



11/3/2014

Certified Mail

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

Facility ID: 0210012004
Permit Number: P0117470
County: Carroll

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

Dear Permit Holder:

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

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

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

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

Sincerely,

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

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

PUBLIC NOTICE
11/3/2014 Issuance of Draft Air Pollution Title V Permit

Utica Gas Services, L.L.C.- Augusta Compressor Facility
8034 Bane Rd NE,
East Twp., OH 44427
Carroll County
FACILITY DESC.: Crude Petroleum and Natural Gas Extraction
PERMIT #: P0117470
PERMIT TYPE: Initial
PERMIT DESC: Initial Title V PTO for a Natural Gas Compressor Station.

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



Statement of Basis For Air Pollution Title V Permit

Facility ID:	0210012004
Facility Name:	Utica Gas Services, L.L.C.- Augusta Compressor Facility
Facility Description:	Natural Gas Delivery Point
Facility Address:	8034 Bane Rd NE, East Twp., OH 44427
Permit #:	P0117470, Initial
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input checked="" type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input checked="" type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input type="checkbox"/> Single Hazardous Air Pollutant <input type="checkbox"/> Combined Hazardous Air Pollutants <input checked="" type="checkbox"/> Maximum Available Control Technology Standard(s) <input checked="" type="checkbox"/> GHG <input type="checkbox"/> Title IV	

A. Standard Terms and Conditions

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



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

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.1.			Lists Facility wide terms and conditions that are enforceable under state law only.
B.2.		40 CFR Part 63, Subpart HH	Lists the emissions units subject to this subpart.
B.3.		40 CFR Part 60, Subpart JJJJ	Lists the emissions units subject to this subpart.
B.4.		40 CFR Part 63, Subpart ZZZZ	Lists the emissions units subject to this subpart.
B.5.		40 CFR Part 60, Subpart	Lists the emissions units subject to this subpart.



		0000	
B.6.	15-05 & 31-03(A)(1) or 31-03(A)(4)		Lists the emissions units subject to this subpart.
B.7.			Lists insignificant emissions units that must comply with all state and federal regulations, as well as any emissions limitations and/or control requirements contained within in the identified permit-to-install for the emissions unit.

C. Emissions Unit Terms and Conditions

<p>Key: EU = emissions unit ID ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit) OR = operational restriction M = monitoring requirements ENF = did noncompliance issues drive the monitoring requirements?</p>													
<p style="text-align: right;">R = record keeping requirements Rp = reporting requirements ET = emission testing requirements (not including compliance method terms) St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement Misc = miscellaneous requirements</p>													
EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
J003	Fugitive VOC shall not exceed 11.98 tons per rolling, 12-month period. VOC from flare stack shall not exceed 0.56 TPY.	31-05(A)(3)	ORC 3704.03(T)	N	N	Y	N	Y	Y	N	N	N	PTI P0117095
P001	10.32 tons per rolling, 12 month period of VOCs. 0.63 ton per rolling, 12 month period of HAPs.		ORC 3704.03(T)	N	Y	Y	N	Y	Y	N	N	Y	PTI P0117469



P001 P016 P017 P021	Compliance with the applicable portions of the rule.		40 CFR Part 63, Subpart HH	N	Y	Y	N	Y	Y	N	N	Y	PTI P0117469 PTI P0117095 PTI P0117097
P002	NOx shall not exceed 0.49 lb/hr& 2.14 tpy.	31-05(A)(3)		N	Y	Y	N	Y	Y	Y	N	Y	PTI P0117469
P002	CO shall not exceed 11.64 tons per rolling, 12 month period.		ORC 3704.03(T)	N	Y	Y	N	Y	Y	Y	N	Y	PTI P0117469
P002 P019	VOC emissions shall be reduced by 95.0% or greater.		40 CFR Part 60, Subpart OOOO	N	Y	Y	N	Y	Y	Y	N	Y	PTI P0117469 PTI P0117095
P003 & P004	VOCs shall not exceed 0.77 lb/hr& 3.37 tpy. (not including formaldehyde) CO shall not exceed 1.75 lbs/hr& 7.69 tpy. SO2 shall not exceed 0.01 lb/hr& 0.04 tpy. PE shall not exceed 0.12 lbs/hr& 0.53 tpy.	31-05(A)(3)		N	Y	Y	N	Y	Y	N	N	N	PTI P0117469



	Visible PE shall not exceed 10% opacity as a 6-minute average.												
P003 & P004	NOx shall not exceed 25.86 tons per rolling 12 month period.		ORC 3704.03(T)	N	Y	Y	N	Y	Y	N	N	N	PTI P0117469
P003 & P004	PE shall not exceed 0.062 lb/MMBtu of actual heat input.	17-11(B)(5)(b)		N	Y	Y	N	Y	Y	N	N	N	PTI P0117469
P005	3.665 tons/month averaged over a 12 month rolling period of VOCs.	31-05(A)(3)	ORC 3704.03(T)	N	Y	Y	N	Y	Y	N	N	N	PTI P0117095
P006-P013	CO shall not exceed 1.18 lbs/hr& 5.18 tpy. NOx shall not exceed 1.96 lbs/hr& 8.57 tpy. VOCs shall not exceed 0.54 lb/hr& 2.38 tpy. Visible PE shall not exceed 10%	31-05(A)(3)		N	Y	Y	N	Y	Y	Y	N	Y	PTI P0112539



	opacity as a 6-minute average. Compliance with 40 CFR Part 60, Subpart OOOO, OAC rule 3745-17-11 and 40 CFR Part 60, Subpart JJJJ.												
P006-P013	PE shall not exceed 0.062 lb/MMBtu of actual heat input.	17-11(B)(5)(b)		N	Y	Y	N	Y	Y	Y	N	Y	PTI P0112539
P006-P013	NO _x shall not exceed 1.0 g/hp-hr and 82 ppmvd at 15% O ₂ . CO shall not exceed 2.0 g/hp-hr and 270 ppmvd at 15% O ₂ . VOCs shall not exceed 0.7 g/hp-hr and 60 ppmvd at 15% O ₂ .		40 CFR Part 60, Subpart JJJJ	N	Y	Y	N	Y	Y	Y	N	Y	PTI P0112539
P006-P013	Compliance with the rule by tracking either the hours of operation or number of		40 CFR Part 60, Subpart OOOO	N	Y	Y	N	Y	Y	Y	N	Y	PTI P0112539



	months between compressor rod packing replacement.													
P006-P013	Compliance with 40 CFR Part 60, Subpart JJJJ is the demonstration of compliance with 40 CFR Part 63, Subpart ZZZZ.		40 CFR Part 63, Subpart ZZZZ	N	Y	Y	N	Y	Y	Y	N	Y	PTI P0112539	
P014 & P015	<p>0.4867 tons/month averaged over a 12 month rolling period of NOx.</p> <p>0.3742 tons/month averaged over a 12 month rolling period of VOCs.</p> <p>Visible PE shall not exceed 10% opacity as a 6-minute average.</p> <p>Compliance with OAC rule 3745-17-11 and 40 CFR Part 60, Subpart JJJJ</p>	31-05(A)(3)		N	Y	Y	N	Y	Y	Y	N	N	PTI P0117095	



