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

1/6/2014

Certified Mail

Mr. Joe Morgan
PAVONIA COMPRESSOR STATION
Environmental Permitting, 4th Floor
1700 MacCorkle Avenue, S.E.
Charleston, WV 25314

Facility ID: 0370000226
Permit Number: P0115649
County: Richland

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 11/26/2013. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Northwest District Office

Response to Comments

Facility ID:	0370000226
Facility Name:	PAVONIA COMPRESSOR STATION
Facility Description:	Natural Gas Compressor station
Facility Address:	Environmental Affairs Department 1700 MacCorkle Avenue, S.E. Charleston, WV 25325 Richland County
Permit:	P0115649, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Mansfield News-Journal on 11/29/2013. The comment period ended on 12/29/2013.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

a. Comment: None

b. Response: None

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
PAVONIA COMPRESSOR STATION

Facility ID:	0370000226
Permit Number:	P0115649
Permit Type:	Renewal
Issued:	1/6/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
PAVONIA COMPRESSOR STATION

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance 6
4. Risk Management Plans 7
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 9
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 11
17. Off-Permit Changes 12
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 13
20. Permit to Install Requirement 13
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Records Retention Requirements Under State Law Only 14
26. Inspections and Information Requests 14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements 15
28. Permit Transfers 15

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 15
30. Submitting Documents Required by this Permit 16
B. Facility-Wide Terms and Conditions 17
C. Emissions Unit Terms and Conditions 19
1. B002, HTR3 20
2. B004, HTR2 26
3. P001, RECIP ENGINE/EMERGENCY GENERATOR #067G1 30
4. Emissions Unit Group - A: P004, P005, P006, P007,P008, P009 35
5. Emissions Unit Group -TEG Dehydrators: P002,P003, ... 38

Authorization

Facility ID:	0370000226
Facility Description:	Natural Gas Compressor station
Application Number(s):	A0047462
Permit Number:	P0115649
Permit Description:	Title V Renewal Permit of a Natural Gas Compressor station.
Permit Type:	Renewal
Issue Date:	1/6/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0087492

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

PAVONIA COMPRESSOR STATION
Environmental Affairs Department
1700 MacCorkle Avenue, S.E.
Charleston, WV 25325

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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, Northwest 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

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 recordingsfor 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 submittedscheduled maintenancerequests, 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, Northwest 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, Northwest 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, Northwest 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 permitexcept 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

Officialthat, 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, Northwest 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, Northwest 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 intermittentconsistent 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, Northwest 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, Northwest 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, noemissions unit identified in this permit that has beencertified 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 RequirementsUnder 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 theOhio EPA DAPC, Northwest 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, Northwest 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 RequirementsUnder 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, Northwest 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, Northwest 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.

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 ofan 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, Northwest 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.

B. Facility-Wide Terms and Conditions

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 insignificant emission units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emission unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21and/or 40 CFR Part 60 or 63.

   a) B005 (Heating system Boiler #1 – 3.2 mmBtu/hr)
   b) B006 (Heating System Boiler #2 – 3.2 mmBtu/hr)
   c) B007 (Line Heater #1 – 1.5 mmBtu/hr)

3. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DDDDD. The final rules found in 40 CFR Part 63, Subpart DDDDD establish national emission standards for hazardous air pollutants (NESHAP), operational limits, work practice standards, and compliance requirements for industrial, commercial, and institutional boilers located at a major source of hazardous air pollutants (HAP).

   The following emissions units are designed to only burn gas 1 fuels (subcategory) and therefore are not subject to the emission limits in Tables 1 and 2, or 11 through 13 of the subpart or the operating limits in Table 4 to the subpart. However, the boilers and process heaters are subject to tune-ups requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart; and the existing boilers must be included in the one-time energy assessment, performed in accordance with Table 3 #4 of the subpart). The permittee shall comply with the requirements of this NESHAP for the facility's existing boilers and process heaterno later than January 31, 2016:

   Emissions units B005, B006, B007 and regeneration boilers on P002 and P003.

