



10/31/2014

Mrs. Kristin Ikard
 Utica Gas Services, LLC-Carrollton Compressor Facility
 P.O. Box 54342
 Oklahoma City, OK 73154

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0210012002
 Permit Number: P0117233
 Permit Type: Initial Installation
 County: Carroll

Certified Mail

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

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

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

Sincerely,



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

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



FINAL

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

for

Utica Gas Services, LLC-Carrollton Compressor Facility

Facility ID:	0210012002
Permit Number:	P0117233
Permit Type:	Initial Installation
Issued:	10/31/2014
Effective:	10/31/2014



Division of Air Pollution Control
Permit-to-Install
for
Utica Gas Services, LLC-Carrollton Compressor Facility

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Authorization

Facility ID: 0210012002
Facility Description: Natural Gas Delivery Point
Application Number(s): A0051230, A0052018, A0052054, A0052120
Permit Number: P0117233
Permit Description: Initial installation of previously unpermitted unpaved roadways (F001), back-up generators (P016 and P017), condensate tanks (T001-T003) and produced water tanks (T004-T006) due to increased emissions. Also, new installation of methanol loading (J002) and an open flare (P018). Emission units are located at a compressor station that is switching from FEPTIO to Title V.
Permit Type: Initial Installation
Permit Fee: \$2,100.00
Issue Date: 10/31/2014
Effective Date: 10/31/2014

This document constitutes issuance to:

Utica Gas Services, LLC-Carrollton Compressor Facility
2098 Panda Road SE
Carrollton, OH 44615

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0117233

Permit Description: Initial installation of previously unpermitted unpaved roadways (F001), back-up generators (P016 and P017), condensate tanks (T001-T003) and produced water tanks (T004-T006) due to increased emissions. Also, new installation of methanol loading (J002) and an open flare (P018). Emission units are located at a compressor station that is switching from FEPTIO to Title V.

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

- | | |
|-----------------------------------|----------------|
| Emissions Unit ID: | F001 |
| Company Equipment ID: | UPR |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | J002 |
| Company Equipment ID: | ML-1 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P018 |
| Company Equipment ID: | FLARE-2 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |

Group Name: 400 bbl condensate tanks

Emissions Unit ID:	T001
Company Equipment ID:	T1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T002
Company Equipment ID:	T2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T003
Company Equipment ID:	T3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: 400 bbl produced water tanks

Emissions Unit ID:	T004
Company Equipment ID:	T4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T005
Company Equipment ID:	T5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Emissions Unit ID:	T006
Company Equipment ID:	T6
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: Baldor Generators

Emissions Unit ID:	P016
Company Equipment ID:	GEN-90
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P017
Company Equipment ID:	GEN-2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable



Final Permit-to-Install
Utica Gas Services, LLC-Carrollton Compressor Facility
Permit Number: P0117233
Facility ID: 0210012002
Effective Date:10/31/2014

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

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



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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

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



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

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

5. **Scheduled Maintenance/Malfunction Reporting**

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

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

6. **Compliance Requirements**

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule



3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

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

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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



9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

10. Applicability

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

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

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



that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.



- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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



B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines: P016 and P017. The complete NSPS requirements may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office.
3. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution: P018, T001 – T006. The complete New Source Performance Standards (NSPS) requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office.
4. Air contaminant sources that qualify as de minimis under OAC rule 3745-15-05, or are exempt under OAC rule 3745-31-03(A)(1) or (4) are not subject to emission standards established within this permit. Although this permit does not apply to de minimis or exempt sources, emissions from de minimis or exempt sources must be included in the total potential to emit (PTE) calculations for this permit.



C. Emissions Unit Terms and Conditions



1. F001, Unpaved Roadways

Operations, Property and/or Equipment Description:

Fugitive emissions from unpaved roadways.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions. See also paragraph b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-17-07(B)(5)	No visible particulate emissions (PE) from unpaved roadways and parking areas except for a period of time not to exceed 13 minutes during any 60-minute observation period.
d.	OAC rule 3745-17-08(B)	See b)(2)c through b)(2)e.
e.	OAC rule 3745-31-05(F)	Fugitive particulate emissions (PE) shall not exceed 0.01 TPY.

(2) Additional Terms and Conditions

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



December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

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

Permit-to-Install P0117233 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3).

Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions.

- c. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the unpaved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- e. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Work Practice Plan

The permittee shall develop and implement a site-specific Work Practice Plan designed to minimize or eliminate fugitive dust from the permittee's unpaved roadways and parking areas. This Work Practice Plan shall include, at a minimum, the following elements:

- a. An identification of each segment of unpaved roadway or parking area for which the plan applies.
- b. A determination of the frequency that each roadway or parking area will be inspected to determine if additional control measures are needed.



- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways/parking areas. This form/record should include, at a minimum, the following elements:
 - i. roadway or parking area segment inspected;
 - ii. date inspected;
 - iii. name of employee who either did the inspection or who can verify that the inspection was completed;
 - iv. result of the inspection (needs treated or does not need treated);
 - v. a description of why no treatment was needed;
 - vi. date treated;
 - vii. name of employee who either treated the segment or who can verify that the segment was treated; and
 - viii. method used to treat the segment.

- d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA (Northeast District Office) approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the Northeast District Office for review and approval. The permittee can begin using the revised Work Practice Plan once Northeast District Office has approved its use.

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(3) Work Practice Plan Record Keeping

The permittee shall maintain records of the following information:

- a. the records required to be collected under the Work Practice Plan, and



- b. the date and reason any element of the Work Practice Plan was not implemented.

The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part I of this permit.

e) Reporting Requirements

- (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the Northeast District Office.
- (2) The permittee shall submit semiannual deviation reports concerning any failure to implement the Work Practice Plan. These reports shall be submitted as part of the semi-annual monitoring, recordkeeping, and reporting requirements deviation reports required in the Standard Terms and Conditions section of this permit.

f) Testing Requirements

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

- a. Emission Limitation:

No visible PE from unpaved roadways and parking areas except for a period of time not to exceed 13 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with USEPA Method 22 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources").

- b. Emission Limitation:

Fugitive PE shall not exceed 0.01 TPY.

Applicable Compliance Method:

Compliance with the fugitive PE limitation shall be determined by using the emission factor equations in Section 13.2.2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for unpaved roadways. Should further updates in AP-42 occur, the most current equations for unpaved roads shall be used.

Unpaved roadways:

$$EF = ((k*(s/12)^a*(W/3)^b)(365-p)/365))$$

where:



EF = particulate emission factor (lb/VMT);

k = 4.9 (AP-42, 13.2.2 11/2006);

s = surface material silt content (%) = 0.2% (as submitted in A0052054);

a = 0.7 (AP-42, 13.2.2 11/2006);

W = mean vehicle weight (tons) = 4.83 (as submitted in A0052054);

b = 0.45 (AP-42, 13.2.2 11/2006); and

p = number of days/year with > 0.01 inch precipitation = 150.

Therefore EF = 0.20 lb/VMT;

Maximum travel = 45 miles/year (as submitted in A0052054); and

$(45 \text{ VMT/year})(0.20 \text{ lb/VMT})(1 \text{ ton}/2,000 \text{ lbs}) = 0.01 \text{ TPY}$.

g) Miscellaneous Requirements

(1) None.



2. J002, ML-1

Operations, Property and/or Equipment Description:

Methanol truck loading

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Fugitive volatile organic compound (VOC) emissions shall not exceed 0.003 ton per month averaged over a twelve-month rolling period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

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

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



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

- c. All methanol loading lines shall be equipped with fittings which are vapor tight.
 - d. The permittee shall not permit methanol to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following information:
 - a. the throughput of methanol for each month, in gallons; and
 - b. the rolling, 12-month summation of the methanol throughput, in gallons.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Fugitive VOC emissions shall not exceed 0.003 ton per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

VOC emissions shall be based on multiplying the loading loss factor (*L), by the rolling, 12-month summation of the methanol throughput, in tons, divided by 2000 lbs/ton and 12 months/yr.

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

*L = 12.46 SPM/T



where:

L = loading loss, pounds per 1000 gallons loaded;

S = saturation factor, 1.45 for splash fill;

P = vapor pressure of liquid loaded (@ 51.92 °F = 1.2707);

M = molecular weight of vapor = 32.04; and

T = temperature of bulk liquid = 511.92 °R.

g) Miscellaneous Requirements

(1) None.



3. P018, FLARE-2

Operations, Property and/or Equipment Description:

24.26 mmBtu/hr open-tip flare (controlling the dehydration flash tank off-gases (P001-P003), condensate storage tank emissions (T001, T002, T003), produced water storage tank emissions (T004, T005, T006), and truck loading emissions (J001) when the VRU is down)

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Nitrogen oxides (NO _x) emissions shall not exceed 0.60 ton per month averaged over a twelve-month rolling period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	ORC 3704.03(T)	Carbon monoxide (CO) emissions shall not exceed 3.28 tons per month averaged over a twelve-month rolling period. See c)(1) and c)(2).
e.	OAC rule 3745-17-11(B)	See b)(2)d.
f.	40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (60.5360-60.5430) [In accordance with 40 CFR 60.5365, this emissions unit includes a storage vessel affected facility.]	Following the compliance date of April 15, 2015 for Group 1 storage vessels*, and April 15, 2014 or 60 days after startup (whichever is later) for Group 2 storage vessels**, each storage vessel with VOC emissions calculated to exceed 6 tons per year shall reduce VOC emissions by 95.0% or greater. See c)(3), d)(4) and e)(4).
g.	40 CFR Part 60.1 through 60.19	The General Provisions that apply are specified in Table 3 of 40 CFR Part 60, Subpart OOOO.



