



1/6/2015

Certified Mail

Mr. Cory Vail
Crum Compressor Station
8150 N. Central Expressway
Suite 1100
Dallas, TX 75206

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0661005040
Permit Number: P0117011
Permit Type: Initial Installation
County: Noble

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: Ohio EPA-SEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Crum Compressor Station**

Facility ID:	0661005040
Permit Number:	P0117011
Permit Type:	Initial Installation
Issued:	1/6/2015
Effective:	1/6/2015
Expiration:	1/6/2025



Division of Air Pollution Control
Permit-to-Install and Operate
for
Crum Compressor Station

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Final Permit-to-Install and Operate
Crum Compressor Station
Permit Number: P0117011
Facility ID: 0661005040
Effective Date: 1/6/2015

Authorization

Facility ID: 0661005040
Application Number(s): A0050722, A0050907, A0051073, A0051227, A0051248, A0052202, A0052301, A0052363
Permit Number: P0117011
Permit Description: Initial PTIO for a compressor station
Permit Type: Initial Installation
Permit Fee: \$3,600.00
Issue Date: 1/6/2015
Effective Date: 1/6/2015
Expiration Date: 1/6/2025
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Crum Compressor Station
52934 Town Highway 192
Seneca Twp., OH 43780

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

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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0117011
 Permit Description: Initial PTIO for a compressor station

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

- Emissions Unit ID: F001**
 Company Equipment ID: FD-1
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: J001**
 Company Equipment ID: LDOUT1
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: J002**
 Company Equipment ID: J002
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: P011**
 Company Equipment ID: P011
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: P016**
 Company Equipment ID: P013-P015
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: P017**
 Company Equipment ID: FLARE
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: P801**
 Company Equipment ID: FC-1
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: T001**
 Company Equipment ID: storage tanks
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Group Name: compressor engines

Emissions Unit ID:	P001
Company Equipment ID:	C-100
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	C-200
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Emissions Unit ID:	P003
Company Equipment ID:	C-300
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	C-400
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	C-500
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	C-600
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	C-700
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	C-800
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	C-900
Superseded Permit Number:	
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
Crum Compressor Station
Permit Number: P0117011
Facility ID: 0661005040
Effective Date: 1/6/2015

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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



Final Permit-to-Install and Operate
Crum Compressor Station
Permit Number: P0117011
Facility ID: 0661005040
Effective Date: 1/6/2015

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Crum Compressor Station

Permit Number: P0117011

Facility ID: 0661005040

Effective Date: 1/6/2015

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) See B.2.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), for this project were not necessary because for the emissions units not exempted from modeling per OEPA Engineering Guide #69, 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 when controlled. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO 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 PTIO.
3. The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
4. The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
5. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart ZZZZ, NESHAP for Stationary Reciprocating Internal Combustion Engines at Area Sources. Although Ohio EPA has determined that this GACT applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, US 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 US EPA. For more information on the area source rules, please refer to the following US EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.
6. This facility is subject to 40 CFR Part 60, Subpart OOOO. The complete NSPS requirements, including the NSPS General Provisions, may be accessed via the internet from the e-CFR website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.
7. Specific emissions units contained in this permit are subject to 40 CFR Part 60, Subpart JJJJ (P001-P009). The complete NSPS requirements, including the NSPS General Provisions, may be accessed via the internet from the e-CFR website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.



8. This facility is subject to 40 CFR Part 63, Subpart HH. The dehydration units at this facility are exempt per 63.764(e)(ii) from the requirements of 63.764(d)(2) due to the actual average emission of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 Mg/yr, as determined by the procedures specified in 63.772(b)(2) of 40 CFR 63, Subpart HH. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the e-CFR website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office of local air agency.

