



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

6/12/2013

Certified Mail

Hondo Hanagan
Kensington Processing Plant
1099 Main Avenue
Suite 210
Durango, CO 81301

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0215002002
Permit Number: P0113985
Permit Type: OAC Chapter 3745-31 Modification
County: Columbiana

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI 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, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-NEDO; Pennsylvania; West Virginia



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Kensington Processing Plant**

Facility ID: 0215002002
Permit Number: P0113985
Permit Type: OAC Chapter 3745-31 Modification
Issued: 6/12/2013
Effective: 6/12/2013



Division of Air Pollution Control
Permit-to-Install
for
Kensington Processing Plant

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Final Permit-to-Install
Kensington Processing Plant
Permit Number: P0113985
Facility ID: 0215002002
Effective Date: 6/12/2013

Authorization

Facility ID: 0215002002
Facility Description: Natural gas processing facility
Application Number(s): A0047484, A0047664
Permit Number: P0113985
Permit Description: Chapter 31 modification to a natural gas processing plant to include an inlet raw condensate storage tank and a condensate truck loading operation during temporary start-up operations.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$9,350.00
Issue Date: 6/12/2013
Effective Date: 6/12/2013

This document constitutes issuance to:

Kensington Processing Plant
11543 SR 644
Kensington, OH 44427

of a Permit-to-Install 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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

A handwritten signature in black ink, appearing to read "Scott J. Nally".

Scott J. Nally
Director



Final Permit-to-Install
Kensington Processing Plant
Permit Number: P0113985
Facility ID: 0215002002
Effective Date:6/12/2013

Authorization (continued)

Permit Number: P0113985

Permit Description: Chapter 31 modification to a natural gas processing plant to include an inlet raw condensate storage tank and a condensate truck loading operation during temporary start-up operations.

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

Emissions Unit ID:	J002
Company Equipment ID:	StartupLoading
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	HP Flare
Superseded Permit Number:	P0110251
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T001
Company Equipment ID:	CDWaterTank
Superseded Permit Number:	P0110251
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Kensington Processing Plant
Permit Number: P0113985
Facility ID: 0215002002
Effective Date:6/12/2013

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have



been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.



15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



Final Permit-to-Install
Kensington Processing Plant
Permit Number: P0113985
Facility ID: 0215002002
Effective Date:6/12/2013

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 calculated uncontrolled potential to emit volatile organic compounds for this facility is currently greater than Title V thresholds. After the compliance dates of 40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for storage vessel, reciprocating compressor, and onshore natural gas processing plant affected facilities, the Closed Drain Water Tank and Flare (T001), Closed Drain Drum (P003), Condensate Product Storage Tanks (T002 – T005) and Condensate Stabilizer Flare (P006) will have federally enforceable restrictions upon the control devices which will limit the facility below the Title V thresholds. The facility will be considered Title V until that date.
3. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution: P001, P003, P006, P007, P801 and T001. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction or Modification Commenced After July 23, 1984: P001 and T007 during the Start-up Period. The complete New Source Performance Standards (NSPS) requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office.
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 shall include the following sources:
 - a) Cryo Unit Hot Oil Heaters 1 -2, B001-B002 (Permit-by-rule – PBR ID PBR09705),
 - b) Mol Sieve Regen Gas Heaters 1-3, B004-B006 (Permit-by-rule – PBR ID PBR09705),
 - c) Cryo Drain Drum, P004 (de minimis with controls per OAC rule 3745-15-05),
 - d) 3.7 mmBtu/hr Condensate Stabilizer Reboiler, B007 (exempt per OAC rule 3745-31-03(A)(1)(a)),
 - e) Skim oil tank, T006 (de minimis per OAC rule 3745-15-05),



- f) Methanol storage tank, T007 (de minimis per OAC rule 3745-15-05),
- g) Open drain water tank, T008 (de minimis per OAC rule 3745-15-05),
- h) Slop oil tank, T009 (de minimis per OAC rule 3745-15-05),
- i) Inlet and residue compressor blowdown, P002 (de minimis with controls per OAC rule 3745-15-05),
- j) Gas Chromatograph Sample Loop Returns, P005 (de minimis with controls per OAC rule 3745-15-05), and
- k) Truck Loading Rack, J001 (de minimis with controls per OAC rule 3745-15-05).



Final Permit-to-Install
Kensington Processing Plant
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C. Emissions Unit Terms and Conditions



1. J002, Start-up Truck Loading Station

Operations, Property and/or Equipment Description:

Temporary Truck Loading Station from the Closed Drain Water Tank, to be used only during the Start-up Period as defined in emissions unit P001.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 2.25 tons per year. See b)(2)a and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.

(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 from this air contaminant source since the calculated potential to emit for VOC is less than 10 tons/yr.

