



State of Utah

SPENCER J. COX
Governor

DEIDRE HENDERSON
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Department of
Environmental Quality

Kimberly D. Shelley
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQE-IN144080008-24

September 4, 2024

Karen Pratt
Uinta Wax Operating, LLC
6000 Western Place, Suite 1000
Fort Worth, TX 76107
kpratt@finleyresources.com

Dear Ms. Pratt:

Re: Intent to Approve: Modification to Approval Order DAQE-AN144080005-15 to Update
Equipment
Project Number: N144080008

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, **Mr. Enqiang He**, as well as the DAQE number as shown on the upper right-hand corner of this letter. Mr. Enqiang He, can be reached at (801) 556-1580 or ehe@utah.gov, if you have any questions.

Sincerely,

Alan D. Humpherys, Manager
New Source Review Section

ADH:EH:jg

cc: TriCounty Health Department
EPA Region 8

STATE OF UTAH
Department of Environmental Quality
Division of Air Quality

INTENT TO APPROVE
DAQE-IN144080008-24
Modification to Approval Order DAQE-AN144080005-15
to Update Equipment

Prepared By
Mr. Enqiang He, Engineer
(801) 556-1580
ehe@utah.gov

Issued to
Uinta Wax Operating, LLC - Randlett Compressor Station

Issued On
September 4, 2024



New Source Review Section Manager
Alan D. Humpherys

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GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name

Uinta Wax Operating, LLC

Source Name

Uinta Wax Operating, LLC - Randlett
Compressor Station

Mailing Address

6000 Western Place, Suite 1000
Fort Worth, TX 76107

Physical Address

Section 31, T3S, R2E Four miles south of
Randlett
Uintah County, UT

Source Contact

Name: Karen Pratt
Phone: (720) 990-9927
Email: kpratt@finleyresources.com

UTM Coordinates

601,528 m Easting
4,447,800 m Northing
Datum NAD83
UTM Zone 12

SIC code 4922 (Natural Gas Transmission)

SOURCE INFORMATION

General Description

Uinta Wax Operating, LLC (Uinta Wax) operates the Randlett Compressor Station in Uintah County. The Randlett Compressor Station consists of compressor engines, triethylene glycol (TEG) dehydrator units, a thermal oxidizer, tank combustors, storage tanks, pressurized tanks, a high-pressure flare, and an emergency generator engine.

NSR Classification

Minor Modification at Minor Source

Source Classification

Located in Uinta Basin O3 NAA
Uintah County
Airs Source Size: B

Applicable Federal Standards

NSPS (Part 60), A: General Provisions
NSPS (Part 60), JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
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), HH: National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities

MACT (Part 63), ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Project Description

Uinta Wax has requested the following changes to the facility:

1. The previously permitted emergency generator engine (II.A.5) rated at 176 hp will be derated to 131.6 hp.
2. One (1) additional tank combustor will be added to the facility to control VOC/HAP emissions from the atmospheric tanks.
3. The high-pressure flare shall control VOC/HAP emissions from emergencies, as well as events including but not limited to facility shutdown and when gas is unable to be sent via pipeline.
4. The source has revised PTE from compressor blowdown, compressor rod packing, and pigging launcher and receivers for maintenance.
5. The source has revised fugitive PTE VOC/HAP emissions from components such as flanges, valves, connectors, etc.

In addition to the equipment and processes to be added or modified above, Uinta Wax has also requested to remove the following equipment and processes:

1. Two (2) previously permitted compressor engines (II.A.4) rated at 690 hp each.
2. Natural gas liquid extraction process unit (II.A.6).
3. Two (2) 2.0 MMBtu/hr ethylene glycol reboiler heaters (II.A.8).
4. 4.0 MMBtu/hr (combined) hot oil heaters (II.A.9).
5. Four (4) tank heaters (II.A.13) each rated at 0.25 MMBtu/hr, and
6. The pneumatic pump (II.A.10).

As a result of the changes above, site-wide PTE have been updated.

