



9/16/2014

Certified Mail

Mrs. Kristin Ikard
 Utica Gas Services, L.L.C.- Augusta Compressor Facility
 P.O. Box 54342
 Oklahoma City, OK 73154

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0210012004
 Permit Number: P0117469
 Permit Type: Administrative Modification
 County: Carroll

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

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, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Erica R. Engel-Ishida, Interim Manager
Permit Issuance and Data Management Section, DAPC

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



FINAL

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

for

Utica Gas Services, L.L.C.- Augusta Compressor Facility

Facility ID:	0210012004
Permit Number:	P0117469
Permit Type:	Administrative Modification
Issued:	9/16/2014
Effective:	9/16/2014



Division of Air Pollution Control
Permit-to-Install
for
Utica Gas Services, L.L.C.- Augusta Compressor Facility

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Authorization

Facility ID: 0210012004
Facility Description: Natural Gas Delivery Point
Application Number(s): A0051532
Permit Number: P0117469
Permit Description: Admin mod/Initial installation to change the permit type from FEPTIO to PTI for associated units at a natural gas compressor station.
Permit Type: Administrative Modification
Permit Fee: \$300.00
Issue Date: 9/16/2014
Effective Date: 9/16/2014

This document constitutes issuance to:

Utica Gas Services, L.L.C.- Augusta Compressor Facility
8034 Bane Rd NE
East Twp., OH 44427

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

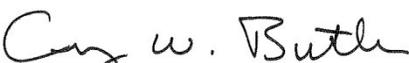
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0117469

Permit Description: Admin mod/Initial installation to change the permit type from FEPTIO to PTI for associated units at a natural gas compressor station.

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

Emissions Unit ID: J001
 Company Equipment ID: TL-1
 Superseded Permit Number: P0110302
 General Permit Category and Type: Not Applicable

Emissions Unit ID: J002
 Company Equipment ID: ML-1
 Superseded Permit Number: P0110714
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P001
 Company Equipment ID: DEHY-1
 Superseded Permit Number: P0110302
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P002
 Company Equipment ID: FLARE-1
 Superseded Permit Number: P0110302
 General Permit Category and Type: Not Applicable

Group Name: 400 bbl Condensate Tanks

Emissions Unit ID:	T001
Company Equipment ID:	TK-1
Superseded Permit Number:	P0110302
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T002
Company Equipment ID:	TK-2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: 400 bbl Produced Water Tanks

Emissions Unit ID:	T011
Company Equipment ID:	T107
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T012
Company Equipment ID:	T108
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Utica Gas Services, L.L.C.- Augusta Compressor Facility
Permit Number: P0117469
Facility ID: 0210012004
Effective Date:9/16/2014

Group Name: Natural Gas Engines

Emissions Unit ID:	P003
Company Equipment ID:	AC1643
Superseded Permit Number:	P0110714
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	AC1326
Superseded Permit Number:	P0110714
General Permit Category andType:	Not Applicable



Final Permit-to-Install
Utica Gas Services, L.L.C.- Augusta Compressor Facility
Permit Number: P0117469
Facility ID: 0210012004
Effective Date:9/16/2014

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, Northeast District Office.



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

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) 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, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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



8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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.



B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart HH, National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities: P001. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office.
3. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (Area Source RICE MACT). Although Ohio EPA has determined that this area source MACT (also known as the 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>.
4. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution: P002 and T001, T002, T011 and T012. The complete New Source Performance Standards (NSPS) requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office
5. Air contaminant sources that qualify as de minimis under OAC rule 3745-15-05, or are exempt under OAC rule 3745-31-03(A)(1) or (4) are not subject to emission standards established within this permit. Although this permit does not apply to de minimis or exempt sources, emissions from de minimis or exempt sources must be included in the total potential to emit (PTE) calculations for this permit.



C. Emissions Unit Terms and Conditions



1. J001, TL-1

Operations, Property and/or Equipment Description:

Condensate truck loading

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Volatile organic compound (VOC) emissions shall not exceed 1.30 tons/year.</p> <p>See b)(2)a. and b)(2)c. through b)(2)e.</p>
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.



The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/yr.

