



2/18/2014

Certified Mail

Elizabeth Gayne
 Dominion Transmission Inc - Gilmore Station
 5000 Dominion Blvd
 Glen Allen, VA 23060

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0679000075
 Permit Number: P0116176
 Permit Type: Administrative Modification
 County: Tuscarawas

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

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)3858501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

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



FINAL

**Division of Air Pollution Control
Permit-to-Install**

for

Dominion Transmission Inc - Gilmore Station

Facility ID:	0679000075
Permit Number:	P0116176
Permit Type:	Administrative Modification
Issued:	2/18/2014
Effective:	2/18/2014



Division of Air Pollution Control
Permit-to-Install
for
Dominion Transmission Inc - Gilmore Station

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. Federally Enforceable Standard Terms and Conditions	4
2. Severability Clause	4
3. General Requirements	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting	6
6. Compliance Requirements	6
7. Best Available Technology	7
8. Air Pollution Nuisance	7
9. Reporting Requirements	8
10. Applicability	8
11. Construction of New Sources(s) and Authorization to Install	8
12. Permit-To-Operate Application	9
13. Construction Compliance Certification	9
14. Public Disclosure	10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	10
16. Fees.....	10
17. Permit Transfers	10
18. Risk Management Plans	10
19. Title IV Provisions	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions	13
1. B007, Engine #5	14
2. B008, Engine #6	20



Authorization

Facility ID: 0679000075
Facility Description: Natural gas compressor station
Application Number(s): M0002572
Permit Number: P0116176
Permit Description: Administrative modification of PTI 06-3038 issued on May 28, 1992 to include control and other requirements for toxic air contaminants, emissions testing results, and to update/correct rule authority citations
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 2/18/2014
Effective Date: 2/18/2014

This document constitutes issuance to:

Dominion Transmission Inc - Gilmore Station
656 Gravel Lick Road
Port Washington, OH 43837

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

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

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

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Interim Director



Authorization (continued)

Permit Number: P0116176
Permit Description: Administrative modification of PTI 06-3038 issued on May 28, 1992 to include control and other requirements for toxic air contaminants, emissions testing results, and to update/correct rule authority citations

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

Emissions Unit ID:	B007
Company Equipment ID:	Engine #5
Superseded Permit Number:	06-3038
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B008
Company Equipment ID:	Engine #6
Superseded Permit Number:	06-3038
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Dominion Transmission Inc - Gilmore Station
Permit Number: P0116176
Facility ID: 0679000075
Effective Date: 2/18/2014

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been



necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

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

4. Monitoring and Related Record Keeping and Reporting Requirements

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



and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

- (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted local air agency, 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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- 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 ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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



9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

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

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



- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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



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

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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



Final Permit-to-Install
Dominion Transmission Inc - Gilmore Station
Permit Number: P0116176
Facility ID: 0679000075
Effective Date: 2/18/2014

B. Facility-Wide Terms and Conditions



Final Permit-to-Install
Dominion Transmission Inc - Gilmore Station
Permit Number: P0116176
Facility ID: 0679000075
Effective Date: 2/18/2014

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.



Final Permit-to-Install
Dominion Transmission Inc - Gilmore Station
Permit Number: P0116176
Facility ID: 0679000075
Effective Date: 2/18/2014

C. Emissions Unit Terms and Conditions



1. B007, Engine #5

Operations, Property and/or Equipment Description:

29.4 mmBtu/hr, 4200 HP Dresser Rand TCV10 natural gas-fired, 2-stroke lean-burn reciprocating internal combustion engine (RICE) controlled with an oxidation catalyst with a minimum 50% control efficiency for formaldehyde; administrative modification of PTI 06-3038 issued on May 28, 1992 to include control and other requirements for toxic air contaminants, emissions testing results, and to update/correct rule authority citations

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) c)(2), and d)(4) - d)(6)

