



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

9/22/2014

Certified Mail

Michael Zeilstra
Tennessee Gas Pipeline - Station 214
1001 Louisiana Street, Suite 1000
RM1446A
Houston, TX 77002

Facility ID: 0210000046
Permit Number: P0117468
County: Carroll

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Free Press Standard. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NEDO; Pennsylvania; West Virginia

PUBLIC NOTICE
9/22/2014 Issuance of Draft Air Pollution Title V Permit

Tennessee Gas Pipeline - Station 214

2029 Cobbler Road NE,
Carrollton, OH 44615-0000

Carroll County

FACILITY DESC.: Pipeline Transportation of Natural Gas

PERMIT #: P0117468

PERMIT TYPE: Renewal

PERMIT DESC: Title V Renewal for a Natural Gas Compressor Station.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Kevin Fortune, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



Statement of Basis For Air Pollution Title V Permit

Facility ID:	0210000046
Facility Name:	Tennessee Gas Pipeline - Station 214
Facility Description:	Compressor Station for Natural Gas Pipeline
Facility Address:	2029 Cobbler Road NE, Carrollton, OH 44615-0000
Permit #:	P0117468, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input checked="" type="checkbox"/> Carbon Monoxide <input type="checkbox"/> Volatile Organic Compounds <input checked="" type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input checked="" type="checkbox"/> Single Hazardous Air Pollutant <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants <input type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GHG <input type="checkbox"/> Title IV	

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Y
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	N
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



Statement of Basis
Tennessee Gas Pipeline - Station 214
Permit Number: P0117468
Facility ID: 0210000046

Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	40 CFR Part 63 subpart ZZZZ revisions incorporated by reference.
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	N/A



P012	average	17-07 (A)	N	N	Y	Y	N	Y	Y	Y	N	N	OR – combust only natural gas
B002 P005 P012	- PE shall not exceed 0.062lb/MM Btu actual heat input.	17-11 (B)	N	N	Y	Y	N	Y	Y	Y	N	N	OR – combust only natural gas
B002 P005 P012	- NA, See comment	18-06 (G)	N	Y	Y	Y	N	Y	Y	Y	N	N	OR – combust only natural gas
B002 P005 P012	- 2.0 grams per HP-hr	14-12	N	N	Y	Y	N	Y	Y	Y	N	N	Compliance with required NOx reductions is accomplished with the use of control equipment (NSCR), which was also installed to comply with subpart ZZZZ.
B002 P005 P012	- See comments	N	40 CFR part 63, subpart ZZZZ	N	Y	Y	N	Y	Y	Y	N	N	Reduce formaldehyde emissions by at least 76%. To comply, NSCR was installed. Compliance is demonstrated by record keeping; however additional emissions testing are required under specific conditions.
P013 P016	- 20% opacity as a 6-minute average	17-07 (A)	N	N	Y	Y	N	Y	Y	Y	N	N	OR – combust only natural gas
P013 P016	- PE shall not exceed 0.062lb/MMBtu actual heat input.	17-11 (B)	N	N	Y	Y	N	Y	Y	Y	N	N	OR – combust only natural gas
P013 P016	- NA, See comment	18-06 (G)	N	Y	Y	Y	N	Y	Y	Y	N	N	OR – combust only natural gas
P013 P016	- 26.5 grams per HP-hr	14-12	N	N	N	N	N	N	N	N	N	N	No controls for NOx have been installed on these lean burn engines.
P013 P016	- NA, See comment	N	40 CFR part 63,	N	N	N	N	N	N	N	N	N	40 CFR 63, Subpart ZZZZ does not contain any emissions limitations or operating limitations for existing, spark ignition, four



Statement of Basis
Tennessee Gas Pipeline - Station 214
Permit Number: P0117468
Facility ID: 0210000046

			subpart ZZZZ										stroke lean burn stationary RICE.
F001	N	N	N	N	N	N	N	N	N	N	N	N	There are no applicable rules for the fugitive VOC emissions from this existing station.



DRAFT

Division of Air Pollution Control
Title V Permit
for
Tennessee Gas Pipeline - Station 214

Facility ID:	0210000046
Permit Number:	P0117468
Permit Type:	Renewal
Issued:	9/22/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Tennessee Gas Pipeline - Station 214

Table of Contents

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



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	15
30. Submitting Documents Required by this Permit	16
B. Facility-Wide Terms and Conditions.....	17
C. Emissions Unit Terms and Conditions	21
1. F001, Plant wide Fugitive Emissions.....	22
2. Emissions Unit Group - 4S-LB Engines: P013, P014, P015, P016.....	23
3. Emissions Unit Group - 4S-RB Engines: Main Units.....	26
4. Emissions Unit Group - Auxiliary Engines: Engines used to supply power to the station	36



Draft Title V Permit
Tennessee Gas Pipeline - Station 214
Permit Number: P0117468
Facility ID: 0210000046
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0210000046
Facility Description: Compressor Station for Natural Gas Pipeline
Application Number(s): A0051436
Permit Number: P0117468
Permit Description: Title V Renewal for a Natural Gas Compressor Station.
Permit Type: Renewal
Issue Date: 9/22/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0109362

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

Tennessee Gas Pipeline - Station 214
2029 Cobbler Road NE
Carrollton, OH 44615-0000

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Title V Permit
Tennessee Gas Pipeline - Station 214
Permit Number: P0117468
Facility ID: 0210000046
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

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

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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



c) The permittee shall submit required reports in the following manner:

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

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

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

5. Title IV Provisions

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

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

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

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

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.



- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

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

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

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

9. Marketable Permit Programs

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

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



10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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



13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms



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

- b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

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

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

15. Operational Flexibility

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

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



16. Emergencies

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

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

17. Off-Permit Changes

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

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

23. Title VI Provisions

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



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

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

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

The permittee shall submit required reports in the following manner:

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

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

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



whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

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

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

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

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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



30. Submitting Documents Required by this Permit

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



Draft Title V Permit
Tennessee Gas Pipeline - Station 214
Permit Number: P0117468
Facility ID: 0210000046
Effective Date: To be entered upon final issuance

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 regulated stationary internal combustion engines are subject to the applicable requirements specified in OAC Chapter 3745-14-12 and in B.3 and B.4 below: B002, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015 and P016.
3. Compliance plan.
 - a) After May 1, 2007, an owner or operator of a large NO_x SIP call engine shall not operate the engine in the 2007 control period or any subsequent year's control period unless the owner or operator complies with the requirements of a compliance plan which meets the provisions listed below.
 - (1) Per OAC rule 3745-14-01(B)(2) "Control period" means the period beginning May first of a year and ending on September thirtieth of the same year, inclusive.
 - (2) The compliance plan shall be approved by the director.
 - (3) The compliance plan shall demonstrate enforceable emission reductions from one or more stationary internal combustion engines equal to or greater than the facility seasonal NO_x 2007 tonnage reduction.
 - (4) The compliance plan may cover some or all engines at an individual facility or at several facilities or at all facilities in the state of Ohio that are in control of the same owner/operator.
 - (5) The compliance plan was submitted to the director by May 1, 2006, and has been approved.
 - (6) The compliance plan may include credit for decreases in NO_x emissions from large NO_x SIP call engines in the state of Ohio due to NO_x control equipment. Credit may also be included for decreases in NO_x emissions from other engines in the state of Ohio due to NO_x control equipment not reflected in the 2007 base NO_x emissions in the NO_x SIP call engine inventory.
 - (7) The compliance plan shall include the following items:
 - a. List of engines subject to the plan, including the engine's manufacturer, model, facility location address, and facility identification number;
 - b. The projected control period hours of operation for each engine and supporting documentation;
 - c. A description of the NO_x emissions control installed, or to be installed, on each engine and documentation to support the projected NO_x emission rates;
 - d. The past and projected NO_x emission rates for each affected engine in grams per brake horsepower-hour;



- e. A numerical demonstration that the emission reductions obtained from all engines included under the plan will be equivalent to or greater than the owner/operator's facility seasonal NO_x 2007 tonnage reduction, based on the difference between the past NO_x emission rate and the projected NO_x emission rate multiplied by the projected operating hours for each affected engine, and taking into account any credit under section B.3.a)(6) of this permit; and
 - f. Provisions for monitoring, reporting and record keeping for each affected engine.
- b) The projected NO_x emission rate in grams per brake horsepower-hour for each affected engine shall be included in a federally enforceable permit [see C.2.b)(1)e and C.4.b)(1)e].

[Authority for term: OAC rules 3745-14-12 and 3745-77-07(C)]

4. Any owner or operator subject to the requirements of section B.3 of this permit shall comply with the following requirements:

a) Monitoring requirements:

- (1) Complete an initial performance test consistent with the requirements of 40 CFR Part 60, Appendix A, following installation of emission controls required to achieve the emission rate limit specified in section B.3.b) of this permit.
- (2) Perform periodic monitoring sufficient to yield reliable data from the relevant time period that is representative of a source's compliance with the emission rate limit specified in section B.3.b) of this permit. Such periodic monitoring may include either:
 - a. Performance tests consistent with the requirements of 40 CFR Part 60, Appendix A, or portable monitors using ASTM D6522-00(2005);
 - b. A parametric monitoring program that specifies operating parameters, and their ranges, that will provide reasonable assurance that each engine's emissions are consistent with the requirements of section B.3.b) of this permit;
 - c. A predictive emissions measurement system that relies on automated data collection from instruments; or
 - d. A continuous emission monitoring system that complies with 40 CFR Part 60 or 40 CFR Part 75.

b) Record keeping requirements:

- (1) Maintain all records necessary to demonstrate compliance with the requirements of this rule for a period of two calendar years at the plant at which the subject engine is located. The records shall be made available to the director and administrator upon request.
- (2) For each engine subject to the requirements of this rule, the owner or operator shall maintain records of:
 - a. Identification and location of each engine subject to the requirements of this rule;



- b. Calendar date of record;
 - c. The number of hours the unit is operated during each control period compared to the projected operating hours;
 - d. Type and quantity of fuel used; and
 - e. The results of all compliance tests.
- c) Reporting requirements.

