John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/10/2013

Certified Mail

Nathan Wheldon
Harrison West Compressor Station
1515 Arapahoe Street
Suite 1600 - Tower 1
Denver, CO 80202-2137

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
Yes	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0634005033
Permit Number: P0112519
Permit Type: Initial Installation
County: Harrison

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-SEDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Harrison West Compressor Station

Facility ID:	0634005033
Permit Number:	P0112519
Permit Type:	Initial Installation
Issued:	6/10/2013
Effective:	6/10/2013
Expiration:	6/10/2023

Division of Air Pollution Control
Permit-to-Install and Operate
for
Harrison West Compressor Station

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Authorization

Facility ID:	0634005033
Application Number(s):	A0046404, A0047849
Permit Number:	P0112519
Permit Description:	120 mmscfd natural gas Compressor Station w/dehydrator system
Permit Type:	Initial Installation
Permit Fee:	$3,800.00
Issue Date:	6/10/2013
Effective Date:	6/10/2013
Expiration Date:	6/10/2023

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Harrison West Compressor Station
Possum Hollow Road
Freeport, OH 43973

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0112519
Permit Description: 120 mmscfd natural gas Compressor Station w/dehydrator system

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P009**
Company Equipment ID:	P009
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P010**
Company Equipment ID:	P010
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P801**
Company Equipment ID:	P801
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: 1480 HP (11.39 MMBtu/hr) Waukesh

Emissions Unit ID:	**P001**
Company Equipment ID:	P001
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	P002
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: 1980 HP (15.3 MMBtu/hr) Waukesh

Emissions Unit ID:	**P003**
Company Equipment ID:	P003
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	P004
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	P005
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P006**
Company Equipment ID:	P006
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P007**
Company Equipment ID:	P007
Superseded Permit Number:	

General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P008**
Company Equipment ID:	P008
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement.Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is takenby Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Southeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines at Area Sources. Although Ohio EPA has determined that this Generally Available Control TechnologyNESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

3. Specific emissions units contained in this permit are subject to 40 CFR Part 60, Subparts JJJJ (P001, P002, P003 P004, P005, P006, P007 and P008), and OOOO (P001, P002, P003 P004, P005, P006, P007, and P008). The complete NSPS requirements, including the NSPS General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulation (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

4. Air contaminant sources that qualify as de minimis under OAC rule 3745-15-05, or are exempt under OAC rule 3745-31-03(A)(1) or (4) are not subject to emission standards established within this permit. Although this permit does not apply to de minimis or exempt sources, emissions from de minimis or exempt sources must be included in the total potential to emit (PTE) calculations for this permit. PTE calculations should include sources such as:

   a) Dehydrator reboiler (2.0 MMBtu/hr) heater, B001 (de minimis and exempt per 3745-15-05 & 3745-31-03(A)(1)(a)),

   b) Material Loadout, J001 and Roadways and Parking Areas, F001 (de minimis per OAC rule 3745-15-05),

   c) Storage Tanks, T001 - T006 (exempt per 3745-31-03(A)(1)(l)).

5. The Compressor Station must comply with the Used Oil Management Standards of OAC Chapter 3745-279.

6. Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), for this project were not necessary because the emissions units not exempted from modeling per OEPA Engineering Guide #69, maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year when controlled. OAC Chapter 3745-31 requires

permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

C. Emissions Unit Terms and Conditions

1. P009

Operations, Property and/or Equipment Description:

5.45 MMBTU/hr Dehydrator Flare with 98% control of VOC emissions from the dehydrator process.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Carbon Monoxide (CO) emissions shall not exceed 0.55 lb/million Btu.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Nitrogen oxide (NO_X) emissions shall not exceed 0.138 lb/million Btu and 3.30 tons per year. Sulfur dioxide (SO_2) emissions shall not exceed 0.000457 lb/million Btu and 0.01 tons per year. Particulate emissions (PE) shall not exceed 0.00559 lb/MMBtu and 0.13 ton per year. Volatile organic compound (VOC) emissions shall not exceed 0.00539 lb/million Btu from the pilot & purge gas and 0.865 lb/hr from flared process gas.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Total VOC Emissions shall not exceed 3.82 tons per year. See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b. below.
d.	40 CFR Part 63, Subpart HH (40 CFR 63.760 - 63.779) [In accordance with 40 CFR 63.760(a)(2) & (3), this emissions unit processes, upgrades or stores natural gas or hydrocarbon liquids prior to the point of custody transfer from the facility.]	See d(1) below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2,006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally–approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2,006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_X, SO_2, VOC and PE from this air contaminant source since the uncontrolled potential to emit for SO_2, VOC and particulate emissions is less than 10 tons/yr.