9. 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 PTE calculations for this permit. PTE calculations, therefore, should include the following sources from this facility:
 - a) P012 hot oil heater;
 - b) P018 vapor recovery tower;
 - c) P019 stabilizer skid;
 - d) P021 closed system slug catcher;
 - e) P022 inlet meter skid;
 - f) P023 inlet filter separator;
 - g) P024 compressor discharge coalescing filter;
 - h) P025 discharge scrubber;
 - i) P026 discharge meter skid;
 - j) P028 fuel gas skid;
 - k) P029 three-phase separator;
 - l) P030 natural gas liquids pump skid;
 - m) P031 electric flash gas compressor;
 - n) P032 instrument air skid;
 - o) P033 underground drain drums;
 - p) T002-6 pressurized condensate surge tanks.

10. The Compressor Station must comply with the Used Oil Management Standards of OAC Chapter 3745-279.

11. Abbreviations throughout are as follows:

Pollutants

NO _x	nitrogen oxides
CO	carbon monoxide
VOC	volatile organic carbon
PE	particulate emissions
CO ₂ e	carbon dioxide equivalents

Units

TPY	tons per year
lb	pound
g	gram
bbl	barrel
MM	million
Btu	British thermal units



Final Permit-to-Install and Operate

Crum Compressor Station

Permit Number: P0117011

Facility ID: 0661005040

Effective Date: 1/6/2015

hp	horsepower
bhp	brake horsepower
d	day
hr	hour
m	month
yr	year
VMT	Vehicle Miles Traveled

Regulations

OAC	Ohio Administrative Code
ORC	Ohio Revised Code
CFR	Code of Federal Regulations
e-CFR	Electronic Code of Federal Regulation
BAT	Best Available Technology
MACT	Maximum Achievable Control Technology
NSPS	New Source Performance Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
GACT	Generally Available Control Technology

General

PTE	Potential to Emit
PTIO	Permit to Install and Operate
PER	Permit Evaluation Report
SIP	State Implementation Plan
NAAQS	National Ambient Air Quality Standards
VRU	Vapor Recovery Unit
ICE	Internal Combustion Engine



Final Permit-to-Install and Operate
Crum Compressor Station
Permit Number: P0117011
Facility ID: 0661005040
Effective Date: 1/6/2015

C. Emissions Unit Terms and Conditions



1. F001 Unpaved Roadways and Parking Areas

Operations, Property and/or Equipment Description:

Unpaved well site entrance and gravel access roadway and parking area (maximum of 4,502 ft; 5,291 VMT)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 06/30/2008	Develop and implement a site-specific work practice plan designed as described in c)(1) below to minimize or eliminate fugitive dust emissions. See b)(2)a.-b. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 06/30/2008	See b)(2)c. below.

(2) Additional Terms and Conditions

a. The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee cannot begin using any modified Work Practice Plan until such time as the Southeast District Office approves the revised plan.



- b. This BAT emissions limit applies until US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.
- c. These rule paragraphs apply once US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM emissions from this air contaminant source since the PTE for PM is less than 10 TPY.

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

(1) The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittees paved and unpaved roadways and parking areas. This work practice plan shall include, at a minimum, the following elements:

- a. An identification of each segment of unpaved roadway or parking area for which the plan applies.
- b. A determination of the frequency that each roadway or parking area will be inspected to determine if additional control measures are needed.
- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways. This form/record should include, at a minimum, the following elements:
 - i. Roadway or parking area segment inspected;
 - ii. Date inspected;
 - iii. Name of employee doing the inspection;
 - iv. Result of the inspection (needs treated or does not need treated);
 - v. A description of why no treatment was needed;
 - vi. Date treated;
 - vii. Name of employee treating the segment; and
 - viii. Method used to treat the segment.
- d. A description of how and where the records shall be maintained.

(2) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day



to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

- (3) The permittee shall maintain records of the following information:
 - a. The records required to be collected under the Work Practice Plan, and
 - b. the date and reason any element of the Work Practice Plan was not implemented.
- d) Reporting Requirements
 - (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the Southeast District Office.
 - (2) See B. 3.-4.
- e) Testing Requirements
 - (1) None.



