



11/6/2013

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: BRINKER COMPRESSOR STATION
Facility ID: 0215050202
Permit Type: Renewal
Permit Number: P0108874

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically 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 U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

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

Cc: Ohio EPA DAPC, Northeast District Office



PROPOSED

**Division of Air Pollution Control
Title V Permit
for
BRINKER COMPRESSOR STATION**

Facility ID:	0215050202
Permit Number:	P0108874
Permit Type:	Renewal
Issued:	11/6/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



**Division of Air Pollution Control
Title V Permit
for
BRINKER COMPRESSOR STATION**

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Proposed Title V Permit
BRINKER COMPRESSOR STATION
Permit Number: P0108874
Facility ID: 0215050202
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0215050202
Facility Description: Compressor Station
Application Number(s): A0042540
Permit Number: P0108874
Permit Description: Renewal Title V permit for a natural gas compressor station.
Permit Type: Renewal
Issue Date: 11/6/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0084416

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

BRINKER COMPRESSOR STATION
5213 Leetonia Rd
Leetonia, OH 44431

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 Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Proposed Title V Permit
BRINKER COMPRESSOR STATION
Permit Number: P0108874
Facility ID: 0215050202
Effective Date: To be entered upon final issuance

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- 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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))



- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenance requests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally



enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northeast District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))



4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) 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 reissuance, or modification, or for denial of a permit renewal application.
- 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 except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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, reopening 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.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))



10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))



13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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.
- b) 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 paragraph (E) of OAC rule 3745-77-03.
 - (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.
- c) 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.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms



and conditions with which there has been continuous compliance throughout the year are not separately identified.

- b. The permittee's current compliance status.
- c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
- d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
- e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))



16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible 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 Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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. 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



Proposed Title V Permit
BRINKER COMPRESSOR STATION
Permit Number: P0108874
Facility ID: 0215050202

Effective Date: To be entered upon final issuance

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Proposed Title V Permit
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B. Facility-Wide Terms and Conditions



Proposed Title V Permit
BRINKER COMPRESSOR STATION
Permit Number: P0108874
Facility ID: 0215050202

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), per 40 CFR §63.6585: B001, B002, B003, B004, and B005. The complete MACT requirements, including the MACT 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 appropriate Ohio EPA District office or local air agency.
3. 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.



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Facility ID: 0215050202
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C. Emissions Unit Terms and Conditions



1. Emissions Unit Group – 4SRB Engines: B001, B002

EU ID	Operations, Property and/or Equipment Description
B001	Ingersoll-Rand 38 KVG, serial no. 83NL844, 4-stroke rich burn, natural gas fired reciprocating internal combustion engine (RICE) having a maximum capacity of 10.3 mmBTU/hr (880 BHP). Compressor no.15501.
B002	Ingersoll-Rand 38 KVG, serial no. 83NL845, 4-stroke rich burn, natural gas fired reciprocating internal combustion engine (RICE) having a maximum capacity of 10.3 mmBTU/hr (880 BHP). Compressor no.15502.

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 3745-17-11(B)(5)(b)	Particulate emissions (PE) shall not exceed 0.062 lb/mmBtu actual heat input.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-18-06(G)	This emissions unit is exempt from this requirement pursuant to OAC rule 3745-18-06(A). See b)(2)a.
d.	40 CFR Part 63, Subpart ZZZZ (40 CFR 63.6595(a)(1), 63.6603(a), Table 2d #12 and Table 5 #14)	Beginning on October 19, 2013, NSCR must be utilized to reduce emissions. The average CO concentration shall not exceed 270 ppmvd at 15% O ₂ , or emissions of CO shall be reduced by 75% or more, or emissions of THC shall be reduced by 30% or more.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR 63.1 through 63.15	Table 8 to Subpart ZZZZ of 40 CFR Part 63 – Applicability of General Provisions to Subpart ZZZZ shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