c) Operational Restrictions

(1) The permittee shall operate the dehydrator flare at all times the dehydration unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable recordkeeping requirements required under 40 CFR Part 63, Subpart HH, including the following sections:

63.774(d)	Record the actual annual benzene emissions calculated as provided by rule.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

CO emissions shall not exceed 0.55 lb/million Btu.

Applicable Compliance Method:

The emissions limitation for CO is based on the emission factor of 0.55 lb CO/MMBtu*(from TNRCC RG-109, Table 4 for other flares combusting low-level Btu waste streams*).

b. Emissions Limitations:

NOx emissions shall not exceed 0.138 lb/million Btu and 3.30 tons per year.

Applicable Compliance Method:

The emissions limitation for NOx is based on the emission factor of 0.138 lbNOx/MMBtu (*from TNRCC RG-109, Table 4 for other flares combusting high-level Btu waste streams)*and using the estimated burner rating of 5.45 MMBtu/hr. Estimated NOx emissions shall be determined by the following calculation:

0.138 lbNOx/million Btu x 5.45 million Btu/hr = 0.752 lbNOx /hr

0.752 lb NOx/hr x 8,760 hrs/yr x 1 ton/2,000 lbs = 3.30 tons NOx/year.

c. Emissions Limitations:

SO_2 emissions shall not exceed 0.000457lb/million Btu and 0.01 tons per year.

Applicable Compliance Method:

The SO_2 emissions limitation is based on a standard sulfur content of 2,000 gr/MMscf. (AP-42 Section 1.4, Table 1.4-2)

Compliance with the ton per year SO_2 emissions limitation shall be determined by the following calculations:

2,000 gr/MMscf / 7,000 gr/lb / 32 lb/lbmole x 64 lb/lbmole / 1,250 Btu/scf x 5.45 MMBtu/hr = 0.00249 lb SO_2/hr

0.00249lb SO_2/hr x 8,760 hrs/year x 1 ton/2,000 lbs = 0.01 tons SO_2/year.

d. Emissions Limitations:

VOC emissions shall not exceed 0.00539 lb/million BTU from the pilot & purge gas and 0.865 lb/hr from flared process gas.

Total VOC emissions shall not exceed 3.82 tons per year.

Applicable Compliance Method:

The emissions limitation for VOC is based on using the AP-42 emissions factor of 5.5lb of VOCs/MMscf from Chapter 1.4 for Natural Gas Combustion, Table 1.4-2 "Emission Factors for Natural Gas Combustion" and using the estimated burner rating of 5.45MMBtu/hr. Estimated VOC emissions shall be determined by the following calculation:

Pilot & Purge gas Combustion + 2% uncontrolled process gas + Combustion of 98% of flared process gas = 3.82 tons VOC/year

5.39E-03 lb VOC/million Btu x 5.45million Btu/hr + (1-0.98) x 42.14 lb/hr VOC to flare = 0.87 lb VOC/hr

0.87lb VOC/hr(x 8,760 hr/yr x 1 ton/2,000 lbs) = 3.82 tons VOC/year.

g) Miscellaneous Requirements

(1) None.

2. P010

Operations, Property and/or Equipment Description:

Equipment Maintenance Blowdown emissions where it is not feasible to vent to a flare for control; based on a maximum of 3 events per month *(of P001 thru P008 + emergency shutdown)* equal to approximately 1.28 tons per year total.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01.	Fugitive volatile organic compound (VOC) emissions shall not exceed 1.28 tons per year. See b)(2)a. and c)(1) below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b. below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has

not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally–approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC emissions is less than 10 tons/yr.

c) Operational Restrictions

(1) The permittee shall minimize the frequency and size of blowdown events by conducting routine operation and maintenance activities in a manner consistent with safety and good air pollution control practices.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following records on a monthly basis:

a. The date, number and type of each maintenance blowdown event;

b. Total volume of gas emitted from each maintenance blowdown event; and

c. Total volume of gas emitted from all maintenance blowdown events as a rolling, 12-month total.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

Fugitive VOC emissions shall not exceed 1.28 tons per year.

