Nevada Department of Conservation and Natural Resources • Division of Environmental Protection

Bureau of Air Pollution Control

901 SOUTH STEWART STREET SUITE 4001
CARSON CITY, NEVADA 89701-5249
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Facility ID No. A1002 *Permit No.* AP4922-3128.02

CLASS I AIR QUALITY OPERATING PERMIT (*40 CFR Part 70 Program)*

Issued to: RUBY PIPELINE LLC – WIELAND FLAT COMPRESSOR STATION (HEREINAFTER REFERRED TO AS PERMITTEE)
Mailing Address: 370 VAN GORDON STREET, LAKEWOOD, CO 80228
Physical Address: 11364 MOUNTAIN CITY HIGHWAY, ELKO, NV 89801
Driving Directions: FROM ELKO ALONG STATE ROUTE 225, 6.5 MILES NORTH OF INTERSECTION OF STATE ROUTE 225 AND STATE ROUTE 226
General Facility Location:

SECTION 28 & 29, T 39 N, R 55 E, MDB&M
HA 44 – NORTH FORK AREA / ELKO COUNTY
NORTH 4,566,599 M, EAST 600,769 M, UTM ZONE 11, NAD 83

Emission Unit List:

A. System 01 – Gas Turbine Compressor

S2.001	Gas Turbine Compressor #1 (A-01) (Solar Turbine Titan 130 – 16,977 hp)
S2.002	Gas Turbine Compressor #2 (A-02) (Solar Turbine Titan 130 – 16,977 hp)

B. System 02 – Standby Emergency Generator

S2.003	Standby E-generator (731 hp, Waukesha L36L, 5283700818, 2010) (A-Aux-1)

******End of Emission Unit List******

Facility ID No. A1002 *Permit No.* AP4922-3128.02
CLASS I AIR QUALITY OPERATING PERMIT

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section I. General Conditions

A. Nevada Administrative Code (NAC) 445B.063
The Department may use any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed, to determine excess emissions.

B. NAC 445B.22013
Prohibited Discharge
The Permittee shall not cause or permit the discharge into the atmosphere from any stationary source of any hazardous air pollutant or toxic regulated air pollutant that threatens the health and safety of the general public, as determined by the Director.

C. NAC 445B.22017
Visible Emissions: Maximum Opacity; Determination and Monitoring of Opacity.
1. Except as otherwise provided in this section and NAC 445B.2202, the Permittee may not cause or permit the discharge into the atmosphere from any emission unit which is of an opacity equal to or greater than 20 percent. Opacity must be determined by one of the following methods:
   a. If opacity is determined by a visual measurement, it must be determined as set forth in Reference Method 9 in Appendix A of 40 CFR Part 60.
2. The provisions of this section and NAC 445B.2202 do not apply to that part of the opacity that consists of uncombined water. The burden of proof to establish the application of this exemption is upon the person seeking to come within the exemption.

D. NAC 445B.22067
Open Burning
The open burning of any combustible refuse, waste, garbage, oil, or for any salvage operations, except as specifically exempted, is prohibited. Specific exemptions from open burning are described in NAC 445B.22067(2).

E. NAC 445B.22087
Odors
1. The Permittee may not discharge or cause to be discharged, from any stationary source, any material or regulated air pollutant which is or tends to be offensive to the senses, injurious or detrimental to health and safety, or which in any way interferes with or prevents the comfortable enjoyment of life or property.
2. The Director shall investigate an odor when 30 percent or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy. The sample must be at least 20 people or 75 percent of those exposed if fewer than 20 people are exposed.
3. The Director shall deem the odor to be a violation if he or she is able to make two odor measurements within a period of 1 hour. These measurements must be separated by at least 15 minutes. An odor measurement consists of a detectable odor after the odorous air has been diluted with eight or more volumes of odor-free air.

F. NAC 445B.225
Prohibited Conduct: Concealment of Emissions
The Permittee may not install, construct or use any device which conceals any emission without reducing the total release of regulated air pollutants to the atmosphere.

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section I. General Conditions (continued)

G. NAC 445B.227

Prohibited conduct: Operation of source without required equipment; removal or modification of required equipment; modification of required procedure

Except as otherwise provided in NAC 445B.001 to 445B.390, inclusive, no person may:

1. Operate a stationary source of air pollution unless the control equipment for air pollution which is required by applicable requirements or conditions of this Operating Permit is installed and operating.
2. Disconnect, alter, modify or remove any of the control equipment for air pollution or modify any procedure required by an applicable requirement or condition of the permit.

H. NAC 445B.232

Excess Emissions

1. Scheduled maintenance or testing or scheduled repairs which may result in excess emissions of regulated air pollutants prohibited by NAC 445B.100 to 445B.390, inclusive, must be approved in advance by the Director and performed during a time designated by the Director as being favorable for atmospheric ventilation.
2. The Permittee shall notify the Director of the proposed time and expected duration at least 30 days before any scheduled maintenance or testing which may result in excess emissions of regulated air pollutants prohibited by NAC 445B.001 to 445B.390, inclusive. The scheduled maintenance or testing must not be conducted unless the scheduled maintenance or testing is approved pursuant to NAC 445B.232(1).
3. The Permittee shall notify the Director of the proposed time and expected duration at least 24 hours before any scheduled repairs which may result in excess emissions of regulated air pollutants prohibited by NAC 445B.001 to 445B.390, inclusive. The scheduled repairs must not be conducted unless the scheduled repairs are approved pursuant to NAC 445B.232(1).
4. The Permittee shall notify the Director by email of any excess emissions within 24 hours after any malfunction or upset of the process equipment or equipment for controlling pollution or during start-up or shutdown of that equipment. The Permittee shall send the email to aircompliance@ndep.nv.gov.
5. The Permittee shall provide the Director, within 15 days after any malfunction, upset, start-up, shutdown or human error which results in excess emissions, sufficient information to enable the Director to determine the seriousness of the excess emissions. The information must include at least the following:
   a. The identity of the stack or other point of emission, or both, where the excess emissions occurred.
   b. The estimated magnitude of the excess emissions expressed in opacity or in the units of the applicable limitation on emission and the operating data and methods used in estimating the magnitude of the excess emissions.
   c. The time and duration of the excess emissions.
   d. The identity of the equipment causing the excess emissions.
   e. If the excess emissions were the result of a malfunction, the steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of the malfunction.
   f. The steps taken to limit the excess emissions.
   g. Documentation that the equipment for controlling air pollution, process equipment or processes were at all times maintained and operated, to a maximum extent practicable, in a manner consistent with good practice for minimizing emissions.
6. The Permittee shall ensure that any notification or related information submitted to the Director pursuant to this section is provided in a format specified by the Director.

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section I. General Conditions (continued)