- a. This emissions unit is exempt from OAC rule 3745-18-06(G) during any calendar day in which natural gas is the only fuel burned.
- b. Beginning on October 19, 2013, the permittee shall control the emissions from the stationary RICE exhaust using a non-selective catalytic reduction (NSCR) control device. The permittee shall either limit the concentration of CO to 270 ppmvd or less at 15% O₂ at the outlet of the control device, or the average reduction of CO, calculated according to 40 CFR 63.6620(e), shall not be less than 75% of the uncontrolled CO emissions, or the average reduction of THC, calculated according to 40 CFR 63.6620(e), shall not be less than 30% of the uncontrolled CO emissions.
- c. The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR Part 63.6603(a)	Emission limitations and operating limitations
Table 2d #12	Emission limitations
40 CFR Part 63.6605	General requirements for compliance
40 CFR Part 63.6665	General provisions
Table 8	General provisions

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR 63.6605	General requirements for compliance.
40 CFR Part 63 Table 5 #14	Installation of CPMS to monitor catalyst inlet temperature according to 40 CFR 63.6625(b), or installation of equipment to automatically shut down engine if the catalyst inlet temperature exceeds 1250 degrees Fahrenheit.



40 CFR 63.6625(h)	Time spent at idle during start up and the engine's start up time shall be minimized to a time period not to exceed 30 minutes.
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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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR Part 63.6625(b) and Table 5 #14	CPMS monitoring, installation, collection, operation, and maintenance requirements unless using equipment to automatically shut down engine if catalyst inlet temperature exceeds 1250 degrees Fahrenheit
40 CFR Part 63.6635	Monitoring and data collection
Table 6 #15	Demonstrating continuous compliance with emission limitations, operating limitations, work practices, and management practices
40 CFR Part 63.6655	Required record keeping
40 CFR Part 63.6660	Required form of records and required records retention

e) Reporting Requirements

- (1) 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR Part 63.6640(b)	Report deviations of emission or operating limitations
40 CFR Part 63.6640(e)	Report instances in which the applicable requirements in Table 8 to Subpart ZZZZ were not met.
40 CFR Part 63.6645	Required notifications
40 CFR Part 63.6650	Required reports
Table 7 #3	Requirements for compliance report



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:

PE shall not exceed 0.062 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.0095 lb/mmBtu. This emission factor is specified in U.S.EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.2, Table 3.2-3 (7/00).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

Beginning on October 19, 2013, NSCR must be utilized to reduce emissions. The average CO concentration shall not exceed 270 ppmvd at 15% O₂, or emissions of CO shall be reduced by 75% or more, or emissions of THC shall be reduced by 30% or more.

Applicable Compliance Method:

Compliance shall be demonstrated as specified in 40 CFR Part 63, Subpart ZZZZ.



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- (2) The permittee shall demonstrate ongoing compliance as required pursuant to 40 CFR Part 63, Subpart ZZZZ, including the following sections:

Applicable Rule	Requirement
40 CFR Part 63.6612(a)	Required date for initial performance tests
40 CFR Part 63.6620 and Table 4 #3	Requirements for performance tests
40 CFR Part 63.6630(e) and Table 5 #14	Demonstrating initial compliance with emission limitations and operating limitations
40 CFR Part 63.6640(c) and Table 6 #15	Demonstrating continuous compliance with emission limitations, operating limitations, works practices, and management practices

g) Miscellaneous Requirements

- (1) None.



2. B003, 4SLB Engine

Operations, Property and/or Equipment Description:

Ingersoll-Rand 48 KVSFT 563, serial no. 48FT563, 4-stroke lean burn, natural gas fired reciprocating internal combustion engine (RICE) having a maximum capacity of 13.7 mmBTU/hr (1,320 BHP). Compressor no.15503.