Applicable Compliance Method:

Compliance with the VOC emissions limitation shall be based upon the following calculation using the inputs provided in the permittee's application and the recordkeeping requirements in d)(1):

VOC (tons/yr) =
[(total VOC estimate for P001-P002 blowdowns combined X # of blowdown events per year)
+ (total VOC estimate for P003-P008 blowdowns combined X # of blowdown events per year)]
X 1 ton/2,000 pounds

Where:

Total VOC emissions estimate for a P001 & P002 blowdown event = 76 lbs/event
Total VOC emissions estimate for a P003 thru P008 blowdown event = 306 lbs/event
Emissions estimate for an annual period with 36 blowdown events = 13,752 lbs/yr, then multiplied by the VOC content of approximately 18.6 % and multiplied by 1 ton / 2000 lb = 1.28 tons per year.

Summary equation:

(2 engines)(38 lbs/event) (36 possible events per yr) = 2,736

+ (6 engines)(51 lbs/event) (36 possible events per yr) = 11,016

= 13,752 lbs (18.6% VOC content)(1 ton /2000 lbs) = 1.28 tons VOC per year

g) Miscellaneous Requirements

(1) None.

3. P801

Operations, Property and/or Equipment Description:

Equipment leaks from various components, including connectors, flanges, compressors, open ended lines, pump seals, and valves.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Fugitive emissions of Volatile Organic Compounds (VOC) shall not exceed 4.15 tons per rolling, 12-month period. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b. below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation

Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally–approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC emissions is less than 10 tons/yr.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

Fugitive emissions of VOC shall not exceed 4.15 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emissions limitation shall be demonstrated by the following calculation based on the emissions factors (lb/hr/component) provided in Table 2-4 of U.S. EPA's Protocol for Equipment

Leak Emission Estimates (11/95) for components in gas, light oil, and water/oil service:

VOC = [(# of valves in gas service X gas service valve EF X 0.186 VOC wt fraction)

+ (# of valves in light oil service X light oil service valve EF X 0.954 VOC wt fraction)

+ (# of valves in water/oil service X water/oil service valve EF X 0.954 VOC wt fraction)

+ (# of pumps in gas service X gas service pump EF X 0.186 VOC wt fraction)

+ (# of pumps in light oil service X light oil service pump EF X 0.954 VOC wt fraction)

+ (# of pumps in water/oil service X water/oil service pump EF X 0.954 VOC wt fraction)

+ (# of connectors/flanges in gas service X gas service connector/flange EF X 0.186 VOC wt fraction)

+ (# of connectors/flanges in light oil service X light oil service connector/flange EF X 0.954 VOC wt fraction)

+ (# of connectors/flanges in water/oil service X water/oil service connector/flange EF X 0.954 VOC wt fraction)

+ (# of open-ended lines in gas service X gas service open-ended line EF X 0.186 VOC wt fraction)

+ (# of other points in gas service X gas service other equipment EF X 0.186 VOC wt fraction)] , then

X 8,760 hrs/yr X 1 ton/2,000 lbs ≤ 4.15 tons per rolling, 12-month period.

Where:

Valve EFs = 1.190 lb/hr/source for gas service, and 0.265 lb/hr/source for light oil service and 0.010 lb/hr/source for water/oil service;

Pump Seal EFs = 0.0E-00 lb/hr/source for gas service, and 0.229 lb/hr/source for light oil service, and 4.23E-4 lb.hr/source for water service;

Connector/flange EFs = 0.103 lb/hr/source for gas service, and 0.022 lb/hr/source for light oil service, and 0.012 lb/hr/source water/oil service;

Open-ended line EFs = 0.035 lb/hr/source for gas service
Other* EFs = 0.155 lb/hr/source for gas service

* includes compressors, drains/vents, pressure safety valves and sample points

* As an alternative to using the above emissions factors to calculate VOC emissions, the facility may use facility specific VOC information for site specific emissions factors.