Any owner or operator subject to the requirements of this rule shall submit results of all compliance tests to the director.

[Authority for term: OAC rules 3745-14-12 and 3745-77-07(C)]

5. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:
- a) None.



Draft Title V Permit
Tennessee Gas Pipeline - Station 214
Permit Number: P0117468
Facility ID: 0210000046
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. F001, Plant wide Fugitive Emissions

Operations, Property and/or Equipment Description:

Plant wide Fugitive VOC Emissions

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 operations(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. 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.	No applicable rules	

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.



2. Emissions Unit Group - 4S-LB Engines: P013, P014, P015, P016

EU ID	Operations, Property and/or Equipment Description
P013	2000 HP (22 mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/lean burn, reciprocating pipeline compressor engine
P014	2000 HP (22 mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/lean burn, reciprocating pipeline compressor engine
P015	2000 HP (22 mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/lean burn, reciprocating pipeline compressor engine
P016	2000 HP (22 mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/lean burn, reciprocating pipeline compressor engine

- 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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/mmBtu of actual heat input.
c.	OAC rule 3745-18-06(G)	These emissions units are exempt from this requirement pursuant to OAC rule 3745-18-06(A). See b)(2)a.
d.	OAC rule 3745-14-12	The projected emissions of nitrogen oxides (NO _x) shall not exceed 26.5 grams per Brake HP-hour. See B.2, B.3 and B.4.
e.	40 CFR Part 63, Subpart ZZZZ (40 CFR 63.6600(c))	See b)(2)b.



- (2) Additional Terms and Conditions
 - a. These emissions units are exempt from OAC rule 3745-18-06(G) during any calendar day in which natural gas is the only fuel burned.
 - b. These emissions units are exempt from the requirements of 40 CFR Part 63, Subpart ZZZZ via 40 CFR 63.6590(b)(3).
- c) Operational Restrictions
 - (1) The permittee shall burn only natural gas in these emissions units.
[Authority for term: OAC rule 3745-77-07(A)(1)]
- d) Monitoring and/or Recordkeeping Requirements
 - (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in these emissions units.
[Authority for term: OAC rule 3745-77-07(C)(1)]
- e) Reporting Requirements
 - (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in these emissions units. Each report shall be submitted within 30 days after the deviation occurs.
[Authority for term: OAC rule 3745-77-07(C)(1)]
- f) Testing Requirements
 - (1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

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

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



b. Emission Limitation:

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

Applicable Compliance Method:

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

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

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

c. Emission Limitation:

The projected emissions of NO_x shall not exceed 26.5 grams per Brake HP-hour.

Applicable Compliance Method:

Compliance shall be demonstrated as specified in B.2, B.3 and B.4.

[Authority for term: OAC rule 3745-14-12 and 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group - 4S-RB Engines: Main Units

EU ID	Operations, Property and/or Equipment Description
B002	1320 HP (14.52 mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/rich burn, reciprocating pipeline compressor engine with non-selective catalytic reduction
P005	1320 HP (14.52 mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/rich burn, reciprocating pipeline compressor engine with non-selective catalytic reduction
P006	1320 HP (14.52 mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/rich burn, reciprocating pipeline compressor engine with non-selective catalytic reduction
P007	1320 HP (14.52 mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/rich burn, reciprocating pipeline compressor engine with non-selective catalytic reduction
P008	1320 HP (14.52 mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/rich burn, reciprocating pipeline compressor engine with non-selective catalytic reduction
P009	1320 HP (14.52 mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/rich burn, reciprocating pipeline compressor engine with non-selective catalytic reduction
P010	1320 HP (14.52 mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/rich burn, reciprocating pipeline compressor engine with non-selective catalytic reduction
P011	1320 HP (14.52 mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/rich burn, reciprocating pipeline compressor engine with non-selective catalytic reduction
P012	1320 HP (14.52 mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/rich burn, reciprocating pipeline compressor engine with non-selective catalytic reduction

- 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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/mmBtu of actual heat input.
c.	OAC rule 3745-18-06(G)	These emissions units are exempt from this requirement pursuant to OAC rule 3745-18-06(A). See c)(1).