I. NAC 445B.252

Testing and Sampling

1. To determine compliance with NAC 445B.001 to 445B.390, inclusive, before the approval or the continuance of an operating permit or similar class of permits, the Director may either conduct or order the Permittee of any stationary source to conduct or have conducted such testing and sampling as the Director determines necessary. Testing and sampling or either of them must be conducted and the results submitted to the Director within 60 days after achieving the maximum rate of production at which the affected facility will be operated, but not later than 180 days after initial start-up of the facility and at such other times as may be required by the Director.
2. Tests of performance must be conducted and data reduced in accordance with the methods and procedures of the test contained in each applicable subsection of this section unless the Director:
   a. Specifies or approves, in specific cases, the use of a reference method with minor changes in methodology;
   b. Approves the use of an equivalent method;[1]
   c. Approves the use of an alternative method, the results of which the Director has determined to be adequate for indicating whether a specific stationary source is in compliance;[2] or
   d. Waives the requirement for tests of performance because the Permittee of a stationary source has demonstrated by other means to the Director's satisfaction that the affected facility is in compliance with the standard.
3. Tests of performance must be conducted under such conditions as the Director specifies to the operator of the plant based on representative performance of the affected facility. The Permittee shall make available to the Director such records as may be necessary to determine the conditions of the test of performance. Operations during periods of start-up, shutdown and malfunction must not constitute representative conditions of a test of performance unless otherwise specified in the applicable standard.
4. The Permittee of an affected facility shall give notice to the Director 30 days before the test of performance to allow the Director to have an observer present. A written testing procedure for the test of performance must be submitted to the Director at least 30 days before the test of performance to allow the Director to review the proposed testing procedures.
5. Each test of performance must consist of at least three separate runs using the applicable method for that test. Each run must be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the runs apply. In the event of forced shutdown, failure of an irreplaceable portion of the sampling train, extreme meteorological conditions or other circumstances with less than three valid samples being obtained, compliance may be determined using the arithmetic mean of the results of the other two runs upon the Director's approval.
6. All testing and sampling will be performed in accordance with recognized methods and as specified by the Director.[3]
7. The cost of all testing and sampling and the cost of all sampling holes, scaffolding, electric power and other pertinent allied facilities as may be required and specified in writing by the Director must be provided and paid for by the Permittee of the stationary source.
8. All information and analytical results of testing and sampling must be certified as to their truth and accuracy and as to their compliance with all provisions of these regulations, and copies of these results must be provided to the Director no later than 60 days after the testing or sampling, or both.
9. Notwithstanding the provisions of NAC 445B.252(2), the Director shall not approve an alternative method or equivalent method to determine compliance with a standard or emission limitation contained in Part 60, 61 or 63 of Title 40 of the Code of Federal Regulations for:
   a. An emission unit that is subject to a testing requirement pursuant to Part 60, 61 or 63 of Title 40 of the Code of Federal Regulations; or
   b. An affected source.

[1] Requires additional approval from the EPA Administrator.
[2] Requires additional approval from the EPA Administrator.
[3] Requires additional approval from the EPA Administrator.

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section I. General Conditions (continued)

J. NAC 445B.273(1)
Schedules for Compliance
All new and existing stationary sources must comply with NAC 445B.001 through 445B.390, inclusive. Existing stationary sources are in compliance with those sections and may continue to operate under the provisions of their approved compliance schedules, which may be amended from time to time.

K. NAC 445B.275
Violations: Acts constituting; notice
1. Failure to comply with any requirement of NAC 445B.001 to 445B.390, inclusive, any applicable requirement or any condition of an operating permit constitutes a violation. As required by NRS 445B.450, the Director shall issue a written notice of an alleged violation to the Permittee for any violation, including, but not limited to:
   a. Failure to apply for and obtain an operating permit;
   b. Failure to construct a stationary source in accordance with the application for an operating permit as approved by the Director;
   c. Failure to construct or operate a stationary source in accordance with any condition of an operating permit;
   d. Commencing construction or modification of a stationary source without applying for and receiving an operating permit or a modification of an operating permit as required by NAC 445B.001 to 445B.3477, inclusive, or a mercury operating permit to construct as required by NAC 445B.3611 to 445B.3689, inclusive;
   e. Failure to comply with any requirement for recordkeeping, monitoring, reporting or compliance certification contained in an operating permit; or
   f. Failure to pay fees as required by NAC 445B.327 or 445B.3689.
2. The written notice must specify the provision of NAC 445B.001 to 445B.390, inclusive, the condition of the operating permit or the applicable requirement that is being violated.
3. Written notice shall be deemed to have been served if delivered to the person to whom addressed or if sent by registered or certified mail to the last known address of the person.

L. NAC 445B.305
Operating permits: Imposition of more stringent standards for emissions
The Director may impose standards for emissions on a proposed stationary source that are more stringent than those found in NAC 445B.001 to 445B.390, inclusive, as a condition of approving an operating permit for the proposed stationary source.

M. NAC 445B.315
Contents of operating permits: Exception for operating permits to construct; required conditions
1. Notwithstanding any provision of this section to the contrary, the provisions of this section do not apply to operating permits to construct.
2. The Director shall cite the legal authority for each condition contained in an operating permit.
3. An operating permit must contain the following conditions:
   a. The term of the operating permit is 5 years.
   b. The Permittee shall retain records of all required monitoring data and supporting information for 5 years after the date of the sample collection, measurement, report or analysis. Supporting information includes all records regarding calibration and maintenance of the monitoring equipment and all original strip-chart recordings for continuous monitoring instrumentation.
   c. Each of the conditions and requirements of the operating permit is severable, and if any are held invalid, the remaining conditions and requirements continue in effect.
   d. The Permittee shall comply with all conditions of the operating permit. Any noncompliance constitutes a violation and is a ground for:
      (1) An action for noncompliance;
      (2) Revising, revoking, reopening and revising, or terminating the operating permit by the Director; or
      (3) Denial of an application for a renewal of the operating permit by the Director.
   e. The need to halt or reduce activity to maintain compliance with the conditions of the operating permit is not a defense to noncompliance with any condition of the operating permit.

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section I. General Conditions (continued)

M. NAC 445B.315 (continued)
Contents of operating permits: Exception for operating permits to construct; required conditions (continued)

3. An operating permit must contain the following conditions (continued):
   - f. The Director may revise, revoke and reissue, reopen and revise, or terminate the operating permit for cause.
   - g. The operating permit does not convey any property rights or any exclusive privilege.
   - h. The Permittee shall provide the Director, in writing and within a reasonable time, with any information that the Director requests[4] to determine whether cause exists for revising, revoking and reissuing, reopening and revising, or terminating the operating permit, or to determine compliance with the conditions of the operating permit.
   - i. The Permittee shall pay fees to the Director in accordance with the provisions set forth in NAC 445B.327 and 445B.331.
   - j. The Permittee shall allow the Director or any authorized representative, upon presentation of credentials, to:
     - (1) Enter upon the premises of the Permittee where:
       - (a) The stationary source is located;
       - (b) Activity related to emissions is conducted; or
       - (c) Records are kept pursuant to the conditions of the operating permit;[5]
     - (2) Have access to and copy, during normal business hours, any records that are kept pursuant to the conditions of the operating permit[6]
     - (3) Inspect, at reasonable times, any facilities, practices, operations or equipment, including any equipment for monitoring or controlling air pollution, that are regulated or required pursuant to the operating permit; and
     - (4) Sample or monitor, at reasonable times, substances or parameters to determine compliance with the conditions of the operating permit or applicable requirements.
   - k. A responsible official (as defined in NAC 445B.156) of the stationary source shall certify that, based on information and belief formed after a reasonable inquiry, the statements made in any document required to be submitted by any condition of the operating permit are true, accurate and complete.

N. NAC 445B.319, NAC 445B.342, NAC 445B.3425, and NAC 445B.344
Any changes to this operating permit will comply with all provisions established under NAC 445B.319 (Administrative Amendment),[7] NAC 445B.342 (Notification of Authorized Change), NAC 445B.3425 (Minor Revision), and NAC 445B.344 (Significant Revision).

[4] The Permittee shall submit yearly reports including, but not limited to, throughput, production, fuel consumption, hours of operation, and emissions. These reports will be submitted in the format required by the Nevada Division of Environmental Protection Bureau of Air Pollution Control and Bureau of Air Quality Planning (Air Programs) for all emission units/systems specified on the form. The report must be submitted to the Air Programs no later than March 1 annually for the preceding calendar year, unless otherwise approved by the Air Programs.

[5] Under NAC 445B.288(3), the Permittee shall retain an operating log for emission units considered insignificant activities subject to a limitation on its hours of operation pursuant to NAC 445B.288(2) for not less than 5 years.

[6] The Permittee shall provide a digital spreadsheet or specified format required by the Nevada Division of Environmental Protection Bureau of Air Pollution Control.

[7] Under NAC 445B.287(3), an operating permit may not be transferred from one owner or piece of equipment to another. The Permittee may apply for an administrative amendment reflecting a change of ownership or the name of the stationary source.

