



9/30/2014

Monica Styles
Sun Pipeline Company
7155 Inkster Road
Taylor, MI 48180

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0387032003
Permit Number: P0117349
Permit Type: Initial Installation
County: Wood

Dear Permit Holder:

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

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

How to appeal this permit

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

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

Certified Mail

Table with 2 columns: Yes/No and various permit conditions like TOXIC REVIEW, SYNTHETIC MINOR TO AVOID MAJOR NSR, CEMS, MACT/GACT, NSPS, NESHAPS, NETTING, MODELING SUBMITTED, SYNTHETIC MINOR TO AVOID TITLE V, FEDERALLY ENFORCABLE PTIO (FEPTIO), SYNTHETIC MINOR TO AVOID MAJOR GHG.

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: Ohio EPA-NWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Sun Pipeline Company**

Facility ID:	0387032003
Permit Number:	P0117349
Permit Type:	Initial Installation
Issued:	9/30/2014
Effective:	9/30/2014
Expiration:	9/30/2019



Division of Air Pollution Control
Permit-to-Install and Operate
for
Sun Pipeline Company

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?	5
7. What reports must I submit under this permit?	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	7
15. What happens if a portion of this permit is determined to be invalid?	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions	10
1. P001, ME 1	11



Final Permit-to-Install and Operate
Sun Pipeline Company
Permit Number: P0117349
Facility ID: 0387032003
Effective Date: 9/30/2014

Authorization

Facility ID: 0387032003
Application Number(s): A0051387
Permit Number: P0117349
Permit Description: Large portable maintenance flare with a capacity of 260 million British thermal units per hour
Permit Type: Initial Installation
Permit Fee: \$200.00
Issue Date: 9/30/2014
Effective Date: 9/30/2014
Expiration Date: 9/30/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Sun Pipeline Company
2196 Brandeberry Road
Fostoria, OH 44830

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

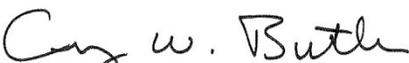
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Permit-to-Install and Operate
Sun Pipeline Company
Permit Number: P0117349
Facility ID: 0387032003
Effective Date: 9/30/2014

Authorization (continued)

Permit Number: P0117349

Permit Description: Large portable maintenance flare with a capacity of 260 million British thermal units per hour

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

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



Final Permit-to-Install and Operate
Sun Pipeline Company
Permit Number: P0117349
Facility ID: 0387032003
Effective Date: 9/30/2014

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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



Final Permit-to-Install and Operate
Sun Pipeline Company
Permit Number: P0117349
Facility ID: 0387032003
Effective Date: 9/30/2014

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Sun Pipeline Company

Permit Number: P0117349

Facility ID: 0387032003

Effective Date: 9/30/2014

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
Sun Pipeline Company
Permit Number: P0117349
Facility ID: 0387032003
Effective Date: 9/30/2014

C. Emissions Unit Terms and Conditions



1. P001, ME 1

Operations, Property and/or Equipment Description:

Large portable flare

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)a., b)(2)a., b)(2)b., c)(1), d)(1), e)(3), f)(1)a., f)(1)b. and f)(1)c.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Volatile Organic Compound (VOC) emissions shall not exceed 102.97 lbs/hr during flaring operations. 9.88 tons of VOC per rolling, 12-month period during flaring operations. Carbon Monoxide (CO) emissions shall not exceed 94.94 lbs/hr during the flaring operations. 9.11 tons of CO per rolling, 12-month period during the flaring operations. Nitrogen Oxide (NO _x) emissions shall not exceed 17.45 lbs/hr during the flaring operations.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		1.68 tons of NO _x per rolling, 12-month period during the flaring operations. See b)(2)a., b)(2)b. and c)(1)
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective as effective 11/30/2001	See b)(2)c. and b)(2)d.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)e.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1):
 - i. VOC emissions shall not exceed 102.97 lbs/hr during flaring operations and 9.88 tons VOC per rolling, 12-month period during the flaring operations;
 - ii. CO emissions shall not exceed 94.94 lbs/hr during the flaring operations and 9.11 tons CO per rolling, 12-month period during the flaring operations; and
 - iii. NO_x emissions shall not exceed 17.45 lbs/hr during the flaring operations and 1.68 tons NO_x per rolling, 12-month period during flaring operations.
- b. The PM10 and SO₂ emissions associated with the operation of the flare are negligible and will therefore not be included in this permit.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- d. The BAT requirement under OAC rule 3745-31-05(A)(3)(a)(ii), as effective 11/30/01, has been determined to be compliance with the restriction on the annual volume of LNG sent to the flare in c)(1)b.