P014 & P015	0.9733 tons/month averaged over a 12 month rolling period of CO. Compliance with 40 CFR Part 60, Subpart JJJJ.	31-05(A)(3)	ORC 3704.03(T)	N	Y	Y	N	Y	Y	Y	N	N	PTI P0117095
P014 & P015	Visible PE shall not exceed 20% opacity as a 6-minute average. See Comments.	17-07(A)		N	Y	Y	N	Y	Y	Y	N	N	PTI P0117095 The emission limitation specified by this rule shall become effective once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan.
P014 & P015	PE shall not exceed 0.062 lb/MMBtu of actual heat input.	17-11(B)(5)(b)		N	Y	Y	N	Y	Y	Y	N	N	PTI P0117095
P014 & P015	NO _x shall not exceed 1.0 g/hp-hr and 82 ppmvd at 15% O ₂ . CO shall not exceed 2.0 g/hp-hr and 270 ppmvd at 15% O ₂ . VOCs shall not exceed 0.7 g/hp-hr and 60 ppmvd at 15% O ₂ .		40 CFR Part 60, Subpart JJJJ	N	Y	Y	N	Y	Y	Y	N	N	PTI P0117095



P014 & P015	Compliance with 40 CFR Part 60, Subpart JJJJ is the demonstration of compliance with 40 CFR Part 63, Subpart ZZZZ.		40 CFR Part 63, Subpart ZZZZ	N	Y	Y	N	Y	Y	Y	N	N	PTI P0117095
P016 & P017	1.101 tons/month averaged over a 12 month rolling period of VOCs.	31-05(A)(3)	ORC 3704.03(T)	N	Y	Y	N	Y	Y	N	N	Y	PTI P0117095
P019	1.006 tons/month averaged over a 12 month rolling period of NOx. 5.463 tons/month averaged over a 12 month rolling period of CO.	31-05(A)(3)	ORC 3704.03(T)	N	Y	Y	N	Y	Y	Y	N	Y	PTI P0117095
P021	0.5375 tons/month averaged over a 12 month rolling period of VOCs.	31-05(A)(3)		N	Y	Y	N	Y	Y	N	N	Y	PTI P0117097
P801	1.105 tons/month averaged over a 12 month rolling period	31-05(A)(3)	ORC 3704.03(T)	N	N	Y	N	Y	Y	N	N	N	PTI P0117095



	of VOCs.												
T001 & T002	<p>VOCs from the flare stack shall not exceed 3.59 tpy.</p> <p>Compliance with applicable requirements of 40 CFR Part 60, Subpart OOOO</p> <p>Use of submerged or bottom fill on tank.</p>	31-05(A)(3)		N	Y	Y	N	Y	Y	N	N	N	PTI P0117469
T001 T002 T005-T010	VOC emissions shall be reduced by 95.0% or greater.		40 CFR Part 60, Subpart OOOO	N	Y	Y	N	Y	Y	N	N	N	PTI P0117469 PTI P0117095
T005-T010	<p>0.2358 tons/month averaged over a 12 month rolling period of VOCs.</p> <p>Compliance with applicable requirements of 40 CFR Part 60, Subpart OOOO</p>	31-05(A)(3)		N	Y	Y	N	Y	Y	N	N	N	PTI P0117095



Statement of Basis
Utica Gas Services, L.L.C.- Augusta Compressor Facility
Permit Number: P0117470
Facility ID: 0210012004

	Use of submerged or bottom fill on tank.												
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DRAFT

**Division of Air Pollution Control
Title V Permit**

for

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

Facility ID:	0210012004
Permit Number:	P0117470
Permit Type:	Initial
Issued:	11/3/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



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

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Draft Title V Permit
Utica Gas Services, L.L.C.- Augusta Compressor Facility
Permit Number: P0117470
Facility ID: 0210012004
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0210012004
Facility Description: Natural Gas Delivery Point
Application Number(s): A0051255
Permit Number: P0117470
Permit Description: Initial Title V PTO for a Natural Gas Compressor Station.
Permit Type: Initial
Issue Date: 11/3/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

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

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Title V Permit
Utica Gas Services, L.L.C.- Augusta Compressor Facility
Permit Number: P0117470
Facility ID: 0210012004
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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



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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



4. Risk Management Plans

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

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

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



- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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



10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible



Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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



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

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

14. Permit Shield

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

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

15. Operational Flexibility

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

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



16. Emergencies

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

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

17. Off-Permit Changes

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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



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

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

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

The permittee shall submit required reports in the following manner:

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

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

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



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

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

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

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

28. Permit Transfers

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

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

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

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

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

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



30. Submitting Documents Required by this Permit

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



Draft Title V Permit
Utica Gas Services, L.L.C.- Augusta Compressor Facility
Permit Number: P0117470
Facility ID: 0210012004
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart HH, National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities: P001, P016, P017 & P021. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office.
3. The 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: P006 - P015. 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.
4. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (Area Source RICE MACT). Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.
5. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution: P002, P006 – P015, P019, T001, T002, T005 – T010, T011 and T012. The complete New Source Performance Standards (NSPS) requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office
6. 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.
7. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:



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- a) F001 – Unpaved roadways and parking areas (PTI P0117095);
- b) J001 – Condensate truck loading (PTI P0117469);
- c) J002 – Methanol loading (PTI P0117469);
- d) J004 – Methanol loading (PTI P0117097);
- e) P020 – Pigging emissions (PTI P0112539);
- f) T011 – 400-bbl produced water storage tank (PTI P0117469); and
- g) T012 – 400-bbl produced water storage tank (PTI P0117469).



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C. Emissions Unit Terms and Conditions



1. J003, TL-101

Operations, Property and/or Equipment Description:

Condensate truck loading 2

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.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3) (PTI P0117095)	Fugitive volatile organic compound (VOC) emissions shall not exceed 11.98 tons per rolling, 12-month period. VOC emissions from the flare stack shall not exceed 0.56 TPY. See b)(2)a through b)(2)d.

(2) Additional Terms and Conditions

- a. All condensate loading lines shall be equipped with fittings which are vapor tight.
- b. The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.
- c. The permittee shall not permit condensate to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
- d. The vapors collected by the vapor collection system shall be vented to the flare at all times the emissions unit is in operation. The flare shall have a minimum destruction efficiency of 98%. See emissions unit P019 for flare requirements.

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

- a. the throughput of condensate for each month, in gallons; and
- b. the rolling, 12-month summation of the condensate throughput, in gallons.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify any deviation from the work practice standards in section b)(2). Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

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 11.98 tons per rolling, 12-month period.

Applicable Compliance Method:

VOC emissions shall be based on multiplying a loading loss factor (L_L) by the rolling, 12-month summation of the condensate throughput, in gallons, divided by 2000. The loading loss factor was derived using AP-42, Section 5.2, "Transportation and Marketing of Petroleum Liquids", Equation 1 (6/08).

$$L_L = 12.46 \text{ SPM/T (1-CE/100)}$$

where:

L_L = loading loss, pounds per 1000 gallons loaded;



S = saturation factor, 0.6 for submerged fill;

P = vapor pressure of liquid loaded (@ 49.7 °F = 5.6083);

M = molecular weight of vapor = 63.2586;

T = temperature of bulk liquid = 509.7 °R; and

CE = collection efficiency of trucks not passing annual leak tests, from AP-42, Section 5.2, "Transportation and Marketing of Petroleum Liquids" (6/08) = 70%.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

b. Emission Limitation:

VOC emissions from the flare stack shall not exceed 0.56 TPY.