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section I. General Conditions (continued)

O. NAC 445B.325

Termination, reopening and revision, modification, and revocation and reissuance

1. A Class I operating permit must be reopened and revised to incorporate any additional applicable requirement adopted pursuant to the Act if, on the effective date of the applicable requirement, the operating permit has a remaining term of 3 or more years. The reopening must be completed no later than 18 months after the effective date of the applicable requirement.[8]
2. An operating permit may be terminated, reopened and revised, modified, or revoked and reissued if:
   a. The Director or the Administrator determines that the operating permit contains a material mistake or is based on inaccurate statements;
   b. The Director or the Administrator determines that the operating permit, as written, does not ensure compliance with all applicable requirements; or
   c. The Director determines that there has been a violation of any of the provisions of NAC 445B.001 to 445B.390, inclusive, any applicable requirement, or any condition contained in the operating permit
3. The Director shall notify the Permittee at least 30 days before the Director terminates, reopens and revises, revises, or revokes and reissues the operating permit. The notice must be made by certified mail and must contain the legal authority, the jurisdiction and the reasons for the action taken.[9]
4. If the Administrator notifies the Director and the Permittee that cause exists to reopen the operating permit, the Director shall forward to the Administrator a proposed determination of the reopening and revision, the revision of, or the revocation and reissuance of the operating permit within 90 days after receipt of the notice from the Administrator.[10]
5. If the Director reopens an operating permit, he or she shall revise only those portions of the operating permit for which cause exists.
6. The reopening of an operating permit pursuant to this section must comply with all of the relevant requirements for the issuance or revision of a permit, including the requirements related to the content of the permit and the requirements for notice, public participation and comment, and a review by any affected states.

P. NAC 445B.3265

Operating permits: Revocation and reissuance

1. An operating permit may be revoked if the control equipment is not operating.
2. An operating permit may be revoked by the Director upon determining that there has been a violation of NAC 445B.001 to 445B.390, inclusive, or the provisions of 40 CFR 52.21, or 40 CFR Part 60 or 61, Prevention of Significant Deterioration, New Source Performance Standards, and National Emission Standards for Hazardous Air Pollutants, adopted by reference in NAC 445B.221.
3. The revocation is effective 10 days after the service of a written notice, unless a hearing is requested.

[8] State only requirements (only Nevada has authority to enforce).
[9] State only requirements (only Nevada has authority to enforce).
[10] State only requirements (only Nevada has authority to enforce).

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section I. General Conditions (continued)

P. NAC 445B.3265 (continued)
Operating permits: Revocation and reissuance (continued)

4. To reissue a revoked operating permit, the holder of the revoked permit must file a new application with the Director, accompanied by the fee for an initial operating permit as specified in NAC 445B.327. An environmental review of the stationary source must be conducted as though construction had not yet commenced.

Q. NAC 445B.3405(1)(d)
The Permittee shall record:

1. Monitoring information required by the conditions of this permit including the date, the location and the time of the sampling or the measurements and the operating conditions at the time of the sampling or measurements; and
2. The date on which the analyses were performed, the company that performed them, the analytical techniques that the company used, and the results of such analyses.

R. NAC 445B.3405(1)(e)
The Permittee shall:

1. Promptly report to the Director all deviations from the requirements of this operating permit; and
2. Report to the Director the probable cause of all deviations and any action taken to correct the deviations. For this operating permit, prompt is defined as submittal of a report within 15 days of the deviation. This definition does not alter any reporting requirements as established for reporting of excess emissions as required under NAC 445B.232, or for reporting of an emergency (as defined by NAC 445B.326); and
3. Submit reports of any required monitoring every 6 months, within 8 weeks after June 30 and December 31 of each calendar year. The reports must contain a summary of the data collected as required by all monitoring, recordkeeping and compliance requirements and as specified in this operating permit.

S. NAC 445B.3405(1)(j)
The Permittee shall submit a compliance certification annually,[11] or more frequently if required by an applicable requirement, to the Director. A copy of the compliance certification must be submitted to the Administrator. A compliance certification must include:

1. An identification of each term or condition of the operating permit that is the basis of the certification;
2. The status of the stationary source's compliance with any applicable requirement;
3. A statement of whether compliance was continuous or intermittent;
4. The method used for determining compliance; and
5. Any other facts the Director determines to be necessary to determine compliance.

T. NAC 445B.3443
Renewal of permit

1. All Class I operating permits must be renewed 5 years after the date of issuance.
2. A complete application for the renewal of a Class I operating permit must be submitted to the Director on the form provided by the Director with the appropriate fee at least 240 days, but not earlier than 18 months, before the expiration date of the current Class I operating permit for stationary sources.[12]
3. Applications for the renewal of a Class I operating permit must comply with all requirements for the issuance of an initial Class I operating permit as specified in NAC 445B.3395.
4. If an application for the renewal of a Class I operating permit is submitted in accordance with NAC 445B.3443(2), the stationary source may continue to operate under the conditions of the existing Class I operating permit until the Class I operating permit is renewed or the application for renewal is denied.

[11] The Permittee shall submit the compliance certification on or before March 1.
[12] The Director shall determine whether the application is complete within 60 days of receipt of the application (NAC 445B.3395). It is recommended the Permittee submit the application at least 300 days before the expiration date of the current Class I operating permit.

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section I. General Conditions (continued)

T. NAC 445B.3443 (continued)
Renewal of permit (continued)
5. If an application for the renewal of a Class I operating permit is not submitted in accordance with NAC 445B.3443(2):
   a. The stationary source may be required to cease operation when the Class I operating permit expires; and
   b. The Permittee of the stationary source:
      (1) Must apply for the issuance of a new Class I operating permit pursuant to NAC 445B.3375; and
      (2) May not recommence the operation until the new Class I operating permit is issued.
6. The fee for the issuance of a new Class I operating permit or the renewal of a Class I operating permit is specified in NAC 445B.327.

U. Nevada Revised Statute (NRS) 445B.470
Prohibited acts; penalty; establishment of violation; request for prosecution
1. A person shall not knowingly:
   a. Violate any applicable provision, the terms or conditions of any permit or any provision for the filing of information;
   b. Fail to pay any fee;
   c. Falsify any material statement, representation or certification in any notice or report; or
   d. Render inaccurate any monitoring device or method, required pursuant to the provisions of NRS 445B.100 to 445B.450, inclusive, or 445B.470 to 445B.640, inclusive, or any regulation adopted pursuant to those provisions.
2. Any person who violates any provision of NRS 445B.470(1) shall be punished by a fine of not more than $10,000 for each day of the violation.
3. The burden of proof and degree of knowledge required to establish a violation of subsection 1 are the same as those required by 42 U.S.C. § 7413(c), as that section existed on October 1, 1993.
4. If, in the judgment of the Director of the Department or the Director's designee, any person is engaged in any act or practice which constitutes a criminal offense pursuant to NRS 445B.100 to 445B.640, inclusive, the Director of the Department or the designee may request that the Attorney General or the district attorney of the county in which the criminal offense is alleged to have occurred institute by indictment or information a criminal prosecution of the person.
5. If, in the judgment of the control officer of a local air pollution control board, any person is engaged in such an act or practice, the control officer may request that the district attorney of the county in which the criminal offense is alleged to have occurred institute by indictment or information a criminal prosecution of the person.

V. ASIP NAC Article 2.5.4
Breakdown or upset, determined by the Director to be unavoidable and not the result of careless or marginal operations, shall not be considered a violation of these regulations.

W. 40 CFR 52.21(r)(4)
At such time that the Permittee becomes a major stationary source or major modification solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of 40 CFR Part 52.21 paragraphs (j) through (s) of this section shall apply to the source or modification as though construction had not yet commenced on the source or modification.

