State of Utah

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Lieutenant Governor

Department of
Environmental Quality

L. Scott Baird
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQE-IN100050016-20

February 27, 2020

Richard Ayala
Kinder Morgan Altamont LLC
370 Van Gordon Street
Lakewood, CO 80228

Dear Mr. Ayala:

Re: Intent to Approve:
Modification to Approval Order DAQE-AN100050009-13 to Update Equipment and Permit
Project Number: N100050016

The attached document is the Intent to Approve (ITA) for the above-referenced project. The ITA is subject to public review. Any comments received shall be considered before an Approval Order (AO) is issued. The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Future correspondence on this ITA should include the engineer's name, **Tad Anderson,** as well as the DAQE number as shown on the upper right-hand corner of this letter. Tad Anderson, can be reached at (801) 536-4456 or tdanderson@utah.gov, if you have any questions.

Sincerely,

Jon L. Black, Manager
New Source Review Section

JLB:TA:sa

cc: TriCounty Health Department
Donald Law, EPA Region VIII

STATE OF UTAH
Department of Environmental Quality
Division of Air Quality

INTENT TO APPROVE
DAQE-IN100050016-20
Modification to Approval Order DAQE-AN100050009-13 to Update Equipment and Permit

Prepared By
Tad Anderson, Engineer
(801) 536-4456
tdanderson@utah.gov

Issued to
Kinder Morgan Altamont LLC - Altamont Main Gas Processing Plant

New Source Review Section Manager
Section Manager NSR

Date: February 27, 2020

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GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name
Kinder Morgan Altamont LLC

Source Name
Kinder Morgan Altamont LLC - Altamont Main Gas Processing Plant

Mailing Address
370 Van Gordon Street
Lakewood, CO 80228

Physical Address
P.O. Box 587
Altamont, UT 84001

Source Contact
Name Richard Ayala
Phone (303) 914-4932
Email richard_ayala@kindermorgan.com

UTM Coordinates
557129 m Easting
4467475 m Northing
Datum NAD27
UTM Zone 12

SIC code 1321 (Natural Gas Liquids)

SOURCE INFORMATION

General Description
The Kinder Morgan Altamont LLC (Kinder Morgan) operates the Altamont Main Gas Processing Plant that receives gas from a high-pressure gathering system and a low-pressure gathering system. The high-pressure gas is received via pipeline from the East, West and South Compressor Stations. Low-pressure gas comes directly from some of the surrounding production fields to the inlet of the plant via low-pressure gas pipelines. The Altamont Main Plant processes the gas to extract natural gas liquid (NGL) products, which are stored in storage vessels and loaded onto trucks for offsite distribution. The Gas Processing Plant is designed to operate continuously with an inlet of 90 MMscfd.

All inlet gas received at the plant is processed to extract natural gas liquids using a low-temperature propane refrigeration process. Natural gas liquid products from this process include propane, butane and natural gasoline. These liquid products are stored in pressure vessels and loaded onto trucks. Liquid condensate received at the inlet of the plant is also stored in pressure vessels and loaded onto trucks.

To prevent gas hydrate formation during low-temperature processing, an ethylene glycol (EG) injection and regeneration system is used at the plant.

Also produced in this process is pipeline-quality natural gas. Some of this gas is used to fuel combustion sources in the facility. The remaining residue gas is compressed by on site residue gas compressors and discharged for sales and fuel gas for other Kinder Morgan facilities in the area.

During normal operations, routine and predictable blowdown events of combustible process gases will be sent to the facility process flare. The facility process flare will also control the combustible gases released during non-routine events to prevent emergency situations at the facility.

NSR Classification
New Major Source - Nonattainment Area

Source Classification
Located in Attainment Area
Duchesne County
Airs Source Size: A

Applicable Federal Standards
NSPS (Part 60), A: General Provisions
NSPS (Part 60), Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
NSPS (Part 60), IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
NSPS (Part 60), JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
NSPS (Part 60), 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
NSPS (Part 60), OOOOa: Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015
MACT (Part 63), A: General Provisions
MACT (Part 63), ZZZZ: NESHAP for Stationary Reciprocating Internal Combustion Engines
Title V (Part 70) Major Source

Project Description
Kinder Morgan has requested to remove the existing emergency flare and install a new process flare on site. The new process flare will control routine and predictable events on site as well as any non-planned events. Removing the existing emergency flare and installing the new process flare will result in an increase in permitted emissions to above the major source thresholds (103.16 TPY of NO_X, 112.83 TPY of CO and 116.20 TPY of VOC).