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-14-12	The projected emissions of nitrogen oxides (NO _x) shall not exceed 2.0 grams per Brake HP-hour. See B.2, B.3 and B.4.
e.	40 CFR Part 63, Subpart ZZZZ (40 CFR 63.6580 to 63.6675) In accordance with 40 CFR 63.6585, this emissions unit is a stationary reciprocating internal combustion engine (RICE) subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines.	The existing, natural gas, stationary 4SRB spark ignition (SI) RICE, located at a major source for hazardous air pollutants (HAPs), shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ.
f.	40 CFR 63.6600(a) Table 1a to Subpart ZZZZ	Emissions of formaldehyde shall not exceed 350 ppbvd at 15% O ₂ or shall be reduced by 76% or more at 100 percent load plus or minus 10 percent. Compliance with the formaldehyde standard may be demonstrated by using Method 25A (reported as propane) during the performance test and demonstrating the average reduction of total hydrocarbon emissions (THC) to be 30% or greater. See b)(2)a, b)(2)b, c)(2), c)(3) and c)(4).
g.	40 CFR 63.1 through 63.15	Table 8 to Subpart ZZZZ of 40 CFR Part 63 – Applicability of General Provisions to Subpart ZZZZ shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

- a. The permittee shall control the emissions of formaldehyde from the stationary RICE exhaust using a non-selective catalytic reduction (NSCR) control device. The permittee shall either limit the concentration of formaldehyde to 350 ppbvd or less at 15% O₂ at the outlet of the control device or the average reduction of formaldehyde, calculated according to 40 CFR 63.6620(e), shall not be less than 76% of the uncontrolled formaldehyde emissions.

[40 CFR 63.6600(a)], [40 CFR 63.6640(a)], and [Subpart ZZZZ Table 1a]



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

Applicable Rule	Requirement
40 CFR 63.6595(a)	The RICE must be in compliance with the emission and operating limitations in Part 63 Subpart ZZZZ; the compliance date was 6/15/07.
Applicable Tables from Part 63, Subpart ZZZZ	Comply with as applicable: emission limit options in Table 1a; operating limitations in Table 1b #1; performance test frequency in Table 3 #3; performance test methods in Table 4 #2 or #3; initial compliance demonstration in Table 5 #7 or #9; continuous compliance monitoring requirements in Table 6 #4 or #7; reporting requirements/frequency in Table 7; and the general provision from Subpart A in Table 8.
40 CFR 63.6600(a)	Maintain compliance with the emission limitation in Table 1a (limit formaldehyde to 350 ppbvd at 15% O ₂ or reduce formaldehyde by 76%) and the operating limitations identified in Table 1b to Part 63 Subpart ZZZZ.
40 CFR 63.6600(a); 40 CFR 63.6610; 40 CFR 63.6620; and Subpart ZZZZ Tables 4 & 5	Conduct an initial performance test within 180 days of startup, using the appropriate test methods in Table 4; while continuously monitoring the temperature at the inlet of the catalyst to the NSCR using a continuous parameter monitoring system (CPMS), as required in Table 5; and establish the operating parameter for the pressure drop across the catalyst.
40 CFR 63.6615; Subpart ZZZZ Table 3 #3; and Table 6 #4 or #7	Continue to monitor the catalyst inlet temperature using the existing CPMS system.
40 CFR 63.6625(b); and 40 CFR 63.8(c), (d), & (e)	Maintain and comply with the existing site-specific monitoring plan for the continuous monitoring system (CMS), i.e., the CPMS, to include a quality control program and performance evaluation test plan for the CMS, in accordance with 40 CFR 63.8.
40 CFR 63.6665	Meet all of the general provisions of Subpart A, from Sections 63.1 through 63.15, that apply to the SI RICE, as identified in Table 8 to Subpart ZZZZ.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in these emissions units.

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

- (2) The permittee shall maintain the catalyst so that the pressure drop across the catalyst does not change by more than two inches of water at 100 percent load plus or minus 10



percent from the pressure drop across the catalyst measured during the initial performance test.

[Authority for term: 40 CFR Part 63.6600(a) and Table 1(b) to Subpart ZZZZ of Part 63]

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

Applicable Rule	Requirement
40 CFR 63.6625(b)(2)	CPMS must be installed, operated, and maintained in continuous operation in accordance with the site-specific monitoring plan.
40 CFR 63.6605	General duty to minimize emissions, with good air pollution control practices for minimizing emissions; and compliance required at all times.
40 CFR 63.6625(h)	Minimize idle and startup time, not to exceed 30 minutes.
40 CFR 63.6600(a); 40 CFR 63.6640(a); and Subpart ZZZZ Table 1b #1	Comply with operating limitations in Table 1b: The temperature of the stationary RICE exhaust at the inlet of the catalyst shall be maintained at greater than or equal to 750 degrees Fahrenheit and less than or equal to 1,250 degrees Fahrenheit; and the pressure drop across the catalyst shall be maintained at no more than 2 inches of water, plus or minus 10% of the pressure drop measured during the initial performance test, at 100% load.
40 CFR 63.6625(b)(4) through (6)	Must conduct an annual equipment performance evaluation or system accuracy audit on the temperature measurement device. The temperature sensor must meet the minimum tolerance range and must be installed, operated, and maintained as specified in 40 CFR 63.6625(b) and in accordance with the site-specific monitoring plan.