******End of General Conditions******

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section II. Construction Conditions

A. Not Applicable.

******End of Construction Conditions******

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section III. Ambient Air Monitoring Requirements

A. Not Applicable.

******End of Ambient Air Monitoring Requirements******

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section IV. Specific Operating Conditions

A. Emission Units S2.001 and S2.002

System 01 – Gas Turbine Compressor		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.001	Gas Turbine Compressor #1 (A-01) (Solar Turbine Titan 130 – 16,977 hp)	4,566,566	600,891
S2.002	Gas Turbine Compressor #2 (A-02) (Solar Turbine Titan 130 – 16,977 hp)	4,566,566	600,891

1. Air Pollution Control Equipment (NAC 445B.3405)
   a. Emissions from **S2.001 and S2.002**, each, shall be controlled by a **lean, pre-mix combustion (SoLoNox)**.
   b. Descriptive Stack Parameters
      Stack Height: 46 feet
      Stack Diameter: 7.55 feet
      Stack Temperature: 901 °F
      Exhaust Flow: 161,000 dry standard cubic feet per minute (dscfm)

2. Operating Parameters (NAC 445B.3405)
   a. **S2.001 and S2.002,** each, may consume only **natural gas**.
   b. The maximum allowable fuel consumption rate for **S2.001 and S2.002**, each, shall not exceed **145,713.7 standard cubic feet (scf)** per hour, averaged over a calendar day.
   c. Hours
      (1) **S2.001 and S2.002**, each, may operate a total of **24** hours per day.

3. Emission Limits (NAC 445B.305, NAC 445B.3405)
   The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.001 and S2.002,** each**,** the following pollutants in excess of the following specified limits:
   a. The discharge of **PM** (particulate matter) to the atmosphere shall not exceed **4.17** pounds per hour, nor more than **18.3** tons per 12-month rolling period.
   b. The discharge of **PM_{10}** (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed **4.17** pounds per hour, nor more than **18.3** tons per 12-month rolling period.
   c. The discharge of **$PM_{2.5}$** (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed **4.17** pounds per hour, nor more than **18.3** tons per 12-month rolling period.
   d. The discharge of **SO_2** (sulfur dioxide) to the atmosphere shall not exceed **0.47** pounds per hour, nor more than **2.07** tons per 12-month rolling period.
   e. The discharge of **NO_X** (oxides of nitrogen) to the atmosphere shall not exceed **12.7** pounds per hour, nor more than **55.5** tons per 12-month rolling period.
   f. The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **15.4** pounds per hour, nor more than **67.6** tons per 12-month rolling period.
   g. The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **0.88** pounds per hour, nor more than **3.87** tons per 12-month rolling period.
   h. NAC 445B.22017 – The opacity from the **S2.001 and S2.002**, each, shall not equal or exceed **20** percent.
   i. NAC 445B.2203 – The maximum allowable discharge of **PM_{10}** to the atmosphere from **S2.001 and S2.002**, each, shall not exceed **0.33** pounds per MMBtu.
   j. NAC 445B.22047 – The maximum allowable discharge of **sulfur** to the atmosphere from **S2.001 and S2.002**, each, shall not exceed **88.73** pounds per hour.

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section IV. Specific Operating Conditions (continued)

A. Emission Units S2.001 and S2.002 (continued)

4. Monitoring, Recordkeeping, and Reporting (NAC 445B.3405)
The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.
   a. Monitor and record the hours of operation for **S2.001 and S2.002**, each, for each calendar day.
   b. Monitor and record the consumption rate of **natural gas** for each calendar day for **S2.001 and S2.002**, each, (in scf) by multiplying the hourly fuel consumption rate as stated in **A.2.b.** of this section and the total daily hours of operation. The corresponding average hourly fuel consumption rate in scf per hour as provided on the manufacturer's specification, to be kept onsite with records.
   c. Record the corresponding average hourly consumption rate in scf per hour. The average hourly consumption rate shall be determined from the total daily consumption and the total daily hours of operation.
   d. Record the consumption rate of **natural gas**, in scf, on a cumulative monthly basis, for each 12-month rolling period.

5. Performance and Compliance Testing (NAC 445B.3405, (NAC 445B.252(1))
   a. The Permittee, upon issuance of this operating permit, shall conduct and record renewal performance testing at least 90 days prior to the expiration of this operating permit, but no earlier than 365 days from the date of expiration of this operating permit, and every 5 years thereafter, in accordance with the following:
      (1) All opacity compliance demonstrations and/or performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section **I.I.** Testing and Sampling (NAC 445B.252) of this operating permit. Material sampling must be conducted in accordance with protocols approved by the Director. All performance test results shall be based on the arithmetic average of three valid runs. (NAC 445B.252(5))
      (2) Testing shall be conducted on the exhaust stack (post controls).
      (3) Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
      (4) Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
   b. Standards of Performance for New Stationary Sources – 40 CFR Part 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines
   The Permittee must perform annual NO_X performance tests (no more than 14 calendar months following the previous performance test) in accordance with 40 CFR 60.4400 to demonstrate continuous compliance unless the permittee qualifies for reduced testing based on **Section IV.A.6.d.(1)** of the operating permit. (40 CFR 60.4340(a) and 40 CFR 60.4400(a))

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Section IV. Specific Operating Conditions (continued)

A. Emission Units S2.001 and S2.002 (continued)

6. Federal Requirements

Standards of Performance for New Stationary Sources – 40 CFR Part 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines

a. Emission Limits for Nitrogen Oxides (40 CFR 60.4320, Table 1)

For a new turbine firing natural gas with a heat input at peak load greater than 135.47 MMBtu per hour, the Permittee shall meet the NO_X emission standard of **25** parts per million (ppm) at 15 percent O_2 or **150** nanograms per Joule (ng/J) of useful output (1.2 pounds per megawatt-hour (lb/MWh)). (40 CFR 60.4320(a) and (b))

b. Emission Limits for Sulfur Dioxide (40 CFR 60.4330)

The Permittee shall comply with one of the following (40 CFR 60.4430(a)):

(1) Not cause to be discharged into the atmosphere from the subject stationary combustion turbine any gases which contain SO_2 in excess of **110** ng/J (0.90 lb/MWh gross output) (40 CFR 60.4430(a)(1)); or

(2) Not burn in the subject stationary combustion turbine any fuel which contains total potential sulfur emissions in excess of **26** ng SO_2/J (0.060 lb SO_2/MMBtu) heat input. (40 CFR 60.4430(a)(2))

c. General Compliance Requirements (40 CFR 60.4333)

(1) The Permittee must operate and maintain the stationary combustion turbine, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction. (40 CFR 60.4333(a))

d. Monitoring

(1) *How do I demonstrate continuous compliance for NO_X if I do not use water or steam injection? (40 CFR 60.4340)*

The Permittee must perform annual performance tests (no more than 14 calendar months following the previous performance test) in accordance with 40 CFR 60.4400 to demonstrate continuous compliance. (40 CFR 60.4340(a))

(a) If the NO_X emission result from the performance test is less than or equal to 75 percent of the NO_X emission limit for the turbine, you may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NO_X emission limit for the turbine, you must resume annual performance tests. (40 CFR 60.4340(a)(1))

(b) An affected facility that has not operated for the 60 calendar days prior to the due date of a performance test is not required to perform the subsequent performance test until 45 calendar days after the next operating day. The Administrator or delegated authority must be notified of recommencement of operation consistent with 40 CFR 60.4375(d). (40 CFR 60.4340(a)(2))

(c) If the permittee has operated 168 operating hours or less in total or with a particular fuel since the date the previous performance test was required to be conducted, the permittee may request an extension from the otherwise required performance test until after the affected facility has operated more than 168 operating hours in total or with a particular fuel since the date of the previous performance test was required to be conducted. A request for an extension under this paragraph (a)(3) must be addressed to the relevant air division or office director of the appropriate Regional Office of the U.S. EPA as identified in 40 CFR 60.4(a) for his or her approval at least 30 calendar days prior to the date on which the performance test is required to be conducted. If an extension is approved, a performance test must be conducted within 45 calendar days after the day the facility reaches 168 hours of operation since the date the previous performance test was required to be conducted. When the facility has operated more than 168 operating hours since the date the previous performance test was required to be conducted, the Administrator or delegated authority must be notified consistent with 40 CFR 60.4375(d). (40 CFR 60.4340(a)(3))