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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3)(a) do not apply to the VOC, CO, NO_x, SO₂ and PM₁₀ emissions since the potential to emit of these pollutants is less than 10 tons per year, taking into account the federally enforceable restrictions established under OAC rule 3745-31-05(D) in this permit.

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [See b)(2)a.]:

- a. The flare shall have a minimum control efficiency of 99% for VOC emissions.
- b. The maximum annual volume of LNG sent to the flare unit shall not exceed 11,200 barrels based upon a rolling, 12-month summation of the volume of LNG flared.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the flare LNG volume levels specified in the following table:

Month(s)	Maximum Allowable LNG Volume Flared
1	11,200
1-2	11,200
1-3	11,200
1-4	11,200
1-5	11,200
1-6	11,200
1-7	11,200
1-8	11,200
1-9	11,200
1-10	11,200
1-11	11,200
1-12	11,200

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual LNG volumes flare limitation shall be based upon a rolling, 12-month summation.

- (2) The permittee shall burn only propane, ethane or a mixture of the two components in this emission unit.
- (3) A pilot flame shall be maintained in the flare's pilot light burner during operations of the flare.



- (4) The flare shall be designed for and operated with no visible emissions except for periods not to exceed a total of five minutes during any two consecutive hours.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the LNG volume flared for each month;
 - b. during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative LNG volume flared for each calendar month; and
 - c. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the LNG volume flared.
- (2) The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record the following information each day that the flare is in operation:

- a. All periods during which there was no pilot flame.
 - b. The operating times for the flare, monitoring equipment, and the associated emissions unit.
- (3) For each day during which the permittee burns a fuel other than propane, ethane or a combination of the two, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) 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 District Office or Local Air Agency, and/or any other individual or organization specifically



identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the 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 signatory authority may be represented as provided through procedures established in Air Services.

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month limitation on the LNG volume flared from this emissions unit; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable LNG volume flared.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emissions Limitations:
 - VOC emissions shall not exceed 102.97 lbs/hr during the flaring operations.
 - 9.88 tons of VOC per rolling, 12-month period during the flaring operations.



Applicable Compliance Method:

The hourly emissions limitation was established by the following formula:

Mole fraction of compound (0.0341 for propane) x flow rate in scf per hour (2,595,050) x 1 scfh/379 lbmol/hr x MW of compound (44.1 for propane) x (1-0.99) = VOC lb per hour

Propane:

$$0.0341 * 2,595,050 \text{ scf/hr} * (1/379 \text{ lbmol/hr}) * 44.1 * 0.01 = \mathbf{102.97 \text{ lbs/hr VOC}}$$

If required, volatile organic compound emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

The annual emissions limitation was established by the following formula. As propane has a higher mole weight, it was used to exemplify worst case operations:

Annual compound liquid flow rate (11,200 bbl/yr) x 42 gal/bbl x liquid density conversion (1/7.48 gal/scf liquid propane) x liquid to gas volume conversion (270 scf gas/scf liquid propane) x 1scf/379 lb-mol x MW propane (44.1 lb/lb-mol) x (1-0.99) x (1 ton/2,000 lb) = VOC ton per year

$$11,200 \text{ bbl/yr} * 42 \text{ gal/bbl} * (1/7.48 \text{ gal/scf}) * (270 \text{ scf gas/scf}) * 1 \text{ scf/379 lb-mol} * 44.1 \text{ lb/lb-mol} * (1-0.99) * (1 \text{ ton/2,000 lb}) = 9.88 \text{ tons VOC per year.}$$

Where:

11,200 bbl/yr = maximum annual volume of LNG sent to the flare as requested in application

Therefore, provided compliance is shown with the rolling, 12-month flared LNG volume restriction, compliance with the annual emission limitation shall also be demonstrated.

b. Emissions Limitations:

CO emissions shall not exceed 94.94 lbs/hr during the flaring operations.

9.11 tons of CO per rolling, 12-month period during the flaring operations.

Applicable Compliance Method:

The hourly emissions limitation was demonstrated by the following formula which employs emissions factors for CO from USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 13.5 Table 13.5-1 (9/91).