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -1480 HP (11.39 MMBtu/hr) Waukesha : P001, P002

EU ID	Operations, Property and/or Equipment Description
P001	Compressor Engine #1 – 1,480 HP (11.39 MMBtu/hr) Waukesha L7042 - natural gas-fired four-stroke rich burn internal combustion engine equipped with a three-way oxidation catalyst controlling CH_2O, CO, NOx, & VOCs by 80, 97, 98.5 & 66 percent respectively
P002	Compressor Engine #2 – 1,480 HP (11.39 MMBtu/hr) Waukesha L7042 - natural gas-fired four-stroke rich burn internal combustion engine equipped with a three-way oxidation catalyst controlling CH_2O, CO, NOx, & VOCs by 80, 97, 98.5 & 66 percent respectively

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Nitrogen oxide (NO_X) emissions from the stack serving this emissions unit shall not exceed 2.86tons/year. Carbon monoxide (CO) emissions from the stack serving this emissions unit shall not exceed 3.57tons/year. Volatile Organic compounds (VOC) emissions from the stack serving this emissions unit shall not exceed 4.0tons/year. Visible particulate emissions (PE) shall

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		not exceed 10% opacity from the stack serving this emissions unit, as a 6-minute average. PE emissions from the stack serving this emissions unit shall not exceed 6.78E-2 g/hp-hr and 0.97 ton/ year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)and OAC rule 3745-17-11. See b)(2)a. below.
b.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c. below.
d.	40 CFR Part 60, Subpart JJJJ (40 CFR 60. 4230 – 60.4248) [In accordance with 40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1, this emissions unit is a 1480hp, natural gas-fired, stationary spark internal combustion engine manufactured afterJuly 1, 2007 that islocated at a new natural gas compressor station and is subject to the emission limitations and controlmeasures specified in this section.]	NOx emissions shall not exceed 1.0 g/hp-hr or 82ppmvd at 15% oxygen (O_2). CO emissions shall not exceed 2.0 g/hp-hr or 270 ppmvd at 15% O_2. VOC emissions shall not exceed 0.7 g/hp-hror 60ppmvd at 15% O_2. [40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1]
e.	40 CFR Part 60.1 – 19 (40 CFR 60.4246)	Table 3 to Subpart JJJJ of 40 CFR Part 60 – Applicability of General Provisions to Subpart JJJJ shows which part of the General Provisions in 40 CFR Part 60.1 – 19 apply.
f.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 pound/million Btu actual heat input. This emission limitation is less stringent than the limitations listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.
g.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule. This emission limitation is less stringent than the limitations listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally–approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

This Permit-to-install and operate for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):

i. The emissions from the engine are ventedto anoxidation catalyst controlling CH_2O, CO, NO_X, and VOCs by80, 97, 98.5 and 66 percent respectively, at all times the emissions unit is in operation.

ii. NO_X emissions shall not exceed 2.86 tons/year.

iii. CO emissions shall not exceed 3.57 tons/year.

iv. VOC emissions shall not exceed 4.0 tons/year.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, emissions from this air contaminant source since the uncontrolled potential-to-emit for PEemissions is less than 10 tons/year.

d. The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4236(a)	Installation deadlines
60.4243(b)	Compliance demonstration

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

(2) The permittee shall comply with the applicable restrictions of 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4234	Duration of compliance with emission standards
60.4243(b)	Maintenance requirements
60.4243(e)	Alternative fuel
60.4243(g)	AFR controllers

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall comply with the applicable restrictions of 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4245(a), (c) and (d)	Notification, record keeping, and reporting requirements

e) Reporting Requirements

(1) The reports required by this permit may be submitted through Ohio EPA's e-business center: Air Services online web portal; or they may be mailed as a hard copy to the Ohio EPA, Southeast District Office.

(2) Annual Permit Evaluation Report (PER)forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelvemonths for each air contaminant source identified in this permit.

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(4) Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

a. construction date (no later than 30 days after such date);

b. actual start-up date (within 15 days after such date); and

c. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
50 West Town Street, Suite 700
P. O. Box 1049
Columbus, Ohio 43216-1049

and

Southeast District Office of the Ohio EPA
Division of Air Pollution Control
2195 Front Street, Logan, Ohio 43138.

(5) The permittee shall submit notifications and reports to the Ohio EPA, Southeast District Office as required pursuant to 40 CFR Part 60, Subpart JJJJ, per the following sections:

60.4243(b)(2)(ii) and 60.4245	Maintain records of maintenance plan and records of maintenance conducted on the engine
60.4245(a)	Maintain records of notifications and supporting documentation
60.4245(c)	Must submit an initial notification

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following method:

a. Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in 40 CFR 60.4233(e) and according to the requirements specified in 40 CFR 60.4244, as applicable. The permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practices for minimizing emissions. In addition, the permittee must conduct an initial performance test. See 40 CFR 60.4243(b)(2)(ii) and f)(2) below. Note: The Ohio Gathering Company has chosen this compliance option in lieu of purchasing certified engines.

b. Emissions Limitation:

NO_X emissions shall not exceed 2.86 ton/year.