2. J001 Condensate Truck Loading

Operations, Property and/or Equipment Description:

Truck loading of condensate, 1.1 MM bbl maximum annual throughput, controlled via vapor balance with condensate tank; vapors from condensate tank controlled by VRU with 100% capture and control efficiency (low pressure flare when VRU is down for maintenance 1000 hr/yr maximum, with 100% capture and 98% control efficiency).

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 06/30/2008	Install a VRU with 100% capture and 100% design control efficiency for VOC emissions from the condensate tank. Install a low pressure flare with 100% capture and 98% control efficiency for VOC emissions from the condensate tank when the VRU is not in operation. Use vapor balance for the condensate tanks during condensate truck loading. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 06/30/2008	See b)(2)b. below.



(2) Additional Terms and Conditions

- a. This BAT emissions limit applies until US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.
- b. These rule paragraphs apply once US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM emissions from this air contaminant source since the PTE for PM is less than 10 TPY.

c) Operational Restrictions

- (1) As the low pressure flare is used for periodic maintenance of the VRU, an inherent limitation of 1000 hr/yr has been established for the flaring of tank emissions when the VRU is not operational.
- (2) The permittee shall operate the VRU or low pressure flare at all times truck loadout is being completed for the control of VOC emissions via the condensate tanks and shall maintain the VRU and low pressure flare in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modification deemed necessary by the permittee.
- (3) In the event the VRU or low pressure flare is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the throughput of the emissions unit, in bbl/d.
- (2) The permittee shall maintain records of the number of hr/yr the low pressure flare is used.
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the VRU and low pressure flare, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of the VRU and low pressure flare to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.



- (5) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the VRU and low pressure flare while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the VRU and low pressure flare and shall maintain the following information:
 - a. The date of the inspection;
 - b. A description of each/any problem identified and the date it was corrected;
 - c. A description of any maintenance and repairs performed; and
 - d. The name of the person who performed the inspection.

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

- (7) The permittee shall maintain records that document any time periods when the VRU and low pressure flare was not in service when the emissions unit(s) was/were in operation, as well as a record of all operations during which the low pressure flare was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
 - (1) See B. 3.-4.
 - f) Testing Requirements
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Design Efficiency:

Install a VRU with 100% capture and 100% design control efficiency for VOC emissions from the condensate tanks;

Install a low pressure flare with 100% capture and 98% control efficiency for VOC emissions from the condensate tanks when VRU is not operating;

Use vapor balance for the condensate tanks during condensate truck loading.



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Applicable Compliance Method:

Compliance is demonstrated by VRU manufacturer's design efficiencies of 100% and 98% control for VOC emissions;

Compliance is demonstrated by low pressure flare manufacturer's design efficiencies of 100% capture and 98% control for VOC emissions;

Compliance is demonstrated by using vapor balance for the condensate tanks during condensate truck loading.

g) Miscellaneous Requirements

(1) None.



3. J002 Produced Water Truck Loading

Operations, Property and/or Equipment Description:

Truck loading of produced water, 21,900 bbl maximum annual throughput.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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)(a)(ii), as effective 06/30/2008	See b)(2)b. below.

(2) **Additional Terms and Conditions**

a. This BAT emissions limit applies until US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.

b. These rule paragraphs apply once US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM emissions from this air contaminant source since the PTE for PM is less than 10 TPY.

c) **Operational Restrictions**

(1) None.



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- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain records of the throughput of the emissions unit, in bbl/d.
- e) Reporting Requirements
 - (1) See B. 3.-4.
- f) Testing Requirements
 - (1) None.
- g) Miscellaneous Requirements
 - (1) None.