- c. All loading operations performed at this emissions unit shall employ submerged or bottom fill.
- d. The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.
- e. The permittee shall not permit condensate to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the throughput of condensate for each month, in gallons; and
 - b. the annual throughput of condensate, in gallons.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify any deviation from the work practice standards in section b)(2). Each report shall be submitted within 30 days after the deviation occurs.
- (2) The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
VOC emissions shall not exceed 1.30 tons/year.



Applicable Compliance Method:

VOC emissions shall be based on multiplying a loading loss factor (L*) by the annual throughput of condensate, in tons, divided by 2000.

The loading loss factor was derived using AP-42, Section 5.2, "Loading Loss Equation".

$$*L = 12.46 \text{ SPM/T}$$

where:

L = loading loss, pounds per 1000 gallons loaded;

S = saturation factor, 0.6 for submerged fill;

P = vapor pressure of liquid loaded, pounds per square inch absolute;

M = molecular weight of vapor;

T = temperature of bulk liquid ($^{\circ}\text{R}$);

MW = 66;

P @ 49.7 $^{\circ}\text{F}$ = 4.2412;

Submerged Fill Factor = 0.6; and

Temperature = 508.3 $^{\circ}\text{R}$.

g) Miscellaneous Requirements

(1) None.



2. J002, ML-1

Operations, Property and/or Equipment Description:

Methanol loading

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compounds (VOC) emissions shall not exceed 0.78 lb/hr and 3.42 tons/year. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.



- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate for VOC is less than 10 tons/yr.

- c. Monthly record keeping is not required since the emission limits are based on the emissions unit's potential to emit (at a throughput of 660 gal/hr).
- d. All methanol loading lines shall be equipped with fittings which are vapor tight.
- e. The permittee shall not permit methanol to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) None.

e) Reporting Requirements

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

f) Testing Requirements

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

- a. Emission Limitations:

VOC emissions shall not exceed 0.78 lb/hr and 3.42 tons/year.

Applicable Compliance Method:

Hourly VOC emissions shall be based on multiplying a loading loss factor (L*) by the hourly maximum loading rate of 660 gal/hr.

The loading loss factor was derived using AP-42, Section 5.2, "Loading Loss Equation".

*L = 12.46 SPM/T

where:



L = loading loss, pounds per 1000 gallons loaded;

S = saturation factor, 1.45 for splash fill;

P = vapor pressure of liquid loaded (@ 48.3 °F = 1.0391);

M = molecular weight of vapor = 32.04; and

T = temperature of bulk liquid = 508.3 °R.

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

g) Miscellaneous Requirements

(1) None.



3. P001, DEHY-1

Operations, Property and/or Equipment Description:

35 mmscfd dehydration unit

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) b)(1)e and d)(4).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	<p>Volatile organic compound (VOC) emissions from the flare stack shall not exceed 10.32 tons per rolling, 12-month period.</p> <p>Hazardous air pollutant (HAP) emissions from the flare stack shall not exceed 0.63 ton per rolling, 12-month period.</p> <p>See b)(2)a, b)(2)c, b)(2)d, c)(1) and c)(2).</p>
b.	40 CFR Part 63, Subpart HH, National Emission Standards for HAP from Oil and Natural Gas Production Facilities, 40 CFR 63.760(b)(2)	Compliance with the applicable portions of 40 CFR Part 63, Subpart HH. Any final amendments to this rule will supersede any previous Subpart HH requirement(s) in this permit.
c.	40 CFR 63.764(e)	<p>Exemption from control requirements.</p> <p>See b)(2)b.</p>
d.	40 CFR 63.1 – 63.15	The General Provisions that apply are specified in Table 2 of 40 CFR Part 63, Subpart HH.
e.	ORC 3704.03(F)(4)(d)	See d)(4).

(2) Additional Terms and Conditions

a. Dehydrator flash tank off-gases that are not used as fuel in the reboiler shall be directed to the condensate storage tank's vapor recovery unit or flare.