- c. The permittee shall not permit natural gas liquids to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall record the following information:

- a. the amount of raw condensate loaded out of the Closed Drain Water Tank, in gallons, on a daily basis; and
- b. the amount of raw condensate loaded out of the Closed Drain Water Tank, in gallons, on a monthly basis.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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. Emission Limitation:

Fugitive VOC emissions shall not exceed 2.25 tons per year.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by the following calculation:

$$E = (L, \text{ in lb/1000 gal}) \times (\text{condensate gal/yr}) \times (\% \text{ VOC}) \times (\text{ton/2000 lbs})$$

where:

E = VOC emissions rate, in tons per year;



Condensate gal/yr = summation of d)(1)b;

% VOC = 0.8616; and

L = the loading loss factor derived using AP-42, Section 5.2, "Loading Loss Equation":

L = 12.46 SPM/T

where:

L = loading loss, pounds per 1000 gallons loaded;

S = saturation factor, 0.60 for submerged fill;

P = vapor pressure of liquid loaded = 14.1;

M = molecular weight of vapor = 49.05; and

T = temperature of bulk liquid = 520 °R.

g) Miscellaneous Requirements

(1) None.



2. P001, Emissions units controlled by HP Flare

Operations, Property and/or Equipment Description:

Non-assisted open flare with a maximum heat input capacity of 8,500 mmBtu/hr but an annual average operating rate of 5.2 mmBtu/hr used to control the closed drain drum (P003) and start-up inlet raw condensate storage tank (T007) and the following de minimis units: the cryo drain drum (P004), the compressor maintenance blowdowns (P002), and the gas chromatograph sample loop return (P005), along with emergency releases of hydrocarbon emissions from pressure relief devices.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 (BAT after the Start-up Period is over)	<u>Post Start-up Period:</u> Nitrogen oxides (NO _x) emissions shall not exceed 0.35 lb/hr and 1.55 TPY. Carbon monoxide (CO) emissions shall not exceed 1.92 lbs/hr and 8.43 TPY. See b)(2)a and b)(2)g.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (BAT during the Start-up Period)	<u>During the Start-up Period:</u> Nitrogen oxides (NO _x) emissions shall not exceed 3.26 lbs/hr and 2.53 TPY. See b)(2)a and b)(2)g.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
d.	ORC 3704.03(T) (BAT after the Start-up Period is over)	<u>Post Start-up Period:</u> Volatile organic compound (VOC) emissions shall not exceed 14.80 tons per rolling, 12-month period (including emissions from P003, purge and pilot gas, and de minimis units).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>The requirements of this rule include compliance with the applicable requirements of 40 CFR Part 60, Subpart OOOO.</p> <p>See b)(2)g and c)(2).</p>
e.	<p>ORC 3704.03(T) (BAT during the Start-up Period)</p>	<p><u>During the Start-up Period:</u></p> <p>Volatile organic compound (VOC) emissions shall not exceed 39.36 tons per rolling, 12-month period (including emissions from P003, T007, purge and pilot gas, and de minimis units).</p> <p>Carbon monoxide (CO) emissions shall not exceed 13.76 tons per rolling, 12-month period.</p> <p>The requirements of this rule include compliance with the applicable requirements of 40 CFR Part 60, Subpart OOOO and 40 CFR Part 60, Subpart Kb.</p> <p>See b)(2)g, c)(2) and c)(4).</p>
f.	<p>40 CFR Part 60, Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (60.5360-60.5430)</p> <p>[In accordance with 40 CFR 60.5400, this emissions unit consists of a flare used to control leaks from pressure relief devices in a process unit in an onshore natural gas processing plant.]</p> <p>40 CFR Part 60, Subpart VVa: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (SOCMI) for which construction, reconstruction, or modification commenced after November 7, 2006. (40 CFR 60.18, 60.5400, 60.482-1a(a), (b), and (d), 60.482-10a)</p>	<p>The facility is subject to the applicable requirements of Subpart VVa for equipment leaks of VOC at a facility which commenced construction after August 23, 2011 per 60.5400 of Subpart OOOO.</p> <p>See b)(2)c, b)(2)d, c)(3), d)(6) and e)(4).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 60.1 through 60.19	The General Provisions that apply are specified in Table 3 of 40 CFR Part 60, Subpart OOOO.
h.	OAC rule 3745-17-07(A)	See b)(2)e.
i.	OAC rule 3745-17-11(B)	See b)(2)f.
j.	40 CFR Part 60, Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction or Modification Commenced After July 23, 1984	<u>During the Start-up Period:</u> The start-up inlet raw condensate storage tank (T007) is subject to the applicable requirements of Subpart Kb for a storage vessel with a design capacity greater than 151 m ³ (39,890 gal) containing a volatile organic liquid which commenced construction after July 23, 1984. See b)(2)g, b)(2)h, d)(7) and e)(5).

(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 NO_x and CO (after start-up) from this air contaminant source since the uncontrolled potential to emit for NO_x and CO (after start-up) is less than 10 tons/yr.
- c. No later than October 15, 2012 or upon startup, the permittee shall demonstrate compliance with the applicable requirements of 40 CFR 60.482-1a(a), (b), and (d), 60.482-2a, and 60.482-4a through 60.482-11a, except as provided in 60.5401.



