

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

6/30/2014

Certified Mail

Elizabeth Gayne  
East Ohio Gas - Lesho Compressor Station  
5000 Dominion Blvd  
Glen Allen, VA 23060

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0278002009  
Permit Number: P0117103  
Permit Type: Administrative Modification  
County: Trumbull

Dear Permit Holder:

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

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

**How to appeal this permit**

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

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

## **How to save money, reduce pollution and reduce energy consumption**

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

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NEDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
East Ohio Gas - Lesho Compressor Station**

Facility ID:	0278002009
Permit Number:	P0117103
Permit Type:	Administrative Modification
Issued:	6/30/2014
Effective:	6/30/2014
Expiration:	4/19/2021





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
East Ohio Gas - Lesho Compressor Station

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	5
7. What reports must I submit under this permit? .....	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	10
1. B001, Lesho compressor .....	11





**Final Permit-to-Install and Operate**  
East Ohio Gas - Lesho Compressor Station  
**Permit Number:** P0117103  
**Facility ID:** 0278002009  
**Effective Date:** 6/30/2014

## Authorization

Facility ID: 0278002009  
Application Number(s): M0002829  
Permit Number: P0117103  
Permit Description: Administrative modification to remove NSPS JJJJ requirements and add MACT/GACT Subpart ZZZZ requirements to the permit since engine B001 was manufactured April 6, 2004.  
Permit Type: Administrative Modification  
Permit Fee: \$0.00  
Issue Date: 6/30/2014  
Effective Date: 6/30/2014  
Expiration Date: 4/19/2021  
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

East Ohio Gas - Lesho Compressor Station  
9687 Barclay North Road  
6690 Beta Dr. #214, Mayfield Village Ohio 44143  
Kinsman Twp., OH 44428

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

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

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



**Final Permit-to-Install and Operate**  
East Ohio Gas - Lesho Compressor Station  
**Permit Number:** P0117103  
**Facility ID:** 0278002009  
**Effective Date:** 6/30/2014

## **Authorization (continued)**

Permit Number: P0117103

Permit Description: Administrative modification to remove NSPS JJJJ requirements and add MACT/GACT Subpart ZZZZ requirements to the permit since engine B001 was manufactured April 6, 2004.

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

<b>Emissions Unit ID:</b>	<b>B001</b>
Company Equipment ID:	Lesho compressor
Superseded Permit Number:	P0108366
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
East Ohio Gas - Lesho Compressor Station  
**Permit Number:** P0117103  
**Facility ID:** 0278002009  
**Effective Date:** 6/30/2014

## **A. Standard Terms and Conditions**



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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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



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

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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



**Final Permit-to-Install and Operate**  
East Ohio Gas - Lesho Compressor Station  
**Permit Number:** P0117103  
**Facility ID:** 0278002009  
**Effective Date:** 6/30/2014

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines at Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



**Final Permit-to-Install and Operate**  
East Ohio Gas - Lesho Compressor Station  
**Permit Number:** P0117103  
**Facility ID:** 0278002009  
**Effective Date:** 6/30/2014

## **C. Emissions Unit Terms and Conditions**



**1. B001, Lesho compressor**

**Operations, Property and/or Equipment Description:**

810 HP (6.76 mmBTU/hr) Caterpillar G3512 LE which is a Stationary, 4 stroke lean burn (4SLB), spark ignition (SI) reciprocating internal combustion engine (RICE); more than 500 brake horsepower (bHP); burning natural gas; complying with 40 CFR 63, Subpart ZZZZ Table 2d #8; meeting the definition of a remote stationary RICE in 40 CFR 63.6675; and installed before 6/12/06.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63 Subpart ZZZZ (40 CFR 63.6580 to 63.6675)  In accordance with 40 CFR 63.6585, this emissions unit is a stationary reciprocating internal combustion engine (RICE) subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines.	The existing, natural gas, stationary 4SLB, spark ignition (SI) RICE, located at an area source for hazardous air pollutants (HAPs), shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ.
b.	40 CFR 63.6603(a) and (f)  Table 2d #8 to Subpart ZZZZ	The remote stationary RICE, must comply with the maintenance / operational requirements from the NESHAP for



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		existing 4SLB remote stationary SI RICE, greater than 500 horsepower (HP), and located at an area source of HAP.
c.	OAC rule 3745-17-11(B)(5)	Particulate emissions (PE) shall not exceed 0.062 lb per mmBtu actual heat input.
d.	OAC rule 3745-18-06(G)	Pursuant to OAC rule 3745-18-06(A), this stationary internal combustion engine is exempt from the sulfur dioxide (SO <sub>2</sub> ) emission limitation specified by this rule during any calendar day in which natural gas is the only fuel burned.
e.	OAC rule 3745-17-07(A)	Visible PE from the exhaust stack shall not exceed 20% opacity as a six-minute average, except as provided by rule.
f.	ORC 3704.03(T)	Emissions of nitrogen oxides (NOx) shall not exceed 15.61 tons per year.  Emissions of CO shall not exceed 17.72 tons per year.
g.	OAC rule 3745-31-05(A)(3), as effective 11/30/01.	Compliance with the applicable requirements of 40 CFR Part 63, Subpart ZZZZ  Emissions of volatile organic compounds (VOC) shall not exceed 3.20 tons per year.  PE shall not exceed 1.84 tons per year.  See b)(2)d. and b)(2)e.
h.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06.	See b)(2)e.