- b. The glycol dehydration unit is exempt from the control requirements of §63.764(d) because the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram/year, with federally enforceable controls in place.
 - c. Maintenance of the temperature of the exhaust gases from the condenser and maintenance of the flare used to control VOC and HAPs will assure compliance with the rolling, 12-month summations. Additional monthly record keeping is not required since the annual limits are based on the emissions unit's potential to emit (at a throughput of 35 mmscf of natural gas/day and 98% destruction efficiency). See emissions unit P002 for flare requirements.
 - d. The flare shall have a minimum destruction efficiency of 98%. See emissions unit P002 for flare requirements.
- c) Operational Restrictions
- (1) All emissions from the dehydrator still vent shall be vented to a condenser that shall meet the monitoring and record keeping requirements of this permit, when the emissions unit is in operation, including the following:
 - a. The condenser shall be operated at all times when gases are vented to it.
 - b. The condenser must be equipped with a temperature monitoring device that monitors and records the dehydration still vent temperature.
 - c. The condenser, temperature monitoring device and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
 - (2) The condenser temperature shall be maintained below 120 degrees Fahrenheit during operation of this emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain the following records for the condenser:
 - a. monitor and record the temperature of the exit of the condenser on a daily basis (Monday through Friday, excluding major holidays); and
 - b. record all periods of time when the condenser is not operating correctly to control the emissions from the dehydration still vent.
 - (2) The permittee shall maintain records of the annual facility natural gas or hydrocarbon liquid throughput for each year, in accordance with 40 CFR 63.760(a)(1)(ii).
 - (3) The permittee shall maintain the following records for the actual average emissions of benzene per year from the glycol dehydration unit process vent in accordance with 63.772(b)(2), determined either uncontrolled or with federally enforceable controls in place:



- a. The permittee shall determine actual average benzene emissions using the model GRI-GLY Calc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLY Calc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or
 - b. The permittee shall determine an average mass rate of benzene emissions in kilograms per hour through direct measurement using the methods in 63.772(a)(1)(i) or (ii), or an alternative method according to 63.7(f). Annual emissions in kilograms per year shall be determined by multiplying the mass rate by the number of hours the unit is operated per year. This result shall be converted to megagrams per year.
- (4) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

*The composition of the gas being processed may vary due to the nature of the industry. The company will sample the gas semiannually to perform a detailed gas analysis in order to determine if the composition has changed such that it will result in an increase in emissions of any toxic air contaminant.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all periods of time when the condenser outlet temperature exceeds 120 degrees F; and
 - b. all periods of time (start time and date, and end time and date) when the temperature monitoring device that monitors and records condenser vapor outlet temperature is not working and process gas is being vented to the condenser.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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



f) Testing Requirements

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

a. Emission Limitation:

VOC emissions from the flare stack shall not exceed 10.32 tons per rolling, 12-month period.

Applicable Compliance Method:

The permittee may determine the VOC emissions (excludes methane and ethane) using the GRI-GLYCalc™ model, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit(s) and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1);

Potential VOC and/or benzene emissions estimates shall be based on the maximum glycol circulation rate(s), in gallons per minute (gpm); the worst case pollutant concentrations from representative extended gas analyses of the inlet wet gas; and the maximum natural gas flow rate, as determined by 40 CFR 63.772(b)(1)(i); or for a new unit, potential emissions shall be estimated in accordance with 40 CFR 63.760(a) and increased by a factor of 1.2.

See emissions unit P002 for testing requirements.

b. Emission Limitation:

HAP emissions from the flare stack shall not exceed 0.63 tons per rolling, 12-month period.

Applicable Compliance Method:

The permittee may determine the HAP emissions (excludes methane and ethane) using the GRI-GLYCalc™ model, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit(s) and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1);

Potential HAP and/or benzene emissions estimates shall be based on the maximum glycol circulation rate(s), in gallons per minute (gpm); the worst case pollutant concentrations from representative extended gas analyses of the inlet



wet gas; and the maximum natural gas flow rate, as determined by 40 CFR 63.772(b)(1)(i); or for a new unit, potential emissions shall be estimated in accordance with 40 CFR 63.760(a) and increased by a factor of 1.2.

c. Emission Limitation:

The flare shall have a minimum destruction efficiency of 98%.