Applicable Compliance Methods:

The short term emission rate was determined by multiplying 0.20 g/bhp-hr, the emission factor specified in the manufacturer's engine specification sheet by 1,480 bhp, the power output rating of this unit, and dividing by 453.59 g/lb equals 0.65257 lb/hr (as submitted in application).

The annual emission limitation was established by multiplying the short term emission rate above by the maximum hours of operation, 8,760 hours/year, and dividing by 2,000 pounds/ton.

Compliance with the annual emission limitation may be assumed provided that the permittee demonstrates compliance with the hourly emission rate.

c. Emissions Limitation:

CO emissions shall not exceed 3.57 ton/year.

Applicable Compliance Methods:

The short term emission rate was determined by multiplying 0.25 g/bhp-hr, the emission factor specified in the manufacturer's engine specification sheet by 1,480 bhp, the power output rating of this unit, and dividing by 453.59 g/lb equals 0.8157 lb/hr (as submitted in application).

The annual emission limitation was established by multiplying the short term emission rate above by the maximum hours of operation, 8,760 hours/year, and dividing by 2,000 pounds/ton.

Compliance with the annual emission limitation may be assumed provided that the permittee demonstrates compliance with the hourly emission rate.

d. Emissions Limitation:

VOC emissions shall not exceed 4.0 ton/year.

Applicable Compliance Methods:

The short term emission rate was determined by multiplying 0.28 g/bhp-hr, the emission factor specified in the manufacturer's engine specification sheet by 1,480 bhp, the power output rating of this unit, and dividing by 453.59 g/lb equals 0.91 lb/hr (as submitted in application).

The annual emission limitation was established by multiplying the short term emission rate above by the maximum hours of operation, 8,760 hours/year, and dividing by 2,000 pounds/ton.

Compliance with the annual emission limitation may be assumed provided that the permittee demonstrates compliance with the hourly emission rate.

e. Emissions Limitation:

Visible PE shall not exceed 10% opacity from the stack serving this emissions unit, as a 6-minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

f. Emissions Limitation:

PE emissions from the stack serving this emissions unit shall not exceed 6.78E-2 g/hp-hr and 0.97 ton/year.

Applicable Compliance Method:

The short term emission limit was derived from an emission factor of 0.0194 pound/million Btu, the emission factor is specified in AP-42 Table 3.2-3 (7/00), using the manufacturer's brake-specific fuel consumption(7.696Btu/hp-hr).

The annual emission limitation was established by multiplying the short term emission limit by the maximum rated capacity of the engine (1,480 HP) andby the maximum hours of operation, 8,760 hours/year, and dividing by 2,000 pounds/ton and 453.59 grams per pound.

Compliance with the annual emission limitation may be assumed provided that the permittee demonstrates compliance with the short term emission rate.

If required, compliance with the hourly emission rate shall be determined according to 40 CFR Part 60, Appendix A, U.S. EPA Methods 1 - 5.

g. Emissions Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

h. Emissions Limitation:

PE shall not exceed 0.062 pound/million Btu of actual heat input.

Applicable Compliance Method:

Compliance with this emission limitation may be based upon an emission factor of 0.0194 pound/million Btu of heat input. This emission factor is specified in the U.S. EPA reference document AP-42, Compilation of Air Pollution Emission Factors, Section 3.2, Table 3.2-3 (7/00).

If required, compliance with this emission limitation shall be determined according to OAC rule 3745-17-03(B)(10) and 40 CFR Part 60, Appendix A, U.S.EPA Methods 1 – 5.

i. Emissions Limitations:

NOx emissions shall not exceed 1.0 g/hp-hr or 82 ppmvd at 15% O_2.

Applicable Compliance Method:

If required, compliance with these emission limitations shall be determined according to the methods provided in Table 2 to 40 CFR Part 60, Subpart JJJJ. See f)(2) below.

j. Emissions Limitations:

CO emissions shall not exceed 2.0 g/hp-hr or 270 ppmvd at 15% O_2.