(2) Additional Terms and Conditions

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

Applicable Rule	Requirement
40 CFR 63.6595(a)(1)	The compliance date for Part 63 Subpart ZZZZ for existing SI RICE at an area source is 10/19/13.
Applicable Tables from Part 63, Subpart ZZZZ	Compliance requirements in Table 2d #8; continuous compliance in Table 6 #9; general provision from Subpart A in Table 8.



40 CFR 63.6603(a)	Maintain compliance with operational limitations in Table 2d #8 (inspection and maintenance requirements) to Part 63 Subpart ZZZZ.
40 CFR 63.6665	Meet all of the general provisions of Subpart A, from Sections 63.1 through 63.15, that apply to the SI RICE, as identified in Table 8 to Subpart ZZZZ.
40 CFR 63.6603(f)	Must meet the definition of remote stationary RICE in 40 CFR 63.6675.

b. The existing non-emergency SI 4SLB stationary RICE with a site rating of more than 500 HP located at area sources of HAP must meet the definition of remote stationary RICE in 40 CFR 63.6675 on the initial compliance date for the engine, October 19, 2013, in order to be considered a remote stationary RICE under this subpart. The permittee shall reevaluate the status of the stationary RICE every 12 months to document that it meets the definition of a remote stationary RICE. If the evaluation indicates that the stationary RICE no longer meets the definition of remote stationary RICE in 40 CFR 63.6675, the engine must meet all of the requirements for existing non-emergency SI 4SLB stationary RICE, located at an area source of HAP, with a site rating of more than 500 HP, that are not remote stationary RICE within 1 year of the evaluation.

[40 CFR 63.6603(f)]

c. In order to meet the definition of and maintain the status of a Remote stationary RICE, the stationary RICE must meet any of the following criteria\*:

i. the RICE is located in an offshore area that is beyond the line of ordinary low water along that portion of the coast of the United States that is in direct contact with the open seas and beyond the line marking the seaward limit of inland waters; or

ii. the RICE is located on a pipeline segment with 10 or fewer buildings intended for human occupancy and no buildings with four or more stories within 220 yards (200 meters) on either side of the centerline of any continuous 1-mile (1.6 kilometers) length of pipeline. Each separate dwelling unit in a multiple dwelling unit building is counted as a separate building intended for human occupancy; and

the pipeline segment does not lie within 100 yards (91 meters) of either a building or a small, well-defined outside area (such as a playground, recreation area, outdoor theater, or other place of public assembly) that is occupied by 20 or more persons on at least 5 days a week for 10 weeks in any 12-month period. The days and weeks need not be consecutive. The building or area is considered occupied for a full day if it is occupied for any portion of the day; or

iii. the stationary RICE is not located on gas pipelines and has 5 or fewer buildings intended for human occupancy and no buildings with four or more stories within a 0.25 mile radius around the engine.



\*The term pipeline segment means all parts of those physical facilities through which gas moves in transportation, including but not limited to pipe, valves, and other appurtenance attached to pipe, compressor units, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies; and includes stationary RICE located within 50 yards (46 meters) of the pipeline segment providing power for equipment on a pipeline segment.

\*Transportation of gas means the gathering, transmission, or distribution of gas by pipeline, or the storage of gas.

\*A building is intended for human occupancy if its primary use is for a purpose involving the presence of humans. And a building or area is considered occupied for a full day if it is occupied for any portion of the day.

[40 CFR 63.6675]

- d. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then the emission limitations/control measures for VOC and PE no longer apply.
- e. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan. The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC and PE emissions from this air contaminant source since the controlled potential to emit of VOC and PE, per pollutant, is less than 10 tons per year, per pollutant.
- f. This emissions unit is a stationary, natural gas-fired, 4-Stroke Lean Burn, Spark Ignition, Internal Combustion Engine, located at an area source for HAPs emissions. Its date of manufacture was April 6, 2004.
- g. In accordance with Ohio Revised Code Section 3704.3 (F)(4)(f)(i), this emissions unit is not subject to the requirements of the Ohio Air Toxics Policy, OAC Chapter 3745-114, as fossil fuel combustion sources are specifically exempted therein.
- h. Since the above emission limitations were established based upon the maximum potential to emit of each air contaminant, no record keeping of source operation or fuel consumption is required below.



c) Operational Restrictions

- (1) Following the compliance date of the NESHAP, 10/19/13, unless meeting the requirements of 40 CFR 63.6625(j), the permittee shall change the oil and filter every 2,160 hours of operation or annually, whichever comes first; shall inspect the spark plugs every 2,160 hours of operation or annually, whichever comes first; and shall inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace them as necessary. A log shall be maintained for the hours of operation between each oil, filter, and spark plug change and the date of each required inspection.