Applicable Compliance Method:

Compliance shall be demonstrated by the design and operation specifications detailed in emissions unit P002.

g) Miscellaneous Requirements

- (1) The permittee shall meet the applicable requirements of the most current version of 40 CFR Part 63, Subpart HH following any amendments to these rules, which may supersede any requirements identified in this permit.



4. P002, FLARE-1

Operations, Property and/or Equipment Description:

7.179 mmBtu/hr enclosed flare (controlling the dehydration unit condenser (P001) and the condensate storage tank emissions (T001 & T002) when the VRU is down)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Nitrogen oxides (NO _x) emissions shall not exceed 0.49 lb/hr and 2.14 tons/year. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	ORC 3704.03(T)	Carbon monoxide (CO) emissions shall not exceed 11.64 tons per rolling, 12-month period.
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-17-11(B)	See b)(2)d.
f.	40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (60.5360-60.5430) [In accordance with 40 CFR 60.5365, this emissions unit includes a storage vessel affected facility.]	Following the compliance date of October 15, 2013, each storage vessel constructed, modified, or reconstructed after August 23, 2011 and with VOC emissions calculated to exceed 6 tons per year, shall reduce VOC emissions by 95.0% or greater. See c)(3), d)(4) and e)(3).
g.	40 CFR Part 60.1 through 60.19	The General Provisions that apply are specified in Table 3 of 40 CFR Part 60, Subpart OOOO.



(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x emissions from this air contaminant source since the uncontrolled potential to emit for NO_x is less than 10 tons/yr.

c. The emissions from the flare are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

d. The uncontrolled mass rate of PE from the flare is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero.

c) Operational Restrictions

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

(2) The flare shall be designed and operated as follows:

a. The flare shall be operated with a 98% destruction efficiency.

b. The flare shall be operated at all times when emissions may be vented to it.

c. A pressure sensor shall be maintained at all times on the flare to detect the need for a flame.

d. The device to monitor the flare for the presence of a flame shall be in operation at all times the pressure sensor detects a need for a flame.

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



- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5395(b), 60.5410(e)(4), and 60.5411(b)	cover and closed vent system requirements
60.5411(a)(1) and 60.5412(b)(1)	operate closed vent systems and control devices used to comply with the provisions of 60.5395 at all times when emissions may be vented to them.
60.5411(a)(2)	design and operate the closed vent system with no detectable emissions.
60.5411(a)(3)	any valves associated with the closed vent system that are capable of diverting all or a portion of the emissions away from the flare must be equipped with bypass flow monitors or must be secured in the non-diverting position using a car-seal or a lock-and-key type configuration. Low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and safety devices are not subject to this requirement.
60.5412(a)(1)	performance requirements for an enclosed combustion device.
60.5412(a)(2) and 60.5413(c)	design analysis requirements for a vapor recovery device.
60.5412(a)(3) and 60.5413	design and operation requirements for a flare.
60.5413(a)(1)	performance test exemption if flare is designed and operated in accordance with section 60.18(b). Perform a visible emissions test using Method 22 at 40 CFR Part 60, Appendix A-7.
60.5412(a)(3) and 60.5413(a)(7) and (d)	performance test exemption if control device demonstrates compliance using a performance test conducted by the manufacturer. The manufacturer must determine a maximum inlet gas flow rate which must not be exceeded for each control device.
60.5415(e)(2)	continuous compliance requirements for control devices.
60.5416(b)(9), (10), (11), and (12)	repair all leaks detected from the closed vent system or cover as soon as practicable. First attempt at repair must be made no later than <u>5 calendar days</u> after detection, and repair must be completed no later than <u>15 calendar days</u> after detection, except as provided by rule (e.g., delay of repair, unsafe to inspect, difficult to inspect).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a pressure sensor and flame detection device to monitor the need for a flame and presence of a flame, respectively, when the emissions unit is in operation. The monitoring device and any recorder shall