- 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 3745-17-11(B)(5)(b)	Particulate emissions (PE) shall not exceed 0.062 lb/mmBtu actual heat input.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-18-06(G)	This emissions unit is exempt from this requirement pursuant to OAC rule 3745-18-06(A). See b)(2)a.
d.	40 CFR Part 63 Subpart ZZZZ (40 CFR 63.6595(a)(1), 63.6603(a), Table 2d #9, and Table 5 #13)	Beginning on October 19, 2013, emissions of carbon monoxide (CO) shall not exceed 47 ppmvd at 15% O ₂ or emissions of CO shall be reduced by 93% or more using an oxidation catalyst.
e.	40 CFR 63.1 through 63.15	Table 8 to Subpart ZZZZ of 40 CFR Part 63 – Applicability of General Provisions to Subpart ZZZZ shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.



(2) Additional Terms and Conditions

- a. This emissions unit is exempt from OAC rule 3745-18-06(G) during any calendar day in which natural gas is the only fuel burned.
- b. The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR Part 63.6603(a)	Emission limitations and operating limitations
Table 2d #9	Emission limitations
40 CFR Part 63.6605	General requirements for compliance
40 CFR Part 63.6665	General provisions
Table 8	General provisions

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR 63.6605	General requirements for compliance.
40 CFR Part 63 Table 5 #13	Installation of CPMS to monitor catalyst inlet temperature according to 40 CFR 63.6625(b), or installation of equipment to automatically shut down engine if the catalyst inlet temperature exceeds 1350 degrees Fahrenheit.
40 CFR 63.6625(h)	Time spent at idle during start up and the engine's start up time shall be minimized to a time period not to exceed 30 minutes.

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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:



Effective Date: To be entered upon final issuance

Applicable Rule	Requirement
40 CFR Part 63.6625(b) and Table 5 #13	CPMS monitoring, installation, collection, operation, and maintenance requirements unless using equipment to automatically shut down engine is catalyst inlet temperature exceeds 1350 degrees Fahrenheit
Table 5 #13	Demonstrating initial compliance with emission limitations and operating limitations
40 CFR Part 63.6635	Monitoring and data collection
Table 6 #14	Demonstrating continuous compliance with emission limitations, operating limitations, work practices, and management practices
40 CFR Part 63.6655	Required record keeping
40 CFR Part 63.6660	Required form of records and required records retention

e) Reporting Requirements

- (1) 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR Part 63.6640(b)	Report deviations of emission or operating limitations
40 CFR Part 63.6640(e)	Report instances in which the applicable requirements in Table 8 to Subpart ZZZZ were not met.
40 CFR Part 63.6645	Required notifications
40 CFR Part 63.6650	Required reports
Table 7 #3	Requirements for compliance report

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:

PE shall not exceed 0.062 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.0000771 lb/mmBtu. This emission factor is specified in U.S.EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.2, Table 3.2-2 (7/00).



Effective Date: To be entered upon final issuance

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

Beginning on October 19, 2013, emissions of CO shall not exceed 47 ppmvd at 15% O₂ or emissions of CO shall be reduced by 93% or more using an oxidation catalyst.

Applicable Compliance Method:

Compliance shall be demonstrated as specified in 40 CFR Part 63, Subpart ZZZZ.

- (2) The permittee shall demonstrate ongoing compliance as required pursuant to 40 CFR Part 63, Subpart ZZZZ, including the following sections:

Applicable Rule	Requirement
40 CFR Part 63.6612(a)	Required date for initial performance tests
40 CFR Part 63.6620 and Table 4 #3	Requirements for performance tests
40 CFR Part 63.6630(e) and Table 5 #13	Demonstrating initial compliance with emission limitations and operating limitations
40 CFR Part 63.6640(c) and Table 6 #14	Demonstrating continuous compliance with emission limitations, operating limitations, works practices, and management practices

g) Miscellaneous Requirements

- (1) None.



Effective Date: To be entered upon final issuance

3. Emissions Unit Group – Emergency Generators: B004, B005

EU ID	Operations, Property and/or Equipment Description
B004	Emergency generator: LeRoi RXIS, serial no. 230199, 4-stroke rich burn, natural gas fired reciprocating internal combustion engine (RICE) having a maximum capacity of 1.9 mmBTU/hr (165 BHP). Compressor no.155G1.
B005	Emergency generator: LeRoi RXIS, serial no. 230200, 4-stroke rich burn, natural gas fired reciprocating internal combustion engine (RICE) having a maximum capacity of 1.9 mmBTU/hr (165 BHP). Compressor no.155G2.