- d. Equipment that is in vacuum service is excluded from the requirements of 40 CFR 60.482–2a to 60.482–10a if it is identified as required in 40 CFR 60.486a(e)(5).
 - e. The emissions from the flare are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
 - f. The uncontrolled mass rate of PE from the flare is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero.
 - g. The facility will be operating under two scenarios. One scenario is the Start-up Period, and the other is the Post Start-Up Period. For the purposes of this permit, the Start-up Period is defined as the period of operation from the initial start-up of the plant until the date that either the condensate stabilizer becomes fully operational, or the total amount of raw condensate stored in T007 exceeds 525,000 gallons as measured by the amount of raw condensate loaded out of the Closed Drain Water Tank, whichever occurs first. The above-listed (BAT during start-up period) shall apply until the date that the Start-up Period ends, at which point the (BAT after start-up period is over) shall commence.
 - h. During the Start-up Period, emissions unit T007 shall be equipped with a closed vent system and control device meeting the following specifications:
 - i. The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in 40 CFR Part 60, Subpart VV, § 60.485(b).
 - ii. The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements (§ 60.18) of the General Provisions.
- c) Operational Restrictions
- (1) The permittee shall burn only natural gas as defined in 40 CFR 63.761 in this emissions unit, except during an emergency.
 - (2) All collected gas shall be vented to an open flare designed and operated as follows:
 - a. The flare shall be operated with a 95% destruction efficiency.
 - b. An automatic flame ignition system shall be installed.
 - c. If using a pilot flame ignition system, the presence of a pilot flame shall be monitored using a thermocouple or other equivalent device to detect the



presence of a flame. A pilot flame shall be maintained at all times in the flare's pilot light burner. If the pilot flame goes out and does not relight, then an alarm shall sound. The net heating value of the gas being combusted and the actual exit velocity shall be calculated as required in 40 CFR 60.18.

- d. If using an electric arc ignition system, the arcing of the electric arc ignition system shall pulse continually and a device shall be installed and used to continuously monitor the electric arc ignition system.
- e. Any flare, auto ignition system, and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- f. The flare shall operate at a maximum inlet gas flow rate determined by testing performed by the manufacturer. An inlet gas flow rate meter shall be installed and used to continuously monitor the flow.
- g. There shall be no visible particulate emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. A visible emissions test using Method 22 at 40 CFR Part 60, Appendix A-7 must be performed monthly.
- h. The flare shall operate at no more than a rolling, 12-month average 5.2 mmBtu/hr heat input at all times except for times when a malfunction occurs such that excess gas must be safely disposed of through the flare.
- i. The flare shall comply with the applicable requirements of 40 CFR 60.18.

(3) For the pressure relief devices, the permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subparts A, OOOO and VVa, including the following sections:

60.5400(a) and 60.482-10a(a) through (d) and (m)	Meet the requirements of 60.482-10a for closed vent systems and control devices.
60.5400(a), 60.482-4a(c), 60.482-10a(a) and (d)	Flares shall comply with the requirements of 40 CFR Part 60 Section 60.18.
60.5400(a) and 60.482-10a(m)	Operate closed vent systems and control devices used to comply with provisions of 40 CFR 60.482-10a at all times when emissions may be vented to them.
60.5400(a) and 60.482-10a(g)	Repair all leaks, as indicated by an instrument reading greater than 500 ppmv above background or by visual inspections, from the closed vent systems and control devices as soon as practicable. First attempt at repair must be made no later than <u>5 calendar days</u> after detection, and repair must be completed no later than <u>15 calendar days</u> after detection, except as provided by rule (e.g.,



	delay of repair, unsafe to inspect, difficult to inspect).
60.5400(a) and 60.482-10a(h)	Meet the requirements of 60.482-10a(h) for delays of repair.
60.5400(a) and 60.482-10a(i)	Vapor collection systems and closed vent systems operated under a vacuum are exempt from the inspection requirements of 60.482-10a(f).
60.5400(a) and 60.482-10a(j)	Meet the requirements of 60.482-10a(j) for parts of the closed vent system designated as unsafe to inspect in lieu of 60.482-10a(f).
60.5400(a) and 60.482-10a(k)	Meet the requirements of 60.482-10a(k) for parts of the closed vent system designated as difficult to inspect in lieu of 60.482-10a(f).

*The permittee may choose to comply with any alternative standards provided in 40 CFR Part 60, Subparts A and OOOO.