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) (administrative modification to PTI 06-3038 issued final May 28, 1992)	Particulate emissions (PE) shall not exceed 4.94 tons per year. The requirements of this rule include compliance with OAC rules 3745-17-07(A), 3745-17-11(B)(5)(b), and 3745-31-10 through 20.
b.	OAC rules 3745-31-10 through 20 (BACT as established in PTI 06-3038 issued final May 28, 1992)	Carbon monoxide (CO) emissions shall not exceed 2.8 grams per horsepower-hour (g/HP-hr) and 25.93 lbs/hr. Nitrogen oxides (NO _x) emissions shall not exceed 2.0 g/HP-hr and 18.52 lbs/hr. Volatile organic compounds (VOC) emissions shall not exceed 0.9 g/HP-hr and 8.33 lbs/hr. CO emissions shall not exceed 113.6 tons per year. NO _x emissions shall not exceed 81.1 tons per year. VOC emissions shall not exceed 36.5



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		tons per year. See b)(2)a.
c.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/mmBtu of actual heat input.
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
e.	OAC rule 3745-18-06(G)	See b)(2)b. below.
f.	40 CFR 63, Subpart ZZZZ	See b)(2)c. below.
g.	OAC rule 3745-110-03	See b)(2)d. below.

(2) Additional Terms and Conditions

- a. Based on the “Prevention of Significant Deterioration” (PSD) analysis conducted to ensure the application of “Best Available Control Technology” (BACT), BACT for this emissions unit has been determined to be use of best engineering/maintenance practices.
- b. This emissions unit is exempt from OAC rule 3745-18-06(G) during any calendar day in which natural gas is the only fuel burned.
- c. This emissions unit is an existing spark ignition, 2SLB stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions. Therefore, the unit does not have to meet the requirements of 40 CFR Part 63, Subpart ZZZZ, and 40 CFR Part 63, Subpart A, including the initial notification requirements specified in 40 CFR 63.6645(d).
[40 CFR 63.6590(b)(3)]
- d. This emissions unit is a new source, as defined in OAC rule 3745-31-01, for which a PTI was issued prior to January 1, 2008. Pursuant to OAC rule 3745-110-02(A)(2)(b), this emissions unit is not subject to OAC rule 3745-110-03(F).

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.
- (2) The permittee shall employ an oxidation catalyst on this emissions unit for the purpose of reducing formaldehyde emissions sufficient to comply with Ohio’s “Toxic Air Contaminant” statute. The oxidation catalyst that shall achieve at least 50% removal efficiency for formaldehyde. The oxidation catalyst shall be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.



d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain records of the following information each month for this emissions unit:
 - a. the hours of operation for this emissions unit; and
 - b. the rolling 12-month hours of operation for this emissions unit.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling 12-month summation of the hours of operation, upon issuance of this permit.

- (3) The permittee shall maintain records of the date of any completed required maintenance to demonstrate compliance with the oxidation catalyst manufacturer's recommendations. Records of any deviations from the manufacturer's recommendations shall also be maintained.
- (4) The permit-to-install (PTI) application for emissions units B007 and B008 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the original PTI application received on September 20, 1991, and in the supplement to the original application received on September 28, 2012. 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 PTI application and the AERMOD model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the AERMOD model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: formaldehyde (acrolein, acetaldehyde)

TLV ($\mu\text{g}/\text{m}^3$): 368 (formaldehyde)

Maximum Hourly Emission Rate (lbs/hr): 3.42 (formaldehyde; after controls)

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 8.73 (after stack height increase)

MAGLC ($\mu\text{g}/\text{m}^3$): 8.76

- (5) 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, 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.

Note: only compounds/pollutants as identified in OAC rule 3745-114-01 at the time of the modification will be subject to re-evaluation.

- (6) 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.
- e) Reporting Requirements
 - (1) The permittee shall submit quarterly deviation (excursion) reports for this emissions unit. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
 - (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.



f) Testing Requirements

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

- a. Emissions Limitation:
 PE shall not exceed 4.94 tons per year.

Applicable Compliance Method:
 Compliance with the annual emissions limitation is demonstrated by the following calculation:

$$\begin{aligned}
 \text{PE(tons/yr)} &= \text{emissions factor for particulate, in lb million Btu X} \\
 &\quad \text{the maximum fuel input rating X 8,760 hours/yr X 1} \\
 &\quad \text{ton/2,000 pounds} \\
 &= 0.0384 \text{ lb/million Btu X 29.4 million Btu/hr X 8,760} \\
 &\quad \text{hours/yr X 1 ton/2,000 pounds} \\
 &= 4.94 \text{ tons}
 \end{aligned}$$

Where:
 0.0384 lb/million Btu
 = emissions factor for particulate from AP-42 Table 3.2-1 (July 2000); and
 29.4 million Btu/hr = maximum fuel input rating of EU B007.

