for each reciprocating compressor affected facility or track the number of months since initial startup, or October 15, 2012, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later.
 - ii. If complying with 40 CFR §60.5385(a)(2), the permittee must replace the reciprocating compressor rod packing before the total number of hours of operation reaches 26,000 hours or the number of months since the most recent rod packing replacement reaches 36 months.
 - iii. If complying with 40 CFR §60.5385(a)(3), the permittee must operate the rod packing emissions collection system under negative pressure and continuously comply with the closed vent requirements in 40 CFR §60.5416(a) and (b).
- d. The permittee must perform the required notification, recordkeeping, and reporting requirements in accordance with 40 CFR §60.5420, which include but not limited to:
- i. Initial Annual Report as specified in 40 CFR §60.5420(b);
 - ii. Annual Reports as specified in 40 CFR §60.5420(b); and
 - iii. Recordkeeping Requirements as specified in 40 CFR §60.5420(c)(3).
35. This compressor station is subject to the applicable requirements of 40 CFR Part 60, Subpart OOOOa, Standards of Performance for Crude Oil and Natural Gas Facilities For Which Construction, Modification, Or Reconstruction Commenced After September 18, 2015, and the applicable requirements of 40 CFR Part 60, Subpart A, General Provisions. The applicable requirements include, but may not be limited to:

Fugitive Equipment Component Requirements:

- a. The permittee must demonstrate initial and continuous compliance with the following standards that apply to fugitive equipment components affected facilities [40 CFR §60.5410a(j) and §60.5415(h)]:
 - i. The permittee shall develop a fugitive emissions monitoring plan as required by 40 CFR §60.5397a(b)(c), and (d) [40 CFR §60.5410a(j)];
 - ii. The permittee shall conduct an initial and subsequent periodic monitoring surveys as required by 40 CFR §60.5397a(f)(2) and (g) [40 CFR §60.5410a(j) and §60.5415(h)]; and
 - iii. The permittee must repair each identified source of fugitive emissions for each affected facility as required by 40 CFR §60.5397a(h) [40 CFR §60.5410a(j) and §60.5415(h)].
- b. The permittee must perform the required notification, recordkeeping, and reporting requirements in accordance with 40 CFR §60.5420a, which include, but may not be limited to:
 - i. Initial Annual Report as specified in 40 CFR §60.5420a(b);
 - ii. Annual reports as specified in 40 CFR §60.5420a(b); and
 - iii. Recordkeeping Requirements as specified in 40 CFR §60.5420a(c)(15).

SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: WARRIOR MET COAL GAS, LLC
FACILITY NAME: CASSIDY SALES NO. 2 COMPRESSOR STATION
LOCATION: NORTHPORT, TUSCALOOSA COUNTY, ALABAMA

| PERMIT NUMBER | DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE |
|----------------------|--|
| 413-0065-X018 | 1,380 hp Caterpillar G3516ULB, 4-)Stroke, Lean-Burn Natural Gas-Fired Reciprocating Internal Combustion Engine w/Oxidation Catalytic Converter and Air to Fuel Ratio Controller (40 CFR Part 60, Subpart JJJJ, Subpart OOOO) |

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

Alabama Department of Environmental Management

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.
6. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shutdown as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events **that exceed 1 hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five years. These records shall be available for inspection.
7. This process, including all air pollution control devices and capture systems for which this permit is issued, shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
8. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
9. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.

- 10. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
- 11. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
- 12. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
- 13. Prior to a date to be specified by the Chief of the Air Division in the authorization to operate, emission tests are to be conducted by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, for the following pollutants. Written tests results are to be reported to the Air Division within 30 days of completion of testing.

| | | | |
|----------------------------------|-----|-----------------------|-----|
| Particulates..... | () | Carbon Monoxide | (X) |
| Sulfur Dioxide..... | () | Nitrogen Oxides | (X) |
| Volatile Organic Compounds | (X) | Formaldehyde | (X) |

- 14. Emissions tests are to be conducted for the following pollutants at intervals not to exceed 8,760 hours of following the date of initial compliance testing. All test reports must be submitted to the Air Division within 30 days of completion of testing.

| | | | |
|-----------------------------------|------------|-----------------------|------------|
| Particulates..... | () | Carbon Monoxide | () |
| Sulfur Dioxide..... | () | Nitrogen Oxides | () |
| <i>Volatile Organic Compounds</i> | <i>()</i> | <i>Formaldehyde</i> | <i>()</i> |

- 15. Unless otherwise stated in this permit or an applicable regulation, the Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- (a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- (b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).