(2) Additional Terms and Conditions

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

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

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

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

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

c) Operational Restrictions

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

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

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

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

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

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

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



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

60.5395(a), 60.5410(h)(2), and 60.5415(e)(3)	Operate the flare to achieve a 95% reduction of emissions of VOC from each storage vessel emitting more than 6 TPY. Emissions are to be determined per 60.5365(e).
60.5412(a)(3) and 60.5413	Design and operation requirements for a flare.
60.5413(a)(1)	Performance test exemption if flare is designed and operated in accordance with section 60.18(b). Perform a visible emissions test using Method 22 at 40 CFR Part 60, Appendix A-7.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a pressure sensor and/or flame detection device to monitor the need for a flame and presence of a flame, respectively, when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- (2) The permittee shall record the following information each day for the flare and process operations:
- a. all periods during which the pressure sensor and/or flame detection device were not functioning properly; and
 - b. the operating times for the flare and monitoring equipment.
- (3) The permittee shall maintain records of each day a fuel other than natural gas is burned in this emissions unit.
- (4) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5417(d)(1)(iii) and 60.5415(e)(3)(i)(B)	Install, calibrate, operate, and maintain a heat sensing monitoring device equipped with a continuous recorder that indicates the continuous ignition of the pilot flame.
60.5417(c)(1)	Detect and record the presence of a flare flame at least <u>once every hour</u> .
60.5417(c)(2)	Install, calibrate, operate, and maintain the continuous monitoring systems in accordance with a site specific monitoring plan including the information required by rule.



60.5417(c)(3) and (4)	Conduct a continuous parameter monitoring systems equipment performance check, system accuracy audit, or other audit procedure as specified in the site-specific monitoring plan at least <u>once every 12 months</u> . Conduct performance evaluations of the continuous parameter monitoring systems as specified in the site-specific monitoring plan.
60.5417(g)(4)	Deviations for the flare occur when the monitoring data are not available for at least 75 percent of the operating hours in a day.
60.5420(c)	The applicable records identified in 40 CFR 60.5420(c) and 40 CFR 60.7(f) must be maintained either onsite or at the nearest local field office for at least 5 years.
60.5420(c)(5)(iii)	Maintain records of deviations.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit, except during an emergency. Each report shall be submitted within 30 days after the deviation occurs.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all periods of time during which the pressure sensor and/or flame detection device were not functioning properly or the flare was not maintained as required in this permit;
 - 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, electronically through Ohio EPA Air Services, 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).

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



- (4) The permittee shall submit notifications and reports to the Ohio EPA, Northeast District Office as required pursuant to 40 CFR Part 60, Subpart OOOO, per the following sections:

60.5420(b)(6)(iii)	Submit records of deviations.
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f) Testing Requirements

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

a. Emission Limitation:

NO_x emissions shall not exceed 0.60 ton per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

The emission rate specified above was established by multiplying the emission factor from AP-42, Table 13.5-1 (revised 1/95), of 0.068 lbNO_x/mmBtu by the maximum heat input rate of 24.26 mmBtu/hr. This number was then multiplied by the maximum annual hours of operation (8,760 hours), then divided by 2,000 lbs per ton and then divided by 12 months per year.

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

b. Emission Limitation:

CO emissions shall not exceed 3.28 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

The emission rate specified above was established by multiplying the emission factor from AP-42, Table 13.5-1 (revised 1/95), of 0.37 lb CO/mmBtu by the maximum heat input rate of 24.26 mmBtu/hr. This number was then multiplied by the maximum annual hours of operation (8,760 hours), then divided by 2,000 lbs per ton and then divided by 12 months per year.

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



c. Emission Limitation:

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

Applicable Compliance Method:

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

d. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

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



4. Emissions Unit Group -400 bbl condensate tanks: T001,T002,T003,

EU ID	Operations, Property and/or Equipment Description
T001	400-bbl Condensate Storage Tank
T002	400-bbl Condensate Storage Tank
T003	400-bbl Condensate Storage Tank

All condensate storage tanks vent to a vapor recovery unit with a flare back-up (P018).

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions from the flare stack shall not exceed 0.48 ton per month averaged over a twelve-month rolling period, per emissions unit. The requirements of this rule include compliance with the applicable requirements of 40 CFR Part 60, Subpart OOOO. Use of submerged or bottom fill on tank. See b)(2)a, b)(2)d, c)(1) and c)(2).
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	40 CFR Part 60, Subpart Kb	See b)(2)c.
d.	OAC Rule 3745-21-09(L)(1)	Exempt pursuant to OAC rule 3745-21-09(L)(2)(a). See b)(2)e.
e.	40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (60.5360-60.5430)	Following the compliance date of April 15, 2015 for Group 1 storage vessels*, and April 15, 2014 or 60 days after startup (whichever is later) for Group 2 storage vessels**, each storage vessel with VOC



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 60.5365, this emissions unit includes a storage vessel affected facility.]	emissions calculated to exceed 6 tons per year shall reduce VOC emissions by 95.0% or greater. See c)(3), d)(3) and e)(3).
f.	40 CFR Part 60.1 through 60.19	The General Provisions that apply are specified in Table 3 of 40 CFR Part 60, Subpart OOOO.