- (4) During the Start-up Period, the total amount of raw condensate stored in emissions unit T007 shall not exceed 525,000 gallons, as measured by the amount of raw condensate loaded out of the Closed Drain Water Tank.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) For each day during which the permittee burns a fuel other than natural gas as defined in 40 CFR 63.761, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit, except during an emergency.
- (2) The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- (3) The permittee shall monitor the flare to ensure that it is operated and maintained in conformance with its design and the requirements contained in this permit.
- (4) The permittee shall:
 - a. continuously monitor and record the presence of the pilot flame;
 - b. record all periods during which the automatic flare ignition system (pilot flame or electronic arc ignition system) was not working;
 - c. record all periods during which there was gas being vented to the flare but the flare was not lit;



- d. record gas flow rate at the inlet to the flare at least once every hour, in lbs/hour;
 - e. record a summation of the gas flow rate at the inlet to the flare monthly, in lbs/month;
 - f. record a rolling, 12-month, summation of the gas flow rate at the inlet to the flare monthly, in lbs/month; and
 - g. sample the gas stream monthly and record the VOC weight percentage.
- (5) The permittee shall maintain a record of all periods of time (date and number of hours) when, due to emergency or upset condition, the flare is burning collected gases such that the rolling, 12-month average heat input is greater than 5.2 mmBtu/hr, along with a description of the emergency and/or the reason that the flare was used at a rolling, 12-month average heat input greater than 5.2 mmBtu/hr. The rolling, 12-month average heat input shall be calculated from the monitored flow rate and a maximum heating value of 0.023 mmBtu/lb.
- (6) For the pressure relief devices, the permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subparts A, OOOO and VVa, including the following sections:

60.5400(a), 60.482-10a(e)	Monitor the control device to ensure it is operated and maintained in conformance with its design.
60.5400(a), 60.482-10a(f)(1) and (2), and 60.485a(b)	Inspect each closed vent system, except as provided by rule. If the vapor collection system or closed vent system is constructed of hard-piping, an initial inspection shall be performed according to 60.485a(b) (i.e., Method 21), and annual visual inspections shall be performed for visible, audible, or olfactory indications of leaks. If the vapor collection system or closed vent system is constructed of ductwork, initial and annual inspections shall be performed according to the procedures of 60.485a(b).
60.5400(a) and 60.482-10a(l)(1)	Maintain required records for parts of the closed vent system that are designated as unsafe to inspect.
60.5400(a) and 60.482-10a(l)(2)	Maintain required records for parts of the closed vent system that are designated as difficult to inspect.



60.5400(a) and 60.482-10a(l)(3)	Maintain required records for leaks and repairs of closed vent systems as specified in 60.486a(c).
60.5400(a) and 60.482-10a(l)(4) and (5)	Maintain required records for inspections.
60.5400(e) and 60.486a(d)	Maintain required records for the design requirements for closed vent systems and control devices.
60.5400(e) and 60.486a(e)	Maintain required log.
60.5421(b)	Maintain required records for pressure relief devices.

(7) In accordance with § 60.116b(b), the permittee shall keep readily accessible records showing the dimension of the storage vessel (T007) and an analysis showing the capacity of the storage vessel (T007).

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas as defined in 40 CFR 63.761 was burned in this emissions unit, except during an emergency. Each report shall be submitted within 30 days after the deviation occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all periods of time during which the pilot flame or electronic arc ignition system were not working and process gas was being vented to it;
 - b. all periods of time when, due to emergency or upset conditions, the flare is burning collected gases at greater than the rolling, 12-month average heat input of 5.2 mmBtu/hr;
 - c. all periods of time when the maximum inlet gas flow rate was not within the range determined by testing performed by the manufacturer;
 - d. the probable cause of each deviation (excursion);
 - e. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - f. the magnitude and duration of each deviation (excursion).



If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (4) For the pressure relief devices, the permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subparts A, OOOO and VVa, including the following sections:

60.5400(e) and 60.487a(a)	Submit semiannual reports beginning 6 months after the initial startup date.
60.5400(e) and 60.487a(b) and (c)	Initial and subsequent semiannual report requirements.
60.5422	Submit the required information for pressure relief switches

- (5) In accordance with § 60.115(d), after installing a closed vent system and flare to comply with § 60.112b, the permittee shall meet the following requirements.

- a. A report containing the measurements required by § 60.18(f) (1), (2), (3), (4), (5), and (6) shall be furnished to the Administrator as required by § 60.8 of the General Provisions. This report shall be submitted within 6 months of the initial start-up date.
- b. Records shall be kept of all periods of operation during which the flare pilot flame is absent.
- c. Semiannual reports of all periods recorded under § 60.115b(d)(2) in which the pilot flame was absent shall be furnished to the Administrator.

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. Emission Limitations:

NO_x emissions shall not exceed 0.35 lb/hr and 1.55 TPY (BAT after the Start-up Period is over).

NO_x emissions shall not exceed 3.61 lbs/hr and 2.53 TPY (BAT during the Start-up Period).



Applicable Compliance Method:

The hourly emission rate specified above for BAT after the Start-up Period is over was established by multiplying the emission factor from AP-42, Table 13.5-1 (revised 1/95), of 0.068 lbNO_x/mmBtu by the maximum rolling, 12-month average heat input rate.

The hourly emission rate specified above for BAT during the Start-up Period was established by multiplying the emission factor from AP-42, Table 13.5-1 (revised 1/95), of 0.068 lbNO_x/mmBtu by the maximum amount of flash gas generated in T007 (0.0208 mmscf/hr, which is equivalent to 21,000 gallons/hr of raw condensate) and the conversion of 2,305 Btu/scf. This value was then added to the hourly rate calculated in the paragraph above.