- (c) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- (d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 30 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

16. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.
17. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.
18. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

- (a) by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;
- (b) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- (c) by paving;
- (d) by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust

- will not become airborne. Alternative methods shall be approved by the Department prior to utilization.
19. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
 20. In accordance with ADEM Admin. Code. r. 335-3-4-.01(1), any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.
 21. Should this facility, at any time, exceed the limits for NO_x, CO, or VOC, the permittee shall notify the Air Division within two (2) working days of determining that the exceedance occurred.
 22. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
 23. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

Synthetic Minor Source Requirements

24. The permittee shall not cause or allow combined formaldehyde (CH₂O) emissions from X016, X017, and X018 to exceed 9.0 YPY as measured by EPA Reference Method 323. Alternate methods may be used provided prior approval is granted by the Air Division.
25. This unit shall be equipped and operated at all times with a oxidizing catalytic converter in order to comply with the applicable emission limits of this permit. The permittee shall not operate the engine without an active catalytic converter installed.
26. The permittee shall conduct an initial performance test for CH₂O using the appropriate EPA Reference Method or an alternative method approved in advance by the Air Division within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup to demonstrate compliance with the applicable emission limits.
27. The permittee shall maintain the catalyst such that the pressure drop across the catalyst does not change by more than 2 inches of water at 100% load ($\pm 10\%$) from the pressure drop across the catalyst that is measured during the initial performance test. The permittee shall monitor and record the pressure differential across the catalyst at least once during any calendar month that the engine is operated.

28. The temperature of the engine's exhaust must be maintained such that the catalyst inlet temperature is ≥ 750 °F and ≤ 1350 °F. The permittee shall monitor and record the catalyst temperature at least once during any daily that the engine is operated.
29. The permittee shall conduct a performance test and reestablish the operating limitation for the pressure drop across the catalyst within 90 days of restarting the engine after completing a replacement of the catalyst for an engine. The permittee shall continue to monitor and record all operating parameters in accordance with the previously established compliance ranges until new ranges are established.
30. The permittee shall maintain records of the pressure drop across the catalyst and the catalyst inlet temperature. The permittee shall maintain these records on-site and make these records available for inspection upon request. These records shall be retained for a period of five (5) years from the date of generation of each record.
31. Should this engine exceed any emission standard or operational limitation, at any time, the permittee shall notify the Air Division within two working days of determining that the exceedance occurred.

NESHAP Requirements

32. This unit is subject to the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

NSPS Requirements

33. This unit is subject to the applicable requirements of 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and the applicable requirements of 40 CFR Part 60, Subpart A, General Provisions. The applicable requirements include, **but may not be limited to:**
 - a. The permittee shall not cause or allow emissions from this engine to exceed 1.0 g/hp-hr or 82 ppmvd at 15% O₂ of NO_x; 2.0 g/hp-hr or 270 ppmvd at 15% O₂ of CO; and/or 0.7 g/hp-hr or 60 ppmvd at 15% O₂ of VOC as measured by the appropriate EPA Reference Method or an alternative method approved in advance by the Air Division [40 CFR §60.4233(e)];
 - b. The permittee shall submit notifications as to the date construction is commenced on this engine postmarked no later than 30 days after such date and the actual date of initial startup of this engine postmarked within 15 days after such date [40 CFR §60.7(a)(1) and (3)];
 - c. The permittee shall maintain a maintenance plan on file, records of all maintenance conducted on this engine, and to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practices for minimizing emission. These records shall be maintained on site for a period of two years and made available for inspection upon request [40 CFR §60.4243(b)];