(2) Additional Terms and Conditions

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the controlled potential to emit for VOC (taking into account the federally enforceable control device) is less than 10 tons/yr.
- c. This emission unit is exempt from the control requirements of 40 CFR 60.110(b) because it is a vessel with a design capacity less than or equal to 1,589.874 m³ used for petroleum or condensate stored, processed, or treated prior to custody transfer.
- d. Maintenance of the flare used to control VOC will assure compliance with the tons/year limitation. See emissions unit P018 for flare requirements.
- e. A fixed roof tank meeting one of the following criteria is exempt from installing an internal floating roof or other control device and is not subject to the requirements identified in OAC 3745-21-09(L):
 - i. a fixed roof tank with a capacity of less than 40,000 gallons; or



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

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

c) Operational Restrictions

- (1) All of the emissions from the storage tank shall be captured by a vapor recovery unit (VRU) or flare.
- (2) During all periods of downtime of the VRU, a backup flare shall be utilized to control emissions that is designed and operated as required in emissions unit P018.
- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5395(a), 60.5410(h)(2), and 60.5415(e)(3)	Operate the flare to achieve a 95% reduction of emissions of VOC from each storage vessel emitting more than 6 TPY. Emissions are to be determined per 60.5365(e).
60.5395(e) and 60.5411(b)	Equip the storage tanks with a cover connected through a closed vent system to the flare. The cover and all openings in the cover must form a continuous barrier over the entire surface area of the liquid in the storage vessel and must be secured in a closed, sealed position whenever material is stored in the storage vessels except as provided by rule.
60.5395(e) and 60.5411(b)(3)	Each storage vessel thief hatch shall be weighted and properly seated.
60.5395(e) and 60.5411(c)	Design the closed vent system to route all gases, vapors, and fumes emitted from the material in the storage vessel to a control device. Low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and safety devices are not subject to these requirements.
60.5395(e) and 60.5411(c)(2)	Design and operate the closed vent system with no detectable emissions, as determined using olfactory, visual and auditory inspections.
60.5395(e) and 60.5411(c)(3)	For closed vent systems containing one or more bypass devices, either install a flow indicator or secure the bypass device valve in the non-diverting position using a car-seal or a lock-and-key type configuration.
60.5412(a)(3) and 60.5413	Design and operation requirements for a flare.
60.5413(a)(1)	Performance test exemption if flare is designed and operated in accordance with section 60.18(b). Perform a



	visible emissions test using Method 22 at 40 CFR Part 60, Appendix A-7.
60.5415(e)(3)(A) and 60.5416(c)(4), (5), (6), and (7)	Repair all leaks detected from the closed vent system or cover as soon as practicable. First attempt at repair must be made no later than <u>5 calendar days</u> after detection, and repair must be completed no later than <u>30 calendar days</u> after detection, except as provided by rule (e.g., delay of repair, unsafe to inspect, difficult to inspect). Grease or another applicable substance must be applied to deteriorating or cracked gaskets to improve the seal while awaiting repair.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of all periods of downtime for the VRU.
- (2) The permittee shall record the annual throughput of each tank in gallons per year. The permittee shall keep records of U.S. EPA TANKS software program and/or other process simulation program calculations used to demonstrate annual storage tank and process vent emissions. These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.
- (3) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5416(c)(1)	For each closed vent system, conduct monthly olfactory, visual and auditory inspections for defects including, but not limited to, visible cracks, holes or gaps in piping; loose connections; liquid leaks; or broken or missing caps or other closure devices. Monthly inspections must be separated by at least 14 calendar days.
60.5416(c)(2)	For each cover, conduct monthly olfactory, visual and auditory inspections for defects including, but not limited to, visible cracks, holes or gaps in the cover, or between the cover and the separator wall; broken, cracked or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices. Monthly inspections must be separated by at least 14 calendar days.
60.5416(c)(3)	For each bypass device, except as provided for in Section 60.5411(c)(3)(ii), set the flow indicator to sound an alarm at the inlet to the bypass device when the stream is being diverted away, or visually inspect the seal or closure mechanism monthly to verify that the valve is maintained in