Applicable Compliance Method:

VOC emissions shall be based on multiplying a loading loss factor (L_L) by the rolling, 12-month summation of the condensate throughput, in gallons, divided by 2000. The loading loss factor was derived using AP-42, Section 5.2, "Transportation and Marketing of Petroleum Liquids", Equation 1 (6/08).

$$L_L = 12.46 \text{ SPM/T} (CE/100)(1-DE/100)$$

where:

L_L = loading loss, pounds per 1000 gallons loaded;

S = saturation factor, 0.6 for submerged fill;

P = vapor pressure of liquid loaded (@ 49.7 °F = 5.6083);

M = molecular weight of vapor = 63.2586;

T = temperature of bulk liquid = 509.7 °R;

CE = collection efficiency of trucks not passing annual leak tests, from AP-42, Section 5.2, "Transportation and Marketing of Petroleum Liquids" (6/08) = 70%; and

DE = destruction efficiency of flare (P019) = 98%.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

g) Miscellaneous Requirements

(1) None.



2. P001, DEHY-1

Operations, Property and/or Equipment Description:

35 mmscfd dehydration unit

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) (PTI P0117469)	Volatile organic compound (VOC) emissions from the flare stack shall not exceed 10.32 tons per rolling, 12-month period. Hazardous air pollutant (HAP) emissions from the flare stack shall not exceed 0.63 ton per rolling, 12-month period. See b)(2)a, b)(2)c, b)(2)d, c)(1) and c)(2).
b.	40 CFR Part 63, Subpart HH, National Emission Standards for HAP from Oil and Natural Gas Production Facilities, 40 CFR 63.760(b)(2)	Compliance with the applicable portions of 40 CFR Part 63, Subpart HH. Any final amendments to this rule will supersede any previous Subpart HH requirement(s) in this permit.
c.	40 CFR 63.764(e)	Exemption from control requirements. See b)(2)b.
d.	40 CFR 63.1 – 63.15	The General Provisions that apply are specified in Table 2 of 40 CFR Part 63, Subpart HH.
e.	ORC 3704.03(F)(4)(d)	See d)(4).

(2) Additional Terms and Conditions

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



- b. The glycol dehydration unit is exempt from the control requirements of §63.764(d) because the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram/year, with federally enforceable controls in place.
 - c. Maintenance of the temperature of the exhaust gases from the condenser and maintenance of the flare used to control VOC and HAPs will assure compliance with the rolling, 12-month summations. Additional monthly record keeping is not required since the annual limits are based on the emissions unit's potential to emit (at a throughput of 35 mmscf of natural gas/day and 98% destruction efficiency). See emissions unit P002 for flare requirements.
 - d. The flare shall have a minimum destruction efficiency of 98%. See emissions unit P002 for flare requirements.
- c) Operational Restrictions
- (1) All emissions from the dehydrator still vent shall be vented to a condenser that shall meet the monitoring and record keeping requirements of this permit, when the emissions unit is in operation, including the following:
 - a. The condenser shall be operated at all times when gases are vented to it.
 - b. The condenser must be equipped with a temperature monitoring device that monitors and records the dehydration still vent temperature.
 - c. The condenser, temperature monitoring device and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0117469]
 - (2) The condenser temperature shall be maintained below 120 degrees Fahrenheit during operation of this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0117469]
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain the following records for the condenser:
 - a. monitor and record the temperature of the exit of the condenser on a daily basis (Monday through Friday, excluding major holidays); and
 - b. record all periods of time when the condenser is not operating correctly to control the emissions from the dehydration still vent.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]
 - (2) The permittee shall maintain records of the annual facility natural gas or hydrocarbon liquid throughput for each year, in accordance with 40 CFR 63.760(a)(1)(ii).



[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart HH and PTI P0117469]

- (3) The permittee shall maintain the following records for the actual average emissions of benzene per year from the glycol dehydration unit process vent in accordance with 63.772(b)(2), determined either uncontrolled or with federally enforceable controls in place:
 - a. The permittee shall determine actual average benzene emissions using the model GRI-GLY Calc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLY Calc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or
 - b. The permittee shall determine an average mass rate of benzene emissions in kilograms per hour through direct measurement using the methods in 63.772(a)(1)(i) or (ii), or an alternative method according to 63.7(f). Annual emissions in kilograms per year shall be determined by multiplying the mass rate by the number of hours the unit is operated per year. This result shall be converted to megagrams per year.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart HH and PTI P0117469]

- (4) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all periods of time when the condenser outlet temperature exceeds 120 degrees F; and



- b. all periods of time (start time and date, and end time and date) when the temperature monitoring device that monitors and records condenser vapor outlet temperature is not working and process gas is being vented to the condenser.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

f) **Testing Requirements**

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

- a. Emission Limitation:

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

Applicable Compliance Method:

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

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

See emissions unit P002 for testing requirements.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart HH and PTI P0117469]



a. Emission Limitation:

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

Applicable Compliance Method:

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

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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart HH and PTI P0117469]

b. Emission Limitation:

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

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

g) Miscellaneous Requirements

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



3. P002, FLARE-1

Operations, Property and/or Equipment Description:

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

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0117469)	Nitrogen oxides (NO _x) emissions shall not exceed 0.49 lb/hr and 2.14 tons/year. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	ORC 3704.03(T) (PTI P0117469)	Carbon monoxide (CO) emissions shall not exceed 11.64 tons per rolling, 12-month period.
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-17-11(B)	See b)(2)d.
f.	40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (60.5360-60.5430) [In accordance with 40 CFR 60.5365, this emissions unit includes a storage vessel affected facility.]	Following the compliance date of October 15, 2013, each storage vessel constructed, modified, or reconstructed after August 23, 2011 and with VOC emissions calculated to exceed 6 tons per year, shall reduce VOC emissions by 95.0% or greater. See c)(3), d)(4) and e)(3).
g.	40 CFR Part 60.1 through 60.19	The General Provisions that apply are specified in Table 3 of 40 CFR Part 60, Subpart OOOO.



(2) Additional Terms and Conditions

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

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

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

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

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

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0117469]

(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.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0117469]

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

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

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



[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 60, Subpart OOOO and PTI P0117469]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a pressure sensor and flame detection device to monitor the need for a flame and presence of a flame, respectively, when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

- (3) The permittee shall maintain records of each day a fuel other than natural gas is burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

- (4) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5413(d)(9)	If using a performance test conducted by the manufacturer, maintain required records for each combustion control device model tested by the manufacturer.
60.5416(a)(1)	Conduct an <u>initial</u> inspection of all closed vent system joints, seams, or other connections that are permanently or semi-permanently sealed to demonstrate that the system operates with no detectable emissions. Conduct subsequent <u>annual</u> visual inspections for defects. Any defective components that are replaced must be inspected to demonstrate that these components operate with no detectable emissions.
60.5416(a)(2)	Conduct <u>initial and annual</u> inspections of all closed vent system components other than those described under 60.5416(a)(1) to demonstrate that that system operates with no detectable emissions. Also conduct <u>annual</u> visual inspections for defects.