4. P016 Venting

Operations, Property and/or Equipment Description:

Venting, i.e., compressor and VRU blowdowns controlled by high pressure flare/P017 with 100% capture and 98% control efficiency, plus pigging (fugitive); maximum number of compressor and VRU blowdown events are 286/yr and 26/yr, respectively; the maximum number of pigging events shall not exceed 780/yr

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 06/30/2008	Install a high pressure flare with 100% capture and 98% design control efficiency for VOC emissions from compressor and VRU blowdowns. Fugitive VOC emissions from pigging shall not exceed 0.32 tons/m as a rolling, 12-month average. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 06/30/2008	See b)(2)b. below.



(2) Additional Terms and Conditions

- a. This BAT emissions limit applies until US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.
- b. These rule paragraphs apply once US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM emissions from this air contaminant source since the PTE for PM is less than 10 TPY.

c) Operational Restrictions

- (1) The permittee shall operate the high pressure flare at all times compressor and VRU blowdowns are being completed for the control of VOC emissions and shall maintain the high pressure flare in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modification deemed necessary by the permittee.
- (2) In the event the high pressure flare is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following records on a monthly basis for pigging events:
 - a. The date, number, and type of each maintenance and venting event;
 - b. Percent VOC fraction in the gas stream obtained by representative sampling and analysis (e.g., gas chromatography);
 - c. Total volume of gas emitted from each maintenance and venting event;
 - d. Total volume of gas emitted from all maintenance and venting events as a rolling, 12-month average;
 - e. Gas density derived using actual stream sampling data (e.g., gas chromatography); and
 - f. Monthly VOC emissions in tons/m as a rolling, 12-month average
- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the high pressure flare, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.



- (3) The permittee shall conduct periodic inspections of the high pressure flare to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.
- (4) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the high pressure flare while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the high pressure flare and shall maintain the following information:
 - a. The date of the inspection;
 - b. A description of each/any problem identified and the date it was corrected;
 - c. A description of any maintenance and repairs performed; and
 - d. The name of the person who performed the inspection.

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

- (6) The permittee shall maintain records that document any time periods when the high pressure flare was not in service when the emissions unit(s) was/were in operation, as well as a record of all operations during which the high pressure flare was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
 - (1) See B. 3.-4.
 - f) Testing Requirements
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Design Efficiency:

Install a high pressure flare with 100% capture and 98% design control efficiency for VOC emissions from compressor and VRU blowdowns.



Applicable Compliance Method:

Compliance is demonstrated by high pressure flare manufacturer's design control efficiency of 100% capture and 98% control efficiency.

b. Emissions Limitation:

Fugitive VOC emissions from pigging shall not exceed 0.32 tons/m as a rolling, 12-month average.

Applicable Compliance Method:

The VOC emissions limitation for pigging was derived by the calculation below using the inputs provided in the permittee's application.

$$\frac{\text{events}}{\text{yr}} * \frac{\text{scf}}{\text{event}} * \frac{\text{lb}}{\text{lbmol}} = \frac{\text{tons}}{\text{yr}} * \% \text{VOC}$$

$$= \text{VOC emissions} \frac{\text{tons}}{\text{yr}} * \frac{\text{yr}}{12 \text{ months rolling}} \leq \frac{0.32 \text{ tons}}{\text{m rolling 12}}$$

g) Miscellaneous Requirements

(1) None.



5. **P017 High Pressure and Low Pressure Flare**

Operations, Property and/or Equipment Description:

A combined dual stack high pressure and low pressure flares. The high pressure flare has 100% capture and 98% control efficiency of VOC emissions from compressors and VRU blowdown events (pilot permitted to burn 8,760 hr/yr). The low pressure flare has 100% capture and 98% control efficiency of VOC emissions for use only when: (1) VRU is down to combust gas emissions from the vapor recovery tower (VRT) condensate storage tanks and condensate truck loading via the condensate storage tanks using vapor balance, and (2) 100% capture and 98% control efficiency of VOC emissions for use at all times to control emissions from the dehydration BTEX unit.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 06/30/2008	NO _x emissions shall not exceed 0.13 tons/m as a rolling, 12-month average. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006	See b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3), as effective 06/30/2008	CO emissions shall not exceed 0.64 tons/m as a rolling, 12-month average.