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Section IV. Specific Operating Conditions (continued)

A. Emission Units S2.001 and S2.002 (continued)

6. Federal Requirements (continued)
Standards of Performance for New Stationary Sources – 40 CFR Part 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines (continued)

d. Monitoring (continued)

(2) *Determining the Total Sulfur Content of the Turbine's Combustion Fuel (40 CFR 60.4360)*
The Permittee must monitor the total sulfur content of the fuel being fired in the turbine, except as provided in 40 CFR Part 60.4365. The sulfur content of the fuel must be determined using total sulfur methods described in 40 CFR Part 60.4415. Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than half the applicable limit, ASTM D4084, D4810, D5504, or D6228, or Gas Processors Association Standard 2377 (all of which are incorporated by reference, see 40 CFR Part 60.17), which measure the major sulfur compounds, may be used. (40 CFR 60.4360)

(3) *Exemption from Monitoring the Total Sulfur Content of Fuel (40 CFR 60.4365)*
The Permittee may elect not to monitor the total sulfur content of the fuel combusted in the turbine, if the fuel is demonstrated not to exceed potential sulfur emissions of 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input for units located in continental areas. The Permittee must use one of the following sources of information to make the required demonstration (40 CFR 60.4365):

(a) The fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel, specifying that the maximum total sulfur content for natural gas use in continental areas is 20 grains of sulfur or less per 100 standard cubic feet, has potential sulfur emissions of less than less than 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input for continental areas (40 CFR 60.4365(a)); or

(b) Representative fuel sampling data which show that the sulfur content of the fuel does not exceed 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input for continental areas. At a minimum, the amount of fuel sampling data specified in Section 2.3.1.4 or 2.3.2.4 of 40 CFR Part 75 Appendix D is required. (40 CFR 60.4365(b))

(4) *Determining the Sulfur Content of the Fuel (40 CFR 60.4370)*
The frequency of determining the sulfur content of the fuel must be as follows:

(a) *Gaseous Fuel.* If the Permittee elects not to demonstrate sulfur content using options in 40 CFR Part 60.4365, and the fuel is supplied without intermediate bulk storage, the sulfur content value of the gaseous fuel must be determined and recorded once per unit operating day. (40 CFR 60.4370(b))

(b) *Custom Schedules*. Notwithstanding the requirements of 40 CFR Part 60.4370(b), operators or fuel vendors may develop custom schedules for determination of the total sulfur content of gaseous fuels, based on the design and operation of the affected facility and the characteristics of the fuel supply. Except as provided in 40 CFR Parts 60.4370(c)(1) and 60.4370(c)(2), custom schedules shall be substantiated with data and shall be approved by the Administrator before they can be used to comply with the standard in 40 CFR Part 60.4330. (40 CFR 60.4370(c))

(i) The two custom sulfur monitoring schedules set forth in 40 CFR Parts 60.4370(c)(1)(i) through 60.4370(c)(1)(iv) and 60.4370(c)(2) are acceptable, without prior Administrative approval (40 CFR 60.4370(c)(1)):

(I) The Permittee shall obtain daily total sulfur content measurements for 30 consecutive unit operating days, using the applicable methods specified in this subpart. Based on the results of the 30 daily samples, the required frequency for subsequent monitoring of the fuel's total sulfur content shall be as specified in 40 CFR Parts 60.4370(c)(1)(ii), 60.4370(c)(1)(iii), or 60.4370(c)(1)(iv), as applicable. (40 CFR 60.4370(c)(1)(i))

(II) If none of the 30 daily measurements of the fuel's total sulfur content exceeds half the applicable standard, subsequent sulfur content monitoring may be performed at 12-month intervals. If any of the samples taken at 12-month intervals has a total sulfur content greater than half but less than the applicable limit, follow the procedures in 40 CFR Part 60.4370(c)(1)(iii). If any measurement exceeds the applicable limit, follow the procedures in 40 CFR Part 60.4370(c)(1)(iv). (40 CFR 60.4370(c)(1)(ii))

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Section IV. Specific Operating Conditions (continued)

A. Emission Units S2.001 and S2.002 (continued)

6. Federal Requirements (continued)
Standards of Performance for New Stationary Sources – 40 CFR Part 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines (continued)
d. Monitoring (continued)
(4) *Determining the Sulfur Content of the Fuel (40 CFR 60.4370)* (continued)
(b) *Custom Schedules*. Notwithstanding the requirements of 40 CFR Part 60.4370(b), operators or fuel vendors may develop custom schedules for determination of the total sulfur content of gaseous fuels, based on the design and operation of the affected facility and the characteristics of the fuel supply. Except as provided in 40 CFR Parts 60.4370(c)(1) and 60.4370(c)(2), custom schedules shall be substantiated with data and shall be approved by the Administrator before they can be used to comply with the standard in 40 CFR Part 60.4330. (40 CFR 60.4370(c))
(i) The two custom sulfur monitoring schedules set forth in 40 CFR Parts 60.4370(c)(1)(i) through 60.4370(c)(1)(iv) and 60.4370(c)(2) are acceptable, without prior Administrative approval (40 CFR 60.4370(c)(1)):
(III) If at least one of the 30 daily measurements of the fuel's total sulfur content is greater than half but less than the applicable limit, but none exceeds the applicable limit, then (40 CFR 60.4370(c)(1)(iii)):
(A) Collect and analyze a sample every 30 days for 3 months. If any sulfur content measurement exceeds the applicable limit, follow the procedures in 40 CFR Part 60.4370(c)(iv). (40 CFR 60.4370(c)(1)(iii)(A))
(B) Begin monitoring at 6-month intervals for 12 months. If any sulfur content measurement exceeds the applicable limit, follow the procedures in 40 CFR Part 60.4370(c)(1)(iv). (40 CFR 60.4370(c)(1)(iii)(B))
(C) Begin monitoring at 12-month intervals. If any sulfur content measurement exceeds the applicable limit, follow the procedures in 40 CFR Part 60.4370(c)(1)(iv). (40 CFR 60.4370(c)(1)(iii)(C))
(IV) If a sulfur content measurement exceeds the applicable limit, immediately begin daily monitoring according to 40 CFR Part 60.4370(c)(1)(i). Daily monitoring shall continue until 30 consecutive daily samples, each having a sulfur content no greater than the applicable limit, are obtained. At that point, the applicable procedures of 40 CFR Parts 60.4370(c)(1)(ii) or 60.4370(c)(1)(iii) shall be followed. (40 CFR 60.4370(c)(1)(iv))
(c) The Permittee may use the data collected from the 720-hour sulfur sampling demonstration described in Section 2.3.6 of 40 CFR Part 75 to determine a custom sulfur sampling schedule as follows (40 CFR 60.4370(c)(2)):
(i) If the maximum fuel sulfur content obtained from the 720 hourly samples does not exceed 20 grains/100 scf, no additional monitoring of the sulfur content of the gas is required, for the purposes of this subpart. (40 CFR 60.4370(c)(2)(i))
(ii) If the maximum fuel sulfur content obtained from any of the 720 hourly samples exceed 20 grains/100 scf, but none of the sulfur content values (when converted to weight percent sulfur) exceeds half the applicable limit, then the minimum required sampling frequency shall be one sample at 12 month intervals. (40 CFR 60.4370(c)(2)(ii))
(iii) If any sample result exceeds half the applicable limit, but none exceeds the applicable limit, follow the provisions of 40 CFR Part 60.4370(c)(1)(iii). (40 CFR 60.4370(c)(2)(iii))
(iv) If the sulfur content of any of the 720 hourly samples exceeds the applicable limit, follow the provisions of 40 CFR Part 60.4370(c)(1)(iv). (40 CFR 60.4370(c)(2)(iv))

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Section IV. Specific Operating Conditions (continued)