The TPY emission limitation above for BAT after the Start-up Period is over was developed by multiplying the short-term allowable NO_x emission limitation (0.35 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

The TPY emission limitation above for BAT during the Start-up Period was developed by multiplying the emission factor from AP-42, Table 13.5-1 (revised 1/95), of 0.068 lbNO_x/mmBtu by the maximum amount of flash gas generated in T007 (12.5 mmscf/yr, which is equivalent to 525,000 gallons/yr of raw condensate) and the conversion of 2,305 Btu/scf, and then dividing by 2,000 lbs per ton. This value was then added to the annual rate calculated in the paragraph above.

If required, compliance with the hourly NO_x emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7.

b. Emission Limitations:

CO emissions shall not exceed 1.92 lbs/hr and 8.43 TPY (BAT after the Start-up Period is over).

CO emissions shall not exceed 13.76 tons per rolling, 12-month period (BAT during the Start-up Period).

Applicable Compliance Method:

The hourly emission rate specified above for BAT after the Start-up Period is over was established by multiplying the emission factor from AP-42, Table 13.5-1 (revised 1/95), of 0.37 lb CO/mmBtu by the maximum rolling, 12-month average heat input rate.



The TPY emission limitation for BAT after the Start-up Period is over was developed by multiplying the short-term allowable CO emission limitation (1.92 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

The TPY emission limitation above for BAT during the Start-up Period was established by multiplying the emission factor from AP-42, Table 13.5-1 (revised 1/95), of 0.37 lb CO/mmBtu by the maximum amount of flash gas generated in T007 (12.5 mmscf/yr, which is equivalent to 525,000 gallons/yr of raw condensate) and the conversion of 2,305 Btu/scf, and then dividing by 2,000 lbs per ton. This value was then added to the annual rate calculated in the paragraph above.

If required, compliance with the hourly CO emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10.

c. Emission Limitations:

VOC emissions shall not exceed 14.80tons per rolling, 12-month period (BAT after the Start-up Period is over).

VOC emissions shall not exceed 39.36 tons per rolling, 12-month period (BAT during the Start-up Period).

Applicable Compliance Method:

Compliance with the VOC emission limitations shall be based upon the following calculation using the inputs provided in the permittee's application and the record keeping requirements in d)(4):

$$\text{VOC (tons/mo.)} = (\text{Inlet gas flow rate}) \times (\text{VOC weight percentage}) \times (1 - \text{flare destruction efficiency}) \times (\text{ton}/2000 \text{ lbs})$$

where:

Inlet gas flow rate = lbs/mo., including purge and pilot gas;

VOC weight percentage = percentage of VOC in the inlet gas stream (based on monthly sample analysis in d)(4)); and

Flare destruction efficiency = 95%.

The rolling, 12-month emissions shall be calculated by summing the monthly emissions.

d. Emission Limitation:

The flare shall be designed and operated with no visible emissions, except for a total of five minutes during any two consecutive hours.



Applicable Compliance Method:

Compliance with the visible emissions limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22. Method 22 shall be conducted monthly for a 2-hour observation period.

g) Miscellaneous Requirements

- (1) Any amendment to 40 CFR Part 60, Subpart OOOO shall supersede the compliance limitations and/or options contained in this permit.



3. T001, Closed Drain Water Tank and Flare

Operations, Property and/or Equipment Description:

500 bbl (21,000 gal) closed drain water tank vented to 5 mmBtu/hr non-assisted open flare (de minimis units skim oil tank and methanol storage tank are also vented to the flare).

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) 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) (BAT after the Start-up Period is over)	<p><u>Post Start-up Period:</u></p> <p>Volatile organic compound (VOC) emissions shall not exceed 10.82 tons per rolling, 12-month period (including purge and pilot gas and de minimis units).</p> <p>The requirements of this rule include compliance with the applicable requirements of 40 CFR Part 60, Subpart OOOO.</p> <p>Use of submerged or bottom fill on tank.</p> <p>See b)(2)h and c)(2).</p>
b.	ORC 3704.03(T) (BAT during the Start-up Period)	<p><u>During the Start-up Period:</u></p> <p>Volatile organic compound (VOC) emissions shall not exceed 14.85 tons per rolling, 12-month period (including purge and pilot gas and de minimis units).</p> <p>The requirements of this rule include compliance with the applicable requirements of 40 CFR Part 60, Subpart OOOO.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Use of submerged or bottom fill on tank. See b)(2)h and c)(2).
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (BAT after the Start-up Period is over)	<u>Post Start-up Period:</u> Nitrogen oxide (NO _x) emissions shall not exceed 0.34 lb/hr and 1.49 TPY. Carbon monoxide (CO) emissions shall not exceed 1.85 lbs/hr and 8.10 TPY. See b)(2)a and b)(2)h.
d.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (BAT during the Start-up Period)	<u>During the Start-up Period:</u> Nitrogen oxide (NO _x) emissions shall not exceed 0.76 lb/hr and 1.62 TPY. Carbon monoxide (CO) emissions shall not exceed 4.15 lbs/hr and 8.79 TPY. See b)(2)a and b)(2)h.
e.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
f.	40 CFR Part 60, Subpart Kb	See b)(2)c and b)(2)e.
g.	OAC rule 3745-21-09(L)(2)(b)	See b)(2)d.
h.	OAC rule 3745-17-07(A)	See b)(2)f.
i.	OAC rule 3745-17-11(B)	See b)(2)g.
j.	40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (60.5360-60.5430) [In accordance with 40 CFR 60.5365, this emissions unit includes a storage vessel affected facility.]	Following the compliance date of October 15, 2013, each storage vessel constructed, modified, or reconstructed after August 23, 2011 and with VOC emissions calculated to exceed 6 tons per year, shall reduce VOC emissions by 95.0% or greater. See c)(3), d)(5) and e)(4).
k.	40 CFR Part 60.1 through 60.19	The General Provisions that apply are specified in Table 3 of 40 CFR Part 60, Subpart OOOO.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 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 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 3745-31-05, then these emission limits/control measures no longer apply.