be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

- (2) The permittee shall record the following information each day for the flare and process operations:
 - a. all periods during which the pressure sensor and/or flame detection device were not functioning properly; and
 - b. the operating times for the flare and monitoring equipment.
- (3) The permittee shall maintain records of each day a fuel other than natural gas is burned in this emissions unit.
- (4) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5413(d)(9)	If using a performance test conducted by the manufacturer, maintain required records for each combustion control device model tested by the manufacturer.
60.5416(a)(1)	Conduct an <u>initial</u> inspection of all closed vent system joints, seams, or other connections that are permanently or semi-permanently sealed to demonstrate that the system operates with no detectable emissions. Conduct subsequent <u>annual</u> visual inspections for defects. Any defective components that are replaced must be inspected to demonstrate that these components operate with no detectable emissions.
60.5416(a)(2)	Conduct <u>initial and annual</u> inspections of all closed vent system components other than those described under 60.5416(a)(1) to demonstrate that that system operates with no detectable emissions. Also conduct <u>annual</u> visual inspections for defects.
60.5416(a)(3)	Conduct <u>initial and annual</u> inspections of the storage vessel covers to identify any defects.
60.5416(a)(4)	Except for low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and safety devices, operate the bypass valve flow monitors to collect a reading at least <u>once every 15 minutes</u> or visually inspect all bypass valves secured in the non-diverting position at least <u>monthly</u> to verify that valve remains in the non-diverting position
60.5416(b)(1) through (8)	Conduct inspections of closed vent systems to detect leaks according to USEPA Method 21 and as provided by rule. The condition of no detectable emissions is defined as an



	organic concentration value less than 500 ppmv.
60.5417(a)	Requirements for continuous parameter monitoring system for each control device.
60.5417(b)	Monitoring requirements exemptions.
60.5417(c)	Design and operation requirements of continuous monitoring system.
60.5417(d)	Continuous recorder requirements.
60.5417(e)	Requirements for calculation of daily average value for each monitored operating parameter.
60.5417(f)	Establish a minimum operating parameter value or a maximum operating parameter value, as appropriate for each control device installed in accordance with 40 CFR 60.5417(d).
60.5417(g)	Requirements for deviations.
60.5420(c)	The applicable records identified in 40 CFR 60.5420(c) and 40 CFR 60.7(f) must be maintained for a period of 5 years following the date of record and they must be accessible upon request.
60.5420(c)(5)	Maintain required records for the determination that the VOC emissions of each storage vessel is either below or above 6 TPY and for deviations from the requirements of the subpart.
60.5420(c)(6)	Maintain required records for inspections of closed vent systems.
60.5420(c)(7)	Maintain required records for inspections of storage vessel covers.
60.5420(c)(8)	Maintain required records for inspections of bypass valves.
60.5420(c)(9)	Maintain required records for leaks and repairs of closed vent systems.
60.5420(c)(11)	Maintain required records for continuous parameter monitoring systems.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following:
 - i. use of natural gas only as a fuel in the flare; and
 - ii. the destruction efficiency of 98% for the flare.
 - b. all periods of time during which the pressure sensor and/or flame detection device were not functioning properly or the flare was not maintained as required in this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall submit notifications and reports to the Ohio EPA, Northeast District Office as required pursuant to 40 CFR Part 60, Subpart OOOO, per the following sections:

60.5420(a)(1)	Initial notifications are not required for storage vessels.
60.5410(e)(8), 60.5420(b)(1), and 60.5420(b)(6)	Submit the required information for storage vessels in the initial annual report within 30 days of the end of the initial compliance period and in the subsequent reports due the same date each year as the initial annual report.
60.5420(b)(7)	Submit the results of performance testing to USEPA's WebFIRE database within 60 days of completing each performance test.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 NO_x emissions shall not exceed 0.49 lb/hr and 2.14 tons/year.



Applicable Compliance Method:

The hourly emission rate specified above was established by multiplying the emission factor from AP-42, Table 13.5-1 (revised 1/95), of 0.068 lbNO_x/mmBtu by the maximum heat input rate of 7.178 mmBtu/hr.

The tpy emission limitation was developed by multiplying the short-term allowable NO_x emission limitation (0.49 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

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

b. Emission Limitation:

CO emissions shall not exceed 11.64 tons per rolling, 12-month period.

Applicable Compliance Method:

The emission rate specified above was established by multiplying the emission factor from AP-42, Table 13.5-1 (revised 1/95), of 0.37 lb CO/mmBtu by the maximum heat input rate of 7.178 mmBtu/hr. This number was then multiplied by the maximum annual hours of operation (8,760 hours), and then divided by 2,000 lbs per ton.