   [40 CFR Part 63, Subpart DDDDD]

C. Emissions Unit Terms and Conditions

1. B002, HTR3

Operations, Property and/or Equipment Description:

10.0 mmBtu/hr natural gas fired line heater no.3

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) (PTI #03-13048, issued on 5/22/03)	0.2 lb particulate emissions (PE)/hr and 0.88 ton PE/yr 0.007 lb sulfur dioxide (SO_2)/hr and 0.03 ton SO_2/yr 1.0 lb nitrogen oxides (NOx)/hr and 4.4 tons NOx/yr 0.82 lb carbon monoxide(CO)/hr and 3.61 tons CO/yr 0.053 lb volatile organic compounds (VOC)/hr and 0.23 ton VOC/yr The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 17-10(B)(1), 18-06(A), 21-08(B) and 40 CFR Part 60, Subpart Dc.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input
d.	OAC rule 3745-18-06(A)	See b)(2)a.
e.	40 CFR, Part 60, Subpart Dc	See b)(2)b. and d)(2)
f.	40 CFR Part 63 Subpart DDDDD	See b)(2)c., c)(2), d)(3) and e)(2).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 63.7575, this emissions unit is in the 'unit designed to fire Gas 1 fuels' subcategory existing process heater located at a major source of HAP emissions and subject to the applicable emissions limitations/ control requirements specified in this section.]	

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).

b. This regulation does not specify emission limitations for units that only fire natural gas.

c. This emissions unit is subject to the initial notification requirements of 40 CFR, Part 63, Subpart DDDDD (Boiler MACT) as outlined in 63.9(b) and the work practice standards located in Table 3 as outlined in 63.7500 (i.e., it is not subject to the emission limits, performance testing, monitoring, or site-specific monitoring plan requirements of Subpart DDDDD or any other requirements in 40 CFR, Part 63, Subpart A).

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI #03-13048]

(2) The permittee shall comply with the applicable operating requirements pursuant to 40 CFR, Part 63, Subpart DDDDD, including the following sections:

63.7495(b)	compliance date
63.7510(e)	initial compliance demonstration
63.7500(e)	conduct annual tune-up
63.7500(a)(1) - Table 3	one-time energy assessment
63.7545(e) 63.7530(d), 63.7530(e)	notification of compliance

[40 CFR, Part 63, Subpart DDDDD]

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.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 60, Subpart Dc and PTI #03-13048]

(2) The permittee shall collect and record the amount of fuel (natural gas) combusted during each calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

(3) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR, Part 63, Subpart DDDDD, including the following sections:

63.7555(a)(i)	maintain records of startup and shutdown events
63.7555(a)(j)	fuel records for startup and shutdown
63.7560	general recordkeeping requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

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.

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

(2) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR, Part 63, Subpart DDDDD, including the following sections:

63.7550(b), (c) and (h)(3)	annual reporting requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

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:
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
The permittee may demonstrate compliance with the lb PE/mmBtu allowable limitation above by multiplying the emission factor of 1.9 lbs PE (filterable)/mm cu.ft. of natural gas [from AP-42, Table 1.4-2 (revised 7/98)] by the emissions unit's maximum hourly natural gas consumption rate (10,000 cu.ft./hr), and then dividing by the maximum heat input rate of the emissions unit (10 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the PE limitation above pursuant to OAC rule 3745-17-03(B)(9).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048}

b. Emission Limitations:
0.2 lb PE/hr and 0.88 ton/yr PE

Applicable Compliance Method:
The permittee may demonstrate compliance with the hourly allowable PE emission limitation by multiplying the emission factor of 1.9 lbs PE/mm cu. ft. of natural gas [from AP-42, Table 1.4-2 (revised 7/98)] by the maximum natural gas consumption rate of 10,000 cu. ft./hr.

If required, the permittee shall demonstrate compliance with the hourly PE limitation above pursuant to Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable PE limitation shall be demonstrated as long as compliance with the hourly allowable PE emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 , and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

c. Emission Limitations:
0.007 lb SO_2/hr and 0.03 ton/yr SO_2

Applicable Compliance Method:
Compliance with the hourly allowable SO_2 emission limitation may be determined by multiplying the emission factor of 0.00071 lb SO_2/mmBtu (based on the estimate of 0.25 grain of sulfur per 100 standard cubic feet of natural gas) by the maximum heat input capacity to the boiler (10 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the hourly allowable SO_2 limitation pursuant to Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable SO2 emission limitation shall be demonstrated as long as compliance with the hourly allowable SO2 emission

limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 , and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

d. Emission Limitations:
1.0 lbNOx/hr and 4.4 tons/yrNOx

Applicable Compliance Method:
The permittee may demonstrate compliance with the hourly allowable NOx emission limitation by multiplying the emission factor of 100 lbsNOx/mm cu. ft. of natural gas [from AP-42, Table 1.4-1 (revised 7/98)] by the maximum natural gas consumption rate of 10,000 cu. ft./hr.

If required, the permittee shall demonstrate compliance with the hourly NOx limitation pursuant to Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable NOx limitation shall be demonstrated as long as compliance with the hourly allowable NOx emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 , and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

e. Emission Limitations:
0.82 lbs CO/hr and 3.61 tons/yr CO

Applicable Compliance Method:
The permittee may demonstrate compliance with the hourly allowable CO emission limitation by multiplying the emission factor of 84 lbs CO/mm cu. ft. of natural gas [from AP-42, Table 1.4-1 (revised 7/98)] by the maximum natural gas consumption rate of 10,000 cu. ft./hr.