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	2534	45996.00
Carbon Monoxide	4.79	54.09
Nitrogen Oxides	-13.87	64.83
Particulate Matter - PM ₁₀	-0.26	3.04
Particulate Matter - PM _{2.5}	-0.16	3.04
Sulfur Oxides	0	0.90
Volatile Organic Compounds	9.86	104.16
Volatile Organic Compounds - Fugitive		21.85

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Acetaldehyde (CAS #75070)	-2680	2520
Acrolein (CAS #107028)	-1640	1560
Benzene (Including Benzene From Gasoline) (CAS #71432)	-620	1180

Ethyl Benzene (CAS #100414)	14	28
Formaldehyde (CAS #50000)	-1520	5280
Generic HAPs (CAS #GHAPS)	4880	4880
Hexane (CAS #110543)	1460	5460
Methanol (CAS #67561)	-1260	740
Toluene (CAS #108883)	-140	260
Xylenes (Isomers And Mixture) (CAS #1330207)	-52	80
	Change (TPY)	Total (TPY)
Total HAPs	-0.78	10.99

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 intent to approve will be published in the Uintah Basin Standard on September 11, 2024. 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	Randlett Compressor Station
II.A.2	Six (6) Compressor Engines Engine rating: 1,380 hp each Three (3) Caterpillar 3516 ULB engines Three (3) Caterpillar 3516B and J engines Emission Controls: catalytic oxidation catalyst at each exhaust stack
II.A.3	One (1) Emergency Generator Engine Rating: 131.6 hp Controlled with a nonselective catalytic reduction (NSCR) New equipment
II.A.4	Two (2) TEG Regenerator Heaters Rating: 1.0 MMBtu/hr each
II.A.5	Two (2) TEG Still Vents Rating: 15 MMscfd each
II.A.6	One (1) Thermal Oxidizer
II.A.7	Two (2) Tank Combustors for Atmospheric Tanks One (1) is new equipment

II.A.8	One (1) High-Pressure Flare New equipment
II.A.9	Four (4) Atmospheric Tanks Tank Capacity: 400 barrels each Controlled by the combustors
II.A.10	Three (3) Pressurized Bullet Tanks Tank Capacity: 30,000 gallons each
II.A.11	Two (2) Pressurized Bullet Tanks Tank Capacity: 50,000 gallons or less each
II.A.12	Various Venting Processes and Components Including episode emissions from compressor blowdown, compressor rod packing, and pigging launcher and receiver, and fugitive VOC emissions from components New equipment
II.A.13	Condensate Truck Loading Station

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	The owner/operator shall not allow visible emissions from the following emission points to exceed the following values: A. The flare, the thermal oxidizer, and the combustors - no visible emissions. B. All other natural gas operated equipment - 10% opacity. C. All other points - 20% opacity. [R307-401]
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 owner/operator shall only use natural gas as fuel in the combustion equipment on site. [R307-401]
II.B.1.c	The owner/operator shall route all emissions from the TEG dehydrators through the thermal oxidizer. [R307-401]
II.B.1.d	The owner/operator shall route all emissions from the atmospheric storage tanks through the tank combustors. [R307-401-8]

