PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-0274-00004/00015
Effective Date: 06/08/2021 Expiration Date: 06/07/2026

Permit Issued To: NATIONAL FUEL GAS SUPPLY CORPORATION
6363 MAIN ST
BUFFALO, NY 14221

Contact: JOSHUA Z ENNIS
NATIONAL FUEL GAS SUPPLY CORPORATION
6363 MAIN ST
BUFFALO, NY 14221
(716) 857-6902

Facility: BEECH HILL COMPRESSOR STATION
PEET RD BETWEEN GRAVES & BEECH HILL RDS
WILLING, NY 14895

Contact: JOSHUA Z ENNIS
NATIONAL FUEL GAS SUPPLY CORPORATION
6363 MAIN ST
BUFFALO, NY 14221
(716) 857-6902

Description:
The National Fuel Gas Supply Corporation Beech Hill Compressor Station is a natural gas storage and transmission facility located in the Town of Willing, Allegany County. The following permit is being issued as a renewal for this facility’s Air Title V operating permit, the pervious permit renewal was issued on April 08, 2013.

Beech Hill Compressor Station consists of three natural gas fired stationary reciprocating internal combustion compressor engines, two rated at 2750 HP and one rated at 2850 HP, one 302 HP Kohler Model 200REZXB spark ignition emergency generator, and two natural gas triethylene glycol (TEG) dehydration units. Other exempt equipment consists of a boiler, heaters, parts washers, and six tanks.

The compressor engines are subject to the NOx emission limit for lean burn spark ignited natural gas fired stationary internal combustion engines which is 1.5 grams per brake horsepower-hour per 6 NYCRR Part 227-2.4(f)(1).
Performance testing completed on June 06, 2019, on Units #1 & 3, which are
representative of the facility's three compressor engines, showed that the engines are in compliance with the 1.5 g/bhp-hr emission limit. The next performance test is due to be completed prior to June 06, 2024, on Units #2 & 3.

The 302 HP emergency generator replaced one 200 HP emergency generator which was decommissioned on June 28, 2018. The emergency generator is subject to 40CFR60 Subpart JJJJ. This emergency generator is an EPA certified engine and no performance testing is required.

The TEG dehydration units use a regenerative glycol system to remove water that accumulates in the natural gas during underground storage at the facility. The units are subject to 40 CFR 63 HHH. National Fuel must record unit operational data and annually sample the natural gas characteristics. The data will be used to determine compliance with the emissions limit set by the rule. This data will be reported semi-annually.

TEG dehydration units are also 6 NYCRR Part 212 and shall comply with the mass emission limit for Benzene in Table 2 of the subpart. The facility is in compliance with the limit as of the issuance of this permit. The facility shall also comply with the degree of air cleaning requirements in Table 4 of the subpart for all non-High Toxicity Air Contaminants (HTAC) emitted from the facility’s process emission sources.

Air dispersion modeling using uncontrolled maximum hourly emission rate potentials show that emissions from the TEG dehydration units are below the applicable short-term and annual guideline concentrations, following the Air Toxics Program Policy DAR-1, for all contaminants modeled.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: MARK F PASSUITE
NYSDEC - REGION 9
270 MICHIGAN AVE
BUFFALO, NY 14203-2915

Authorized Signature: _________________________________ Date: ___ / ___ / _____
Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.
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DEC GENERAL CONDITIONS

**** General Provisions ****

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:
The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:
The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:
A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:
Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:
The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:
The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 3.3
Permits are transferrable with the approval of the department unless specifically prohibited by
the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

**Condition 4: Permit modifications, suspensions or revocations by the Department**

**Applicable State Requirement:** 6 NYCRR 621.13

**Item 4.1:**
The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

a) materially false or inaccurate statements in the permit application or supporting papers;
b) failure by the permittee to comply with any terms or conditions of the permit;
c) exceeding the scope of the project as described in the permit application;
d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

**** Facility Level ****

**Condition 5: Submission of application for permit modification or renewal-REGION 9**

**HEADQUARTERS**

**Applicable State Requirement:** 6 NYCRR 621.6 (a)

**Item 5.1:**
Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165