If required, the permittee shall demonstrate compliance with the hourly CO limitation pursuant to Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable CO limitation shall be demonstrated as long as compliance with the hourly allowable CO emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 , and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

f. Emission Limitations:
0.053 lb VOC/hr and 0.23 ton/yr VOC

Applicable Compliance Method:
The permittee may demonstrate compliance with the hourly allowable VOC emission limitation by multiplying the emission factor of 5.5 lbs VOC/mm cu. ft. of

natural gas [from AP-42, Table 1.4-2 (revised 7/98)] by the maximum natural gas consumption rate of 10,000 cu. ft./hr.

If required, the permittee shall demonstrate compliance with the hourly VOC limitation pursuant to Methods 1 - 4 and 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable VOC limitation shall be demonstrated as long as compliance with the hourly allowable VOC emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 , and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

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

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

g) Miscellaneous Requirements

(1) None.

2. B004, HTR2

Operations, Property and/or Equipment Description:

LINE HEATER: A NATURAL GAS-FIRED INDIRECT PROCESS HEATER

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) (PTI #03-1771, issued on 7/22/98)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-10(B)(1), 3745-17-07(A), 3745-18-06(A), and 3745-21-08(B).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input
d.	OAC rule 3745-18-06(A)	See b)(2)a.
e.	40 CFR, Part 60, Subpart Dc	See b)(2)b. and d)(2)
f.	40 CFR Part 63 Subpart DDDDD [In accordance with 63.7575, this emissions unit is in the 'unit designed to fire Gas 1 fuels' subcategory existing process heater located at a major source of HAP emissions and subject to the applicable emissions limitations/ control requirements specified in this section.]	See b)(2)c., c)(2), d)(3) and e)(2).

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).

b. This regulation does not specify emission limitations for units that only fire natural gas.

c. This emissions unit is subject to the initial notification requirements of 40 CFR, Part 63, Subpart DDDDD (Boiler MACT) as outlined in 63.9(b) and the work practice standards located in Table 3 as outlined in 63.7500 (i.e., it is not subject to the emission limits, performance testing, monitoring, or site-specific monitoring plan requirements of Subpart DDDDD or any other requirements in 40 CFR, Part 63, Subpart A).

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI #03-1771]

(2) The permittee shall comply with the applicable operating requirements pursuant to 40 CFR, Part 63, Subpart DDDDD, including the following sections:

63.7495(b)	compliance date
63.7510(e)	initial compliance demonstration
63.7500(e)	conduct annual tune-up
63.7500(a)(1) - Table 3	one-time energy assessment
63.7545(e) 63.7530(d), 63.7530(e)	notification of compliance

[40 CFR, Part 63, Subpart DDDDD]

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.

[OAC rule 3745-77-07(C)(1) and PTI #03-1771]

(2) The permittee shall collect and record the amount of fuel (natural gas) combusted during each calendar month.

[OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR, Part 63, Subpart DDDDD, including the following sections:

63.7555(a)(i)	maintain records of startup and shutdown events
63.7555(a)(j)	fuel records for startup and shutdown
63.7560	general recordkeeping requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

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.

[OAC rule 3745-77-07(C)(1) and PTI #03-1771]

(2) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR, Part 63, Subpart DDDDD, including the following sections:

63.7550(b), (c) and (h)(3)	annual reporting requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

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. <u>Emission Limitation:</u>
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
The permittee may demonstrate compliance with the lb PE/mmBtu allowable limitation above by multiplying the emission factor of 1.9 lbs PE (filterable)/mm cu.ft. of natural gas [from AP-42, Table 1.4-2 (revised 7/98)] by the emissions unit's maximum hourly natural gas consumption rate (10,000 cu.ft./hr), and then dividing by the maximum heat input rate of the emissions unit (10 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the PE limitation above pursuant to OAC rule 3745-17-03(B)(9).

[OAC rule 3745-77-07(C)(1) and PTI #03-1771]

b. <u>Emission Limitation:</u>
Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-1771]

g) Miscellaneous Requirements

(1) None.