60.5416(a)(3)	Conduct <u>initial and annual</u> inspections of the storage vessel covers to identify any defects.
60.5416(a)(4)	Except for low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and safety devices, operate the bypass valve flow monitors to collect a reading at least <u>once every 15 minutes</u> or visually inspect all bypass valves secured in the non-diverting position at least <u>monthly</u> to verify that valve remains in the non-diverting position.
60.5416(b)(1) through (8)	Conduct inspections of closed vent systems to detect leaks according to USEPA Method 21 and as provided by rule. The condition of no detectable emissions is defined as an organic concentration value less than 500 ppmv.
60.5417(a)	Requirements for continuous parameter monitoring system for each control device.
60.5417(b)	Monitoring requirements exemptions.
60.5417(c)	Design and operation requirements of continuous monitoring system.
60.5417(d)	Continuous recorder requirements.
60.5417(e)	Requirements for calculation of daily average value for each monitored operating parameter.
60.5417(f)	Establish a minimum operating parameter value or a maximum operating parameter value, as appropriate for each control device installed in accordance with 40 CFR 60.5417(d).
60.5417(g)	Requirements for deviations.
60.5420(c)	The applicable records identified in 40 CFR 60.5420(c) and 40 CFR 60.7(f) must be maintained for a period of 5 years following the date of record and they must be accessible upon request.
60.5420(c)(5)	Maintain required records for the determination that the VOC emissions of each storage vessel is either below or above 6 TPY and for deviations from the requirements of the subpart.
60.5420(c)(6)	Maintain required records for inspections of closed vent systems.
60.5420(c)(7)	Maintain required records for inspections of storage vessel



	covers.
60.5420(c)(8)	Maintain required records for inspections of bypass valves.
60.5420(c)(9)	Maintain required records for leaks and repairs of closed vent systems.
60.5420(c)(11)	Maintain required records for continuous parameter monitoring systems.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart OOOO and PTI P0117469]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

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



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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart OOOO and PTI P0117469]

f) Testing Requirements

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

a. Emission Limitation:

NO_x emissions shall not exceed 0.49 lb/hr and 2.14 tons/year.

Applicable Compliance Method:

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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

b. Emission Limitation:

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



Applicable Compliance Method:

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

c. Emission Limitation:

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

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

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

60.5410(e)(5)	Initial performance test requirement.
60.5413(a)	Performance test exemptions.



60.5413(b)	Performance test methods and procedures.
60.5413(c)	Control device design analysis.
60.5413(d)	Performance testing for combustion control devices – manufacturers' performance test.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart OOOO and PTI P0117469]

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. P005, BD

Operations, Property and/or Equipment Description:

Compressor blowdowns

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.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3) (PTI P0117095)	Volatile organic compound (VOC) emissions shall not exceed 3.665 tons/month averaged over a 12-month rolling period. See c)(1).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall minimize the frequency and size of blowdown events by conducting routine operation and maintenance activities in a manner consistent with safety and good air pollution control practices.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0117095]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

a. number of compressor blowdown events;

b. mole % of each VOC component in the gas stream using a representative analysis;



- c. the volume of gas emitted from all compressor blowdown events for each month, in scf; and
- d. the rolling, 12-month summation of the volume of gas emitted from all compressor blowdown events, in scf.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

f) Testing Requirements

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

- a. Emission Limitation:

VOC emissions shall not exceed 3.665 tons/month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be demonstrated based upon the following calculation using the inputs provided in the permittee's application and the record keeping requirements in d)(1):

$$\begin{aligned} \text{VOC (tons/month)} &= \text{sum of the following for each VOC component:} \\ &= [\text{molecular weight} \times ((\text{volume of gas emitted/month}) \times \\ &\quad (\text{mole \% of each VOC component/month})) / \text{molar volume} \\ &\quad \text{conversion}] \times (1 \text{ ton}/2,000 \text{ pounds}) \end{aligned}$$

where:

molecular weight = constant, in lb/lb-mole;

volume of gas emitted/month = from records specified in d)(1)c, in scf;

mole % of each VOC component/month = from analysis required in d)(1)b, in %; and



molar volume conversion = 379.4 scf/lb-mole, at 60 deg F and 1 atm.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

- g) Miscellaneous Requirements
 - (1) None.



5. P019, FLARE-101

Operations, Property and/or Equipment Description:

Air-assisted flare or vapor combustion unit with a maximum heat input rate of 40.444 mmBtu/hr, with inputs from the dehydration units (P016, P017 & P021), storage tanks (T005-T012) and truck loading (J003).

- 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.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3) (PTI P0117095)	Nitrogen oxide (NO _x) emissions shall not exceed 1.006 tons/month averaged over a 12-month rolling period. Carbon monoxide (CO) emissions shall not exceed 5.463 tons/month averaged over a 12-month rolling period. See c)(1) and c)(2).
b.	OAC rule 3745-17-07(A)	See b)(2)a.
c.	OAC rule 3745-17-11(B)	See b)(2)b.
d.	40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (60.5360-60.5430) [In accordance with 40 CFR 60.5365, this emissions unit includes a storage vessel affected facility.]	Following the compliance date of October 15, 2013, each storage vessel constructed, modified, or reconstructed after August 23, 2011 and with VOC emissions calculated to exceed 6 tons per year, shall reduce VOC emissions by 95.0% or greater. See c)(3), d)(4) and e)(3).
e.	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 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.
- b. 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0117095]

- (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.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0117095]

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

60.5395(b), 60.5410(e)(4), and 60.5411(b)	Cover and closed vent system requirements
60.5411(a)(1) and 60.5412(b)(1)	Operate closed vent systems and control devices used to comply with the provisions of 60.5395 at all times when emissions may be vented to them.
60.5411(a)(2)	Design and operate the closed vent system with no detectable emissions.
60.5411(a)(3)	Any valves associated with the closed vent system that are capable of diverting all or a portion of the emissions away from the flare must be equipped with bypass flow monitors or must be secured in the non-diverting position using a car-seal or a lock-and-key type configuration. Low leg drains, high point bleeds, analyzer vents, open-



	ended valves or lines, and safety devices are not subject to this requirement.
60.5412(a)(1)	Performance requirements for an enclosed combustion device.
60.5412(a)(2) and 60.5413(c)	Design analysis requirements for a vapor recovery device.
60.5412(a)(3) and 60.5413	Design and operation requirements for a flare.
60.5413(a)(1)	Performance test exemption if flare is designed and operated in accordance with section 60.18(b). Perform a visible emissions test using Method 22 at 40 CFR Part 60, Appendix A-7.
60.5412(a)(3) and 60.5413(a)(7) and (d)	Performance test exemption if control device demonstrates compliance using a performance test conducted by the manufacturer. The manufacturer must determine a maximum inlet gas flow rate which must not be exceeded for each control device.
60.5415(e)(2)	Continuous compliance requirements for control devices.
60.5416(b)(9), (10), (11), and (12)	Repair all leaks detected from the closed vent system or cover as soon as practicable. First attempt at repair must be made no later than <u>5 calendar days</u> after detection, and repair must be completed no later than <u>15 calendar days</u> after detection, except as provided by rule (e.g., delay of repair, unsafe to inspect, difficult to inspect).

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

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 60, Subpart OOOO and PTI P0117095]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

- (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.



[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

- (3) The permittee shall maintain records of each day a fuel other than natural gas is burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

- (4) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5413(d)(9)	If using a performance test conducted by the manufacturer, maintain required records for each combustion control device model tested by the manufacturer.
60.5416(a)(1)	Conduct an <u>initial</u> inspection of all closed vent system joints, seams, or other connections that are permanently or semi-permanently sealed to demonstrate that the system operates with no detectable emissions. Conduct subsequent <u>annual</u> visual inspections for defects. Any defective components that are replaced must be inspected to demonstrate that these components operate with no detectable emissions.
60.5416(a)(2)	Conduct <u>initial and annual</u> inspections of all closed vent system components other than those described under 60.5416(a)(1) to demonstrate that that system operates with no detectable emissions. Also conduct <u>annual</u> visual inspections for defects.
60.5416(a)(3)	Conduct <u>initial and annual</u> inspections of the storage vessel covers to identify any defects.
60.5416(a)(4)	Except for low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and safety devices, operate the bypass valve flow monitors to collect a reading at least <u>once every 15 minutes</u> or visually inspect all bypass valves secured in the non-diverting position at least <u>monthly</u> to verify that valve remains in the non-diverting position.
60.5416(b)(1) through (8)	Conduct inspections of closed vent systems to detect leaks according to USEPA Method 21 and as provided by rule. The condition of no detectable emissions is defined as an organic concentration value less than 500 ppmv.
60.5417(a)	Requirements for continuous parameter monitoring system for each control device.
60.5417(b)	Monitoring requirements exemptions.