A. Emission Units S2.001 and S2.002 (continued)

6. Federal Requirements (continued)
Standards of Performance for New Stationary Sources – 40 CFR Part 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines (continued)

e. Reporting

(1) *Required Reports to be Submitted (40 CFR 60.4375)*

(a) The notification requirements of 40 CFR 60.8 apply to the initial and subsequent performance tests. (40 CFR 60.4375(b))

(2) *Definition of Excess Emissions and Monitor Downtime for NO_X (40 CFR 60.4380)*
For the purpose of reports required under 40 CFR Part 60.7(c), periods of excess emissions and monitor downtime that must be reported are defined as follows:

(a) For turbines required to monitor combustion parameters or parameters that document proper operation of the NO_X emission controls (40 CFR 60.4380(c)):

(i) An excess emission is a 4-hour rolling unit operating hour average in which any monitored parameter does not achieve the target value or is outside the acceptable range defined in the parameter monitoring plan for the unit. (40 CFR 60.4380(c)(1))

(ii) A period of monitor downtime is a unit operating hour in which any of the required parametric data are either not recorded or are invalid. (40 CFR 60.4380(c)(2))

(3) *Definition of Excess Emissions and Monitor Downtime for SO_2 (40 CFR 60.4385)*
If the Permittee choses the option to monitor the sulfur content of the fuel, excess emissions and monitoring downtime are defined as follows:

(a) For samples of gaseous fuel samples obtained using daily sampling, flow proportional sampling, or sampling from the unit's storage tank, an excess emission occurs each unit operating hour included in the period beginning on the date and hour of any sample for which the sulfur content of the fuel being fired in the combustion turbine exceeds the applicable limit and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit. (40 CFR 60.4385(a))

(b) A period of monitor downtime begins when a required sample is not taken by its due date. A period of monitor downtime also begins on the date and hour of a required sample, if invalid results are obtained. The period of monitor downtime ends on the date and hour of the next valid sample. (40 CFR 60.4385(c))

(4) *When to Submit Reports (40 CFR 60.4395)*
All reports required under 40 CFR Part 60.7(c) must be electronically submitted via CEDRI by the 30th day following the end of each 6-month period. (40 CFR 60.4395)

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Section IV. Specific Operating Conditions (continued)

A. Emission Units S2.001 and S2.002 (continued)

6. Federal Requirements (continued)
Standards of Performance for New Stationary Sources – 40 CFR Part 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines (continued)

f. Performance Tests

(1) *How do I conduct the initial and subsequent performance tests, regarding NO_X? (40 CFR 60.4400)*
The permittee must conduct an initial performance test, as required in 40 CFR 60.8. Subsequent NO_X performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test). (40 CFR 60.4400(a))

(a) There are two general methodologies that you may use to conduct the performance tests. For each test run:

(i) Measure the NO_X concentration (in parts per million (ppm)), using EPA Method 7E in appendix A-4 to this part, EPA Method 20 in appendix A-7 to this part, EPA Method 320 in appendix A of part 63 of this chapter, or ASTM D6348-12 (Reapproved 2020) (incorporated by reference, see 40 CFR 60.17). For units complying with the output-based standard, concurrently measure the stack gas flow rate, using EPA Methods 1 and 2 in appendix A to this part, and measure and record the electrical and thermal output from the unit. Then, use the following equation to calculate the NOX emission rate (40 CFR 60.4400(a)(1)(i)):
Equation 1:

$$E = \frac{1.194 \times 10^{-7} \times (NO_X)_c \times Q_{std}}{P} (Eq. 1)$$

Where:
E = NO_X emission rate, in lb/MWh;
1.194×10^{-7} = conversion constant, in lb/dscf-ppm;
$(NO_X)_c$ = average NO_X concentration for the run, in ppm;
Q_{std} = stack gas volumetric flow rate, in dscf/hr; and
P = gross electrical and mechanical energy output of the combustion turbine, in MW (for simple cycle operation), for combined cycle operation, the sum of all electrical and mechanical output from the combustion and steam turbines, or, for combined heat and power operation, the sum of all electrical and mechanical output from the combustion and steam turbines plus all useful recovered thermal output not used for additional electric or mechanical generation, in MW, calculated according to 40 CFR 60.4350(f)(2); or

(ii) Measure the NO_X and diluent gas concentrations, using either EPA Methods 7E and 3A or EPA Method 20 in appendix A to this part. In addition, when only natural gas is being combusted, ASTM D6522-20 (incorporated by reference, see 40 CFR 60.17) can be used instead of EPA Method 3A in appendix A-2 to this part or EPA Method 20 in appendix A-7 to this part to determine the oxygen content in the exhaust gas. Concurrently measure the heat input to the unit, using a fuel flowmeter (or flowmeters), and measure the electrical and thermal output of the unit. Use EPA Method 19 in appendix A to this part to calculate the NO_X emission rate in lb/MMBtu. Then, use equations 1 and, if necessary, 2 and 3 in 40 CFR 60.4350(f) to calculate the NO_X emission rate in lb/MWh. (40 CFR 60.4400(a)(1)(ii))

(b) Sampling traverse points for NO_X and (if applicable) diluent gas are to be selected following EPA Method 20 or EPA Method 1 (non-particulate procedures), and sampled for equal time intervals. The sampling must be performed with a traversing single-hole probe, or, if feasible, with a stationary multi-hole probe that samples each of the points sequentially. Alternatively, a multi-hole probe designed and documented to sample equal volumes from each hole may be used to sample simultaneously at the required points. (40 CFR 60.4400(a)(2))

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Section IV. Specific Operating Conditions (continued)

A. Emission Units S2.001 and S2.002 (continued)

6. Federal Requirements (continued)
Standards of Performance for New Stationary Sources – 40 CFR Part 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines (continued)

f. Performance Tests (continued)

(1) *How do I conduct the initial and subsequent performance tests, regarding NO_X? (40 CFR 60.4400)*
The permittee must conduct an initial performance test, as required in 40 CFR 60.8. Subsequent NO_X performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test). (40 CFR 60.4400(a)) (continued)

(c) Notwithstanding 40 CFR Part 60.4400(a)(2), the Permittee may test at fewer points than are specified in EPA Method 1 or EPA Method 20 in 40 CFR Part 60 Appendix A if the following conditions are met (40 CFR 60.4400(a)(3)):

(i) The Permittee may perform a stratification test for NO_X and diluent pursuant to the procedures specified in Section 6.5.6.1(a) through e of 40 CFR Part 75 Appendix A. (40 CFR 60.4400(a)(3)(i)(b)):

(ii) Once the stratification sampling is completed, the Permittee may use the alternative sample point selection criteria for the performance test as stated under 40 CFR Part 60.4400(a)(3)(ii)(A) through (C). (40 CFR 60.4400(a)(3)(ii))

(d) The performance test must be done at any load condition within plus or minus 25 percent of 100 percent of peak load. The Permittee may perform testing at the highest achievable load point, if at least 75 percent of peak load cannot be achieved in practice. The Permittee must conduct three separate test runs for each performance test. The minimum time per run is 20 minutes. (40 CFR 60.4400(b))

(i) Compliance with the applicable emission limit in 40 CFR Part 60.4320 must be demonstrated at each tested load level. Compliance is achieved if the three-run arithmetic average NO_X emission rate at each tested level meets the applicable emission limit in 40 CFR Part 60.4320. (40 CFR 60.4400(b)(4))

(ii) The ambient temperature must be greater than 0 °F during the performance test. (40 CFR 60.4400(b)(6))

(2) *How do I conduct the initial and subsequent performance tests for sulfur? (40 CFR 60.4415)*
The Permittee must conduct an initial performance test, as required in 40 CFR 60.8. The Permittee complying with the fuel-based standard may use fuel records (such as a current, valid purchase contract, tariff sheet, transportation contract, or results of a fuel analysis) to satisfy the requirements of 40 CFR 60.8. Subsequent SO_2 performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test). There are four methodologies that the permittee may use to conduct the performance tests. (40 CFR 60.4415(a))