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

c. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the visible particulate emissions limitation shall be determined in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.

d. Emission Limitation:

The flare shall be operated with at least 98% destruction efficiency.

Applicable Compliance Method:

If the flare complies with the control requirements specified in c)(2)b through c)(2)e, compliance with the 98% control efficiency requirement shall be assumed.



- (2) The permittee shall perform performance testing as required pursuant to 40 CFR Part 60, Subpart OOOO, per the following sections:

60.5410(e)(5)	Initial performance test requirement.
60.5413(a)	Performance test exemptions.
60.5413(b)	Performance test methods and procedures.
60.5413(c)	Control device design analysis.
60.5413(d)	Performance testing for combustion control devices – manufacturers' performance test.

g) Miscellaneous Requirements

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



5. Emissions Unit Group - 400 bbl Condensate Tanks: T001 & T002

EU ID	Operations, Property and/or Equipment Description
T001	400-bbl Condensate Storage Tank
T002	400-bbl Condensate Storage Tank

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions from the flare stack shall not exceed 3.59 tons/year. The requirements of this rule include compliance with the applicable requirements of 40 CFR Part 60, Subpart OOOO. Use of submerged or bottom fill on tank. See b)(2)a, b)(2)d, c)(1) and c)(2).
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	40 CFR Part 60, Subpart Kb	See b)(2)c.
d.	OAC Rule 3745-21-09(L)(1)	Exempt pursuant to OAC rule 3745-21-09(L)(2)(a). See b)(2)e.
e.	40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (60.5360-60.5430) [In accordance with 40 CFR 60.5365, this emissions unit includes a storage vessel affected facility.]	Following the compliance date of October 15, 2013, each storage vessel constructed, modified, or reconstructed after August 23, 2011 and with VOC emissions calculated to exceed 6 tons per year, shall reduce VOC emissions by 95.0% or greater. See c)(1) and e)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR Part 60.1 through 60.19	The General Provisions that apply are specified in Table 3 of 40 CFR Part 60, Subpart OOOO.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/yr.
- c. This emission unit is exempt from the control requirements of 40 CFR 60.110(b) because it is a vessel with a design capacity less than or equal to 1,589.874 m³ used for petroleum or condensate stored, processed, or treated prior to custody transfer.
- d. Maintenance of the flare used to control VOC will assure compliance with the tons/year limitation. See emissions unit P002 for flare requirements.
- e. A fixed roof tank meeting one of the following criteria is exempt from installing an internal floating roof or other control device and is not subject to the requirements identified in OAC 3745-21-09(L):
 - i. a fixed roof tank with a capacity of less than 40,000 gallons; or
 - ii. a fixed roof tank used to store crude oil and condensate prior to lease custody transfer and with a capacity of less than 422,000 gallons; or
 - iii. a fixed roof tank that stores a petroleum liquid with a true vapor pressure less than or equal to 1.52 pounds per square inch absolute.



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

c) Operational Restrictions

- (1) All of the emissions from the storage tank shall be captured by a vapor recovery unit (VRU) or flare.
- (2) During all periods of downtime of the VRU, a backup flare shall be utilized to control emissions that is designed and operated as required in emissions unit P002.

d) Monitoring and/or Recordkeeping Requirements

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

e) Reporting Requirements

- (1) The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5420(a)(1)	Initial notifications are not required for storage vessels.
60.5410(e)(8), 60.5420(b)(1), and 60.5420(b)(6)	Submit the required information for storage vessels in the initial annual report within 30 days of the end of the initial compliance period and in the subsequent reports due the same date each year as the initial annual report.
60.5420(b)(7)	Submit the results of performance testing to USEPA's WebFIRE database within 60 days of completing each performance test.
60.5422	Submit the required information for pressure relief devices.



f) Testing Requirements

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

a. Emission Limitation:

VOC emissions from the flare stack shall not exceed 3.59 tons/year.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined using a current version of the U.S. EPA's TANKS software program for storage tank working/breathing losses; either the TANKS software program or other process simulation programs such as, but not limited to, HYSYS or ProMax, to calculate flash losses; the Gas Research Institute's simulation program GLY Calc version 4 or equivalent to calculate flash tank off-gas emissions; and an assumed destruction efficiency of 98% for the flare.

g) Miscellaneous Requirements

(1) None.