(2) Additional Terms and Conditions

- a. This BAT emissions limit applies until US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.
- b. These rule paragraphs apply once US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM emissions from this air contaminant source since the PTE for PM is less than 10 TPY.

c) Operational Restrictions

- (1) The high pressure flare will accept emissions from compressors and VRU blowdown events.
- (2) The low pressure flare will accept emissions from the vapor recovery tower (VRT), condensate storage tanks, and condensate truck loading (via the condensate storage tanks using vapor balance), for a maximum of 1,000 hr/yr when the VRU is not operational, and from the dehydration BTEX unit at all times.

d) Monitoring and/or Recordkeeping Requirements

- (1) Permittee shall keep records of how many hours the high pressure and the low pressure flares are operated per year, as well as what emission units are routed to each.

e) Reporting Requirements

- (1) See B. 3.-4.

f) Testing Requirements

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

a. Emissions Limitation:

NO_x emissions shall not exceed 0.13 tons/m as a rolling, 12-month average.

Applicable Compliance Method:

The NO_x emissions limitation for gas combusted from the condensate storage tanks, condensate truck loading, compressor and VRU blowdown events, vapor recovery tower, dehydration BTEX unit, and the flare pilots was derived by the calculation below using the inputs provided in the permittee's application.

$$\frac{EF \text{ lb}}{MMBtu} * \frac{X \text{ MMBtu}}{hr} * \frac{\text{ton}}{2,000 \text{ lb}} * \frac{8,760 \text{ hr}}{yr} * \frac{yr}{12 \text{ m rolling}} \leq \frac{0.13 \text{ ton NO}_x}{\text{rolling } 12 \text{ m}}$$



b. Emissions Limitation:

CO emissions shall not exceed 0.64 tons/m as a rolling, 12-month average.

Applicable Compliance Method:

The CO emissions limitation for gas combusted from the condensate storage tanks, condensate truck loading, compressor and VRU blowdown events, vapor recovery tower, dehydration BTEX unit, and the flare pilots was derived by the calculation below using the inputs provided in the permittee's application.

$$\frac{EF \text{ lb}}{MMBtu} * \frac{X \text{ MMBtu}}{hr} * \frac{ton}{2,000 \text{ lb}} * \frac{8,760 \text{ hr}}{yr} * \frac{yr}{12 \text{ m rolling}} \leq \frac{0.64 \text{ tons CO}}{\text{rolling 12 m}}$$

g) Miscellaneous Requirements

(1) None.



6. P801 Equipment Leaks

Operations, Property and/or Equipment Description:

Equipment leaks from various components, including connectors, flanges, compressors, open ended lines, pump seals, and valves

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 06/30/2008	VOC emissions shall not exceed 0.03 tons/m as a rolling, 12-month average. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 06/30/2008	See b)(2)b. below.

(2) Additional Terms and Conditions

a. This BAT emissions limit applies until US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.

b. These rule paragraphs apply once US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM emissions from this air contaminant source since the PTE for PM is less than 10 TPY.



c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) See B. 3.-4.

f) Testing Requirements

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

a. Emissions Limitation:

Fugitive VOC emissions shall not exceed 0.03 tons/m as a rolling, 12-month average.

Applicable Compliance Method:

Compliance with the fugitive VOC emissions limitation shall be demonstrated by the following calculation based on the emissions factors provided in Table 2-4 of US EPA's Protocol for Equipment Leak Emission Estimates (11/95) for components in gas, light oil, and water/oil service and the information provided in the permittee's application:

$$\sum \left(\text{component count} * \text{max leak rates} * \text{VOC fraction} * \frac{8,760 \text{ hr}}{\text{yr}} * \frac{1 \text{ ton}}{2,000 \text{ lb}} * \frac{1 \text{ yr}}{12 \text{ m rolling}} \right) \leq 0.03 \text{ ton/m rolling 12}$$

Where component counts, max leak rates, and VOC fractions are based on the data provided in the permittee's application.

g) Miscellaneous Requirements

(1) None.