Kinder Morgan has also requested to install a 50 bhp propane-fired emergency generator; remove ICE-11 (natural gas-fired, 4SRB, residue gas compressor engine, rated at 1373 horse power); update permit to Major Source classification with additional requirements on storage tanks, loading racks and emergency generators.

SUMMARY OF EMISSIONS

The emissions listed below are an estimate of the total potential emissions from the source. Some rounding of emissions is possible.

Criteria Pollutant	Change (TPY)	Total (TPY)
CO_2 Equivalent	34471	82287.00
Carbon Monoxide	59.16	112.83
Nitrogen Oxides	33.48	103.16
Particulate Matter - PM_{10}	4.31	10.94
Particulate Matter - $PM_{2.5}$	4.31	10.94
Sulfur Oxides		0.39
Volatile Organic Compounds	26.94	116.20

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
2,2,4-Trimethylpentane (CAS #540841)	160	200
Acrolein (CAS #107028)	260	1840
Benzene (Including Benzene From Gasoline) (CAS #71432)	-7280	2320
Ethyl Benzene (CAS #100414)	0	20
Formaldehyde (CAS #50000)	740	2900
Hexane (CAS #110543)	-1740	4740
Toluene (CAS #108883)	-2600	1860
Xylenes (Isomers And Mixture) (CAS #1330207)	0	360
	Change (TPY)	**Total (TPY)**
Total HAPs	-7.68	7.12

PUBLIC NOTICE STATEMENT

The NOI for the above-referenced project has been evaluated and has been found to be consistent with the requirements of UAC R307. Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an AO by the Director.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notification of the ITA will be published in the Uintah Basin Standard on March 3, 2020. During the public comment period, the proposal and the evaluation of its impact on air quality will be available for the public to review and provide comment. If anyone so requests a public hearing within 15 days of publication, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated. The proposed conditions of the AO may be changed as a result of the comments received.

SECTION I: GENERAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

I.1	All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101]
I.2	The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]
I.3	Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1]
I.4	All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Director or Director's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401-8]
I.5	At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations,

	review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4]
I.6	The owner/operator shall comply with UAC R307-107. General Requirements: Breakdowns. [R307-107]
I.7	The owner/operator shall comply with UAC R307-150 Series. Emission Inventories. [R307-150]
I.8	The owner/operator shall submit documentation of the status of construction or modification to the Director within 18 months from the date of this AO. This AO may become invalid if construction is not commenced within 18 months from the date of this AO or if construction is discontinued for 18 months or more. To ensure proper credit when notifying the Director, send the documentation to the Director, attn.: NSR Section. [R307-401-18]

SECTION II: PERMITTED EQUIPMENT

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.A THE APPROVED EQUIPMENT

II.A.1	**Site Wide** Natural Gas Processing Plant
II.A.2	**ICE-1, 2, 3** Three (3) Natural Gas-Fired 4SRB Inlet Compressor Engines Power: 1030 horse power (each) Pollution Control NSCR catalysts
II.A.3	**ICE-4, 5, 6** Three (3) Natural Gas-Fired 4SRB Refrigeration Compressor Engines Power: 1030 horse power (each) Pollution Control NSCR catalysts
II.A.4	**ICE-7, 8, 9** Three (3) Natural Gas-Fired 4SRB Residue Gas Compressor Engines Power: 1030 horse power (each) Pollution Control NSCR catalysts
II.A.5	**ICE-10** One (1) Natural Gas-Fired 4SRB Residue Gas Compressor Engine Power: 1373 horse power (each) Pollution Control NSCR catalysts
II.A.6	**ICE-12** One (1) Natural Gas Fired 4SRB Refrigeration Compressor Engine Power: 1260 horse power Pollution Control NSCR catalysts
II.A.7	**EG** Ethylene Glycol Regeneration System Control: BTEX Condenser on the Still Vent