6. Emissions Unit Group - 400 bbl Produced Water Tanks: T011 & T012

EU ID	Operations, Property and/or Equipment Description
T011	400-bbl Produced Water Storage Tank
T012	400-bbl Produced Water Storage Tank

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The requirements of this rule include compliance with the applicable requirements of 40 CFR Part 60, Subpart OOOO. Use of submerged or bottom fill on tank. See b)(2)a, c)(1) and c)(2).
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	40 CFR Part 60, Subpart Kb	See b)(2)c.
d.	OAC Rule 3745-21-09(L)(1)	Exempt pursuant to OAC rule 3745-21-09(L)(2)(b). See b)(2)d.
e.	40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (60.5360-60.5430) [In accordance with 40 CFR 60.5365, this emissions unit includes a storage vessel affected facility.]	Following the compliance date of October 15, 2013, each storage vessel constructed, modified, or reconstructed after August 23, 2011 and with VOC emissions calculated to exceed 6 tons per year, shall reduce VOC emissions by 95.0% or greater. See c)(1) and e)(3).
f.	40 CFR Part 60.1 through 60.19	The General Provisions that apply are specified in Table 3 of 40 CFR Part 60, Subpart OOOO.



(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/yr and at de minimis levels.

- c. This emission unit is exempt from the control requirements of 40 CFR 60.110(b) because it is a vessel with a design capacity less than or equal to 1,589.874 m³ used for petroleum or condensate stored, processed, or treated prior to custody transfer.

- d. A fixed roof tank meeting one of the following criteria is exempt from installing an internal floating roof or other control device and is not subject to the requirements identified in OAC 3745-21-09(L):

- i. a fixed roof tank with a capacity of less than 40,000 gallons; or
- ii. a fixed roof tank used to store crude oil and condensate prior to lease custody transfer and with a capacity of less than 422,000 gallons; or
- iii. a fixed roof tank that stores a petroleum liquid with a true vapor pressure less than or equal to 1.52 pounds per square inch absolute.

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

c) Operational Restrictions

- (1) All of the emissions from the storage tank shall be captured by a vapor recovery unit (VRU) or flare.
- (2) During all periods of downtime of the VRU, a backup flare shall be utilized to control emissions that is designed and operated as required in emissions unit P019.



d) Monitoring and/or Recordkeeping Requirements

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

e) Reporting Requirements

- (1) The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5420(a)(1)	Initial notifications are not required for storage vessels.
60.5410(e)(8), 60.5420(b)(1), and 60.5420(b)(6)	Submit the required information for storage vessels in the initial annual report within 30 days of the end of the initial compliance period and in the subsequent reports due the same date each year as the initial annual report.
60.5420(b)(7)	Submit the results of performance testing to USEPA's WebFIRE database within 60 days of completing each performance test.
60.5422	Submit the required information for pressure relief devices.

f) Testing Requirements

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

- a. None.

g) Miscellaneous Requirements

- (1) None.



7. Emissions Unit Group - Natural Gas Engines: P003 & P004

EU ID	Operations, Property and/or Equipment Description
P003	1,340 HP Caterpillar G3516 TALE compressor engine with oxidation catalyst
P004	1,340 HP Caterpillar G3516 TALE compressor engine with oxidation catalyst

- 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) b)(1)g, d)(2), d)(3), d)(4), d)(5) and e)(4)
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Volatile organic compound (VOC) emissions shall not exceed 0.77 lb/hr and 3.37 tpy (not including formaldehyde). Carbon monoxide (CO) emissions shall not exceed 1.75 lbs/hr and 7.69 tpy. Sulfur dioxide (SO ₂) emissions shall not exceed 0.01 lb/hr and 0.04 tpy. Particulate emissions (PE) shall not exceed 0.12 lb/hr and 0.53 tpy. Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006	See b)(2)b.
c.	ORC 3704.03(T)	Nitrogen oxides (NO _x) emissions shall not exceed 25.86 tons per rolling, 12-month period.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/mmBtu of actual heat input.
f.	OAC rule 3745-18-06	This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).
g.	ORC 3704.03(F)(4)(d)	See d)(2), d)(3), d)(4), d)(5) and e)(4).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the VOC, CO, SO₂ and PE from this air contaminant source, since the potentials to emit for VOC, CO, SO₂ and PE are less than ten tons per year.