- b. These rule paragraphs apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
 - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x and CO from this air contaminant source since the uncontrolled potential to emit for NO_x and CO are less than ten tons per year.
- c. This emissions unit is exempt from the control requirements of 40 CFR 60.110b because it is a vessel with a design capacity less than or equal to 1,589.874 m³ used for petroleum or condensate stored, processed, or treated prior to custody transfer.
- d. A fixed roof tank meeting one of the following criteria is exempt from installing an internal floating roof or other control device and is not subject to the requirements identified in OAC 3745-21-09(L):
 - i. a fixed roof tank with a capacity of less than 40,000 gallons; or
 - ii. a fixed roof tank used to store crude oil and condensate prior to lease custody transfer and with a capacity of less than 422,000 gallons; or
 - iii. a fixed roof tank that stores a petroleum liquid with a true vapor pressure less than or equal to 1.52 pounds per square inch absolute.

If not meeting one of these exemptions the storage vessel shall be installed to comply with the control requirements of OAC rule 3745-21-09(L).

- e. If using a floating roof to reduce emissions, the storage vessel shall be operated to meet the requirements of 40 CFR 60.112b(a)(1) or (2) and the relevant monitoring, inspection, record keeping, and reporting requirements in 40 CFR Part 60, Subpart Kb.
- f. The emissions from the flare are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- g. The uncontrolled mass rate of PE from the flare is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero.



60.5395(a), 60.5410(e)(3), and 60.5415(e)(1)	Operate the flare to achieve a 95% reduction of emissions of VOC from each storage vessel emitting more than 6 TPY. Emissions are to be determined per 60.5395(a).
60.5395(b), 60.5410(e)(4), and 60.5411(b)	Equip the storage tanks with a cover connected through a closed vent system to the flare. The cover and all openings in the cover must form a continuous barrier over the entire surface area of the liquid in the storage vessel and must be secured in a closed, sealed position whenever material is stored in the storage vessels except as provided by rule.
60.5411(a)(1) and 60.5412(b)(1)	Operate closed vent systems and control devices used to comply with the provisions of 60.5395 at all times when emissions may be vented to them.
60.5411(a)(2)	Design and operate the closed vent system with no detectable emissions.
60.5411(a)(3)	Any valves associated with the closed vent system that are capable of diverting all or a portion of the emissions away from the flare must be equipped with bypass flow monitors or must be secured in the non-diverting position using a car-seal or a lock-and-key type configuration. Low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and safety devices are not subject to this requirement.
60.5412(a)(3) and 60.5413(a) and (d)	Performance test exemption if control device demonstrates compliance using a performance test conducted by the manufacturer. The manufacturer must determine a maximum inlet gas flow rate which must not be exceeded for each control device.
60.5415(e)(2)(vii)(A)	Operate the flare with the inlet gas flow rate meeting the range specified by the manufacturer.
60.5415(e)(2)(vii)(B)	Operate the flare with a flame present at all times.
60.5415(e)(2)(vii)(C)	Operate the flare with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. A visible emissions test using Method 22 at 40 CFR Part 60, Appendix A-7 must be performed <u>monthly</u> .
60.5415(e)(2)(vii)(D)(4) and (5)	Replace fuel nozzle(s) and burner tubes on the flare following first failed visible emissions test. A second failure requires either conducting a performance test or replacing the flare.