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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart OOOO and PTI P0117095]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following:
 - i. use of natural gas only as a fuel in the flare; and



- ii. the destruction efficiency of 98% for the flare;
- b. all periods of time during which the pressure sensor and/or flame detection device were not functioning properly or the flare was not maintained as required in this permit.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

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

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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart OOOO and PTI P0117095]

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 1.006 tons/month averaged over a 12-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 40.444 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

b. Emission Limitation:

CO emissions shall not exceed 5.463 tons/month averaged over a 12-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 40.444 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

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

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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart OOOO and PTI P0117095]

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.



6. P021, DEHY-201

Operations, Property and/or Equipment Description:

120-MMSCFD Dehydration Unit

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

(1) 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 (PTI P0117097)	<p>Volatile organic compound (VOC) emissions shall not exceed 0.5375 ton/month averaged over a 12-month rolling period.</p> <p>See b)(2)a, b)(2)e, b)(2)f, c)(1) and c)(2).</p>
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	40 CFR Part 63, Subpart HH, National Emission Standards for HAP from Oil and Natural Gas Production Facilities, 40 CFR 63.760(b)(2)	Compliance with the applicable portions of 40 CFR Part 63, Subpart HH. Any final amendments to this rule will supersede any previous Subpart HH requirement(s) in this permit.
d.	40 CFR 63.764(e)	<p>Exemption from control requirements.</p> <p>See b)(2)d.</p>
e.	40 CFR 63.1 – 63.16	The General Provisions that apply are specified in Table 2 of 40 CFR Part 63, Subpart HH.
f.	ORC 3704.03(F)(4)(d)	See d)(4).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS



pollutant 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 3745-31-05, then these emission limits/control measures no longer apply.

- b. These rule paragraphs apply 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 from this air contaminant source since the controlled potential to emit for VOC is less than ten tons per year.

- c. Dehydrator flash tank off-gases shall be routed to the produced water storage tank for capture in the VRU or destruction in P019 via the produced water storage tanks.
- d. The glycol dehydration unit is exempt from the control requirements of §63.764(d) because the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram/year, with federally enforceable controls in place.
- e. Maintenance of the temperature of the exhaust gases from the condenser and maintenance of the flare used to control VOC and HAPs will assure compliance with the annual limit. Additional monthly record keeping is not required since the annual limits are based on the emissions unit's potential to emit (at a throughput of 120 mmscf of natural gas/day and 98% destruction efficiency). See emissions unit P019 for flare requirements.
- f. The emissions from the dehydration unit's condenser shall be vented to the flare at all times the emissions unit is in operation. The flare shall have a minimum destruction efficiency of 98%. See emissions unit P019 for flare requirements.

c) **Operational Restrictions**

- (1) All emissions from the dehydrator still vent shall be vented to a condenser that shall meet the monitoring and record keeping requirements of this permit, when the emissions unit is in operation, including the following:
 - a. The condenser shall be operated at all times when gases are vented to it.
 - b. The condenser must be equipped with a temperature monitoring device that monitors and records the dehydration still vent temperature.



- c. The condenser, temperature monitoring device and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0117097]

- (2) The condenser temperature shall be maintained below 120 degrees Fahrenheit during operation of this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0117097]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain the following records for the condenser:

- a. monitor and record the temperature of the exit of the condenser on a daily basis (Monday through Friday, excluding major holidays); and
- b. record all periods of time when the condenser is not operating correctly to control the emissions from the dehydration still vent.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117097]

- (2) The permittee shall maintain records of the annual facility natural gas or hydrocarbon liquid throughput for each year, in accordance with 40 CFR 63.760(a)(1)(ii).

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart HH and PTI P0117097]

- (3) The permittee shall maintain the following records for the actual average emissions of benzene from the glycol dehydration unit process vent in accordance with 63.772(b)(2), determined either uncontrolled or with federally enforceable controls in place:

- a. The permittee shall determine actual average benzene emissions using the model GRI-GLY Calc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLY Calc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or
- b. The permittee shall determine an average mass rate of benzene emissions in kilograms per hour through direct measurement using the methods in 63.772(a)(1)(i) or (ii), or an alternative method according to 63.7(f). Annual emissions in kilograms per year shall be determined by multiplying the mass rate by the number of hours the unit is operated per year. This result shall be converted to megagrams per year.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart HH and PTI P0117097]



- (4) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117097]

e) Reporting Requirements

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117097]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117097]

f) Testing Requirements

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

- a. Emission Limitation:

VOC emissions shall not exceed 0.5375 tons/month averaged over a 12-month rolling period.



Applicable Compliance Method:

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

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

See emissions unit P019 for testing requirements.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart HH and PTI P0117097]

b. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated by the design and operation specifications detailed in emissions unit P019.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117097]

g) Miscellaneous Requirements

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



7. P801, FUG

Operations, Property and/or Equipment Description:

Fugitive emissions from components

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.	ORC 3704.03(T) and OAC 3745-31-05(A)(3) (PTI P0117095)	Fugitive volatile organic compound (VOC) emissions shall not exceed 1.105 tons/month averaged over a 12-month rolling period. See d)(1).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Leak Detection and Repair Program

a. The permittee shall develop and implement a leak detection and repair program designed to monitor and repair leaks from ancillary equipment and compressors covered by this permit. This leak detection and repair program shall include the following elements:

i. An initial and then annual inspection of the ancillary and associated equipment and compressors shall be conducted to determine if a leak exists. Leaks shall be determined through the use of an analyzer meeting U.S. EPA Method 21, 40 CFR Part 60, Appendix A.



- ii. The analyzer shall be operated and maintained following the instrument manufacturer's operation and maintenance instructions.
- iii. A leak shall be determined if the instrument reading is equal to or greater than 10,000 ppm total VOC or the "leak detected" instrument reading required per any applicable rule.
- iv. Documentation that includes the following:
 - (a) the date the inspection was conducted;
 - (b) the name of the employee conducting the leak check;
 - (c) the identification of any component that was determined to be leaking; and
 - (d) the date the component was repaired and determined to no longer be leaking.
- b. The records associated with the leak detection and repair program shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

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 1.105 tons/month averaged over a 12 month rolling period.