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 federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), P003 – P004, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: formaldehyde

TLV (mg/m3): 0.37



Maximum Hourly Emission Rate (lbs/hr): 0.40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2.97

MAGLC (ug/m3): 8.77

The permittee, has demonstrated that emissions of formaldehyde, from emissions unit(s) P003 – P004, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” 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 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

*The composition of the gas being processed may vary due to the nature of the industry. The company will sample the gas semiannually to perform a detailed gas analysis in order to determine if the composition has changed such that it will result in an increase in emissions of any toxic air contaminant.



- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
 - (5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.
 - (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (4) The permittee shall include any changes made to a parameter or value used in the dispersion model that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration in the annual PER. If no changes to the emissions, emissions unit(s)



or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

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

a. Emission Limitation:

PE shall not exceed 0.12 lb/hr and 0.53 tpy.

Applicable Compliance Method:

Compliance with the hourly emission limitation above shall be determined by multiplying 0.00991 lb/mmBtu (the emission factor from AP-42, "Stationary Internal Combustion Sources", Table 3.2-3, 7/00) by 11.62 mmBtu/hr (the maximum input rating of this unit).

The TPY emission limitation was developed by multiplying the hourly emission limitation (0.12 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

b. Emission Limitation:

NO_x emissions shall not exceed 25.88 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the emission limitation above shall be determined by dividing 2.0 g/BHP-hr (the manufacturer supplied emission factor) by 454 g/lb, and then multiplying by 1,340 brake-horsepower (the maximum power output rating of this unit). The rolling value is obtained by multiplying by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton.

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

c. Emission Limitation:

CO emissions shall not exceed 1.75 lbs/hr and 7.69 tpy.

Applicable Compliance Method:

Compliance with the hourly emission limitation above shall be determined by dividing 0.59 g/BHP-hr (the manufacturer supplied emission factor, including the



80% control efficiency of the catalytic converter) by 454 g/lb, and then multiplying by 1,340 brake-horsepower (the maximum power output rating of this unit).

The TPY emission limitation was developed by multiplying the hourly emission limitation (1.74 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

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

d. Emission Limitation:

VOC emissions shall not exceed 0.77 lb/hr and 3.37 tpy (not including formaldehyde).

Applicable Compliance Method:

Compliance with the hourly emission limitation above shall be determined by dividing 0.26 g/BHP-hr (the manufacturer supplied emission factor, including the 55% control efficiency of the catalytic converter) by 454 g/lb, and then multiplying by 1,340 brake-horsepower (the maximum power output rating of this unit).

The TPY emission limitation was developed by multiplying the hourly emission limitation (0.77 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

If required, compliance with the hourly VOC emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18, 25 or 25A.

e. Emission Limitation:

SO₂ emissions shall not exceed 0.01 lb/hr and 0.04 tpy.

Applicable Compliance Method:

Compliance with the hourly emission limitation above shall be determined by multiplying 0.000588 lb/mmBtu (the emission factor from AP-42, "Stationary Internal Combustion Sources", Table 3.2-3, 7/00) by 11.62 mmBtu/hr (the maximum input rating of this unit).

The TPY emission limitation was developed by multiplying the hourly emission limitation (0.01 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.



If required, compliance with the hourly SO₂ emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

f. Emission Limitation:

Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible particulate emission limitation shall be demonstrated based upon the visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitation:

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

Applicable Compliance Method:

Compliance with this emission limitation may be based upon an emission factor of 0.00991 pound/million Btu of heat input. This emission factor is specified in the U.S. EPA reference document AP-42, Compilation of Air Pollutant Emission Factors, Section 3.2, Table 3.2-3 (7/00).

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

g) Miscellaneous Requirements

- (1) None.