3. P001, RECIP ENGINE/EMERGENCY GENERATOR #067G1

Operations, Property and/or Equipment Description:

3.1 mmBtu/hr Natural Gas Fired Generator

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) (PTI# 03-10822, issued on 5/13/03)	0.25 lb particulate emissions (PE)/mmBtu of actual heat input 12.1 lbs nitrogen oxides (NOx)/hr and 24.1 tons NOx/yr 0.19 lb sulfur dioxide (SO2)/hr and 0.4 ton SO2/yr 11.53 lbs carbon monoxide (CO)/hr and 23.0 tons CO/yr The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 17-11(B)(5)(b).
b.	OAC rule 3745-17-11(B)(5)(a)	See b)(2)a.
c.	OAC rule 3745-17-07 (A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-18-06(G)	See b)(2)b.
e.	40 CFR, Part 63, Subpart ZZZZ (40 CFR 63.6580-6675)	The existing, stationary, natural gas, reciprocating internal compression engine (RICE) located at a major source for hazardous air pollutants (HAPs), shall meet the requirements of 40 CFR, Part 63, Subpart ZZZZ

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

b. Since natural gas is the only fuel fired in this emissions unit, it is exempt from the sulfur dioxide emission limitation in OAC rule 3745-18-06(G), pursuant to OAC rule 3745-18-06(A).

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1)]

(2) The maximum annual operating hours for this emissions unit shall not exceed 3981.

[OAC rule 3745-77-07(A)(1)]

(3) The permittee shall comply with the applicable operating requirements pursuant to 40 CFR, Part 63, Subpart ZZZZ, including the following sections:

63.6602 – Table 2c	a. oil and filter changes b. inspection of spark plugs c. inspection of all hoses and belts
63.6625(h)	idle and startup requirements
63.6625(f)	installation of non-resettable hour meter

[40 CFR, Part 63, Subpart ZZZZ]

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.

[OAC rule 3745-77-07(C)(1)]

(2) The permittee shall maintain annual records of the operating hours for this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-10822]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit annual reports which identify any exceedances of the 3981 operating hours limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

[OAC rule 3745-77-07(C)(1) and PTI #03-10822]

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:
0.25 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
The permittee shall determine compliance with the PE limitation above based on an emission factor from AP-42, Table 3.2-3 (revised 7/00) of 0.0095 lb PE (filterable)/mmBtu of actual heat input.

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with methods specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1) and PTI #03-10822]

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

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-10822]

c. Emission Limitation:
0.19 lb SO_2/hr, 0.4 ton SO_2/yr

Applicable Compliance Method:
The permittee shall determine compliance with the hourly SO_2 emission limitation by multiplying the appropriate emission factor from AP-42, Table 3.2-3 by the maximum hourly heat input rate (3.1mmBtu/hr).

If required, compliance with the hourly allowable SO_2 emission limitation shall be determined in accordance with Methods 1 through 4 and 6 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly allowable SO_2 emission limitation, compliance with the annual limitation shall be demonstrated (the annual allowable limitation was developed by multiplying the hourly allowable limitation by 3981, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-10822]

d. Emission Limitations:
12.1 lbsNOx/hr, 24.1 tons NOx/yr

Applicable Compliance Method:
The permittee shall determine compliance with the hourly NOx emission limitation by multiplying the appropriate emission factor from AP-42, Table 3.2-3 (revised 7/00) by the maximum hourly heat input rate (3.1 mmBtu/hr).

If required, compliance with the hourly allowable NOx emission limitation shall be determined in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly allowable NOx emission limitation, compliance with the annual limitation shall be demonstrated (the annual allowable limitation was developed by multiplying the hourly allowable limitation by 3981, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-10822]

e. Emission Limitations:
11.53 lbs CO/hr and 23.0 tons CO/yr

Applicable Compliance Method:
The permittee shall determine compliance with the hourly CO emission limitation by multiplying the appropriate emission factor from AP-42, Table 3.2-3 (revised 7/00) by the maximum hourly heat input rate (3.1 mmBtu/hr).

If required, compliance with the hourly allowable CO emission limitation shall be determined in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly allowable CO emission limitation, compliance with the annual limitation shall be demonstrated(the annual allowable

limitation was developed by multiplying the hourly allowable limitation by 3981, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-10822]

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group - A: P004, P005, P006, P007,P008, P009

EU ID	Operations, Property and/or Equipment Description
P004	NG Fired RICE Compressing Natural Gas (19.1 mmBtu/hr)
P005	NG Fired RICE Compressing Natural Gas (19.1 mmBtu/hr)
P006	RECIP ENGINE/INTEGRAL COMPR #06703
P007	NG Fired RICE Engines Compressing Natural NG 14.8 mmBtu/hr
P008	NG Fired RICE Engines Compressing Natural NG 14.8 mmBtu/hr
P009	NG Fired RICE Compressing Natural Gas (19.1 mmBtu/hr)

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)	0.062 lb particulate emissions (PE)/mmBtu of actual heat input
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-18-06(G)	See b)(2)a.
d.	40 CFR, Part 63, Subpart ZZZZ (40 CFR 63.6580-6675) [In accordance with 40 CFR 63.6590 (a)(1)(i), these emissions units are all existing stationary reciprocating internal combustion engines with a site rating of more than 500 brake HP.]	See b)(2)b.