II.B.1.e	The owner/operator shall route the field gas to the high-pressure flare during emergencies, as well as events such as facility shutdowns and when gas is unable to be sent via pipeline. [R307-401-8]																		
II.B.1.f	The owner/operator shall operate the combustors, the thermal oxidizer, and the high-pressure flare in accordance with the general provisions of 40 CFR 60.18. [R307-401-8]																		
II.B.2	Stack Testing Requirements																		
II.B.2.a	<p>The owner/operator shall not emit more than the following rates from the following compressor engine stacks:</p> <p>Compressor Engine Model 3516ULB</p> <table border="1" data-bbox="349 577 941 672"> <thead> <tr> <th>Pollutant</th> <th>lb/hr</th> <th>g/bhp-hr</th> </tr> </thead> <tbody> <tr> <td>NO_x</td> <td>3.04</td> <td>1.0</td> </tr> <tr> <td>CO</td> <td>1.37</td> <td>0.45</td> </tr> </tbody> </table> <p>Compressor Engine Model 3516B and J</p> <table border="1" data-bbox="349 745 941 840"> <thead> <tr> <th>Pollutant</th> <th>lb/hr</th> <th>g/bhp-hr</th> </tr> </thead> <tbody> <tr> <td>NO_x</td> <td>1.52</td> <td>0.5</td> </tr> <tr> <td>CO</td> <td>1.37</td> <td>0.45</td> </tr> </tbody> </table> <p>[R307-401-8]</p>	Pollutant	lb/hr	g/bhp-hr	NO _x	3.04	1.0	CO	1.37	0.45	Pollutant	lb/hr	g/bhp-hr	NO _x	1.52	0.5	CO	1.37	0.45
Pollutant	lb/hr	g/bhp-hr																	
NO _x	3.04	1.0																	
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Pollutant	lb/hr	g/bhp-hr																	
NO _x	1.52	0.5																	
CO	1.37	0.45																	
II.B.2.a.1	<p>Compliance Demonstration To demonstrate compliance with the emission limitations above, the owner/operator shall perform stack testing on the emissions unit according to the stack testing conditions contained in this AO. [R307-165-2, R307-401-8]</p>																		
II.B.2.a.2	<p>Initial Test The owner/operator shall conduct an initial stack test on the emission unit within 180 days after startup of a new emission unit. [R307-165-2]</p>																		
II.B.2.a.3	<p>Test Frequency The owner/operator shall conduct a stack test on the emission unit within two (2) years after the date of the most recent stack test of the emission unit. The Director may require the owner/operator to perform a stack test at any time. [R307-165-2, R307-401-8]</p>																		
II.B.2.b	<p>The owner/operator shall conduct any stack testing required by this AO according to the following conditions. [R307-401-8]</p>																		
II.B.2.b.1	<p>Notification At least 30 days prior to conducting a stack test, the owner/operator shall submit a source test protocol to the Director. The source test protocol shall include the items contained in R307-165-3. If directed by the Director, the owner/operator shall attend a pretest conference. [R307-165-3, R307-401-8]</p>																		
II.B.2.b.2	<p>Testing & Test Conditions The owner/operator shall conduct testing according to the approved source test protocol and according to the test conditions contained in R307-165-4. [R307-165-4, R307-401-8]</p>																		
II.B.2.b.3	<p>Access The owner/operator shall provide Occupational Safety and Health Administration (OSHA)- or Mine Safety and Health Administration (MSHA)-approved access to the test location. [R307-401-8]</p>																		

II.B.2.b.4	Reporting No later than 60 days after completing a stack test, the owner/operator shall submit a written report of the results from the stack testing to the Director. The report shall include validated results and supporting information. [R307-165-5, R307-401-8]
II.B.2.b.5	Possible Rejection of Test Results The Director may reject stack testing results if the test did not follow the approved source test protocol or for a reason specified in R307-165-6. [R307-165-6, R307-401-8]
II.B.2.b.6	Test Methods When performing stack testing, the owner/operator shall use the appropriate EPA-approved test methods as acceptable to the Director. Acceptable test methods for pollutants are listed below. [R307-401-8]
II.B.2.c	Standard Conditions A. Temperature - 68 degrees Fahrenheit (293 K). B. Pressure - 29.92 in Hg (101.3 kPa). C. Averaging Time - As specified in the applicable test method. [40 CFR 60 Subpart A, 40 CFR 63 Subpart A, R307-401-8]
II.B.2.c.1	NO_x 40 CFR 60, Appendix A, Method 7; Method 7E; or other EPA-approved testing method as acceptable to the Director. [R307-401-8]
II.B.2.c.2	CO 40 CFR 60, Appendix A, Method 10 or other EPA-approved testing method as acceptable to the Director. [R307-401-8]
II.B.3	Compressor Engine and Emergency Generator Engine Requirements
II.B.3.a	The owner/operator shall not operate the emergency generator engine on site for more than 100 hours per rolling 12-month period during non-emergency situations. There is no time limit on the use of the engine during emergencies. [40 CFR 60 Subpart ZZZZ, R307-401-8]
II.B.3.a.1	The owner/operator shall calculate a new 12-month total by the 20th day of each month using data from the previous 12 months. Records documenting the operation of the emergency generator engine shall be kept in a log and shall include the following: a. The date the emergency generator engine was used. b. The duration of operation in hours. c. The reason for the emergency generator engine usage. [40 CFR 60 Subpart ZZZZ, 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 the emergency generator engine. [40 CFR 60 Subpart ZZZZ, R307-401-8]
II.B.3.b	The owner/operator shall maintain the stack heights of the compressor engines no less than 61 feet tall, as measured from the ground elevation of the building to the top of the stacks. [R307-410-4]