(a) The use of a current, valid purchase contract, tariff sheet, or transportation contract for the fuel specifying the maximum total sulfur content of all fuels combusted in the affected facility. Alternately, the fuel sampling data specified in Section 2.3.1.4 or 2.3.2.4 Part 75 Appendix D of Chapter 60 may be used. (40 CFR 60.4415(a)(1))

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Section IV. Specific Operating Conditions (continued)

A. Emission Units S2.001 and S2.002 (continued)

6. Federal Requirements (continued)
Standards of Performance for New Stationary Sources – 40 CFR Part 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines (continued)

f. Performance Tests (continued)

(2) *How do I conduct the initial and subsequent performance tests for sulfur? (40 CFR 60.4415)(continued)*
The Permittee must conduct an initial performance test, as required in 40 CFR 60.8. An owner or operator of an affected facility complying with the fuel-based standard may use fuel records (such as a current, valid purchase contract, tariff sheet, transportation contract, or results of a fuel analysis) to satisfy the requirements of 40 CFR 60.8. Subsequent SO_2 performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test). There are four methodologies that the permittee may use to conduct the performance tests. (40 CFR 60.4415(a)) (continued)

(b) Periodically determine the sulfur content of the fuel combusted in the turbine, a representative fuel sample may be collected either by an automatic sampling system or manually. For automatic sampling, follow ASTM D5287-97 (Reapproved 2002) (incorporated by reference, see 40 CFR 60.17) for gaseous fuels or ASTM D4177-95 (Reapproved 2000) (incorporated by reference, see 40 CFR 60.17) for liquid fuels. For manual sampling of gaseous fuels, follow API Manual of Petroleum Measurement Standards, Chapter 14, Section 1; GPA 2166-17; or ISO 10715:1997(E) (all incorporated by reference, see 40 CFR 60.17). The fuel analyses of this section may be performed either by the Permittee, a service contractor retained by the permittee, the fuel vendor, or any other qualified agency. Analyze the samples for the total sulfur content of the fuel using (40 CFR 60.4415(a)(2)):

(i) For gaseous fuels, ASTM D1072-90 (Reapproved 1999), or alternatively D3246-05, D4084-05, D4468-85 (Reapproved 2000), D4810-88 (Reapproved 1999), D6228-98 (Reapproved 2003), D6667-04, or GPA 2140-17, 2261-19, or 2377-86 (all incorporated by reference, see 40 CFR 60.17). (40 CFR 60.4415(a)(2)(ii))

(c) Measure the SO_2 concentration (in parts per million (ppm)), using EPA Method 6, 6C, 8, or 20 in Part 60 Appendix A. For units complying with the output-based standard, concurrently measure the stack gas flow rate, using EPA Methods 1 and 2 in Part 60 Appendix A, and measure and record the electrical and thermal output from the unit. Then use the following equation to calculate the SO_2 emission rate (40 CFR 60.4415(a)(3)):

$$E = \frac{1.664 \times 10^{-7} \times (SO_2)_c \times Q_{std}}{P} \ (Eq. 1)$$

Where:
E = SO_2 emission rate, in lb/MWh;
1.664×10^{-7} = conversion constant, in lb/dscf-ppm;
$(SO_2)_c$ = average SO_2 concentration for the run, in ppm;
Q_{std} = stack gas volumetric flow rate, in dscf/hr; and
P = gross electrical and mechanical energy output of the combustion turbine, in MW (for simple-cycle operation), for combined-cycle operation, the sum of all electrical and mechanical output from the combustion and steam turbines, or, for combined heat and power operation, the sum of all electrical and mechanical output from the combustion and steam turbines plus all useful recovered thermal output not used for additional electric or mechanical generation, in MW, calculated according to 40 CFR 60.4350(f)(2). (40 CFR 60.4415(a)(3))

(d) Measure the SO_2 and diluent gas concentrations, using either EPA Method 6, 6C, or 8 and 3A, or 20 in Part 60 Appendix A. Concurrently measure the heat input to the unit, using a fuel flowmeter (or flowmeters), and measure the electrical and thermal output of the unit. Use EPA Method 19 in Part 60 Appendix A to calculate the SO_2 emission rate in lb/MMBtu. Then, use equations 1 and, if necessary, 2 and 3 in 40 CFR 60.4350(f) to calculate the SO_2 emission rate in lb/MWh. (40 CFR 60.4415(a)(4))

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Section IV. Specific Operating Conditions (continued)

B. Emission Unit S2.003

System 02 – Standby Emergency Generator		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.003	Standby E-generator (731 hp, Waukesha, L36L, 5283700818, 2010) (A-Aux-1)	4,566,653.8	600,924.60

1. Air Pollution Control Equipment (NAC 445B.3405)
   a. **S2.003** has no add-on controls.
   b. Descriptive Stack Parameters
      Stack Height: 18 feet
      Stack Diameter: 1.17 feet
      Stack Temperature: 835 °F

2. Operating Parameters (NAC 445B.3405)
   a. **S2.003** may consume only **natural gas**.
   b. The maximum allowable fuel consumption rate for **S2.003** shall not exceed **6,561.3 standard cubic feet (scf)** per hour, averaged over a calendar day, nor more than **656,125.6 standard cubic feet (scf)** per 12-month rolling period of non-emergency use.
   c. Hours
      (1) **S2.003** may operate a total of **24** hours per day.
      (2) **S2.003** may operate a total of **100** hours per year of non-emergency use. There is no time limit on operation in emergency situations.

3. Emission Limits (NAC 445B.305, NAC 445B.3405)
   The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.003** the following pollutants in excess of the following specified limits:
   a. The discharge of **PM** (particulate matter) to the atmosphere shall not exceed **0.060** pounds per hour, nor more than **0.0030** tons per 12-month rolling period.
   b. The discharge of **PM_{10}** (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed **0.060** pounds per hour, nor more than **0.0030** tons per 12-month rolling period.
   c. The discharge of **$PM_{2.5}$** (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed **0.060** pounds per hour, nor more than **0.0030** tons per 12-month rolling period.
   d. The discharge of **SO_2** (sulfur dioxide) to the atmosphere shall not exceed **0.0036** pounds per hour, nor more than **0.00018** tons per 12-month rolling period.
   e. The discharge of **NO_X** (oxides of nitrogen) to the atmosphere shall not exceed **3.22** pounds per hour, nor more than **0.16** tons per 12-month rolling period.
   f. The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **6.45** pounds per hour, nor more than **0.32** tons per 12-month rolling period.
   g. The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **1.61** pounds per hour, nor more than **0.081** tons per 12-month rolling period.
   h. NAC 445B.22017 – The opacity from the **S2.003** shall not equal or exceed **20** percent.
   i. NAC 445B.2203 – The maximum allowable discharge of **PM_{10}** to the atmosphere from **S2.003** shall not exceed **0.60** pounds per MMBtu.
   j. NAC 445B.22047 – The maximum allowable discharge of **sulfur** to the atmosphere from **S2.003** shall not exceed **4.27** pounds per hour.