[Authority for term: 40 CFR Part 63.6600(a), 40 CFR 63.6625(b), 40 CFR 63.6605 and Table 1(b) to Subpart ZZZZ of Part 63]

- (4) If the catalyst is changed, the permittee must reestablish the values of the operating parameters measured during the initial performance test. When reestablishing the values of the operating parameters, the permittee must also conduct a performance test to demonstrate that the emissions unit is meeting the required emission limitation applicable to this stationary RICE.

[Authority for term: 40 CFR Part 63.6640(b)]

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 these emissions units.

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



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

Applicable Rule	Requirement
40 CFR 63.6625(b); 40 CFR 63.8; and Subpart ZZZZ Table 6 #4 or #7	Continue to comply with the existing CPMS to continuously monitor the catalyst inlet temperature to the NSCR. The CPMS must collect data at least once every 15 minutes and the catalyst inlet temperature shall be reduced to 4-hour rolling averages. The pressure drop across the catalyst must be monitored and recorded monthly. Continue to comply with the existing site specific CPMS monitoring plan.
40 CFR 63.6635	Except for monitor malfunctions, associated repairs, and required quality assurance activities, must continuously monitor that the RICE is operating. Must use all valid data (not recorded during malfunctions, repairs, or required quality assurance or control activities) in calculations used to report emissions or operating levels.
40 CFR 63.6640(a)	Demonstrate continuous compliance with the emission limitation and operating limitations identified in Tables 1a and 1b according to the methods specified in Table 6 to Subpart ZZZZ.
40 CFR 63.6655(a) and 40 CFR 63.10	Keep records of: 1. each notification and report submitted to comply with Part 63, Subpart ZZZZ; 2. the occurrence and duration of each malfunction of the RICE and any control or monitoring equipment; 3. corrective actions taken during each period of malfunction to minimize emissions and restore normal operations; 4. records of performance tests and performance evaluations of the CPMS; 5. all required maintenance performed on air pollution control and monitoring equipment; and 6. any excess emissions or parameter monitoring exceedances, as identified by 40 CFR 63.10.
40 CFR 63.6655(b); 40 CFR 63.10(b); and 40 CFR 63.8(d)	Keep records for each CPMS used to demonstrate compliance, including: the performance evaluation/test plan; previous versions of the performance evaluation plan; performance tests and evaluations; results of the quality control program; CPMS calibration checks or system accuracy audits; maintenance performed on air pollution control and monitoring equipment; the occurrence, duration, and corrective actions taken during periods of malfunction; and all measurements needed to demonstrate compliance with the relevant standard.
40 CFR 63.6655(d)	Keep the records required in Table 6 to Subpart ZZZZ to demonstrate continuous compliance.
40 CFR 63.6625(h)	Maintain a record of each idle and/or startup time that exceeded 30 minutes.
40 CFR 63.6660	Records readily available and retained for at least 5 years after the date of occurrence or date of report according to 63.10(b)(1).

[Authority for term: 40 CFR Part 63, Subpart ZZZZ]



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 these emissions units. Each report shall be submitted within 30 days after the deviation occurs.

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

- (2) A comprehensive written report on the results of the performance tests, conducted to demonstrate compliance with 40 CFR 63.6600(a), shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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

- (3) The permittee shall submit semiannual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required pursuant to 40 CFR Part 63, Subpart ZZZZ, including the following sections:

Applicable Rule	Requirement
40 CFR 63.6640(b)	Submit a report of each instance in which the emission limitation or operating limitations in Tables 1a and 1b were not met; these deviations to be reported according to the requirements of 63.6650.
40 CFR 63.6640(e)	Submit a report of each instance in which the applicable requirements in Table 8 to Subpart ZZZZ, the general provisions from Subpart A, were not met.
40 CFR 63.6645(a)(3)	Submit all notifications required per 63.7(b) and (c); 63.8(e), (f)(4), and (f)(6); and 63.9(b) through (e), (g), and (h) that apply to the SI RICE.
40 CFR 63.6625(b); 40 CFR 63.7(c); and 40 CFR 63.8(d) & (e)(3)	Upon request, submit a performance evaluation test plan for each monitoring system and/or the site-specific test plan to the office requesting it.
40 CFR 63.6645(g); 40 CFR 63.7(b); 40 CFR 63.8(e); and 40 CFR 63.9(e) & (g)	Submit a Notification of Intent to conduct a performance test for the emissions unit or a performance evaluation of the CMS if applicable at least 60 days before the test is scheduled to begin.
40 CFR 63.6650(a)	Submit each applicable report in Table 7 of Subpart ZZZZ.
40 CFR 63.6650(b)(1) to (5) and Subpart ZZZZ Table 7 #1	Submit Semiannual Compliance Reports to include the information identified in 63.6650(c) through (f), as applicable to the SI RICE. Following the initial compliance report, each subsequent report shall cover the reporting period from January 1 st through June 30 th and July 1 st through December 31 st . The Semiannual Compliance Reports must be postmarked or delivered no later than July 31 st and January 31 st .