	the non-diverting position.
60.5417(d)(1)(iii) and 60.5415(e)(3)(i)(B)	Install, calibrate, operate, and maintain a heat sensing monitoring device equipped with a continuous recorder that indicates the continuous ignition of the pilot flame.
60.5417(c)(1)	Detect and record the presence of a flare flame at least <u>once every hour</u> .
60.5417(c)(2)	Install, calibrate, operate, and maintain the continuous monitoring systems in accordance with a site specific monitoring plan including the information required by rule.
60.5417(c)(3) and (4)	Conduct a continuous parameter monitoring systems equipment performance check, system accuracy audit, or other audit procedure as specified in the site-specific monitoring plan at least <u>once every 12 months</u> . Conduct performance evaluations of the continuous parameter monitoring systems as specified in the site-specific monitoring plan.
60.5417(g)(4)	Deviations for the flare occur when the monitoring data are not available for at least 75 percent of the operating hours in a day.
60.5417(g)(5)	Deviations for the bypass devices occur when the flow indicator indicates that flow has been detected and that the stream has been diverted away from the control device to the atmosphere, or if the seal or closure mechanism has been broken, the bypass line valve position has changed, the key for the lock-and-key type lock has been checked out, or the car-seal has broken.
60.5420(c)	The applicable records identified in 40 CFR 60.5420(c) and 40 CFR 60.7(f) must be maintained either onsite or at the nearest local field office for at least 5 years.
60.5420(c)(5)(ii)	Maintain records of each VOC emissions determination for each storage vessel affected facility including identification of the model or calculation methodology used to calculate the VOC emission rate.
60.5420(c)(5)(iii)	Maintain records of deviations.
60.5420(c)(5)(iv)	Maintain records for storage vessels that are skid-mounted or permanently attached to something that is mobile.
60.5420(c)(5)(v)	Maintain records of the identification and location of each storage vessel affected facility.



60.5420(c)(6)	Maintain required records for inspections of closed vent systems.
60.5420(c)(7)	Maintain required records for inspections of storage vessel covers.
60.5420(c)(8)	Maintain required records for inspections of the bypass or each time the key is checked out or each time the alarm is sounded.

e) Reporting Requirements

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

60.5420(a)(1)	Initial notifications are not required for storage vessels.
60.5410(e)(8), 60.5420(b)(1), and 60.5420(b)(6)	Submit the required information for storage vessels in the initial annual report within 90 days of the end of the initial compliance period and in the subsequent reports due the same date each year as the initial annual report.
60.5420(b)(6)(i)	Submit an identification, including the location, of each storage vessel affected facility for which construction, modification or reconstruction commenced during the reporting period.
60.5420(b)(6)(ii)	Submit documentation of the VOC emission rate determination.
60.5420(b)(6)(iii)	Submit records of deviations.
60.5420(b)(6)(iv)	Submit a notification identifying each Group 1 storage vessel affected facility in the initial annual report.
60.5420(b)(6)(v)	Submit a statement that the requirements of 60.5410(h)(2) and (3) have been met.

f) Testing Requirements

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



a. Emission Limitation:

VOC emissions from the flare stack shall not exceed 0.48 ton per month averaged over a twelve-month rolling period, per emissions unit.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.



5. Emissions Unit Group -400 bbl produced water tanks: T004,T005,T006,

EU ID	Operations, Property and/or Equipment Description
T004	400-bbl Produced Water Storage Tank
T005	400-bbl Produced Water Storage Tank
T006	400-bbl Produced Water Storage Tank

All produced water storage tanks vent to a vapor recovery unit with a flare back-up (P018).

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The requirements of this rule include compliance with the applicable requirements of 40 CFR Part 60, Subpart OOOO. Use of submerged or bottom fill on tank. See b)(2)a, c)(1) and c)(2).
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	40 CFR Part 60, Subpart Kb	See b)(2)c.
d.	OAC Rule 3745-21-09(L)(1)	Exempt pursuant to OAC rule 3745-21-09(L)(2)(b). See b)(2)d.
e.	40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (60.5360-60.5430) [In accordance with 40 CFR 60.5365, this emissions unit includes a storage vessel affected facility.]	Following the compliance date of April 15, 2015 for Group 1 storage vessels*, and April 15, 2014 or 60 days after startup (whichever is later) for Group 2 storage vessels**, each storage vessel with VOC emissions calculated to exceed 6 tons per year shall reduce VOC emissions by 95.0% or greater. See c)(3), d)(3) and e)(3).