Propane:

$$256.6 \text{ MMBtu/hr} * 0.37 \text{ (emission factor lbs of CO per MMBtu)} = \mathbf{94.94 \text{ lbs/hr CO}}$$

Where:

256.6 MMBtu/hr = maximum flare heat input while operating this emissions unit.

If required, carbon monoxide emissions shall be determined according to test Methods 1 - 4 and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

The annual CO emission limit was established by the following formula using ethane, which has a higher liquid to gas volume conversion than propane:

$$11,200 \text{ bbl/yr} * 42 \text{ gal/bbl} * (1/7.48 \text{ gal/scf}) * (437 \text{ scf gas/scf liquid}) * 1,792 \text{ Btu/scf} * (1 \text{ MMBtu}/10^6 \text{ Btu}) * 0.37 \text{ lb CO/MMBtu} * (1 \text{ ton}/2,000 \text{ lb}) = 9.11 \text{ tons CO per year}$$

Where:

11,200 bbl/yr = maximum annual volume of LNG sent to the flare as requested in application

Therefore, provided compliance is shown with the rolling, 12-month flared LNG volume restriction, compliance with the annual emission limitation shall also be demonstrated.

c. Emissions Limitations:

NO_x emissions shall not exceed 17.45 lbs/hr during the flaring operations.

1.68 tons of NO_x per rolling, 12-month period during the flaring operations.

Applicable Compliance Method:

The hourly emissions limitation was demonstrated by the following formula which employs emissions factors for NO_x from USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 13.5 Table 13.5-1 (9/91).

$$(256.6 \text{ MMBtu/hr}) * 0.068 \text{ (emission factor lbs of NO}_x \text{ per MMBtu)} = \mathbf{17.45 \text{ lbs/hrNO}_x}$$

Where:

256.6 MMBtu/hr = maximum flare heat input while operating this emissions unit.



If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4 and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

The annual NO_x emission limit was established by the following formula using ethane, which has a higher liquid to gas volume conversion than propane:

$$11,200 \text{ bbl/yr} \times 42 \text{ gal/bbl} \times (1/7.48 \text{ gal/scf}) (437 \text{ scf gas/scf liquid}) \times 1,792 \text{ Btu/scf} \times 0.068 \text{ lbNO}_x/\text{MMBtu} \times (1 \text{ ton}/2,000 \text{ lb}) = 1.67 \text{ tons NO}_x \text{ per year}$$

Where:

11,200 bbl/yr = maximum annual volume of LNG sent to the flare as requested in application

Therefore, provided compliance is shown with the rolling, 12-month flared LNG volume restriction, compliance with the annual emission limitation shall also be demonstrated.

d. Emission Limitation:

The flare shall be designed for and operated with no visible emissions, except for periods of time not to exceed a total of 5 minutes during any 2 consecutive hours.

Applicable Compliance Method:

e. If required, compliance shall be demonstrated in accordance with Method 22 of 40 CFR, Part 60, Appendix A.

g) **Miscellaneous Requirements**

(1) At the discretion and following the approval of the Director (the Northwest Ohio EPA District Office), the permittee may relocate the portable source within the State of Ohio without first obtaining a permit-to-install and operate (PTIO) or a permit-to-install (PTI), providing the appropriate notification and exemption requirements have been met. Pursuant to the permanent exemption for portable sources in OAC rule 3745-31-03(A)(1), the Director may issue a "Notice of Site Approval" for any pre-disclosed location if the portable source meets the requirements of OAC rule 3745-31-05(H), as follows:

a. the portable source is operating pursuant to a currently effective permit-to-install (PTI), permit-to-install and operate (PTIO), or has been approved for registration status and continues to comply with the requirements of the permit and any applicable state and/or federal rules;

b. the portable source has been issued a PTIO or PTI and the permittee continues to comply with the requirements of the permit, including any applicable best available technology (BAT) determination;



- c. the portable source owner has identified and submitted the proposed site to the Ohio EPA;
- d. the permitting District Office/local air agency and the District Office/local air agency having jurisdiction over the new site (if different) have determined that the portable source will have an acceptable environmental impact at the proposed site;
- e. a public notice, meeting the requirements OAC rule 3745-47, is published in the county where the proposed site is located;
- f. the owner of the proposed site (if not the permittee) has provided the portable source owner with approval, or an equivalent declaration, that it is acceptable to move the portable source to the proposed site; and
- g. the permittee has provided the Ohio EPA with a minimum of a 15-day written notice of the relocation.

The portable source can be relocated upon receipt of the Director's "Notice of Site Approval" for the site. Any site approval issued by the Ohio EPA, pursuant to OAC rule 3745-31-05(H) is subject to expiration and renewal. Pursuant to OAC rule 3745-31-07(C)(3), any site approval for a portable source shall be issued for a period of time determined to be appropriate by the Director and the renewal will be reevaluated and subject to the same requirements above.

- (2) If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTIO or PTI (as applicable) for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745-77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.

The "Notice of Intent to Relocate" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.