II.B.4	Monitoring Requirements of Fugitive Emissions (Leak Detection and Repair)
II.B.4.a	<p>The owner/operator shall develop a fugitive emissions monitoring plan. At a minimum, the plan shall include:</p> <ul style="list-style-type: none"> A. Monitoring frequency. B. Monitoring technique and equipment. C. Procedures and timeframes for identifying and repairing leaks. D. Recordkeeping practices. E. Calibration and maintenance procedures. <p>[R307-401-8]</p>
II.B.4.a.1	<p>The plan shall address monitoring for "difficult-to-monitor" and "unsafe-to-monitor" components. [R307-401-8]</p>
II.B.4.b	<p>The owner/operator shall conduct monitoring surveys on site to observe each "fugitive emissions component" for "fugitive emissions."</p> <ul style="list-style-type: none"> A. "Fugitive emissions component" means any component that has the potential to emit fugitive emissions of VOC, including but not limited to valves, connectors, pressure relief devices, open-ended lines, flanges, covers, and closed vent systems, thief hatches or other openings, compressors, instruments, and meters. B. "Fugitive emissions" are considered any visible emissions observed using optical gas imaging or a Method 21 instrument reading of 500 ppm or greater. <p>[R307-401-8]</p>
II.B.4.b.1	<p>Monitoring surveys shall be conducted according to the following schedule:</p> <ul style="list-style-type: none"> A. No later than 60 days after startup of production, as defined in 40 CFR 60.5430a. B. Semiannually after the initial monitoring survey. Consecutive semiannual monitoring surveys shall be conducted at least 4 months apart. C. Annually after the initial monitoring survey for "difficult-to-monitor" components. D. As required by the owner/operator's monitoring plan for "unsafe-to-monitor" components. <p>[R307-401-8]</p>
II.B.4.b.2	<p>Monitoring surveys shall be conducted using one or both of the following to detect fugitive emissions:</p> <ul style="list-style-type: none"> A. Optical gas imaging (OGI) equipment. OGI equipment shall be capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions. B. Monitoring equipment that meets U.S. EPA Method 21, 40 CFR Part 60, Appendix A. <p>[R307-401-8]</p>

II.B.4.c	<p>If fugitive emissions are detected at any time, the owner/operator shall repair the fugitive emissions component as soon as possible but no later than 15 calendar days after detection.</p> <p>If the repair or replacement is technically infeasible, would require a vent blowdown, a well shutdown or well shut-in, or would be unsafe to repair during operation of the unit, the repair or replacement must be completed during the next well shutdown, well shut-in, after an unscheduled, planned or emergency vent blowdown or within 24 months, whichever is earlier.</p> <p>[R307-401-8]</p>
II.B.4.c.1	<p>The owner/operator shall resurvey the repaired or replaced fugitive emissions component no later than 30 calendar days after the fugitive emissions component was repaired.[R307-401-8]</p>
II.B.4.d	<p>The owner/operator shall maintain records of the fugitive emissions monitoring plan, monitoring surveys, repairs, and resurveys. [R307-401-8]</p>

PERMIT HISTORY

This Approval Order shall supersede (if a modification) or will be based on the following documents:

Supersedes	AO DAQE-AN144080005-15 dated November 2, 2015
Incorporates	NOI dated November 27, 2023
Incorporates	Additional information dated April 2, 2024
Incorporates	Additional information dated April 9, 2024
Incorporates	Additional information dated April 25, 2024
Incorporates	Additional information dated August 19, 2024

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