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

(2) Additional Terms and Conditions

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

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

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

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

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

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

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



c) Operational Restrictions

- (1) All of the emissions from the storage tank shall be captured by a vapor recovery unit (VRU) or flare.
- (2) During all periods of downtime of the VRU, a backup flare shall be utilized to control emissions that is designed and operated as required in emissions unit P018.
- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5395(a), 60.5410(h)(2), and 60.5415(e)(3)	Operate the flare to achieve a 95% reduction of emissions of VOC from each storage vessel emitting more than 6 TPY. Emissions are to be determined per 60.5365(e).
60.5395(e) and 60.5411(b)	Equip the storage tanks with a cover connected through a closed vent system to the flare. The cover and all openings in the cover must form a continuous barrier over the entire surface area of the liquid in the storage vessel and must be secured in a closed, sealed position whenever material is stored in the storage vessels except as provided by rule.
60.5395(e) and 60.5411(b)(3)	Each storage vessel thief hatch shall be weighted and properly seated.
60.5395(e) and 60.5411(c)	Design the closed vent system to route all gases, vapors, and fumes emitted from the material in the storage vessel to a control device. Low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and safety devices are not subject to these requirements.
60.5395(e) and 60.5411(c)(2)	Design and operate the closed vent system with no detectable emissions, as determined using olfactory, visual and auditory inspections.
60.5395(e) and 60.5411(c)(3)	For closed vent systems containing one or more bypass devices, either install a flow indicator or secure the bypass device valve in the non-diverting position using a car-seal or a lock-and-key type configuration.
60.5412(a)(3) and 60.5413	Design and operation requirements for a flare.
60.5413(a)(1)	Performance test exemption if flare is designed and operated in accordance with section 60.18(b). Perform a visible emissions test using Method 22 at 40 CFR Part 60, Appendix A-7.
60.5415(e)(3)(A) and 60.5416(c)(4), (5), (6), and (7)	Repair all leaks detected from the closed vent system or cover as soon as practicable. First attempt at repair must be made no later than <u>5 calendar days</u> after detection, and repair must be completed no later than <u>30 calendar days</u> after detection, except as provided by rule (e.g., delay of repair, unsafe to inspect, difficult to inspect). Grease or another applicable substance must



	be applied to deteriorating or cracked gaskets to improve the seal while awaiting repair.
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*The permittee may choose to comply with any alternative standards provided in 40 CFR Part 60, Subparts A and OOOO.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of all periods of downtime for the VRU.
- (2) The permittee shall record the annual throughput of each tank in gallons per year. The permittee shall keep records of U.S. EPA TANKS software program and/or other process simulation program calculations used to demonstrate annual storage tank and process vent emissions. These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.
- (3) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5416(c)(1)	For each closed vent system, conduct monthly olfactory, visual and auditory inspections for defects including, but not limited to, visible cracks, holes or gaps in piping; loose connections; liquid leaks; or broken or missing caps or other closure devices. Monthly inspections must be separated by at least 14 calendar days.
60.5416(c)(2)	For each cover, conduct monthly olfactory, visual and auditory inspections for defects including, but not limited to, visible cracks, holes or gaps in the cover, or between the cover and the separator wall; broken, cracked or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices. Monthly inspections must be separated by at least 14 calendar days.
60.5416(c)(3)	For each bypass device, except as provided for in Section 60.5411(c)(3)(ii), set the flow indicator to sound an alarm at the inlet to the bypass device when the stream is being diverted away, or visually inspect the seal or closure mechanism monthly to verify that the valve is maintained in the non-diverting position.
60.5417(d)(1)(iii) and 60.5415(e)(3)(i)(B)	Install, calibrate, operate, and maintain a heat sensing monitoring device equipped with a continuous recorder that indicates the continuous ignition of the pilot flame.
60.5417(c)(1)	Detect and record the presence of a flare flame at least <u>once every hour</u> .



60.5417(c)(2)	Install, calibrate, operate, and maintain the continuous monitoring systems in accordance with a site specific monitoring plan including the information required by rule.
60.5417(c)(3) and (4)	Conduct a continuous parameter monitoring systems equipment performance check, system accuracy audit, or other audit procedure as specified in the site-specific monitoring plan at least <u>once every 12 months</u> . Conduct performance evaluations of the continuous parameter monitoring systems as specified in the site-specific monitoring plan.
60.5417(g)(4)	Deviations for the flare occur when the monitoring data are not available for at least 75 percent of the operating hours in a day.
60.5417(g)(5)	Deviations for the bypass devices occur when the flow indicator indicates that flow has been detected and that the stream has been diverted away from the control device to the atmosphere, or if the seal or closure mechanism has been broken, the bypass line valve position has changed, the key for the lock-and-key type lock has been checked out, or the car-seal has broken.
60.5420(c)	The applicable records identified in 40 CFR 60.5420(c) and 40 CFR 60.7(f) must be maintained either onsite or at the nearest local field office for at least 5 years.
60.5420(c)(5)(ii)	Maintain records of each VOC emissions determination for each storage vessel affected facility including identification of the model or calculation methodology used to calculate the VOC emission rate.
60.5420(c)(5)(iii)	Maintain records of deviations.
60.5420(c)(5)(iv)	Maintain records for storage vessels that are skid-mounted or permanently attached to something that is mobile.
60.5420(c)(5)(v)	Maintain records of the identification and location of each storage vessel affected facility.
60.5420(c)(6)	Maintain required records for inspections of closed vent systems.
60.5420(c)(7)	Maintain required records for inspections of storage vessel covers.