40 CFR 63.6650(c)	63.6650(c) contains the required information to be submitted in each compliance report.
40 CFR 63.6650(d) & (e)	63.6650(d) contains the required information to be submitted for each deviation from an emission or operating limitation not monitored by a CMS and 63.6650(e) the information needed where using a CMS if applicable to comply with the emission or operating limitation.

[Authority for term: 40 CFR Part 63, Subpart ZZZZ]

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Emission Limitation:

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

Applicable Compliance Method:

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

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

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

c. Emission Limitation:

The projected emissions of nitrogen oxides (NO_x) shall not exceed 2.0 grams per Brake HP-hour.



Applicable Compliance Method:

Compliance shall be demonstrated as specified in B.2, B.3 and B.4.

[Authority for term: OAC rules 3745-14-12 and 3745-77-07(C)(1)]

d. Emission Limitations:

350 ppbvd formaldehyde at 15% O₂ on a dry basis or

reduce formaldehyde by 76% or more at 100 percent load plus or minus 10 percent.

Applicable Compliance Method:

The temperature at the inlet to the catalyst of the NSCR shall be monitored during the performance test and maintained between 750 °F and 1,250 °F. The CPMS, installed to measure the temperature at the inlet to the NSCR catalyst, shall complete one cycle of operation for each successive 15-minute period of operations, with a minimum of 4 successive cycles or operation for each valid hour of testing, and in accordance with 40 CFR 63.6625(b). The 3-hour block average temperature at the inlet to the catalyst shall be documented during performance tests and the pressure drop shall be recorded to establish the operating range for the pressure drop across the catalyst. Per 63.6640(b), if the catalyst is changed or the control device replaced, a new performance test must be conducted to demonstrate compliance with the emission limitation and to reestablish the values for, or compliance with, the operating parameters.

Each performance test shall consist of 3 separate test runs and each test run shall last a minimum of 1 hour and shall be conducted during normal operations. The engine percent load, during the performance test, shall be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load; and the estimated percent load shall be included in the notification of compliance.

A compliant performance test shall demonstrate that either the formaldehyde emissions have been reduced by 76% or that the average formaldehyde concentration is less than or equal to 350 ppbvd, corrected to 15 percent O₂ on a dry basis, and from three 1-hour or longer performance test runs.

The following test methods shall be employed to demonstrate compliance with the emission limitation or control requirement for formaldehyde:

- i. Method 1 or 1A of 40 CFR Part 60, Appendix A to select the sampling port location and the number of traverse points
- ii. Method 3, 3A, or 3B of 40 CFR Part 60, Appendix A or ASTM Method D6522-00 to measure O₂ at the inlet and outlet of the control device to normalize the formaldehyde concentration(s).



- iii. Method 4 of 40 CFR Part 60, Appendix A; or Method 320 of 40 CFR Part 63, Appendix A; or ASTM D6348-03 to measure the moisture content at the inlet and outlet of the control device if demonstrating compliance through the percent control or to measure the moisture content of the stationary RICE exhaust.
- iv. Method 25A of 40 CFR Part 60, Appendix A, reported as propane, to measure THC at the inlet and outlet of the control device, if demonstrating compliance with the formaldehyde standard through the percent control of THC.
- v. Method 320 or Method 323 of 40 CFR Part 63,, Appendix A; or ASTM D 6348-03 to measure formaldehyde at the inlet and outlet of the control device if demonstrating compliance through the percent control or to measure formaldehyde at the exhaust of the stationary RICE.
- vi. The following equation shall be used to normalize the formaldehyde or THC concentrations to a dry basis and to 15 percent oxygen (O₂)**:

$$C_{adj} = C_d (5.9 / 20.9 - \% O_2)$$

where:

C_{adj}= calculated formaldehyde or THC concentration adjusted to 15 percent O₂;

C_d= measured concentration of formaldehyde or THC, uncorrected;

5.9 = 20.9 percent O₂ – 15 percent O₂, the defined O₂ correction value, percent; and

%O₂ = measured O₂ concentration, dry basis, percent.

** Optionally, the pollutant concentrations can be corrected to 15% O₂ using a CO₂ correction factor, by calculating the fuel factor (F_o value) using Method 19 results obtained during the performance test (40 CFR 63.6620(e)(2)).

- vii. If compliance is demonstrated for the control efficiency for formaldehyde or THC, the following equation shall be used to determine the percent reduction:

$$R = (C_i - C_o) / C_i \times 100$$

where:

C_i= concentration of formaldehyde or THC at the control device inlet;

C_o= concentration of formaldehyde or THC at the control device outlet; and



R = percent reduction of formaldehyde or THC emissions.

The permittee shall notify the Director (appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency) in writing of each scheduled performance test date at least 60 calendar days before it is scheduled, to allow the agency time to review and approve the site-specific test plan and to arrange for an observer to be present during the compliance demonstration.

