

12/15/2022

9:16am

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Arkoma Operations, LLC
100.0066.2022_Arkoma

CLEAN AIR ACT STATIONARY SOURCE INSPECTION FINDINGS, ALLEGED VIOLATIONS AND PROPOSED PENALTY FORM

Table 1 - Inspection Information	
Inspection/ Report Review Date(s):	Docket Number:
8/26/2022	C A A - 0 8 - 2 0 2 3 - 0 0 0 1
Respondent Address:	Facility Name(s):
2121 S. Columbia Avenue, Suite 101	Ignacio Gas Treating Plant
City:	Inspector(s) Name(s):
Tulsa	Colin LeCortz
State: Zip Code:	EPA Delegated Official:
OK 74114	Suzanne J. Bohan
Respondent Name:	EPA Attorney Contact(s):
Arkoma Operations, LLC	Abigail Dean, (303) 312-6106

Table 2 - Violations

On June 28, 2022, authorized inspectors obtained evidence that Arkoma Operations, LLC (Respondent) violated multiple provisions for 4-stroke lean-burn compressor engines in its synthetic minor New Source Review permit (permit number SMNSR-SU-000052-2021.004¹), as described in detail below including the time period of violations. The EPA has determined Respondent has committed a total of at least 30 violations of its synthetic minor New Source Review permit. These violations include monitoring and reporting violations, as described in the following table.

Violation Description	Regulatory Citation or Permit Condition	Time Period	Document or Report	Comments
Failure to comply with the Synthetic Tribal Minor New Source Review Permit condition I.D.3(h), such that Arkoma failed to maintain pressure drop across the catalyst bed on each engine to within ± 2 inches of water from the baseline pressure drop reading taken during the most recent performance test for engine E2.	SMNSR-SU-000052-2021.004, Permit condition I.D.3(h)	June 29, 2021- August 23, 2021	3-Ignacio Gas Treating Plant Engine Maintenance Plan.pdf, 9,- 2021 Annual-Compliance Formula workbook.xlsx	Baseline Pressure: 3.37" H ₂ O. Recorded pressures during violation: 5.5, 5.6, 5.4, 5.7, 5.6, 6.1, 6.2, 5.9, 6.0, 6.8, 7.2, 7.6, 7.9.
Failure to comply with the Synthetic Tribal Minor New Source Review Permit condition I.D.3(h), such that Arkoma failed to maintain pressure drop across the catalyst bed on each engine to within ± 2 inches of water from the baseline pressure drop reading taken during the most recent performance test for engine E3.	SMNSR-SU-000052-2021.004, Permit condition I.D.3(h)	February 2, 2021- March 1, 2021	3-Ignacio Gas Treating Plant Engine Maintenance Plan.pdf, 9,- 2021 Annual-Compliance Formula workbook.xlsx	Baseline Pressure: 6.53" H ₂ O. Recorded pressures during violation: 8.8, 3.8, 1.9.
Failure to comply with the Synthetic Tribal Minor New Source Review Permit condition I.D.3(h), such that Arkoma failed to maintain pressure drop across the catalyst bed on each	SMNSR-SU-000052-2021.004, Permit condition	July 18, 2021- September 18, 2021	3-Ignacio Gas Treating Plant Engine Maintenance Plan.pdf, 9,-	Baseline Pressure: 2.07 ² " H ₂ O. Recorded

¹ The previously issued permit, permit number SMNSR-SU-000052-2019.003, was effective during the time of the alleged violations, however that was modified and replaced by permit number SMNSR-SU-000052-2021.004 which became effective on April 18, 2022. The violations listed in column "Regulatory Citation or Permit Condition" reflect citations from SMNSR-SU-000052-2021.004.

² In March 2021, the baseline pressure for engine E3 was changed from 6.53" to 2.07" H₂O during the annual performance test.