[40 CFR 63.6603(a)], [40 CFR 63.6625(j)], and [Part 63, Subpart ZZZZ Table 2d #8]

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

Applicable Rule	Requirement
40 CFR 63.6605	General duty to minimize emissions, with good air pollution control practices for minimizing emissions; and compliance required at all times.
40 CFR 63.6625(e)	Operate & maintain RICE according to mfg. instructions or develop a facility maintenance plan for the RICE.
40 CFR 63.6625(h)	Minimize idle and startup time, not to exceed 30 minutes.
40 CFR 63.6625(j)	Oil analysis program, option to extend the oil change frequency.

- (3) This emissions unit shall fire only natural gas fuel.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee must keep records of the initial and each annual evaluation of the status of the engine as a remote stationary RICE.

[40 CFR 63.6603(f)]

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

Applicable Rule	Requirement
40 CFR 63.6640(a) and 40 CFR 63.6655(d)	Keep the records required in #9 of Table 6 to Subpart ZZZZ to demonstrate continuous compliance.
40 CFR 63.6655(e)(3)	Records of maintenance and inspections conducted in order to demonstrate compliance with Table 2d and to demonstrate that the RICE was operated and maintained according to the facility's maintenance plan.
40 CFR 63.6660	Records readily available and retained for at least 5 years after the date of occurrence or date of report according to 63.10(b)(1).



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

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was fired in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

[OAC rule 3745-15-03(B)(2) and (D)]

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

Applicable Rule	Requirement
40 CFR 63.6640(b); and OAC rule 3745-15-03(B)(2) and (D)	Submit in the PER each instance in which the operational requirements in Table 2d were not met.
40 CFR 63.6640(e) and OAC rule 3745-15-03(B)(2) and (D)	Submit in the PER each instance in which the applicable requirements in Table 8 to Subpart ZZZZ, the general provisions from Subpart A, were not met.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Opacity Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A.

[OAC rule 3745-17-07(A)(1)]



b. Emission Limitations:

0.062 lb PE/MMBtu from RICE greater than 600 HP and 1.84 tons PE/year

Applicable Compliance Method:

The particulate emission limitation is from OAC rule 3745-17-11(B)(5) for stationary internal combustion engines.

The following calculation could be used in order to estimate annual emissions for reporting purposes based on the annual hours of operation:

$$0.062 \text{ lb PE/MMBtu} \times 6.76 \text{ MMBtu/hr} = 0.42 \text{ lb PE/hr}$$

$$0.42 \text{ lb PE/hr} \times 8760 \text{ hours/year} \times 1 \text{ ton}/2000 \text{ lbs} = 1.84 \text{ tons PE/year}$$

If required, the permittee shall demonstrate compliance with the emission limitations through exhaust emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[OAC rule 3745-17-11(B)(5)]

c. Emission Limitation:

NOx emissions shall not exceed 15.61 tons per year.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by multiplying an emission factor of 2.0 grams/HP-Hr (provided by the engines manufacturer) by the engine's horsepower rating of 810 HP and the conversion factor 2.2 lbs/1000 grams and the factors 8,760 hrs/calendar yr and 1.0 ton/2,000 lbs.

If required, the permittee shall demonstrate compliance with the emission limitations through exhaust emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7, as appropriate.

d. Emission Limitation:

CO emissions shall not exceed 17.72 tons per year.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by multiplying an emission factor of 2.27 grams/HP-Hr (provided by the engines manufacturer) by the engine's horsepower rating of 810 HP and the conversion factor 2.2 lbs/1000 grams and the factors 8,760 hrs/calendar yr and 1.0 ton/2,000 lbs.



If required, compliance shall be demonstrated with the emissions limitation through emissions test performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10, as appropriate.

e. Emission Limitation:

VOC emissions shall not exceed 3.20 tons per year.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by multiplying an emission factor of 0.41 grams/HP-Hr (provided by the engines manufacturer) by the engine's horsepower rating of 810 HP and the conversion factor 2.2 lbs/1000 grams and the factors 8,760 hrs/calendar yr and 1.0 ton/2,000 lbs.

If required, the permittee shall demonstrate compliance with the emission limitations through exhaust emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25, as appropriate.

g) Miscellaneous Requirements

- (1) None.