- b. Emissions Limitations:
 CO emissions shall not exceed 2.8 g/HP-hr and 25.93lbs/ hr.

Applicable Compliance Method:
 Compliance with the g/HP-hr and lb/hr emissions limitations has been demonstrated by emissions testing conducted on November 30, 2009 [1.86 g/HP-hr and 16.77 lb/hr].

- c. Emissions Limitations:
 NO_x emissions shall not exceed 2.0 g/HP-hr and 18.52 lbs/hr.

Applicable Compliance Method:
 Compliance with the g/HP-hr and lb/hr emissions limitations has been demonstrated by emissions testing conducted on November 30, 2009 [1.51 g/HP-hr and 13.63 lb/hr].

- d. Emissions Limitations:
 VOC emissions shall not exceed 0.9 g/HP-hr and 8.33lbs/hr.

Applicable Compliance Method:
 Compliance with the g/HP-hr and lb/hr emissions limitations has been demonstrated by emissions testing conducted on November 30, 2009 [0.22 g/HP-hr and 1.94 lb/hr].



- e. Emissions Limitations:
CO emissions shall not exceed 113.6 tons per year.
NO_x emission shall not exceed 81.1 tons per year.
VOC emissions shall not exceed 36.5 tons per year.

Applicable Compliance Method:

Compliance with the annual CO, NO_x, and VOC emission limitations shall be determined by multiplying the tested emission rate for each pollutant, in g/HP-hr from the most recent compliance test by the annual operating rate in d)(2)b., in HP-hours per year, and dividing this value by 453.6 grams per pound and 2,000 pounds per ton.

- f. Emissions Limitation:
PE shall not exceed 0.062 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with the lb/mmBtu emissions limitation is demonstrated by the emissions factor for PE of 0.0384 lb/mm Btu from AP-42 Table 3.2-1 (7/00).

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) None.



2. B008, Engine #6

Operations, Property and/or Equipment Description:

22.4 mmBtu/hr, 3200 HP Dresser Rand TLAD-8 natural gas-fired, 2-stroke lean-burn reciprocating internal combustion engine (RICE)

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) c)(2), and d)(4) – d)(6)

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) (administrative modification to PTI 06-3038 issued final May 28, 1992)	Particulate emissions (PE) shall not exceed 3.74 tons per year. The requirements of this rule include compliance with OAC rules 3745-17-07(A), 3745-17-11(B)(5)(b), and 3745-31-10 through 20.
b.	OAC rules 3745-31-10 through 20 (BACT as established in PTI 06-3038 issued final May 28, 1992)	Carbon monoxide (CO) emissions shall not exceed 2.6 grams per horsepower-hour (g/HP-hr) and 18.33 lbs/hr. Nitrogen oxides (NO _x) emissions shall not exceed 2.0 g/HP-hr and 14.11 lbs/hr. Volatile organic compounds (VOC) emissions shall not exceed 0.8 g/HP-hr and 5.64 lbs/hr. CO emissions shall not exceed 80.4 tons per year. NO _x emissions shall not exceed 61.8 tons per year. VOC emissions shall not exceed 24.7 tons per year. See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/mmBtu of actual heat input.
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
e.	OAC rule 3745-18-06(G)	See b)(2)b. below.
f.	40 CFR 63, Subpart ZZZZ	See b)(2)c. below.
g.	OAC rule 3745-110-03	See b)(2)d. below.

(2) Additional Terms and Conditions

- a. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), BACT for this emissions unit has been determined to be use of best engineering/maintenance practices.
- b. This emissions unit is exempt from OAC rule 3745-18-06(G) during any calendar day in which natural gas is the only fuel burned.
- c. This emissions unit is an existing spark ignition, 2SLB stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions. Therefore, the unit does not have to meet the requirements of 40 CFR Part 63, Subpart ZZZZ, and 40 CFR Part 63, Subpart A, including the initial notification requirements specified in 40 CFR 63.6645(d).
[40 CFR 63.6590(b)(3)]
- d. This emissions unit is a new source, as defined in OAC rule 3745-31-01, for which a PTI was issued prior to January 1, 2008. Pursuant to OAC rule 3745-110-02(A)(2)(b), this emissions unit is not subject to OAC rule 3745-110-03(F).