Applicable Compliance Method:

If required, compliance with these emission limitations shall be determined according to the methods provided in Table 2 to 40 CFR Part 60, Subpart JJJJ. See f)(2) below.

k. Emissions Limitations:

VOC emissions shall not exceed 0.7 g/hp-hr or 60 ppmvd at 15% O_2.

Applicable Compliance Method:

If required, compliance with these emission limitations shall be determined according to the methods provided in Table 2 to 40 CFR Part 60, Subpart JJJJ. See f)(2) below.

(2) The permittee has chosen to demonstrate compliance with the emission standards specified in §60.4233(e) by performing a stack test, and therefore the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the procedures specified in 40 CFR 60.4244; 40 CFR Part 60, Subpart JJJJ Table 2; and the following requirements:

a. An initial performance test shall be performed to demonstrate compliance with the mass emissions limitations in 40 CFR 60.4233(e) for VOC, NO_X, and CO, within60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

b. If the stationary internal combustion engine is rebuilt, or undergoes major repair or maintenance the permittee shall conduct subsequent performance test.

c. Each performance test must be conducted within 10% of 100% peak (or the highest achievable) load and according to the requirements in 40 CFR 60.8 and under the specific conditions that are specified by Table 2 of 40 CFR Part 60, Subpart JJJJ.

d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emission test(s).

e. Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

f. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -1980 HP (15.43 MMBtu/hr) Waukesha: P003,P004,P005,P006,P007,P008

EU ID	Operations, Property and/or Equipment Description
P003	Compressor Engine #3 – 1,980 HP (15.43 MMBtu/hr) Waukesha P9390 - natural gas-fired four-stroke rich burn internal combustion engine equipped with a three-way oxidation catalyst controlling CH_2O, CO, NOx, & VOCs by 80, 97, 98.5 & 66 percent respectively
P004	Compressor Engine #4 – 1,980 HP (15.43 MMBtu/hr) Waukesha P9390 - natural gas-fired four-stroke rich burn internal combustion engine equipped with a three-way oxidation catalyst controlling CH_2O, CO, NOx, & VOCs by 80, 97, 98.5 & 66 percent respectively
P005	Compressor Engine #5 – 1,980 HP (15.43 MMBtu/hr) Waukesha P9390 - natural gas-fired four-stroke rich burn internal combustion engine equipped with a three-way oxidation catalyst controlling CH_2O, CO, NOx, & VOCs by 80, 97, 98.5 & 66 percent respectively
P006	Compressor Engine #6 – 1,980 HP (15.43 MMBtu/hr) Waukesha P9390 - natural gas-fired four-stroke rich burn internal combustion engine equipped with a three-way oxidation catalyst controlling CH_2O, CO, NOx, & VOCs by 80, 97, 98.5 & 66 percent respectively
P007	Compressor Engine #7 – 1,980 HP (15.43 MMBtu/hr) Waukesha P9390 - natural gas-fired four-stroke rich burn internal combustion engine equipped with a three-way oxidation catalyst controlling CH_2O, CO, NOx, & VOCs by 80, 97, 98.5 & 66 percent respectively
P008	Compressor Engine #8 – 1,980 HP (15.43 MMBtu/hr) Waukesha P9390 - natural gas-fired four-stroke rich burn internal combustion engine equipped with a three-way oxidation catalyst controlling CH_2O, CO, NOx, & VOCs by 80, 97, 98.5 & 66 percent respectively

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Nitrogen oxide (NO_X) emissions from the stack serving this emissions unit shall not

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 3.82tons/year. Carbon monoxide (CO) emissions from the stack serving this emissions unit shall not exceed 4.78tons/year. Volatile Organic compounds (VOC) emissions from the stack serving this emissions unit shall not exceed 5.35tons/year. Visible particulate emissions (PE) shall not exceed 10% opacity from the stack serving this emissions unit, as a 6-minute average. PE emissions from the stack serving this emissions unit shall not exceed 6.86E-2 g/hp-hr and 1.31 ton/ year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)and OAC rule 3745-17-11. See b)(2)a. below.
b.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c. below.
d.	40 CFR Part 60, Subpart JJJJ (40 CFR 60. 4230 – 60.4248) [In accordance with 40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1, this emissions unit is a 1480hp, natural gas-fired, stationary spark internal combustion engine manufactured afterJuly 1, 2007 that islocated at a new natural gas compressor station and is subject to the emission limitations and controlmeasures specified in this section.]	NOx emissions shall not exceed 1.00 g/hp-hr or 82ppmvd at 15% oxygen (O_2). CO emissions shall not exceed 2.00 g/hp-hr or 270 ppmvd at 15% O_2. VOC emissions shall not exceed 0.7 g/hp-hror 60ppmvd at 15% O_2. [40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1]
e.	40 CFR Part 60.1 – 19 (40 CFR 60.4246)	Table 3 to Subpart JJJJ of 40 CFR Part 60 – Applicability of General Provisions to Subpart JJJJ shows which part of the