(2) Additional Terms and Conditions

a. Since natural gas is the only fuel fired in this emissions unit, it is exempt from the sulfur dioxide emission limitation in OAC rule 3745-18-06(G), pursuant to OAC rule 3745-18-06(A).

b. These emissions units do not have to meet the requirement of this subpart and of subpart A in accordance with 40 CFR 63.6590(b)(3) because it is an existing spark ignition 2 stroke lean burn (2SLB) stationary reciprocating internal combustion engine (RICE) with a site rating of more than 500 brake horsepower at a major source. In addition, no initial notification is required.

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1)]

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.

[OAC rule 3745-77-07(C)(1)]

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.

[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 Limitations:
0.062 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
The permittee shall determine compliance with the PE limitation above based on an emission factor from AP-42, Table 3.2-1 (revised 7/00) of 0.0384 lb PE (filterable)/mmBtu of actual heat input.

If required, the permittee shall demonstrate compliance with the PE limitations above in accordance with Methods in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]

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

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -TEG Dehydrators: P002,P003,

EU ID	Operations, Property and/or Equipment Description
P002	Triethylene glycol natural gas dehydrator no.1 with regeneration boiler and thermal oxidizer
P003	Triethylene glycol natural gas dehydrator no. 2 with regeneration boiler and thermal oxidizer

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) d)(5), d)(6) and d)(7).

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) (PTI #03-13048, issued on 5/22/03)	<u>Emissions from the Thermal OxidizerStack (stack T01):</u> 0.007 lb particulate emissions (PE/)hr and 0.03 ton PE/yr 0.001 lb sulfur dioxide (SO_2)/hr and 0.005 ton SO_2/yr 0.11 lb nitrogen oxides (NOx)/hr and 0.48 ton NOx/yr 0.59 lb carbon monoxide (CO)/hr and 2.58 tons CO/yr 2.1 lb volatile organic compounds (VOC)/hr and 5.0 tons VOC/yr 2.08 tons benzene/yr 0.103 ton hexane/yr 2.04 tons toluene/yr <u>Emissions from Regeneration Boiler Stack (stack BL3):</u>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.05 lb PE/hr and 0.2 ton PE/yr 0.002 lb SO2/hr and 0.009 ton SO2/yr 0.2 lbNOx/hr and 0.9 ton NOx/yr 0.19 lb CO/hr and 0.81 ton CO/yr 0.012 lb VOC/hr and 0.05 ton VOC/yr See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-10(B)	0.020 lb PE/mmBtu of actual heat input (for stack BL3)
c.	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20% opacity, as a six minute average, except as provided by rule (for stack BL3). See b)(2)h. (for thermal oxidizer stack T01)
d.	OAC rule 3745-17-11(B)	See b)(2)f. (for stack T01)
e.	OAC rule 3745-18-06(A)	See b)(2)c. (for the boiler stack BL3).
f.	OAC rule 3745-18-06(E)	See b)(2)d. (for stack T01).
g.	OAC rule 3745-21-07(M)	See b)(2)e.
h.	40 CFR Part 63, Subpart HHH (40 CFR, 63.1270-1286) [In accordance with 40 CFR 63.1270(a) and (b), these emission units are glycol dehydration units at a natural gas transmission and storage facility.]	See b)(2)h., c)(3), d)(4), e)(3) and f)(4)
i.	40 CFR 63. 1-15 (40 CFR 63.1274(a)	Table 2 of 40 CFR, Part 63, Subpart HHH- Applicability of General Provisions to Subpart HHH shows which parts of the General Provisions in 40 CFR 63. 1-15 apply
j.	40 CFR Part 63, Subpart DDDDD [In accordance with 63.7575, the regeneration boiler included on the TEG dehydrator system is in the 'unit designed to fire Gas 1 fuels' subcategory as an existing process heater located at a major source of HAP emissions and subject to the applicable emissions limitations/	See c)(4), d)(5) and e)(4)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	control requirements specified in this section.]	

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-(10)(B) and 3745-17-07(A), 3745-18-06(A) and 3745-18-06(E) and 40 CFR, Part 63, Subpart HHH.

b. The exhaust gases from the natural gas dehydrators, emission units P002 and P003, shall be vented, through a closed-vent system, to a thermal oxidizer (TO) that shall be capable of reducing the emissions of VOCs and HAPs by, at minimum, 95%, by weight.