60.5416(b)(9), (10), (11), and (12)	Repair all leaks detected from the closed vent system or cover as soon as practicable. First attempt at repair must be made no later than <u>5 calendar days</u> after detection, and repair must be completed no later than <u>15 calendar days</u> after detection, except as provided by rule (e.g., delay of repair, unsafe to inspect, difficult to inspect).
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*The permittee may choose to comply with any alternative standards provided in 40 CFR Part 60, Subparts A and OOOO.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas as defined in 40 CFR 63.761, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit, except during an emergency.
- (2) The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- (3) The permittee shall monitor the flare to ensure that it is operated and maintained in conformance with its design and the requirements contained in this permit.
- (4) The permittee shall:
 - a. continuously monitor and record the presence of the pilot flame;
 - b. record all periods during which the automatic flare ignition system (pilot flame or electronic arc ignition system) was not working;
 - c. record all periods during which there was gas being vented to the flare but the flare was not lit;
 - d. record gas flow rate at the inlet to the flare at least once every hour, in lbs/hour;
 - e. record a summation of the gas flow rate at the inlet to the flare monthly, in lbs/month; and
 - f. sample the gas stream monthly and record the VOC weight percentage.
- (5) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5413(d)(9)	Maintain required records for each combustion control device model tested by the manufacturer.
60.5416(a)(1)	Conduct an <u>initial</u> inspection of all closed vent system joints, seams, or other connections that are permanently or semi-permanently sealed to demonstrate that the system operates with no detectable emissions. Conduct



	subsequent <u>annual</u> visual inspections for defects. Any defective components that are replaced must be inspected to demonstrate that these components operate with no detectable emissions.
60.5416(a)(2)	Conduct <u>initial and annual</u> inspections of all closed vent system components other than those described under 60.5416(a)(1) to demonstrate that that system operates with no detectable emissions. Also conduct <u>annual</u> visual inspections for defects.
60.5416(a)(3)	Conduct <u>initial and annual</u> inspections of the storage vessel covers to identify any defects.
60.5416(a)(4)	Except for low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and safety devices, operate the bypass valve flow monitors to collect a reading at least <u>once every 15 minutes</u> or visually inspect all bypass valves secured in the non-diverting position at least <u>monthly</u> to verify that valve remains in the non-diverting position.
60.5416(b)(1) through (8)	Conduct inspections of closed vent systems to detect leaks according to USEPA Method 21 and as provided by rule. The condition of no detectable emissions is defined as an organic concentration value less than 500 ppmv.
60.5417(d)(1)(viii)(A) and 60.5415(e)(2)(vii)(A)	Install, calibrate, operate, and maintain a continuous monitoring system to measure gas flow rate at the inlet to the flare. The monitoring instrument must have an accuracy of ± 2 percent or better.
60.5417(c)(1)	Record gas flow rate at the inlet to the flare at least <u>once every hour</u> . Detect and record the presence of a flare flame at least <u>once every hour</u> .
60.5417(d)(1)(viii)(B) and 60.5415(e)(2)(vii)(B)	Install, calibrate, operate, and maintain a heat sensing monitoring device equipped with a continuous recorder that indicates the continuous ignition of the pilot flame.
60.5417(c)(2)	Install, calibrate, operate, and maintain the continuous monitoring systems in accordance with a site specific monitoring plan including the information required by rule.



60.5417(c)(3) and (4)	Conduct a continuous parameter monitoring systems equipment performance check, system accuracy audit, or other audit procedure as specified in the site-specific monitoring plan at least <u>once every 12 months</u> . Conduct performance evaluations of the continuous parameter monitoring systems as specified in the site-specific monitoring plan.
60.5417(f)	Establish a minimum operating parameter value or a maximum operating parameter value, as appropriate for each control device installed in accordance with 40 CFR 60.5417(d).
60.5417(g)	Deviations for the flare occur when the inlet gas flow rate exceeds the maximum established during the test, or there is a failure of the monthly visible emissions test.
60.5420(c)	The applicable records identified in 40 CFR 60.5420(c) and 40 CFR 60.7(f) must be maintained for a period of 5 years following the date of record and they must be accessible upon request.
60.5420(c)(5)	Maintain required records for the determination that the VOC emissions of each storage vessel is either below or above 6 TPY and for deviations from the requirements of the subpart.
60.5420(c)(6)	Maintain required records for inspections of closed vent systems.
60.5420(c)(7)	Maintain required records for inspections of storage vessel covers.
60.5420(c)(8)	Maintain required records for inspections of bypass valves.
60.5420(c)(9)	Maintain required records for leaks and repairs of closed vent systems.
60.5420(c)(11)	Maintain required records for continuous parameter monitoring systems.
60.5421(b)	Maintain required records for pressure relief devices.



- (6) The permittee shall record the annual throughput of each tank in gallons per year. The permittee shall keep records of U.S. EPA TANKS software program and/or other process simulation program calculations used to demonstrate annual storage tank and process vent emissions. These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit, except during an emergency. Each report shall be submitted within 30 days after the deviation occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all periods of time during which the pilot flame or electronic arc ignition system were not working and process gas was being vented to it;
 - b. all periods of time when the maximum inlet gas flow rate was not within the range determined by testing performed by the manufacturer;
 - c. the probable cause of each deviation (excursion);
 - d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - e. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (4) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5420(a)(1)		Initial notifications are not required for storage vessels.
60.5410(e)(8), 60.5420(b)(1), 60.5420(b)(6)	and	Submit the required information for storage vessels in the initial annual report within 30 days of the end of the initial compliance period and in the subsequent reports due the same date each year as the initial annual report.