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 3745-17-11(B)(5)(a)	Particulate emissions (PE) shall not exceed 0.310 lb/mmBtu actual heat input.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-18-06(G)	This emissions unit is exempt from this requirement pursuant to OAC rule 3745-18-06(B). See b)(2)a.
d.	40 CFR Part 63, Subpart ZZZZ	Following the compliance date of October 19, 2013, the permittee shall demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ.
e.	40 CFR 63.1 through 63.15	Table 8 to Subpart ZZZZ of 40 CFR Part 63 – Applicability of General Provisions to Subpart ZZZZ shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.



Effective Date: To be entered upon final issuance

(2) Additional Terms and Conditions

- a. This emissions unit is exempt from OAC rule 3745-18-06(G) because the emissions unit's rated heat input capacity is less than 10 mmBtu/hr.
- b. The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR Part 63.6605	General requirements for compliance.
40 CFR Part 63.6625(e)	Maintenance requirements.

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR Part 63.6603(a) and Table 2d #5	<p>Change oil and filter every 500 hours of operation or annually, whichever comes first. Alternatively, the permittee shall utilize an oil analysis program as described in 40 CFR 63.6625(j);</p> <p>Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and</p> <p>Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.</p>
40 CFR Part 63.6625(h)	Time spent at idle during start up and the engine's start up time shall be minimized to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
40 CFR Part 63.6625(f)	The engine shall be equipped with a non-resettable hour meter.



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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR Part 63.6625(j)	Option of utilizing an oil analysis program.
40 CFR Part 63.6655	Record keeping requirements.

e) Reporting Requirements

- (1) 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
Footnote 2 of Table 2d	Reporting failure to perform the management practice requirements according to the schedule required in Table 2d.
40 CFR Part 63.6640(b)	Reporting deviations.
40 CFR Part 63.6640(e)	Report instances in which the applicable requirements in Table 8 to Subpart ZZZZ were not met.

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:

PE shall not exceed 0.310 lb/mmBtu of actual heat input.



Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.0095 lb/mmBtu. This emission factor is specified in U.S.EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.2, Table 3.2-3 (7/00).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall demonstrate ongoing compliance as required pursuant to 40 CFR Part 63, Subpart ZZZZ, including the following sections:

Applicable Rule	Requirement
40 CFR Part 63.6640(a) and Table 6 #9	Demonstrating continuous compliance.

g) Miscellaneous Requirements

- (1) None.



4. P001, Natural Gas Dehydrator System

Operations, Property and/or Equipment Description:

Natural gas dehydration system rated at 0.83 mmscf/hr equipped with two absorber towers with triethylene glycol (use one tower at suction side of RICE or one tower at exhaust side of RICE), a 1.0 mmBTU/hr Hanover Smith reboiler (serial no. 4851) and a 2.8 mmBTU/hr NatCo SHV-4 flare (serial no. EL2F05803-01) with a destruction efficiency of 95%

- 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(D), (PTI 02-22388) (synthetic minor to avoid MACT requirements)	Volatile organic compounds (VOC) emissions from the absorber unit shall not exceed 0.94 lb/hr and 4.11 tons/year. Benzene (a single Hazardous Air Pollutant) emissions from the absorber unit shall not exceed 0.25 lb/hr and 1.11 tons/year. Total combined HAPs emissions from the absorber unit shall not exceed 0.58 lb/hr and 2.53 tons/year. Emissions from the combustion of natural gas in the reboiler and flare shall not exceed 1.11 lbs carbon monoxide (CO)/hour, 4.88 tons CO/year, 0.29 lb nitrogen oxides (NO _x)/hour and 1.27 tons NO _x /year. See b)(2)a through b)(2)e.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the reboiler exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except for a period of not more than 6



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		consecutive minutes in any 60-minute period. Visible particulate emissions shall not exceed 60% opacity, as a 6-minute average, at any time.
c.	OAC rule 3745-17-10(B)	Particulate emissions (PE) from the reboiler exhaust stack shall not exceed 0.020 lb/mmBtu of actual heat input.
d.	40 CFR 60.18(b)	See b)(2)b through b)(2)e.