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		General Provisions in 40 CFR Part 60.1 – 19 apply.
f.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 pound/million Btu actual heat input. This emission limitation is less stringent than the limitations listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.
g.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule. This emission limitation is less stringent than the limitations listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally–approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

This Permit-to-install and operate for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):

i. The emissions from the engine are ventedto anoxidation catalyst controlling CH_2O, CO, NO_X, and VOCs by80, 97, 98.5 and 66 percent respectively, at all times the emissions unit is in operation.

ii. NO_X emissions shall not exceed 3.82 tons/year.

iii. CO emissions shall not exceed 4.78 tons/year.

iv. VOC emissions shall not exceed 5.35 tons/year.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, emissions from this air contaminant source since the uncontrolled potential-to-emit for PEemissions is less than 10 tons/year.

d. The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4236(a)	Installation deadlines
60.4243(b)	Compliance demonstration

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

(2) The permittee shall comply with the applicable restrictions of 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4234	Duration of compliance with emission standards
60.4243(b)	Maintenance requirements
60.4243(e)	Alternative fuel
60.4243(g)	AFR controllers

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall comply with the applicable restrictions of 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4245(a), (c) and (d)	Notification, record keeping, and reporting requirements

e) Reporting Requirements

(1) The reports required by this permit may be submitted through Ohio EPA's e-business center: Air Services online web portal; or they may be mailed as a hard copy to the Ohio EPA, Southeast District Office.

(2) Annual Permit Evaluation Report (PER)forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelvemonths for each air contaminant source identified in this permit.

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(4) Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

a. construction date (no later than 30 days after such date);

b. actual start-up date (within 15 days after such date); and

c. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
50 West Town Street, Suite 700
P. O. Box 1049
Columbus, Ohio 43216-1049

and

Southeast District Office of the Ohio EPA
Division of Air Pollution Control
2195 Front Street, Logan, Ohio 43138.

(5) The permittee shall submit notifications and reports to the Ohio EPA, Southeast District Office as required pursuant to 40 CFR Part 60, Subpart JJJJ, per the following sections:

60.4243(b)(2)(ii) and 60.4245	Maintain records of maintenance plan and records of maintenance conducted on the engine
60.4245(a)	Maintain records of notifications and supporting documentation
60.4245(c)	Must submit an initial notification

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in 40 CFR 60.4233(e) and according to the requirements specified in 40 CFR 60.4244, as applicable. The permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practices for minimizing emissions. In addition, the permittee must conduct an initial performance test. See 40 CFR 60.4243(b)(2)(ii) and f)(2) below. Note: The Ohio Gathering Company has chosen this compliance option in lieu of purchasing certified engines.

b. Emissions Limitation:

NO_X emissions shall not exceed 3.82 ton/year.

Applicable Compliance Methods:

The short term emission rate was determined by multiplying 0.20 g/bhp-hr, the emission factor specified in the manufacturer's engine specification sheet by 1,980 bhp, the power output rating of this unit, and dividing by 453.59 g/lb equals 0.87 lb/hr (as submitted in application).

The annual emission limitation was established by multiplying the short term emission rate above by the maximum hours of operation, 8,760 hours/year, and dividing by 2,000 pounds/ton.

Compliance with the annual emission limitation may be assumed provided that the permittee demonstrates compliance with the hourly emission rate.

c. Emissions Limitation:

CO emissions shall not exceed 4.78 ton/year.

Applicable Compliance Methods:

The short term emission rate was determined by multiplying 0.25 g/bhp-hr, the emission factor specified in the manufacturer's engine specification sheet by 1,980 bhp, the power output rating of this unit, and dividing by 453.59 g/lb equals 1.09 lb/hr (as submitted in application).