II.A.8	**ICE-EME** Emergency Generator Power output: 522 hp Fuel: Diesel
II.A.9	**ICE-EME 2** Emergency Generator Power output: 50 hp Fuel: Propane
II.A.10	**FLARE** Process Flare Capacity: 270,000 lbs/hr
II.A.11	**H-1** Hot Oil Heater Capacity: 24 MMBtu/hr Fuel Type: Natural Gas
II.A.12	**H-2** Hot Oil Heater Capacity: 13 MMBtu/hr Fuel Type: Natural Gas
II.A.13	**LR** Truck Loading Rack Fuel Type: Natural Gasoline & Condensate Controls: Vapor Return
II.A.14	**LR-2** Truck Loading Rack Fuel Type: NGL, propane and butane
II.A.15	**T-1** Slop Oil Tank Size: 10" H X 12' D
II.A.16	**T-2** Pit Tank Size: 20' H X 12' D
II.A.17	**T-3** API Classifier Size: 20 barrel
II.A.18	**T-4, 5** Two (2) Methanol Tanks Size: 20' H X 12' D Size: 8' H X 9'-6" D
II.A.19	**Fugitive Emissions** Gas Processing Plant

SECTION II: SPECIAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.B REQUIREMENTS AND LIMITATIONS

II.B.1	**Site-Wide Requirements**
II.B.1.a	Unless otherwise specified in this AO, visible emissions from the following emission points shall not exceed the following values: A. All natural gas/propane operated equipment and tanks - 10% opacity B. All other points - 20% opacity [R307-401-8]
II.B.1.a.1	Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [R307-401-8]
II.B.1.b	The following production limits shall not be exceeded: 90 million standard dry cubic feet of processed natural gas per day. [R307-401-8]
II.B.1.b.1	To determine compliance with the daily limit, the owner/operator shall calculate the daily limit by tracking the monthly amount of processed natural gas and dividing it by the number of days of the month. This shall be conducted by the 20th day of each month. Records of production shall be kept for all periods when the plant is in operation. Production shall be determined by gas flow meters for natural gas and hours of operation. The records of processing and production shall be kept on a daily basis. Hours of operation shall be determined by supervisor monitoring and maintaining of an operations log. [R307-401-8]
II.B.2	**Compressor Engine Testing Requirements**
II.B.2.a	Emissions to the atmosphere at all times from the indicated emission point shall not exceed the indicated rates: Source: ICE 1-9, Compressor Engines (each) Pollutant — lb/hr — grams/hp-hr NO_x — 1.59 — 0.7 CO — 1.14 — 0.5 Source: ICE-12, Compressor Engine Pollutant — lb/hr — grams/hp-hr NO_x — 1.95 — 0.7 CO — 3.09 — 1.11 Source: ICE-10, Compressor Engines Pollutant — lb/hr — grams/hp-hr NO_x — 1.52 — 0.5 CO — 1.52 — 0.5 [R307-401-8]

II.B.2.a.1	Stack testing to show compliance with the emission limitations stated in the above condition shall be performed as specified below: Testing Emissions Point — Pollutant — Frequency Compressor Engines — CO — # — NO_x — # A. Testing Frequency #Compliance test at least once every 8,760 hours of operation or once every three (3) years, whichever comes first. The Director may require testing at any time. B. Notification The Director shall be notified at least 30 days prior to conducting any required emission testing. A source test protocol shall be submitted to DAQ when the testing notification is submitted to the Director. The source test protocol shall be approved by the Director prior to performing the test(s). The source test protocol shall outline the proposed test methodologies, stack to be tested, and procedures to be used. A pretest conference shall be held, if directed by the Director. C. Sample Location The emission point shall be designed to conform to the requirements of 40 CFR 60, Appendix A, Method 1, or other methods as approved by the Director. An Occupational Safety and Health Administration (OSHA)- or Mine Safety and Health Administration (MSHA)-approved access shall be provided to the test location. D. Volumetric Flow Rate 40 CFR 60, Appendix A, Method 2, Method 19 or other EPA testing methods acceptable to the Director E. NO_x 40 CFR 60, Appendix A, Method 7, 7A, 7B, 7C, 7D or 7E, or other EPA testing methods acceptable to the Director F. CO 40 CFR 60, Appendix A, Method 10, or other EPA testing methods acceptable to the Director G. Calculations To determine mass emission rates (lb/hr, etc.) the pollutant concentration as determined by the appropriate methods above shall be multiplied by the volumetric flow rate and any necessary conversion factors determined by the Director, to give the results in the specified units of the emission limitation. H. The owner/operator shall submit a copy of the results of the test to the Director within 60 days after the test has been completed. I. For an existing source/emission point, the production rate during all compliance testing shall be no less than 90% of the maximum production achieved in the previous three (3) years. [R307-401-8]
II.B.3	**Emergency Generator Engine Requirements**
II.B.3.a	The owner/operator shall not operate each emergency engine on site for more than 100 hours annually for non-emergency situations. There is no time limit on the use of the engines during emergencies. [R307-401-8]