(2) Additional Terms and Conditions

- a. This emissions unit shall be equipped with a flare to control organic compound emissions. The flare shall be fired with natural gas and shall be operated with a minimum 95% destruction efficiency.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(A)(1)]

- b. The flare shall be designed and operated in a manner that will ensure no visible emissions, as determined by 40 CFR 60.18(f), except for periods not to exceed a total of five (5) minutes during any two consecutive hours.

[Authority for term: 40 CFR 60.18(c)(1), PTI 02-22388 and OAC rule 3745-77-07(A)(1)]

- c. The flare shall be operated at all times when emissions may be vented to it, as determined by methods specified in 40 CFR 60.18(f).

[Authority for term: 40 CFR 60.18(e), PTI 02-22388 and OAC rule 3745-77-07(A)(1)]

- d. The flare shall be used only when the net heating value of the gas being combusted is 200 Btu/scf or greater. The net heating value of the gas being combusted shall be determined by methods specified in 40 CFR 60.18(f).

[Authority for term: 40 CFR 60.18(c)(3)(ii), PTI 02-22388 and OAC rule 3745-77-07(A)(1)]

- e. The flare shall be designed for and operated with an exit velocity that satisfies the requirements of 40 CFR 60.18.

[Authority for term: 40 CFR 60.18(c)(3)(ii), PTI 02-22388 and OAC rule 3745-77-07(A)(1)]



c) Operational Restrictions

- (1) The permittee shall burn only natural gas in the reboiler and in the flare of this emissions unit.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(A)(1)]

- (2) The reboiler shall not be operated above its rated capacity of 1.0 mmBtu/hr and the flare shall not be operated above its rated capacity of 2.78 mmBtu/hr.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(A)(1)]

- (3) A pilot flame shall be maintained at all times in the flare's pilot burner.

[Authority for term: 40 CFR 60.18(c)(2), PTI 02-22388 and OAC rule 3745-77-07(A)(1)]

- (4) Only one absorber may be used at any time.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate and maintain a device (thermocouple or other equivalent device) to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder associated with it shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual.

[Authority for term: 40 CFR 60.18(f)(2), PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall record the following information each month:

- a. all periods during which there is no pilot flame; and
- b. the operating times for the flare, monitoring equipment, and the associated emissions unit.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

- (3) To ensure the flare operates within 40 CFR 60.18, the permittee shall maintain flare manufacturer design records including (but not limited to):

- a. average heat content of flare vent exhaust stream calculated from GRI GLY-Calc regenerator vent compositions' calorific value (BTU) including assist gas (if applicable); and
- b. maximum flare exhaust exit velocity calculated from GRI Gly-Calc regenerator vent flow rate and cross sectional area of flare tip.



Considering this demonstration is derived from the maximum design characteristics of the flare, the permittee is only required to re-evaluate flare operation per 40 CFR 60.18 if the flare or method of operation is modified from the original maximum design specifications.

[Authority for term: 40 CFR 60.18(d), PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall record when a fluid, other than glycol, is used in the dehydrator.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) For each day during which the permittee uses any material other than glycol in the absorbers, the permittee shall maintain a record of the type and quantity of material employed in this emissions unit.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from the flare, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the reboiler stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from the reboiler stack, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and



- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall report the use of any material other than glycol in the absorbers within 30 days after the occurrence.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in the reboiler and/or flare. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit semiannual deviation (excursion) reports that identify all periods during which the pilot flame or control flare was not functioning properly and the emissions unit was not shut down. These reports shall include the date, time, and duration of each such incident and shall be submitted to the Ohio EPA, Northeast District Office, by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the flare serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the reboiler stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA,



Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

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:

95% destruction efficiency of the flare control.