The annual emission limitation was established by multiplying the short term emission rate above by the maximum hours of operation, 8,760 hours/year, and dividing by 2,000 pounds/ton.

Compliance with the annual emission limitation may be assumed provided that the permittee demonstrates compliance with the hourly emission rate.

d. Emissions Limitation:

VOC emissions shall not exceed 5.35 ton/year.

Applicable Compliance Methods:

The short term emission rate was determined by multiplying 0.28 g/bhp-hr, the emission factor specified in the manufacturer's data for catalyst outlet, by 1,980 bhp, the power output rating of this unit, and dividing by 453.59 g/lb equals 1.22 lb/hr (as submitted in application).

The annual emission limitation was established by multiplying the short term emission rate above by the maximum hours of operation, 8,760 hours/year, and dividing by 2,000 pounds/ton.

Compliance with the annual emission limitation may be assumed provided that the permittee demonstrates compliance with the hourly emission rate.

e. Emissions Limitation:

Visible PE shall not exceed 10% opacity from the stack serving this emissions unit, as a 6-minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

f. Emissions Limitation:

PE emissions from the stack serving this emissions unit shall not exceed 6.86E-2 g/hp-hr and 1.31 ton/year.

Applicable Compliance Method:

The short term emission limit was derived from an emission factor of 0.0194 pound/million Btu, the emission factor is specified in AP-42 Table 3.2-3 (7/00), using the manufacturer's brake-specific fuel consumption (7.792Btu/hp-hr).

The annual emission limitation was established by multiplying the short term emission limit by the maximum rated capacity of the engine (1,980 HP) andby the maximum hours of operation, 8,760 hours/year, and dividing by 2,000 pounds/ton and 453.59 grams per pound.

Compliance with the annual emission limitation may be assumed provided that the permittee demonstrates compliance with the short term emission rate.

If required, compliance with the hourly emission rate shall be determined according to 40 CFR Part 60, Appendix A, U.S. EPA Methods 1 - 5.

g. Emissions Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

h. Emissions Limitation:

PE shall not exceed 0.062 pound/million Btu of actual heat input.

Applicable Compliance Method:

Compliance with this emission limitation may be based upon an emission factor of 0.0194 pound/million Btu of heat input. This emission factor is specified in the U.S. EPA reference document AP-42, Compilation of Air Pollution Emission Factors, Section 3.2, Table 3.2-3 (7/00).

If required, compliance with this emission limitation shall be determined according to OAC rule 3745-17-03(B)(10) and 40 CFR Part 60, Appendix A, U.S.EPA Methods 1 – 5.

i. Emissions Limitations:

NOx emissions shall not exceed 1.0 g/hp-hr or 82 ppmvd at 15% O_2.

Applicable Compliance Method:

If required, compliance with these emission limitations shall be determined according to the methods provided in Table 2 to 40 CFR Part 60, Subpart JJJJ. See f)(2) below.

j. Emissions Limitations:

CO emissions shall not exceed 2.0 g/hp-hr or 270 ppmvd at 15% O_2.

Applicable Compliance Method:

If required, compliance with these emission limitations shall be determined according to the methods provided in Table 2 to 40 CFR Part 60, Subpart JJJJ. See f)(2) below.

k. Emissions Limitations:

VOC emissions shall not exceed 0.7 g/hp-hr or 60 ppmvd at 15% O_2.

Applicable Compliance Method:

If required, compliance with these emission limitations shall be determined according to the methods provided in Table 2 to 40 CFR Part 60, Subpart JJJJ. See f)(2) below.

(2) The permittee has chosen to demonstrate compliance with the emission standards specified in §60.4233(e) by performing a stack test, and therefore the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the procedures specified in 40 CFR 60.4244; 40 CFR Part 60, Subpart JJJJ Table 2; and the following requirements:

a. An initial performance test shall be performed to demonstrate compliance with the mass emissions limitations in 40 CFR 60.4233(e) for VOC, NO_X, and CO, within60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

b. If the stationary internal combustion engine is rebuilt, or undergoes major repair or maintenance the permittee shall conduct subsequent performance test.

c. Each performance test must be conducted within 10% of 100% peak (or the highest achievable) load and according to the requirements in 40 CFR 60.8 and under the specific conditions that are specified by Table 2 of 40 CFR Part 60, Subpart JJJJ.

d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emission test(s).

e. Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

f. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

g) Miscellaneous Requirements

(1) None.