- d. The permittee shall conduct an initial performance test and subsequent performance testing every 8,760 hours of operation of this engine or every three years, whichever comes first using the appropriate EPA Reference Method or an alternative method approved in advance by the Air Division within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup while operating within 10% of 100% peak (or the highest achievable) load, to demonstrate compliance with the applicable NO_x, CO, and VOC standards [40 CFR §60.4243(b)];
 - e. The permittee shall notify the Air Division in writing at least 30 days in advance of all performance tests to be conducted and submitted as proof of compliance with the applicable emission standards specified in 40 CFR 60, Subpart JJJJ. [40 CFR §60.8(d)];
 - f. The permittee shall submit the results of each performance test within 60 days after the test has been completed [40 CFR §60.4245(d)];
 - g. The permittee shall maintain the applicable records specified in 40 CFR §60.4245(a), which include, but may not be limited to the following:
 - i. All notifications submitted to comply with this subpart and all documentation supporting any notification,
 - ii. Maintenance conducted on the engine, and
 - iii. Documentation that the engine meets the emission standards.
34. This unit is subject to the applicable requirements of 40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015, and the applicable requirements of 40 CFR Part 60, Subpart A, General Provisions. The applicable requirements include, **but may not be limited to:**
- a. The permittee must replace the reciprocating compressor rod packing according to either of the following [40 CFR §60.5385(a)]:
 - i. Before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of the permittee's reciprocating compressor affected facility, or October 15, 2012, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later [40 CFR §60.5385(a)(1)], or
 - ii. Prior to 36 months from the date of the most recent rod packing replacement, or 36 months from the date of startup for a new reciprocating compressor for which the rod packing has not yet been replaced [40 CFR §60.5385(a)(2)], or
 - iii. Collect the emissions from the rod packing using a rod packing emissions collection system which operates under negative pressure and route the rod

- packing emissions to a process through a closed vent system that meets the requirements of 40 CFR §60.5411(a).
- b. The permittee must demonstrate initial compliance with the following standards that apply to reciprocating compressor affected facilities [40 CFR §60.5410(c)]:
 - i. If complying with 40 CFR §60.5385(a)(1) or (2), during the initial compliance period, the permittee must continuously monitor the number of hours of operation or track the number of months since the last rod packing replacement.
 - ii. If complying with 40 CFR §60.5385(a)(3), the permittee must operate the rod packing emissions collection system under negative pressure and route emissions to a process through a closed vent system that meets the requirements of 40 CFR §60.5411(a).
 - c. The permittee must demonstrate continuous compliance with the following standards that apply to reciprocating compressor affected facilities [40 CFR §60.5415(c)]:
 - i. If complying with 40 CFR §60.5385(a)(1), the permittee must continuously monitor the number of hours of operation for each reciprocating compressor affected facility or track the number of months since initial startup, or October 15, 2012, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later.
 - ii. If complying with 40 CFR §60.5385(a)(2), the permittee must replace the reciprocating compressor rod packing before the total number of hours of operation reaches 26,000 hours or the number of months since the most recent rod packing replacement reaches 36 months.
 - iii. If complying with 40 CFR §60.5385(a)(3), the permittee must operate the rod packing emissions collection system under negative pressure and continuously comply with the closed vent requirements in 40 CFR §60.5416(a) and (b).
 - d. The permittee must perform the required notification, recordkeeping, and reporting requirements in accordance with 40 CFR §60.5420, which include but not limited to:
 - i. Initial Annual Report as specified in 40 CFR §60.5420(b);
 - ii. Annual Reports as specified in 40 CFR §60.5420(b); and
 - iii. Recordkeeping Requirements as specified in 40 CFR §60.5420(c)(3).
35. This compressor station is subject to the applicable requirements of 40 CFR Part 60, Subpart OOOOa, Standards of Performance for Crude Oil and Natural Gas Facilities For Which Construction, Modification, Or Reconstruction Commenced After September 18, 2015, and the applicable requirements of 40 CFR Part 60, Subpart A, General Provisions. The applicable requirements include, but may not be limited to:

Fugitive Equipment Component Requirements:

- a. The permittee must demonstrate initial and continuous compliance with the following standards that apply to fugitive equipment components affected facilities [40 CFR §60.5410a(j) and §60.5415(h)]:
 - i. The permittee shall develop a fugitive emissions monitoring plan as required by 40 CFR §60.5397a(b)(c), and (d) [40 CFR §60.5410a(j)];
 - ii. The permittee shall conduct an initial and subsequent periodic monitoring surveys as required by 40 CFR §60.5397a(f)(2) and (g) [40 CFR §60.5410a(j) and §60.5415(h)]; and
 - iii. The permittee must repair each identified source of fugitive emissions for each affected facility as required by 40 CFR §60.5397a(h) [40 CFR §60.5410a(j) and §60.5415(h)].
- b. The permittee must perform the required notification, recordkeeping, and reporting requirements in accordance with 40 CFR §60.5420a, which include, but may not be limited to:
 - i. Initial Annual Report as specified in 40 CFR §60.5420a(b);
 - ii. Annual reports as specified in 40 CFR §60.5420a(b); and
 - iii. Recordkeeping Requirements as specified in 40 CFR §60.5420a(c)(15).