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain records of the following information each month for this emissions unit:
 - a. the hoursof operation for this emissions unit; and
 - b. therolling 12-month hours of operation for this emissions unit.



This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling 12-month summation of the hours of operation, upon issuance of this permit.

- (3) The permittee shall maintain records of the date of any completed required maintenance to demonstrate compliance with the oxidation catalyst manufacturer's recommendations. Records of any deviations from the manufacturer's recommendations shall also be maintained.
- (4) The permit-to-install (PTI) application for emissions units B007 and B008 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the original PTI application received on September 20, 1991, and in the supplement to the original application received on September 28, 2012. 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 PTI application and the AERMOD model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the AERMOD model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: formaldehyde (acrolein, acetaldehyde)

TLV ($\mu\text{g}/\text{m}^3$): 368 (formaldehyde)

Maximum Hourly Emission Rate (lbs/hr): 3.42 (formaldehyde; after controls)

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 8.73 (after stack height increase)

MAGLC ($\mu\text{g}/\text{m}^3$): 8.76

- (5) 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, 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.

Note: only compounds/pollutants as identified in OAC rule 3745-114-01 at the time of the modification will be subject to re-evaluation.

- (6) 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.

- e) Reporting Requirements
 - (1) The permittee shall submit quarterly deviation (excursion) reports for this emissions unit. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
 - (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

- f) Testing Requirements
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
PE shall not exceed 3.77 tons per year.

 - Applicable Compliance Method:
Compliance with the annual emissions limitation is demonstrated by the following calculation:

 - PE(tons/yr) = emissions factor for particulate, in lb million Btu X the maximum fuel input rating X 8,760 hours/yr X 1 ton/2,000 pounds



$$= 0.0384 \text{ lb/million Btu} \times 22.4 \text{ million Btu/hr} \times 8,760 \text{ hours/yr} \times 1 \text{ ton}/2,000 \text{ pounds}$$
$$= 3.77 \text{ tons}$$

Where:

0.0384 lb/million Btu

= emissions factor for particulate from AP-42 Table 3.2-1 (July 2000); and
22.4 million Btu/hr = maximum fuel input rating of EU B008.

b. Emissions Limitations:

CO emissions shall not exceed 2.6 g/HP-hr and 18.33lbs/ hr.

Applicable Compliance Method:

Compliance with the g/HP-hr and lb/hr emissions limitations has been demonstrated by emissions testing conducted on November 30, 2009 [2.16 g/HP-hr and 15.21 lb/hr].

c. Emissions Limitations:

NO_x emissions shall not exceed 2.0 g/HP-hr and 14.11 lbs/hr.

Applicable Compliance Method:

Compliance with the g/HP-hr and lb/hr emissions limitations has been demonstrated by emissions testing conducted on November 30, 2009 [1.39 g/HP-hr and 9.80 lb/hr].

d. Emissions Limitations:

VOC emissions shall not exceed 0.8 g/HP-hr and 5.64lbs/hr.

Applicable Compliance Method:

Compliance with the g/HP-hr and lb/hr emissions limitations has been demonstrated by emissions testing conducted on November 30, 2009 [0.31 g/HP-hr and 2.15 lb/hr].

e. Emissions Limitations:

CO emissions shall not exceed 80.4 tons per year.
NO_x emission shall not exceed 61.8 tons per year.
VOC emissions shall not exceed 24.7 tons per year.

Applicable Compliance Method:

Compliance with the annual CO, NO_x, and VOC emission limitations shall be determined by multiplying the tested emission rate for each pollutant, in g/HP-hr from the most recent compliance test by the annual operating rate in d)(2)b., in HP-hours per year, and dividing this value by 453.6 grams per pound and 2,000 pounds per ton.

f. Emissions Limitation:

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



Applicable Compliance Method:

Compliance with the lb/mmBtu emissions limitation is demonstrated by the emissions factor for PE of 0.0384 lb/mm Btu from AP-42 Table 3.2-1 (7/00).

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

g. Emissions Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) None.