Applicable Compliance Method:

The annual VOC limitation is the estimated potential-to-emit based upon the maximum number of components and type of service (gas/vapor and light liquid) expected at the natural gas production site. The appropriate emission factors from U.S. EPA's "Protocol for Equipment Leak Emission Estimates", Table 2-4, for Oil and Gas production Operations (a conservative estimate), shall be used to demonstrate compliance with the limit. The facility's potential emissions from ancillary and associated equipment shall be documented from the summation of the following calculations:

Component Type # of components x emission factor x % VOC* = lb VOC/hr

In Gas/Vapor Service

Number of connectors (Phase 1 =150, Phase 2 =350, Phase 3 =150) x 0.000441 lb/hr x % VOC = lb VOC/hr

Number of valves (Phase 1 =100, Phase 2 =300, Phase 3 =100) x 0.00992 lb/hr x % VOC = lb VOC/hr

Number of flanges (Phase 1 =0, Phase 2 =450, Phase 3 =0) x 0.00086 lb/hr x % VOC = lb VOC/hr

Number of compressor seals (Phase 1 =2, Phase 2 =14, Phase 3 =4) x 0.01940 lb/hr x % VOC = lb VOC/hr

Number of relief valves (Phase 1 =10, Phase 2 =30, Phase 3 =10) x 0.01940 lb/hr x % VOC = lb VOC/hr

Number of other components (Phase 1 =5, Phase 2 =10, Phase 3 =5) x 0.0194 lb/hr x % VOC = lb VOC/hr

*Where: % VOC for Phase 1 = 22.1158, % VOC for Phase 2 = 18.8003 and % VOC for Phase 3 = 18.8003 (per company's analysis)

In Light Liquid Service

Number of connectors (Phase 1 =0, Phase 2 =40, Phase 3 =0) x 0.000463 lb/hr x % VOC = lb VOC/hr

Number of valves (Phase 1 =50, Phase 2 =60, Phase 3 =50) x 0.00551 lb/hr x % VOC = lb VOC/hr

Number of flanges (Phase 1 =50, Phase 2=0, Phase 3 =50) x 0.00024 lb/hr x % VOC = lb VOC/hr

Number of pump seals (Phase 1 =2, Phase 2 =4, Phase 3 =2) x 0.0287 lb/hr x % VOC = lb VOC/hr



Number of relief valves (Phase 1 =0, Phase 2 =0, Phase 3 =0) x 0.01653 lb/hr x % VOC = lb VOC/hr

Number of other components (Phase 1 =5, Phase 2 =4, Phase 3 =5) x 0.01653 lb/hr x % VOC = lb VOC/hr

*Where: % VOC = 100 per company's analysis

The total summation of VOC emissions per hour shall be multiplied by 8760 hours per year and divided by 2000 pounds per ton, then divided by 12 months per year to calculate the estimated tons per month averaged over a 12 month rolling period of fugitive VOC emissions for the demonstration of compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

g) Miscellaneous Requirements

(1) None.



8. Emissions Unit Group - 120 MMSCFD Dehy Units: P016 & P017

EU ID	Operations, Property and/or Equipment Description
P016	120-MMSCFD Dehydration Unit
P017	120-MMSCFD Dehydration Unit

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

(1) 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.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3) (PTI P0117095)	Volatile organic compound (VOC) emissions from the flare stack for each emissions unit shall not exceed 1.101 tons/month averaged over a 12-month rolling period. See b)(2)c, b)(2)d, c)(1) and c)(2).
b.	40 CFR Part 63, Subpart HH, National Emission Standards for HAP from Oil and Natural Gas Production Facilities, 40 CFR 63.760(b)(2)	Compliance with the applicable portions of 40 CFR Part 63, Subpart HH. Any final amendments to this rule will supersede any previous Subpart HH requirement(s) in this permit.
c.	40 CFR 63.764(e)	Exemption from control requirements. See b)(2)b.
d.	40 CFR 63.1 – 63.16	The General Provisions that apply are specified in Table 2 of 40 CFR Part 63, Subpart HH.
e.	ORC 3704.03(F)(4)(d)	See d)(4).

(2) Additional Terms and Conditions

a. Dehydrator flash tank off-gases shall be routed to the produced water storage tank for capture in the VRU or destruction in P019 via the produced water storage tanks.



- b. The glycol dehydration unit is exempt from the control requirements of §63.764(d) because the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram/year, with federally enforceable controls in place.
 - c. Maintenance of the temperature of the exhaust gases from the condenser and maintenance of the flare used to control VOC and HAPs will assure compliance with the annual limit. Additional monthly record keeping is not required since the annual limits are based on the emissions unit's potential to emit (at a throughput of 120 mmscf of natural gas/day and 98% destruction efficiency). See emissions unit P019 for flare requirements.
 - d. The emissions from the dehydration unit's condenser shall be vented to the flare at all times the emissions unit is in operation. The flare shall have a minimum destruction efficiency of 98%. See emissions unit P019 for flare requirements.
- c) Operational Restrictions
- (1) All emissions from the dehydrator still vent shall be vented to a condenser that shall meet the monitoring and record keeping requirements of this permit, when the emissions unit is in operation, including the following:
 - a. The condenser shall be operated at all times when gases are vented to it.
 - b. The condenser must be equipped with a temperature monitoring device that monitors and records the dehydration still vent temperature.
 - c. The condenser, temperature monitoring device and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0117095]
 - (2) The condenser temperature shall be maintained below 120 degrees Fahrenheit during operation of this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0117095]
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain the following records for the condenser:
 - a. monitor and record the temperature of the exit of the condenser on a daily basis (Monday through Friday, excluding major holidays); and
 - b. record all periods of time when the condenser is not operating correctly to control the emissions from the dehydration still vent.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]



- (2) The permittee shall maintain records of the annual facility natural gas or hydrocarbon liquid throughput for each year, in accordance with 40 CFR 63.760(a)(1)(ii).

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart HH and PTI P0117095]

- (3) The permittee shall maintain the following records for the actual average emissions of benzene from the glycol dehydration unit process vent in accordance with 63.772(b)(2), determined either uncontrolled or with federally enforceable controls in place:

- a. The permittee shall determine actual average benzene emissions using the model GRI-GLY Calc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLY Calc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or
- b. The permittee shall determine an average mass rate of benzene emissions in kilograms per hour through direct measurement using the methods in 63.772(a)(1)(i) or (ii), or an alternative method according to 63.7(f). Annual emissions in kilograms per year shall be determined by multiplying the mass rate by the number of hours the unit is operated per year. This result shall be converted to megagrams per year.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart HH and PTI P0117095]

- (4) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]



e) Reporting Requirements

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

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 for each emissions unit shall not exceed 1.101 tons/month averaged over a 12-month rolling period.

Applicable Compliance Method:

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

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



See emissions unit P019 for testing requirements.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart HH and PTI P0117095]

b. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated by the design and operation specifications detailed in emissions unit P019.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

g) Miscellaneous Requirements

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



9. Emissions Unit Group - 1340 HP Compressor Engines: P003 & P004

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

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001 (PTI P0117469)	Volatile organic compound (VOC) emissions shall not exceed 0.77 lb/hr and 3.37 tpy (not including formaldehyde). Carbon monoxide (CO) emissions shall not exceed 1.75 lbs/hr and 7.69 tpy. Sulfur dioxide (SO ₂) emissions shall not exceed 0.01 lb/hr and 0.04 tpy. Particulate emissions (PE) shall not exceed 0.12 lb/hr and 0.53 tpy. Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006	See b)(2)b.
c.	ORC 3704.03(T) (PTI P0117469)	Nitrogen oxides (NO _x) emissions shall not exceed 25.86 tons per rolling, 12-month period.
d.	OAC rule 3745-17-07(A)(1)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant



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

(2) Additional Terms and Conditions

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

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

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0117469]

d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]



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

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

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

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

Toxic Contaminant: formaldehyde

TLV (mg/m3): 0.37



Maximum Hourly Emission Rate (lbs/hr): 0.40

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

MAGLC (ug/m³): 8.77

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

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

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

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



[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

- (5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]



- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration in the annual PER. If no changes to the emissions, emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

f) Testing Requirements

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

- a. Emission Limitations:

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

Applicable Compliance Methods:

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

- b. Emission Limitation:

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

Applicable Compliance Method:

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]



c. Emission Limitations:

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

Applicable Compliance Methods:

Compliance with the hourly emission limitation above shall be determined by dividing 0.59 g/BHP-hr (the manufacturer supplied emission factor, including the 80% control efficiency of the catalytic converter) by 454 g/lb, and then multiplying by 1,340 brake-horsepower (the maximum power output rating of this unit).