[The closed-vent system shall be designed and operated with no detectable emissions.]

c. Since natural gas is the only fuel fired in this emissions unit. it is exempt from the sulfur dioxide emission limitation in OAC rule 3745-18-06(G), pursuant to OAC rule 3745-18-06(A).

d. There are no sulfur dioxide emission limitations established by OAC Chapter 3745-18 for equipment associated with this emissions unit that are not considered "fuel burning equipment" because the process weight rate is less than 1,000 pounds/hour.

e. This emissions unit is exempt from the requirements of OAC rule 3745-21-07(M)(2) pursuant to OAC rule 3745-21-07(M)(c)(iii).

f. The uncontrolled mass rate of PE* from Stack TO1 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. "Process weight" is defined in OAC rule 3745-17-01 (B)(14).

* The burning of natural gas is the only source of PE from this emissions unit.

g. The emissions from Stack T01 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.

h. The permittee shall comply with all applicable requirements of 40 CFR, Part 63, Subpart HHH, including the following sections:

63.1274(a)	general provisions
63.1274(b)	reports sent to Administrator at

	appropriate address listed in 63.13
63.1274(c)	monitoring, control, recordkeeping, and reporting requirements
63.1274(e)	requirement to apply for a state operating permit under part 70 or part 71
63.1274(g)	leak repair within a specified time after detection

c) Operational Restrictions

(1) The average combustion temperature within the TO, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1200 degrees Fahrenheit.

[OAC rule 3745-77-07(A)(1) and PTI #03-13048]

(2) The permittee shall follow the written standard operating and maintenance procedures for this emissions unit. These written procedures shall be available for inspection and review by the Director or his authorized representative.

[OAC rule 3745-77-07(A)(1) and PTI #03-13048]

(3) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart HHH, including the following sections:

63.1272(a) through (d)	startup, shutdown, and malfunction plans
63.1275(a)	natural gas throughput and benzene emission applicability
63.1275(c)(2)	reduction of HAPs through process modifications or control equipment
63.1281(a) and (c)	closed-vent system requirements
63.1281(e)	process modification requirements

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart HHH]

(4) The permittee shall comply with the applicable operating requirements pursuant to 40 CFR, Part 63, Subpart DDDDD, including the following sections:

63.7495(b)	compliance date
63.7510(e)	initial compliance demonstration
63.7500(e)	conduct tune-up every 5 years
63.7500(a)(1) - Table 3	one-time energy assessment
63.7545(e)	notification of compliance

63.7530(d), 63.7530(e)	

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart DDDDD]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the TO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of plus or minus 1% accuracy measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations.

a. The permittee shall perform an annual inspection of system components for visible emissions and leaks.

b. The permittee shall visually inspect the system components including, but not limited to, the closed-vent system, the entire length of ductwork, piping, connections to covers and control devices for evidence of visible defects such as holes in ductwork, piping or loose connections that may affect the ability of the system to operate with no detectable emissions. A visible hole, gap, tear, or split in the closed-vent system is defined as a leak and shall be repaired as soon as practicable. A first attempt shall be made no later than 5 calendar days after the leak is detected.

c. Repair of the leak shall be completed no later than 15 calendar days after the leak is detected.

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

(2) The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the TO, when the emissions unit was in operation, was less than 1200 degrees Fahrenheit.

b. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation. The log shall also contain a record of the corrective action taken to repair the operating the equipment; and,

c. A record of all startup, shutdown and malfunction events.

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

(3) The permittee shall use Method 21of 40 CFR, Part 60, Appendix A to test each closed-vent system joint, seam, or other connection for any detectable emissions. For annual leak detection monitoring after the initial leak detection monitoring, the permittee is not required to monitor those closed-vent system components which continuously operate at a pressure below atmospheric pressure or those closed-vent system joints, seams, or

other connections that are permanently or semi-permanently sealed (e.g., a welded joint between two sections of metal pipe or a bolted and gasketed pipe flange).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

(4) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart HHH, including the following sections:

63.1283(a) and (c)	closed vent system inspection and monitoring requirements
63.1283(d)	control device monitoring requirements
63.1284(a) and (b)	recordkeeping requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHH]

(5) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR, Part 63, Subpart DDDDD, including the following sections:

63.7555(a)(i)	maintain records of startup and shutdown events
63.7555(a)(j)	fuel records for startup and shutdown
63.7560	general recordkeeping requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

(6) The permit to install for these emissions units (P002 and P003) were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Benzene