60.5420(c)(8)	Maintain required records for inspections of the bypass or each time the key is checked out or each time the alarm is sounded.
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e) Reporting Requirements

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

60.5420(a)(1)	Initial notifications are not required for storage vessels.
60.5410(e)(8), 60.5420(b)(1), and 60.5420(b)(6)	Submit the required information for storage vessels in the initial annual report within 90 days of the end of the initial compliance period and in the subsequent reports due the same date each year as the initial annual report.
60.5420(b)(6)(i)	Submit an identification, including the location, of each storage vessel affected facility for which construction, modification or reconstruction commenced during the reporting period.
60.5420(b)(6)(ii)	Submit documentation of the VOC emission rate determination.
60.5420(b)(6)(iii)	Submit records of deviations.
60.5420(b)(6)(iv)	Submit a notification identifying each Group 1 storage vessel affected facility in the initial annual report.
60.5420(b)(6)(v)	Submit a statement that the requirements of 60.5410(h)(2) and (3) have been met.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. None.

g) Miscellaneous Requirements

- (1) None.



6. Emissions Unit Group -Baldor Generators: P016,P017,

EU ID	Operations, Property and/or Equipment Description
P016	605 HP (4.41 MMBtu/hr) natural gas fired 4 stroke - rich burn, NSCR Generator #1 equipped with a NSCR catalyst to control NOx, CO, VOC, and HAP emissions operating 500 hours per year.
P017	605 HP (4.41 MMBtu/hr) natural gas fired 4 stroke - rich burn, NSCR Generator #2 equipped with a NSCR catalyst to control NOx, CO, VOC, and HAP emissions operating 500 hours per year.

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Install a generator that is designed to meet the following: 4.0 g/hp-hr of carbon monoxide (CO) emissions 2.0 g/hp-hr of nitrogen oxide (NO _x) emissions; and 1.0 g/hp-hr of volatile organic compounds (VOC) emissions. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(F)	See b)(2)c.
d.	OAC rule 3745-17-07(A)	Visible PE from the stack serving each emissions unit shall not exceed 20% opacity, as a 6-minute average. The emission limitation specified by this rule shall become effective once U.S. EPA approves the December 1, 2006



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		version of OAC rule 3745-31-05, as part of the State Implementation Plan.
e.	OAC rule 3745-17-11(B)	PE shall not exceed 0.062 lb/mmBtu of actual heat input.
f.	OAC rule 3745-18-06	These emissions units are exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).
g.	40 CFR Part 60, Subpart JJJJ (40 CFR 60.4230 – 60.4248) [In accordance with 40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1, this emissions unit is a 605 HP, natural gas-fired, stationary spark internal combustion rich burn engine manufactured after January 1, 2009 that is located at a new natural gas compressor station and is subject to the emission limitations and control measures specified in this section.]	NO _x emissions shall not exceed 1.0 g/hp-hr and 82 ppmvd at 15% oxygen (O ₂). CO emissions shall not exceed 2.0g/hp-hr and 270 ppmvd at 15% O ₂ . VOC emissions shall not exceed 0.7 g/hp-hr and 60 ppmvd at 15% O ₂ . [40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1] See b)(2)d., c)(5), d)(8), e)(3), e)(4) and f)(2).
h.	40 CFR Part 60.1 – 60.19 (40 CFR 60.4246)	Table 3 to Subpart JJJJ of 40 CFR Part 60 – Applicability of General Provisions to Subpart JJJJ shows which part of the General Provisions in 40 CFR Part 60.1 – 60.19 apply.
i.	40 CFR Part 63 Subpart ZZZZ (40 CFR 63.6590(c)(1))	A new or reconstructed area source operating in compliance with 40 CFR Part 60, Subpart JJJJ is the demonstration of compliance for 40 CFR Part 63, Subpart ZZZZ.

(2) Additional Terms and Conditions

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



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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, VOC and NO_x emissions from this air contaminant source since the calculated annual emission rate for CO, VOC and NO_x emissions is less than 10 tons/yr taking into account the federally enforceable rule limits of 4.0 g/hp-hr of CO, 2.0 g/hp-hr of NO_x and 1.0 g/hp-hr of VOC under 40 CFR Part 60, Subpart JJJJ. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the uncontrolled potential to emit for PE is less than 10 tons/year.

- c. The permittee is voluntarily restricting operational hours for each generator to 500 hours per year.
- d. The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4236(b)	Deadlines for importing or installing stationary SI ICE produced in previous model years
60.4243(b)	Compliance demonstration for certified and non-certified engines

c) **Operational Restrictions**

- (1) The permittee shall install and operate a generator with a NSCR catalyst for the control of CO, NO_x and VOC emissions whenever this emissions unit is in operation and shall maintain the generator in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the generator is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the generator shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) The annual hours of operation of this emissions unit shall not exceed 500 hours per year, based upon a rolling, 12-month summation of the hours.
- (4) The permittee shall burn only natural gas in this emissions unit.
- (5) The permittee shall comply with the applicable restrictions of 40 CFR Part 60, Subpart JJJJ, including the following sections:



60.4234	Duration of compliance with emission standards
60.4237(a)	For emergency engines not meeting the standards applicable to non-emergency engines, non-resettable hour meter installation requirement
60.4243(b)	Maintenance requirements
60.4243(d)	Maintenance check and readiness testing requirements for emergency engines
60.4243(e)	Alternative fuel
60.4243(g)	AFR controllers

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the generator, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the generator to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the generator and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the generator and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.