60.5420(b)(7)	Submit the results of performance testing to USEPA's WebFIRE database within 60 days of completing each performance test.
60.5422	Submit the required information for pressure relief devices.

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. Emission Limitations:

NO_x emissions shall not exceed 0.34 lb/hr and 1.49 TPY (BAT after the Start-up Period is over).

NO_x emissions shall not exceed 0.76 lb/hr and 1.62 TPY (BAT during the Start-up Period).

Applicable Compliance Method:

The hourly emission rate specified above for BAT after the Start-up Period is over was established by multiplying the emission factor from AP-42, Table 13.5-1 (revised 1/95), of 0.068 lbNO_x/mmBtu by the maximum heat input rate of 5 mmBtu/hr.

The hourly emission rate specified above for BAT during the Start-up Period was established by multiplying the emission factor from AP-42, Table 13.5-1 (revised 1/95), of 0.068 lbNO_x/mmBtu by the maximum amount of flash gas generated in the tank (0.00208 mmscf/hr, which is equivalent to 21,000 gallons/hr of raw condensate) and the conversion of 2,986 Btu/scf. This value was then added to the hourly rate calculated in the paragraph above.

The TPY emission limitation for BAT after the Start-up Period is over was developed by multiplying the short-term allowable NO_x emission limitation (0.34 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

The TPY emission limitation above for BAT during the Start-up Period was developed by multiplying the emission factor from AP-42, Table 13.5-1 (revised 1/95), of 0.068 lbNO_x/mmBtu by the maximum amount of flash gas generated in the tank (1.25 mmscf/yr, which is equivalent to 525,000 gallons/yr of raw condensate) and the conversion of 2,986 Btu/scf, and then dividing by 2,000 lbs per ton. This value was then added to the annual rate calculated in the paragraph above.



If required, compliance with the hourly NO_x emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7.

b. Emission Limitations:

CO emissions shall not exceed 1.85 lbs/hr and 8.10 TPY (BAT after the Start-up Period is over).

CO emissions shall not exceed 4.15 lbs/hr and 8.79 TPY (BAT during the Start-up Period).

Applicable Compliance Method:

The hourly emission rate specified above for BAT after the Start-up Period is over was established by multiplying the emission factor from AP-42, Table 13.5-1 (revised 1/95), of 0.37 lb CO/mmBtu by the maximum heat input rate of 5 mmBtu/hr.

The hourly emission rate specified above for BAT during the Start-up Period was established by multiplying the emission factor from AP-42, Table 13.5-1 (revised 1/95), of 0.37 lb CO/mmBtu by the maximum amount of flash gas generated in the tank (0.00208 mmscf/hr, which is equivalent to 21,000 gallons/hr of raw condensate) and the conversion of 2,986 Btu/scf. This value was then added to the hourly rate calculated in the paragraph above.

The TPY emission limitation for BAT after the Start-up Period is over was developed by multiplying the short-term allowable CO emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

The TPY emission limitation above for BAT during the Start-up Period was developed by multiplying the emission factor from AP-42, Table 13.5-1 (revised 1/95), of 0.37 lb CO/mmBtu by the maximum amount of flash gas generated in the tank (1.25 mmscf/yr, which is equivalent to 525,000 gallons/yr of raw condensate) and the conversion of 2,986 Btu/scf, and then dividing by 2,000 lbs per ton. This value was then added to the annual rate calculated in the paragraph above.

If required, compliance with the hourly CO emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10.

c. Emission Limitations:

VOC emissions shall not exceed 10.82 tons per rolling, 12-month period (including purge and pilot gas and de minimis units) (BAT after the Start-up Period is over).



VOC emissions shall not exceed 14.85 tons per rolling, 12-month period (including purge and pilot gas and de minimis units) (BAT during the Start-up Period).

Applicable Compliance Method:

Compliance with the VOC emission limitations shall be based upon the following calculation using the inputs provided in the permittee's application and the record keeping requirements in d)(4):

$$\text{VOC (tons/mo.)} = (\text{Inlet gas flow rate}) \times (\text{VOC weight percentage}) \times (1 - \text{flare destruction efficiency}) \times (\text{ton}/2000 \text{ lbs})$$

where:

Inlet gas flow rate = lbs/mo., including purge and pilot gas;

VOC weight percentage = percentage of VOC in the inlet gas stream (based on monthly sample analysis in d)(4)); and

Flare destruction efficiency = 95%.

The rolling, 12-month emissions shall be calculated by summing the monthly emissions.

d. Emission Limitation:

There shall be no visible particulate emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

Applicable Compliance Method:

Compliance with the visible emissions limitation shall be determined in accordance with U.S. EPA Method 22 in Appendix A of 40 CFR Part 60. Where using the option to demonstrate compliance for a combustion control device by using a model that has been performance tested by the manufacturer, in accordance with 40 CFR 60.5413(d), Method 22 shall be conducted monthly for a 2-hour observation period.

g) Miscellaneous Requirements

- (1) Any amendment to 40 CFR Part 60, Subpart OOOO shall supersede the compliance limitations and/or options contained in this permit.