II.B.3.a.1	To determine compliance with an annual limit, records documenting the operation of each emergency engine shall be kept in a log and shall include the following: A. The date the emergency engine was used B. The duration of operation in hours C. The reason for the emergency engine usage [R307-401-8]
II.B.3.a.2	To determine the duration of operation, the owner/operator shall install a non-resettable hour meter for each emergency engine. [R307-401-8]
II.B.3.b	The owner/operator shall only use diesel fuel (fuel oil #1, #2 or diesel fuel oil additives) in the 522 hp emergency generator. All diesel burned shall meet the definition of ultra-low sulfur diesel (ULSD), and contain no more than 15 ppm sulfur. [R307-401-8]
II.B.3.b.1	To demonstrate compliance with the diesel fuel requirements for any diesel fuel purchased, the owner/operator shall keep and maintain fuel purchase invoices. The fuel purchase invoices shall indicate the diesel fuel meets the ULSD requirements, or the owner/operator shall obtain certification of sulfur content from the fuel supplier. [R307-401-8]
II.B.4	**Flare Requirements**
II.B.4.a	The Process Flare shall operate with a continuous pilot flame and be equipped with an auto-igniter. [40 CFR 60 Subpart A]
II.B.4.b	The Process Flare shall operate with no visible emissions (except during emergency situations). [40 CFR 60 Subpart A]
II.B.4.c	Visual determination of emissions from the Process Flare shall be conducted according to 40 CFR 60, Appendix A, Method 22. [40 CFR 60 Subpart A]
II.B.5	**Loading Rack Requirements**
II.B.5.a	The owner/operator shall load the non-pressurized tanker trucks on site by the use of submerged loading. [R307-401-8]
II.B.5.b	The owner/operator shall connect a vapor capture line for use during pressurized on-site truck loading operations. The vapor capture/return lines shall be used at all times during pressurized loading operations. [R307-401-8]
II.B.6	**Tank Requirements**
II.B.6.a	Tanks T-1 and T-2 shall only contain residual water and/or liquids from the bottoms of plant vessels. [R307-401-8]
II.B.7	**LDAR Requirements**
II.B.7.a	The Main Gas Processing Plant is subject to the LDAR requirements in 40 CFR 60 Subpart OOOO and OOOOa. [40 CFR 60 Subpart OOOO, 40 CFR 60 Subpart OOOOa, R307-401-8]

PERMIT HISTORY

This Approval Order shall supersede or will be based on the following documents:

Is Derived From	NOI dated June 14, 2018
Incorporates	Additional Information dated November 12, 2019
Incorporates	Additional NOI dated May 23, 2019
Supersedes	AO DAQE-AN100050009-13 dated June 25, 2013

ACRONYMS

The following lists commonly used acronyms and associated translations as they apply to this document:

40 CFR	Title 40 of the Code of Federal Regulations
AO	Approval Order
BACT	Best Available Control Technology
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CDS	Classification Data System (used by Environmental Protection Agency to classify sources by size/type)
CEM	Continuous emissions monitor
CEMS	Continuous emissions monitoring system
CFR	Code of Federal Regulations
CMS	Continuous monitoring system
CO	Carbon monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent - Title 40 of the Code of Federal Regulations Part 98, Subpart A, Table A-1
COM	Continuous opacity monitor
DAQ/UDAQ	Division of Air Quality
DAQE	This is a document tracking code for internal Division of Air Quality use
EPA	Environmental Protection Agency
FDCP	Fugitive dust control plan
GHG	Greenhouse Gas(es) - Title 40 of the Code of Federal Regulations 52.21 (b)(49)(i)
GWP	Global Warming Potential - Title 40 of the Code of Federal Regulations Part 86.1818-12(a)
HAP or HAPs	Hazardous air pollutant(s)
ITA	Intent to Approve
LB/YR	Pounds per year
MACT	Maximum Achievable Control Technology
MMBTU	Million British Thermal Units
NAA	Nonattainment Area
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOI	Notice of Intent
NO_x	Oxides of nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
PM_{10}	Particulate matter less than 10 microns in size
$PM_{2.5}$	Particulate matter less than 2.5 microns in size
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
R307	Rules Series 307
R307-401	Rules Series 307 - Section 401
SO_2	Sulfur dioxide
Title IV	Title IV of the Clean Air Act
Title V	Title V of the Clean Air Act
TPY	Tons per year
UAC	Utah Administrative Code
VOC	Volatile organic compounds