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

d. Emission Limitations:

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

Applicable Compliance Methods:

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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

e. Emission Limitations:

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



Applicable Compliance Methods:

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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

f. Emission Limitation:

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

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

g. Emission Limitation:

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

Applicable Compliance Method:

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]



Draft Title V Permit
Utica Gas Services, L.L.C.- Augusta Compressor Facility
Permit Number: P0117470
Facility ID: 0210012004
Effective Date: To be entered upon final issuance

- g) Miscellaneous Requirements
 - (1) None.



10. Emissions Unit Group - 1775 HP Compressor Engines: P006, P007, P008, P009, P010, P011, P012, P013

EU ID	Operations, Property and/or Equipment Description
P006	1,775-hp Caterpillar G3606 Compressor Engine w/ Oxidation Catalyst
P007	1,775-hp Caterpillar G3606 Compressor Engine w/ Oxidation Catalyst
P008	1,775-hp Caterpillar G3606 Compressor Engine w/ Oxidation Catalyst
P009	1,775-hp Caterpillar G3606 Compressor Engine w/ Oxidation Catalyst
P010	1,775-hp Caterpillar G3606 Compressor Engine w/ Oxidation Catalyst
P011	1,775-hp Caterpillar G3606 Compressor Engine w/ Oxidation Catalyst
P012	1,775-hp Caterpillar G3606 Compressor Engine w/ Oxidation Catalyst
P013	1,775-hp Caterpillar G3606 Compressor Engine w/ Oxidation Catalyst

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) 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 (PTI P0112539)	<p>Carbon monoxide (CO) emissions from the stack serving each emissions unit shall not exceed 1.18 lbs/hr and 5.18 TPY.</p> <p>Nitrogen oxides (NO_x) emissions from the stack serving each emissions unit shall not exceed 1.96 lbs/hr and 8.57 TPY.</p> <p>Volatile organic compound (VOC) emissions from the stack serving each emissions unit shall not exceed 0.54 lb/hr and 2.38 TPY.</p> <p>Visible particulate emissions (PE) from the stack serving each emissions unit shall not exceed 10% opacity as a 6-minute average.</p> <p>Compliance with 40 CFR Part 60,</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Subpart OOOO. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11 and 40 CFR Part 60, Subpart JJJJ. 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)(1)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 pound/million Btu of actual heat input.
e.	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).
f.	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 1,775 HP, natural gas-fired, stationary spark internal combustion engine manufactured after July 1, 2010 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 2.0 g/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)c, c)(2), d)(2), e)(3), e)(4) and f)(2).
g.	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.
h.	40 CFR Part 60, Subpart OOOO In accordance with 40 CFR 63.5365(c), this emissions unit is a reciprocating compressor subject to the Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and	The reciprocating compressor, constructed, modified, or reconstructed after 8/23/11 and located between the wellhead and the point of custody transfer to the natural transmission and storage segment, shall meet the requirements of 40 CFR Part 60, Subpart OOOO no later than 10/15/12 or upon initial startup



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Distribution. 40 CFR 60.5385	following that date; and by tracking either the hours of operation or number of months between compressor rod packing replacement. See c)(3), d)(3) and e)(5).
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 NO_x, CO and VOC emissions from this air contaminant source since the controlled potentials to emit for NO_x, CO and VOC are less than 10 tons/yr.

- c. The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4236(b)	Installation deadlines
60.4243(b)	Compliance demonstration



c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0112539]

- (2) 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
60.4243(b)	Maintenance requirements
60.4243(e)	Alternative fuel
60.4243(g)	AFR controllers

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 60, Subpart JJJJ and PTI P0112539]

- (3) Beginning on 10/15/12 or upon initial startup if the reciprocating compressor is installed after this date, the permittee shall replace the reciprocating compressor rod packing every 26,000 hours of operation; or if not tracking the hours of operation, within 36 months following 10/15/12 or the date of startup (whichever is later), and every 36 months from the date of the last rod packing replacement.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 60, Subpart OOOO and PTI P0112539]

d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112539]

- (2) 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
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[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart JJJJ and PTI P0112539]

- (3) Beginning on 10/15/12 or upon initial startup if the reciprocating compressor is installed after this date, the permittee shall either continuously monitor and record the number of hours of operation or track the number of months since the last rod packing replacement. Records shall be maintained of the date and time of the replacement of the compressor rod packing for each reciprocating compressor in operation at the facility. Records of deviations from the 26,000 hours or 36 months of operation between rod packing replacements shall also be maintained. These records shall be retained for at least 5 years.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart OOOO and PTI P0112539]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112539]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112539]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart JJJJ and PTI P0112539]

- (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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart JJJJ and PTI P0112539]

- (5) The permittee shall submit an initial annual report within 30 days after the end of the initial compliance period, or no later than 11/14/13 or within one year and 30 days of startup, whichever is later. Subsequent annual reports are due on the same date each year following the initial report. The annual reports shall include the following information:
- a. company name and address of the affected facility;
 - b. identification of each affected facility included in the annual report*;
 - c. beginning and ending dates of the reporting period;
 - d. the identification of each reciprocating compressor;
 - e. the cumulative number of hours of operation or the number of months of operation since initial startup of the reciprocating compressor, since the effective date of the NSPS, or since the previous reciprocating compressor rod packing replacement, whichever is later;



- f. records of any deviations from the 26,000 hours or 36 months of operation between rod packing replacements; and
- g. certification by the responsible official of truth, accuracy, and completeness.

* One report for multiple affected facilities may be submitted provided the report contains all of the information required and clearly identified for each.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart OOOO and PTI P0112539]

f) Testing Requirements

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

- a. Emission Limitations:

CO emissions from the stack serving each emissions unit shall not exceed 1.18 lbs/hr and 5.18 TPY.

Applicable Compliance Methods:

Compliance with the hourly emission limitation above shall be determined by dividing 0.30 g/BHP-hr (the manufacturer supplied emission factor, including the 90% control efficiency of the catalytic converter) by 454 g/lb, and then multiplying by 1,775 brake-horsepower (the maximum power output rating of this unit). A safety factor of 10% was also added to the hourly emission rate to account for potential fluctuations in gas composition.

The TPY emission limitation was developed by multiplying the short-term allowable CO emission limitation (1.18 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

If required, compliance with the hourly 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112539]

- b. Emission Limitations:

NO_x emissions from the stack serving each emissions unit shall not exceed 1.96 lbs/hr and 8.57 TPY.



Applicable Compliance Methods:

Compliance with the hourly emission limitation above shall be determined by dividing 0.50 g/BHP-hr (the manufacturer supplied emission factor) by 454 g/lb, and then multiplying by 1,775 brake-horsepower (the maximum power output rating of this unit).

The TPY emission limitation was developed by multiplying the short-term allowable NO_x emission limitation (1.96 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

If required, compliance with the hourly 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 7E.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112539]

c. Emission Limitations:

VOC emissions from the stack serving each emissions unit shall not exceed 0.54 lb/hr and 2.38 TPY.

Applicable Compliance Methods:

Compliance with the hourly emission limitation above shall be determined by dividing 0.14 g/BHP-hr (the manufacturer supplied emission factor, including the 80% control efficiency of the catalytic converter) by 454 g/lb, and then multiplying by 1,775 brake-horsepower (the maximum power output rating of this unit). A safety factor of 10% was also added to the hourly emission rate to account for potential fluctuations in gas composition.