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section IV. Specific Operating Conditions (continued)

B. Emission Unit S2.003 (continued)

4. Monitoring, Recordkeeping, and Reporting (NAC 445B.3405)
The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.
   a. Monitor and record the consumption rate of **natural gas** for each calendar day for **S2.003** (in scf) by use of a fuel flow meter.
   b. Record the corresponding average hourly consumption rate in scf per hour. The average hourly consumption rate shall be determined from the total daily consumption and the total daily hours of operation.
   c. Record the consumption rate of **natural gas**, in scf, on a cumulative monthly basis, for each 12-month rolling period.
   d. Monitor and record the total daily hours of operation for **S2.003** each calendar day of operation. The Permittee shall note which hours of operation are emergency hours, and which hours of operation are hours for non-emergency use.
   e. Record the monthly hours of operation and the corresponding annual hours of operation for the year. The monthly hours of operation shall be determined at the end of each month as the sum of daily hours of operation for each day of the month. The annual hours of operation shall be determined at the end of each month as the sum of the monthly hours of operation for the year.
   f. Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. (40 CFR 60.7(b))

5. Federal Requirements
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
   a. Emissions Standards (40 CFR 60.4233(b))
   The Permittee must comply with the emission standards for new non-road SI (spark ignition) ICE (internal combustion engine) in 40 CFR 60.4233(e), for all pollutants, for the same model year and maximum engine power for their 2011 model year and later emergency stationary SI ICE (except for gasoline and rich burn engines that use LPG). (40 CFR 60.4233(e))
      (1) For a 2009 model year and later emergency engine with a rate power of greater than or equal to 130 hp: (40 CFR 60.4233(e), Table 1)
         (a) The discharge of NO_X to the atmosphere shall not exceed **2.0** grams/hp-hr.
         (b) The discharge of CO to the atmosphere shall not exceed **4.0** grams/hp-hr.
         (c) The discharge of VOC to the atmosphere shall not exceed **1.0** gram/hp-hr.
   b. Monitoring, Operation and Maintenance Requirements (40 CFR 60.4237)
   The Permittee must install a non-resettable hour meter if the SI ICE less than 130 hp and does not meet the emission standards in **B.5(a)** of this section. (40 CFR 60.4237(c))
   c. Compliance Requirements (40 CFR 60.4234, 60.4243(d))
      (1) The Permittee must operate and maintain the SI ICE over the entire life of the engine (40 CFR 60.4234).
      (2) In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs **B.5.c.(2)(a) through (c)** of this section, is prohibited. If the Permittee do not operate the engine according to the requirements in paragraphs **B.5.c.(2)(a) through (c)** of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. (40 CFR 60.4243(d))
         (a) There is no time limit on the use of emergency stationary ICE in emergency situations. (40 CFR 60.4243(d)(1))

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section IV. Specific Operating Conditions (continued)

B. Emission Unit S2.003 (continued)

5. Federal Requirements (continued)
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (continued)

c. Compliance Requirements (40 CFR 60.4234, 60.4243(d)) (continued)

(2) In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs **B.5.c.(2)(a) through (c)** of this section, is prohibited. If the Permittee do not operate the engine according to the requirements in paragraphs **B.5.c.(2)(a) through (c)** of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. (40 CFR 60.4243(d)) (continued)

(b) The Permittee may operate the emergency stationary ICE for any combination of the purposes specified in paragraphs **B.5.c.(2)(b)** of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph **B.5.c.(2)(c)** of this section counts as part of the 100 hours per calendar year. (40 CFR 60.4243(d)(2))

i. Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. (40 CFR 60.4243(d)(1)(i))

(c) Emergency stationary ICE may be operated for up to 50 hours per calendar year in nonemergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph **B.5.c.(2)** of this section. Except as provided in paragraph **B.5.c.(2)(c)(i)** of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. (40 CFR 60.4243(d)(3)).

i. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions of 40 CFR 60.4243(d)(3)(i)(A) through (E) are met. (40 CFR 60.4243(d)(3)(i))

d. Air-to-Fuel Ratio (40 CFR 60.4243(g))

(1) It is expected that air-to-fuel ratio controllers will be used with the operation of three way catalysts/non-selective catalytic reduction. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times. (40 CFR 60.4243(g))

(2) Purchasing an engine certified according to procedures specified in this subpart, for the same model year and demonstrating compliance according to one of the methods specified in 40 CFR 60.4243(a). (40 CFR 60.4243(b)(1)

e. Performance Testing (40 CFR 60.4243)

The Permittee of a stationary SI natural gas fired engines may operate their engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of 40 CFR 60.4233. (40 CFR 60.4243(e))

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section IV. Specific Operating Conditions (continued)

B. Emission Unit S2.003 (continued)

5. Federal Requirements (continued)
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (continued)

f. Notifications, Reports, and Records Requirement (40 CFR 60.4245)

(1) The Permittee must keep records of the following information: (40 CFR 60.4245(a))

(a) All notifications submitted to comply with this subpart and all documentation supporting any notification. (40 CFR 60.4245(a)(1))

(b) Maintenance conducted on the engine. (40 CFR 60.4245(a)(2))

(c) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR Parts 90, 1048, 1054, and 1060, as applicable. (40 CFR 60.4245(a)(3))

(d) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to 40 CFR 60.4243(a)(2), documentation that the engine meets the emission standards. (40 CFR 60.4245(a)(4))

(2) The Permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter if the engine does not meet the standards applicable to non-emergency engines. (40 CFR 60.4245(b))

g. National Emission Standards for Hazardous Air Pollutants for Source Categories – 40 CFR Part 63, Subpart ZZZZ – Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines:
If the compression ignition engine meets the requirements of 40 CFR Part 60 Subpart JJJJ, 40 CFR Part 63 Subpart ZZZZ requirements are also met. (40 CFR Part 63.6590(c))

******End of Specific Operating Conditions******

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section V. Emission Caps

A. Not Applicable.

******End of Emission Caps******

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section VI. Surface Area Disturbance Conditions

The surface area disturbance for Ruby Pipeline, LLC – Wieland Flat Compressor Station is **0** acres.

A. Fugitive Dust (NAC 445B.22037)

1. The Permittee may not cause or permit the handling, transporting, or storing of any material in a manner which allows or may allow controllable particulate matter to become airborne.
2. Except as otherwise provided in NAC 445B.22037(4), the Permittee may not cause or permit the construction, repair, demolition, or use of unpaved or untreated areas without first putting into effect an ongoing program using the best practical methods to prevent particulate matter from becoming airborne. As used in NAC 445B.22037, "best practical methods" includes, but is not limited to, paving, chemical stabilization, watering, phased construction, and revegetation.
3. Except as provided in NAC 445B.22037(4), the Permittee may not disturb or cover 5 acres or more of land or its topsoil until Permittee has obtained an Operating permit for surface area disturbance to clear, excavate, or level the land or to deposit any foreign material to fill or cover the land.
4. The provisions of NAC 445B.22037(2) and (3) do not apply to:
   a. Agricultural activities occurring on agricultural land; or
   b. Surface disturbances authorized by a permit issued pursuant to NRS 519A.180 which occur on land which is not less than 5 acres or more than 20 acres.

******End of Surface Area Disturbance Conditions******

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section VII. Schedules of Compliance

A. Not Applicable

******End of Schedule of Compliance ******

Facility ID No. A1002 *Permit No.* AP4922-3128.02
CLASS I AIR QUALITY OPERATING PERMIT

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Section VIII. Amendments

This permit:

1. **Shall be posted conspicuously at or near the stationary source. (NAC 445B.318(5))**
2. **Shall expire and be subject to renewal five (5) years from:** June 10, 2025 **. (NAC 445B.315(3)(a))**
3. **A completed application for renewal of an operating permit must be submitted to the Director on the form provided by the Director with the appropriate fee at least 240 calendar days before the expiration date of this operation permit (NAC 445B.3443(2)). The Director shall determine whether the application is complete within 60 days of receipt of the application (NAC 445B.3395).**
4. **Any party aggrieved by the Department's decision to issue this permit may appeal to the State Environmental Commission (SEC) within ten days after the date of notice of the Department's action. (NRS 445B.340)**

THIS PERMIT EXPIRES ON: June 10, 2030

Signature: _____

Issued by: Jaimie Mara, PE
Supervisor, Permitting Branch
Bureau of Air Pollution Control

Phone: (775) 687- 9343 Date: **Signature Date**

sm 02/2026

Issued to: RUBY PIPELINE, LLC – WIELAND FLAT COMPRESSOR STATION (AS PERMITTEE)

Class I Non-Permit Equipment List

Appended to Permit #AP4922–3128.02

Emission Unit #	Emission Unit Description
IA1.001	Parker Boiler T3600LR, 3.6 MMBTU/hr (Boiler-01)