Applicable Compliance Method:

If the flare complies with the control requirements specified in sections b)(2)b, b)(2)d and b)(2)e of these terms and conditions and the requirements of 40 CFR Part 60.18, it is assumed that compliance with the 95% destruction efficiency will be maintained.

[Authority for term: OAC rule 3745-15-04(A), PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

VOC emissions from the absorber unit shall not exceed 0.94 lb/hr and 4.11 tons/year.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined by employing the Gas Research Institute's simulation program GLY Calc version 4 or equivalent, wet gas analyses of the gases from the storage field or transmission lines associated with the natural gas compressor station, AP-42 emission factors for products of combustion, operational time for the emissions unit, and an assumed destruction efficiency of 95% for the flare.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

Benzene (a single Hazardous Air Pollutant) emissions from the absorber unit shall not exceed 0.25 lb/hr and 1.11 tons/year.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined by employing the Gas Research Institute's simulation program GLY Calc version 4 or equivalent, wet gas analyses of the gases from the storage field or



transmission lines associated with the natural gas compressor station, AP-42 emission factors for products of combustion, operational time for the emissions unit, and an assumed destruction efficiency of 95% for the flare.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

Total combined HAPs emissions from the absorber unit shall not exceed 0.58 lb/hr and 2.53 tons/year.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined by employing the Gas Research Institute's simulation program GLY Calc version 4 or equivalent, wet gas analyses of the gases from the storage field or transmission lines associated with the natural gas compressor station, AP-42 emission factors for products of combustion, operational time for the emissions unit, and an assumed destruction efficiency of 95% for the flare.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

Emissions from the combustion of natural gas in the reboiler and flare shall not exceed 1.11 lbs CO/hour, 4.88 tons CO/year, 0.29 lbNO_x/hour and 1.27 tons NO_x/year.

Applicable Compliance Method:

CO and NO_x emissions from the combustion of natural gas in the reboiler and flare are calculated using the maximum ratings of the reboiler and flare, and 8,760 hours per year. As long as the maximum ratings are not exceeded, compliance with the emission limitations is demonstrated.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

Visible particulate emissions from the reboiler exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except for a period of not more than 6 consecutive minutes in any 60-minute period. Visible particulate emissions shall not exceed 60% opacity, as a 6-minute average, at any time.



Applicable Compliance Method:

Compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

g. Emission Limitation:

The flare shall be designed and operated in a manner that will ensure no visible emissions, as determined by 40 CFR 60.18(f), except for periods not to exceed a total of five (5) minutes during any two consecutive hours.

Applicable Compliance Method:

Method 22 of 40 CFR Part 60, Appendix A shall be used to demonstrate the compliance of flares with the visible particulate emission provisions. The observation period is 2 hours and shall be used according to Method 22.

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]

h. Emission Limitation:

PE from the reboiler exhaust stack shall not exceed 0.020 lb/mmBtu of actual heat content.

Applicable Compliance Method:

Compliance shall be determined by multiplying an emission factor of 1.9 lbs of particulates/mmscf by the emissions unit's maximum hourly natural gas firing capacity of 0.001 mmscf/hr and dividing by the emissions unit's rated heat input capacity of 1.0 mmBtu/hr.

The emission factor of 1.9 lbs particulates/mmscf is found in U.S.EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

The maximum hourly natural gas firing capacity is calculated by dividing the rated maximum heat input capacity of 1.0 mmBtu/hr by the heat content of the natural gas reported as 1,000 Btu/scf.

If required pursuant to OAC rule 3745-15-04, the permittee shall demonstrate compliance with the particulate emission limitation of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources," Appendix A, Methods 1 through 5, and in OAC rule 3745-17-03(B)(9).

[Authority for term: PTI 02-22388 and OAC rule 3745-77-07(C)(1)]



Proposed Title V Permit
BRINKER COMPRESSOR STATION

Permit Number: P0108874

Facility ID: 0215050202

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g) Miscellaneous Requirements

(1) None.