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

[Authority for term: 40 CFR 63.7(a)(2), (b)(1), and (e)(3), 40 CFR 63.6600(a), 40 CFR 63.6610, 40 CFR 63.6615, 40 CFR 63.6620, 40 CFR 63.6630, 40 CFR 63.6640(a) and (b), 40 CFR 63.6645(a)(3), Part 63, Subpart ZZZZ, Table 1a, Table 1b, Table 3 #3, Table 4 #2 or #3, Table 5 #7 or #9 and Table 6 #4 or #7, OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) Any amendment to 40 CFR Part 63, Subpart ZZZZ shall supersede the Subpart ZZZZ compliance limitations and/or compliance options contained in this permit.



4. Emissions Unit Group - Auxiliary Engines: Engines used to supply power to the station

EU ID	Operations, Property and/or Equipment Description
B001	408 HP (4.96mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/rich burn, reciprocating auxiliary generator engine
P002	408 HP (4.96mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/rich burn, reciprocating auxiliary generator engine
P003	408 HP (4.96mmBtu/hr) natural gas-fired, spark ignition, 4-cycle/rich burn, reciprocating auxiliary generator engine

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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11(B)(5)(a)	PE shall not exceed 0.310 lb/mmBtu of actual heat input.
c.	OAC rule 3745-18-06(G)	These emissions units are exempt from this requirement pursuant to OAC rule 3745-18-06(A). See b)(2)a.
d.	40 CFR Part 63 Subpart ZZZZ (40 CFR 63.6580 to 63.6675) In accordance with 40 CFR 63.6585, this emissions unit is a stationary reciprocating internal combustion engine (RICE) subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines.	The existing, natural gas, stationary 4SRB spark ignition (SI) RICE, located at a major source for hazardous air pollutants (HAPs), shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR 63.6602 Table 2c #11 to Subpart ZZZZ	Emissions of formaldehyde shall not exceed 10.3 ppmvd at 15% O ₂ . See b)(2)b, b)(2)c and c)(2).
f.	40 CFR 63.1 through 63.15	Table 8 to Subpart ZZZZ of 40 CFR Part 63 – Applicability of General Provisions to Subpart ZZZZ shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

- a. These emissions units are exempt from OAC rule 3745-18-06(G) during any calendar day in which natural gas is the only fuel burned.
- b. Following the compliance date of the NESHAP, the permittee shall limit the concentration of formaldehyde from the stationary RICE exhaust to 10.3 ppmvd or less at 15% O₂ at the outlet of the control device or from the exhaust stack of the engine.

[Authority for term: 40 CFR 63.6602, 40 CFR 63.6640(a) and Subpart ZZZZ, Table 2c #11]
- c. The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR 63.6595(a)(1)	The compliance date for Part 63 Subpart ZZZZ for existing SI RICE is 10/19/13.
Applicable Tables from Part 63, Subpart ZZZZ	Following the compliance date, comply with: emission limit in Table 2c #11; performance test methods in Table 4 #3; initial compliance demonstration in Table 5 #12; reporting requirements/frequency in Table 7; general provision from Subpart A in Table 8.
40 CFR 63.6602	Following the compliance date, maintain compliance with the emission limitation in Table 2c #11 (limit formaldehyde to 10.3 ppmvd at 15% O ₂) to Part 63 Subpart ZZZZ.
40 CFR 63.6665	Meet all of the general provisions of Subpart A, from Sections 63.1 through 63.15, that apply to the SI RICE, as identified in Table 8 to Subpart ZZZZ.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in these emissions units.

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



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

Applicable Rule	Requirement
40 CFR 63.6605	General duty to minimize emissions, with good air pollution control practices for minimizing emissions; and compliance required at all times.
40 CFR 63.6625(h)	Minimize idle and startup time, not to exceed 30 minutes.

[Authority for term: 40 CFR Part 63.6605 and 40 CFR 63.6625(h)]

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 these emissions units.

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

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

Applicable Rule	Requirement
40 CFR 63.6635	Except for monitor malfunctions, associated repairs, and required quality assurance activities, must continuously monitor that the RICE is operating. Must use all valid data (not recorded during malfunctions, repairs, or required quality assurance or control activities) in calculations used to report emissions or operating levels.
40 CFR 63.6655(a)	Keep records of: 1. each notification and report submitted to comply with Subpart ZZZZ; 2. The occurrence and duration of each malfunction of the RICE and any control or monitoring equipment; 3. corrective actions taken during each period of malfunction to minimize emissions and restore normal operations; 4. records of performance tests; and 5. all required maintenance performed on air pollution control and monitoring equipment.
40 CFR 63.6625(h)	Maintain a record of each idle and/or startup time that exceeded 30 minutes.
40 CFR 63.6660	Records readily available and retained for at least 5 years after the date of occurrence or date of report according to 63.10(b)(1).