<p>engine to within ± 2 inches of water from the baseline pressure drop reading taken during the most recent performance test for engine E3.</p>	<p>I.D.3(h)</p>		<p>2021 Annual-Compliance Formula workbook.xlsx</p>	<p>pressures during violation: 6.1, 5.6, 5.9, 6.2, 6.8, 7.6, 7.4, 7.7, 7.1, 8.2, 6.4, 7.0, 6.2.</p>
<p>Failure to comply with the Synthetic Tribal Minor New Source Review Permit condition I.D.5(d), such that Arkoma failed to complete required actions within the prescribed amount of time, including but not limited to conducting a performance test within 90 calendar days, as specified in this permit to ensure that the emission limits are being met, and to re-establish the baseline pressure drop across the catalyst bed, if the pressure drop reading exceeds ± 2 inches of water from the baseline pressure drop established during the most recent performance test for engine E2.</p>	<p>SMNSR-SU-000052-2021.004, Permit condition I.D.5(d)</p>	<p>June 29, 2021- August 23, 2021</p>	<p>3-Ignacio Gas Treating Plant Engine Maintenance Plan.pdf, 9,- 2021 Annual-Compliance Formula workbook.xlsx</p>	
<p>Failure to comply with the Synthetic Tribal Minor New Source Review Permit condition I.D.5(d), such that Arkoma failed to complete required actions within the prescribed amount of time, including but not limited to conducting a performance test within 90 calendar days, as specified in this permit to ensure that the emission limits are being met, and to re-establish the baseline pressure drop across the catalyst bed, if the pressure drop reading exceeds ± 2 inches of water from the baseline pressure drop established during the most recent performance test for engine E3.</p>	<p>SMNSR-SU-000052-2021.004, Permit condition I.D.5(d)</p>	<p>February 2, 2021- March 1, 2021</p>	<p>3-Ignacio Gas Treating Plant Engine Maintenance Plan.pdf, 9,- 2021 Annual-Compliance Formula workbook.xlsx</p>	
<p>Failure to comply with the Synthetic Tribal Minor New Source Review Permit condition I.D.5(d), such that Arkoma failed to complete required</p>	<p>SMNSR-SU-000052-2021.004, Permit</p>	<p>July 18, 2021- September 18, 2021</p>	<p>3-Ignacio Gas Treating Plant Engine Maintenance</p>	

actions within the prescribed amount of time, including but not limited to conducting a performance test within 90 calendar days, as specified in this permit to ensure that the emission limits are being met, and to re-establish the baseline pressure drop across the catalyst bed, if the pressure drop reading exceeds ± 2 inches of water from the baseline pressure drop established during the most recent performance test for engine E3.	condition I.D.5(d)		Plan.pdf, 9,-2021 Annual-Compliance Formula workbook.xlsx	
Failure to comply with the Synthetic Tribal Minor New Source Review Permit condition I.F.1, such that Arkoma failed to include a report of compliance documenting clear identification of all instances of deviations from permit requirements and corrective actions taken during the reporting period for engines E2 and E3.	SMNSR-SU-000052-2021.004, Permit condition I.F.1		2,4,8,9,10,-2021-Ignacio Comp-SMNSR Annual Report.pdf	
Failure to comply with the Synthetic Tribal Minor New Source Review Permit condition I.F.3(a) and (b), such that Arkoma failed to include a report of compliance documenting clear identification of all instances of deviations from permit requirements and corrective actions taken during the reporting period for engines E2 and E3.	SMNSR-SU-000052-2021.004, Permit condition I.F.3(a) and (b)		2,4,8,9,10,-2021-Ignacio Comp-SMNSR Annual Report.pdf	

Table 3 - Penalty and Required Corrective Action

Penalty	\$14,350
Required Corrective Action	In addition to paying the monetary penalty, Respondent must resubmit 9,-2021 Annual-Compliance Formula workbook.xlsx and 2,4,8,9,10,-2021-Ignacio Comp-SMNSR Annual Report.pdf. The 9,-2021 Annual-Compliance Formula workbook.xlsx shall show the correct allowances of pressure drop across the catalyst within ± 2 inches of water and correctly note each exceedance of the catalyst pressures for each engine. The 2,4,8,9,10,-2021-Ignacio Comp-SMNSR Annual Report.pdf shall correctly identify each deviation of the pressure drop across the catalyst.