TLV(ug/m3):32,000
Maximum Hourly Emission Rate(lbs/hr):0.95
Predicted 1 Hour Maximum Ground-Level Concentration at the Fence line (ug/m3):35.86
Maximum Acceptable Ground-Level Concentration(MAGLC) (ug/m3): 760

Pollutant: Toluene

TLV (ug/m3): 188,000
Maximum Hourly Emission Rate (lbs/hr): 0.93
Predicted 1 Hour Maximum Ground-Level Concentration at the Fence line (ug/m3):35.02
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4500

[PTI #03-13048]

(7) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters; the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

[PTI #03-13048]

(8) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[PTI #03-13048]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the TO did not comply with the temperature limitation in Section c)(1). The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

(2) The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

(3) The permittee shall submit notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart HHH, per the following sections:

63.1285(a) and (b)	reporting requirements
63.1285(d)	notification of compliance status report
63.1285(e)	periodic reports
63.1285(f)	notification of process change

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHH]

(4) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR, Part 63, Subpart DDDDD, including the following sections:

63.7550(b), (c) and (h)(3)	5 year reporting requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

f) Testing Requirements

(1) Upon request the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC and the thermal oxidizer destruction efficiency requirement of 95%, by weight. [An alternative means of demonstrating compliance is described in term f)(2) below.]

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

b. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for VOC:

i. Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

ii. The test method(s) which must be employed to demonstrate compliance with the 95 percent, by weight, destruction efficiency for VOC's and HAP's.

The destruction efficiency shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

c. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

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

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

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

(2) As an alternative to demonstrating compliance with an emissions test, the permittee may submit a design analysis which includes analysis of the vent stream characteristics and control device operating parameters for the TO. The design analysis shall include the vent stream composition, constituents concentrations, flow rates and shall establish the design minimum and average temperatures in the combustion zone and the combustion zone residence time.

If the permittee and Ohio EPA do not agree on a demonstration of control device performance using a design analysis, then the disagreement shall be resolved using the results of a performance test performed by the permittee in accordance with the methods outlined in term f)(1) above.

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

(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:
Stack TO1 - 0.007 lb PE/hr, 0.03 ton/yr PE

Applicable Compliance Method:

Compliance may be determined by multiplying an emission factor, from AP-42, Table 1.4-2 (revised 7/98), of 1.9 lbsPE(filterable)/mm cu. ft. by a maximum natural gas consumption rate of 3,100 cu. ft./hr

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable PE limitation shall be demonstrated as long as compliance with the hourly allowable PE limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 , and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

b. Emission Limitations:

Stack TO1 - 0.001 lb SO_2/hr, 0.005 ton/yr SO_2

Applicable Compliance Method: The permittee may determine compliance with the hourly allowable SO_2 emission limitation by multiplying a sulfur grain loading of 0.25 gr/100 standard cubic foot (scf) of natural gas [derived from a natural gas sulfur content based on a material balance] by the maximum hourly natural gas consumption rate (3,100 scf/hr), and then dividing by 7000.

If required, the permittee shall demonstrate compliance with the hourly allowable SO_2 emission limitation pursuant to Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable SO_2 limitation shall be demonstrated as long as compliance with the hourly allowable SO_2 emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 , and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

c. Emission Limitations:
Stack TO1 - 0.11 lbNOx/hr, 0.48 ton/yrNOx

Applicable Compliance Method:
The permittee may determine compliance with the hourly allowable NOx emission limitation by multiplying the NOx emission factor of 0.071 lbNOx/mmBtu (the emission factor was derived from the results of emission testing conducted on a similar 1400-degree Fahrenheit TO) by the maximum heat input rate of 3.1 mmBtu/hr.

If required, the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation above pursuant to Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable NOx limitation shall be demonstrated as long as compliance with the hourly allowable NOx emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 , and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

d. Emission Limitations:

Stack T01 - 0.59 lb CO/hr, 2.58 ton/yr CO

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable CO emission limitation by multiplying the CO emission factor of 0.38 lb CO/mmBtu (the emission factor was derived from the results of emission testing conducted on a similar 1400-degree Fahrenheit TO) by the maximum heat input rate of 3.1 mmBtu/hr.

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation pursuant to Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable CO emission limitation shall be demonstrated as long as compliance with the hourly allowable CO emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 , and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

e. Emission Limitations:

Stack TO1- 2.10 lb VOC/hr, 5.0 ton/yr VOC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly VOC emission limitations based upon the results of emission testing conducted in accordance with the requirements specified in section f)(1).

The permittee may also determine compliance with the hourly allowable VOC emission limitation by using the VOC emission estimate software program GLYCalc (version 3) (from the Gas Research Institute) and a pressure of 700 psig and a water flow rate of 20 lbs/hr.