These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain records that document any time periods when the NRCS catalyst was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the generator was not operated according to the manufacturers recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The permittee shall maintain monthly records of the following information:
 - a. the hours of operation for each month; and
 - b. the rolling, 12-month summation of the hours of operation for each month.
- (7) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (8) The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4245(a)(1)	Keeping records of notifications and supporting documentation
60.4243(b)(2)(ii) and 60.4245(a)(2)	Keeping records of maintenance plan and records of maintenance conducted on the engine
60.4245(a)(3) or (4)	Keeping records of certification or documentation that engine meets the emission standards
60.4245(b)	For emergency engines not meeting the standards applicable to non-emergency engines, keeping records of hours of operation and documentation of hours

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.



- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
 - a. construction date (no later than 30 days after such date);
 - b. actual start-up date (within 15 days after such date);
 - c. date of performance testing (if required, at least 30 days prior to testing); and
 - d. notification of any physical or operational change to the existing facility which may increase the emission rate of any air pollutant to which the standard applies (unless that change is specifically exempted under the NSPS or in 40 CFR 60.14(e)) shall be postmarked 60 days before the change is commenced (or as soon as practicable) and shall include information describing the precise nature of the change, productive capacity of the facility before and after the change, and the expected completion date of the change.

Reports are to be sent to:

Ohio Environmental Protection Agency
 DAPC - Permit Management Unit
 50 West Town Street, Suite 700
 P. O. Box 1049
 Columbus, Ohio 43216-1049

and

Northeast District Office of the Ohio EPA
 Division of Air Pollution Control
 2110 E. Aurora Rd, Twinsburg, Ohio 44087.

- (4) The permittee shall submit notifications and reports to the Ohio EPA, Northeast District Office as required pursuant to 40 CFR Part 60, Subpart JJJJ, per the following sections:

60.4245(c)	Must submit an initial notification if not certified
60.4245(d)	Must submit performance test copies within 60 days after the test has been completed



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. Design Efficiency Standards:

Install a generator that is designed to meet the following:

- 4.0 g/hp-hr of CO emissions
- 2.0 g/hp-hr of NO_x emissions; and
- 1.0 g/hp-hr of VOC emissions.

Applicable Compliance Method:

The design efficiency standards are based on the company supplied design estimates as supplied in the Permit-to-install (PTI) application A0051230 received 7/3/14 and supplemented on October 20, 2014. Compliance shall be demonstrated based upon the emission testing requirements specified in f)(2)

b. Emission Limitation:

Visible PE from the stack serving each emissions unit shall not exceed 10% opacity as a 6-minute average.

Applicable Compliance Method:

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

c. Emission Limitation:

PE shall not exceed 0.062 pound/million Btu of actual heat input.

Applicable Compliance Method:

Compliance with this emission limitation may be based upon an emission factor of 0.0000771 pound/million Btu of heat input. This emission factor is specified in the U.S. EPA reference document AP-42, Compilation of Air Pollutant Emission Factors, Section 3.2, Table 3.2-2 (7/00).

If required, compliance with this emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.



d. Emission Limitations:

NO_x emissions shall not exceed 1.0 g/HP-hr and 82 ppmvd at 15% O₂.
CO emissions shall not exceed 2.0 g/HP-hr and 270 ppmvd at 15% O₂.
VOC emissions shall not exceed 0.7 g/HP-hr and 60 ppmvd at 15% O₂.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in f)(2).

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the procedures specified in 40 CFR 60.4244, 40 CFR Part 60, Subpart JJJJ Table 2 and the following requirements:

a. Conduct performance testing in the following manner:

i. if the permittee is purchasing a non-certified engine, an initial performance test shall be performed to demonstrate compliance with the mass emissions limitations in 40 CFR 60.4233(e) for VOC, NO_x and CO, within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

b. If the stationary internal combustion engine is rebuilt or undergoes major repair or maintenance, the permittee shall conduct a subsequent performance test.

c. Each performance test must be conducted within 10% of 100% peak (or the highest achievable) load and according to the requirements in 40 CFR 60.8 and under the specific conditions that are specified by Table 2 of 40 CFR Part 60, Subpart JJJJ.

d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

e. Personnel from the Ohio EPA, Northeast District Office 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.

f. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office 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 Ohio EPA, Northeast District Office.

- g) Miscellaneous Requirements
 - (1) None.