The TPY emission limitation was developed by multiplying the short-term allowable VOC emission limitation (0.54 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112539]

d. 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.

[Authority for term: OAC rule 3745-17-03(B)(1), OAC rule 3745-77-07(C)(1) and PTI P0112539]

e. 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0112539]

f. 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).

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart JJJJ and PTI P0112539]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart JJJJ and PTI P0112539]

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.



11. Emissions Unit Group - 400 bbl Condensate Tanks Group 1: T001 & T002

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

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0117469)	VOC emissions from the flare stack shall not exceed 3.59 tons/year. The requirements of this rule include compliance with the applicable requirements of 40 CFR Part 60, Subpart OOOO. Use of submerged or bottom fill on tank. See b)(2)a, b)(2)d, c)(1) and c)(2).
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	40 CFR Part 60, Subpart Kb	See b)(2)c.
d.	OAC Rule 3745-21-09(L)(1)	Exempt pursuant to OAC rule 3745-21-09(L)(2)(a). See b)(2)e.
e.	40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (60.5360-60.5430) [In accordance with 40 CFR 60.5365, this emissions unit includes a storage vessel affected facility.]	Following the compliance date of October 15, 2013, each storage vessel constructed, modified, or reconstructed after August 23, 2011 and with VOC emissions calculated to exceed 6 tons per year, shall reduce VOC emissions by 95.0% or greater. See c)(1) and e)(3).



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

(2) Additional Terms and Conditions

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

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



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

c) Operational Restrictions

- (1) All of the emissions from the storage tank shall be captured by a vapor recovery unit (VRU) or flare.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 60, Subpart OOOO and PTI P0117469]

- (2) During all periods of downtime of the VRU, a backup flare shall be utilized to control emissions that is designed and operated as required in emissions unit P002.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0117469]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of all periods of downtime for the VRU.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

- (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	Submit the required information for storage vessels in the initial annual report within 30 days of the end of the initial



60.5420(b)(6)	compliance period and in the subsequent reports due the same date each year as the initial annual report.
60.5420(b)(7)	Submit the results of performance testing to USEPA's WebFIRE database within 60 days of completing each performance test.
60.5422	Submit the required information for pressure relief devices.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart OOOO and PTI P0117469]

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117469]

g) Miscellaneous Requirements

(1) None.



12. Emissions Unit Group - 400 bbl Condensate Tanks Group 2: T005, T006, T007, T008, T009, T010

EU ID	Operations, Property and/or Equipment Description
T005	400-bbl Condensate Storage Tank
T006	400-bbl Condensate Storage Tank
T007	400-bbl Condensate Storage Tank
T008	400-bbl Condensate Storage Tank
T009	400-bbl Condensate Storage Tank
T010	400-bbl Condensate Storage Tank

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0117095)	Volatile organic compound (VOC) emissions from each emissions unit shall not exceed 0.2358 ton/month averaged over a 12-month rolling period. 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 and c)(1).
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)	Following the compliance date of October 15, 2013, each storage vessel constructed, modified, or reconstructed after August 23, 2011 and with VOC emissions calculated to exceed 6 tons per



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 60.5365, this emissions unit includes a storage vessel affected facility.]	year, shall reduce VOC emissions by 95.0% or greater. See c)(1) and e)(3).
f.	40 CFR Part 60.1 through 60.19	The General Provisions that apply are specified in Table 3 of 40 CFR Part 60, Subpart OOOO.

(2) Additional Terms and Conditions

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

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

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

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. The flare shall be designed and operated as required in emissions unit P019.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 60, Subpart OOOO and PTI P0117095]

d) Monitoring and/or Recordkeeping Requirements

- (1) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

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

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



[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart OOOO and PTI P0117095]

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 each emissions unit shall not exceed 0.2358 ton/month averaged over a 12-month rolling period.

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

g) Miscellaneous Requirements

(1) None.



13. Emissions Unit Group - Generators: P014 & P015

EU ID	Operations, Property and/or Equipment Description
P014	605-hp Baldor IGLC420-2N Engine Driven Emergency Generator
P015	605-hp Baldor IGLC420-2N Engine Driven Emergency Generator

- 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 (PTI P0117095)	<p>Nitrogen oxide (NO_x) emissions from the stack serving each emissions unit shall not exceed 0.4867 ton/month averaged over a 12-month rolling period.</p> <p>Volatile organic compound (VOC) emissions from the stack serving each emissions unit shall not exceed 0.3742 ton/month averaged over a 12-month rolling period.</p> <p>Visible particulate emissions (PE) from the stack serving each emissions unit shall not exceed 10% opacity as a 6-minute average.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11 and 40 CFR Part 60, Subpart JJJJ.</p> <p>See b)(2)a and c)(1).</p>
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3) (PTI P0117095)	Carbon monoxide (CO) emissions from the stack serving each emissions unit shall not exceed 0.9733 ton/month



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		averaged over a 12-month rolling period. See c)(1). The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart JJJJ.
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 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)c, c)(2), d)(2), 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 NO_x and VOC emissions from this air contaminant source since the controlled potentials to emit for NO_x and VOC are less than 10 tons/yr.

c. The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4236(b)	Installation deadlines
60.4243(b)	Compliance demonstration

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0117095]

(2) 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

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 60, Subpart JJJJ and PTI P0117095]

d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

- (2) 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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart JJJJ and PTI P0117095]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]



- (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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

- (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.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart JJJJ and PTI P0117095]

- (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



[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart JJJJ and PTI P0117095]

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:

CO emissions from the stack serving each emissions unit shall not exceed 0.9733 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

The emission rate specified above was established by dividing 2.00 g/BHP-hr by 454 g/lb, and then multiplying by 605 brake-horsepower (the maximum power output rating of this unit). 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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

b. Emission Limitation:

NO_x emissions from the stack serving each emissions unit shall not exceed 0.4867 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the hourly emission limitation above shall be determined by dividing 1.00 g/BHP-hr (the manufacturer supplied emission factor) by 454 g/lb, and then multiplying by 605 brake-horsepower (the maximum power output rating of this unit).

The TPM averaged over a 12 month rolling period emission limitation was developed by multiplying the short-term NO_x emission limitation (1.33 lbs/hr) by the maximum annual hours of operation (8,760 hours), then dividing by 2,000 lbs per ton and then dividing by 12 months per year.

If required, compliance with the hourly 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 7E.



[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

c. Emission Limitation:

VOC emissions from the stack serving each emissions unit shall not exceed 0.3742 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the hourly emission limitation above shall be determined by dividing 0.70 g/BHP-hr (the manufacturer supplied emission factor) by 454 g/lb, and then multiplying by 605 brake-horsepower (the maximum power output rating of this unit).

The TPM averaged over a 12 month rolling period emission limitation was developed by multiplying the short-term VOC emission limitation (1.02 lbs/hr) by the maximum annual hours of operation (8,760 hours), then dividing by 2,000 lbs per ton and then dividing by 12 months per year.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

d. 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.

[Authority for term: OAC rule 3745-17-03(B)(1), OAC rule 3745-77-07(C)(1) and PTI P0117095]

e. Emission Limitation:

Visible PE from the stack serving each emissions unit shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

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



The emission limitation specified by this rule shall become effective once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan.

[Authority for term: OAC rule 3745-17-03(B)(1), OAC rule 3745-77-07(C)(1) and PTI P0117095]

f. 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117095]

g. 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).

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart JJJJ and PTI P0117095]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart JJJJ and PTI P0117095]

g) **Miscellaneous Requirements**

- (1) None.