Compliance with the annual allowable VOC limitation shall be demonstrated as long as compliance with the hourly allowable VOC emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 , and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

f. Emission Limitation:

Stack TO1- Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

g. Emission Limitation:

Stack T01 - 2.08 tons benzene/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable benzene emission limitation by employing the GRI's GLYCalc, Version 4.0 computer program utilizing a thermal oxidizer control efficiency of 95 percent, by weight, in addition to the amount of natural gas processed and 8760 hours per year of operation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

h. Emission Limitation:

Stack T01 - 0.103 tonhexane/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable hexane emission limitation by employing the GRI's GLYCalc, Version 4.0 computer program utilizing a thermal oxidizer control efficiency of 95 percent, by weight, in addition to the amount of natural gas processed and 8760 hours per year of operation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

i. Emission Limitation:

Stack T01 - 2.04 tons toluene/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable toluene emission limitation by employing the GRI's GLYCalc, Version 4.0 computer program utilizing a thermal oxidizer control efficiency of 95 percent, by weight, in addition to the amount of natural gas processed and 8760 hours per year of operation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

j. Emission Limitation:

Stack BL3 - 0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

The permittee may determine compliance with the lb PE/mmBtu allowable limitation above by multiplying an emission factor, from AP-42, Table 1.4-2 (revised 7/98), of 1.9 lbs PE (filterable)/mm cu.ft. of natural gas by the emissions unit's maximum hourly natural gas consumption rate (2,250 cu.ft./hr), and then dividing by the maximum heat input rate of the emissions unit (2.25 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the PE limitation above pursuant to OAC rule 3745-17-03(B)(9).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

k. Emission Limitations:

Stack BL3 - 0.05 lb PE/hr, 0.2 ton/yr PE

Applicable Compliance Method:

Compliance may be determined by multiplying an emission factor, from AP-42, Table 1.4-2 (revised 7/98), of 1.9 lbsPE(filterable)/mm cu. ft. by a maximum natural gas consumption rate of 2,250 cu. ft./hr.

If required, the permittee shall demonstrate compliance with the hourly allowable PE emission limitation above pursuant to Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable PE limitation shall be demonstrated as long as compliance with the hourly allowable PE emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 , and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

l. Emission Limitations:

Stack BL3 - 0.002 lb SO_2/hr, 0.009 ton/yr SO_2

Applicable Compliance Method:

The permittee may determine compliance by multiplying a sulfur grain loading of 0.25 gr/100 scf of natural gas [derived from a natural gas sulfur content based on material balance] by the maximum hourly natural gas consumption rate (3,100 scf/hr).

If required, the permittee shall demonstrate compliance with the hourly allowable SO_2 limitation pursuant to Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable SO_2 limitation shall be demonstrated as long as compliance with the hourly allowable SO_2 emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 , and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

m. Emission Limitations:

Stack BL3 - 0.2 lbNOx/hr, 1.0 ton/yrNOx

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable NOx emission limitation by multiplying the emission factor, from AP-42, Table 1.4-1 (revised 7/98), of 100 lbsNOx/mm cu. ft. by the maximum natural gas consumption rate of 2,250 cu. ft./hr.

If required, the permittee shall demonstrate compliance with the hourly NOx emission limitation pursuant to Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable NOx emission limitation shall be demonstrated as long as compliance with the hourly allowable NOx emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 , and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

n. Emission Limitations:

Stack BL3 - 0.19 lb CO/hr, 0.81 ton/yr CO

Applicable Compliance Method:

The permittee may determine compliance with the hourly CO emission limitation by multiplying the emission factor, from AP-42, Table 1.4-1 (revised 7/98), of 84 lbs CO/mm cu. ft. by the maximum natural gas consumption rate of 2,250 cu. ft./hr.

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation pursuant to Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A.

Compliance with the annual allowable CO limitation shall be demonstrated as long as compliance with the hourly allowable CO emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 , and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

o. Emission Limitations:

Stack BL3 - 0.012 lb VOC/hr, 0.05 ton/yr VOC

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable VOC emission limitation by multiplying the emission factor, from AP-42, Table 1.4-2 (revised 7/98), of 5.5 lbs VOC/mm cu. ft. by the maximum natural gas consumption rate of 2,250 cu. ft. /hr.

Compliance with the annual allowable VOC limitation shall be demonstrated as long as compliance with the hourly allowable VOC emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760 , and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

p. Emission Limitation:

Stack BL3 - Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-13048]

(2) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart HHH, including the following sections:

63.1282(b)	no detectable emissions test procedure
63.1282(d)	control device performance test procedure
63.1282(e)	compliance demonstration for control devices performance requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHH]

g) Miscellaneous Requirements

(1) None.