[Authority for term: 40 CFR Part 63, Subpart ZZZZ]



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 these emissions units. Each report shall be submitted within 30 days after the deviation occurs.

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

- (2) A comprehensive written report on the results of the performance tests, conducted to demonstrate compliance with 40 CFR 63.6602, shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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

- (3) The permittee shall submit semiannual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required pursuant to 40 CFR Part 63, Subpart ZZZZ, including the following sections:

Applicable Rule	Requirement
40 CFR 63.6640(b)	Submit a report of each instance in which the emission limitation in Table 2c was not met; these deviations to be reported according to the requirements of 63.6650.
40 CFR 63.6640(e)	Submit a report of each instance in which the applicable requirements in Table 8 to Subpart ZZZZ, the general provisions from Subpart A, were not met.
40 CFR 63.6645(a)(1)	Submit all notifications required per 63.7(b) and (c); 63.8(e), (f)(4), and (f)(6); and 63.9(b) through (e), (g), and (h) that apply to the SI RICE.
40 CFR 63.6645(g)	Submit a Notification of Intent to conduct a performance test at least 60 days before the test is scheduled to begin, as required by 63.7(b)(1).
40 CFR 63.6650(a)	Submit each applicable report in Table 7 of Subpart ZZZZ.
40 CFR 63.6650(b)(1) to (5) and Part 63 Subpart ZZZZ Table 7 #1	Submit Semiannual Compliance Reports to include the information identified in 63.6650(c) through (f), as applicable to the SI RICE. Following the initial compliance report, each subsequent report shall cover the reporting period from January 1 st through June 30 th and July 1 st through December 31 st . The Semiannual Compliance Reports must be postmarked or delivered no later than July 31 st and January 31 st .
40 CFR 63.6650(c)	63.6650(c) contains the required information to be submitted in each compliance report.
40 CFR 63.6650(d)	63.6650(d) contains the required information to be submitted for each deviation from an emission or operating limitation not monitored by a continuous monitoring system (CMS).

[Authority for term: 40 CFR Part 63, Subpart ZZZZ]



f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Emission Limitation:

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

Applicable Compliance Method:

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

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

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

c. Emission Limitations:

10.3 ppmvd formaldehyde at 15% O₂

Applicable Compliance Method:

The following test methods shall be employed to demonstrate compliance with the emission limitation for formaldehyde:

- i. Method 1 or 1A of 40 CFR Part 60, Appendix A to select the sampling port location and the number of traverse points
- ii. Method 3, 3A, or 3B of 40 CFR Part 60, Appendix A or ASTM Method D6522-00: to measure O₂ at the inlet and outlet of the control device if demonstrating compliance through the percent control of CO or to



determine the O₂ concentration of the stationary RICE exhaust to normalize the CO concentration.

- iii. Method 4 of 40 CFR Part 60, Appendix A; or Method 320 of 40 CFR Part 63, Appendix A; or ASTM D6348-03 to measure the moisture content at the inlet and outlet of the control device if demonstrating compliance through the percent control or to measure the moisture content of the stationary RICE exhaust.
- iv. Method 320 or Method 323 of 40 CFR Part 63, Appendix A; or ASTM D 6348-03 to measure formaldehyde at the inlet and outlet of the control device if demonstrating compliance through the percent control or to measure formaldehyde at the exhaust of the stationary RICE.
- v. The following equation shall be used to normalize the formaldehyde concentrations to a dry basis and to 15 percent oxygen (O₂)**:

$$C_{adj} = C_d (5.9 / 20.9 - \% O_2)$$

where:

C_{adj}= calculated formaldehyde concentration adjusted to 15 percent O₂;

C_d= measured concentration of formaldehyde, uncorrected;

5.9 = 20.9 percent O₂ - 15 percent O₂, the defined O₂ correction value, percent; and

%O₂ = measured O₂ concentration, dry basis, percent.

** Optionally, the pollutant concentrations can be corrected to 15% O₂ using a CO₂ correction factor, by calculating the fuel factor (F_o value) using Method 19 results obtained during the performance test (40 CFR 63.6620(e)(2)).

The permittee shall notify the Director (appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency) in writing of the scheduled performance test date at least 60 calendar days before it is scheduled, to allow the agency time to review and approve the site-specific test plan and to arrange for an observer to be present during the compliance demonstration.

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

[Authority for term: 40 CFR 63.7(a)(2), (b)(1), and (e)(3), 40 CFR 63.6602, 40 CFR 63.6612, 40 CFR 63.6620, 40 CFR 63.6630, 40 CFR 63.6645(a)(1), Part 63, Subpart ZZZZ, Table 2c #11, Table 4 #3 and Table 5 #12, OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]



Draft Title V Permit

Tennessee Gas Pipeline - Station 214

Permit Number: P0117468

Facility ID: 0210000046

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

- (1) Any amendment to 40 CFR Part 63, Subpart ZZZZ shall supersede the Subpart ZZZZ compliance limitations and/or compliance options contained in this permit.