7. T001 Storage Tanks

Operations, Property and/or Equipment Description:

Two 7,500 bbl condensate storage tanks and five 400 bbl produced water storage tanks. The two 7,500 bbl condensate storage tanks are controlled by VRU with 100% capture and control efficiency, with emissions routed to a low pressure flare with 100% capture and 98% control efficiency 1,000 hr/yr when VRU is not operational. Condensate truck loading vapors are routed to the condensate storage tanks via vapor balance that are then routed to the low pressure flare.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 06/30/2008	Install a VRU with 100% capture and 100% design control efficiency for VOC emissions. Install a low pressure flare with 100% capture and 98% control efficiency for VOC emissions when VRU is not in operation. Use vapor balance for the condensate tanks during condensate truck loading. See b)(2)a. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 06/30/2008	See b)(2)b. below.
c.	40 CFR Part 60, Subpart OOOO (60.5360-60.5430)	<p>Each tank at this facility has a PTE after control(s) of less than 6 TPY and are, therefore, exempt from the requirements of 40 CFR Part 60, Subpart OOOO.</p> <p>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 TPY, shall reduce VOC emissions by 95% or greater.</p>
d.	40 CFR Part 60, Subpart A (60.1-60.19)	General provisions may apply.

(2) Additional Terms and Conditions

- a. This BAT emissions limit applies until US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.
- b. These rule paragraphs apply once US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM emissions from this air contaminant source since the PTE for PM is less than 10 TPY.

c) Operational Restrictions

- (1) An inherent limitation of 1,000 hr/yr has been established for the flaring of condensate tanks emissions when the VRU is not operational.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the throughput of the emissions unit, in bbl/d.
- (2) The permittee shall maintain records of the number of hours/yr the emissions from the condensate tanks are sent to the low pressure flare.
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the VRU and low pressure flare, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.



- (4) The permittee shall conduct periodic inspections of the VRU and low pressure flare to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the VRU and low pressure flare while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the VRU and low pressure flare and shall maintain the following information:
 - a. The date of the inspection;
 - b. A description of each/any problem identified and the date it was corrected;
 - c. A description of any maintenance and repairs performed; and
 - d. The name of the person who performed the inspection.

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

- (7) The permittee shall maintain records that document any time periods when the VRU and the low pressure flare was not in service when the emissions unit(s) was/were in operation, as well as a record of all operations during which the low pressure flare was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
 - (1) See B. 3.-4.
 - f) Testing Requirements
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Design Efficiency:

Install a VRU with 100% capture and 100% design control efficiency for VOC emissions;



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Install a low pressure flare with 100% capture and 98% design control efficiency for VOC emissions when the VRU is not operating;

Use vapor balance for the condensate tanks during condensate truck loading.
Applicable Compliance Method:

Compliance is demonstrated by VRU manufacturer's design efficiencies of 100% capture and 100% control for VOC emissions;

Compliance is demonstrated by the low pressure flare manufacturer's design efficiencies of 100% capture and 98% control for VOC emissions;

Compliance is demonstrated by using vapor balance for the condensate tanks during condensate truck loading.

g) Miscellaneous Requirements

(1) None.



8. P011 Dehydration Process

Operations, Property and/or Equipment Description:

One 120 MMscf/d dehydration unit that includes a 2.0 MMBTU/HR glycol dehydration unit re-boiler and gas-condensate-glycol separator (flash separator); still vent emissions via the BTEX unit are vented to a low pressure flare with 100% capture and 98% control efficiency for VOC reduction; flash gas is used as fuel for processes at the site.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 06/30/2008	Install a low pressure flare with 100% capture and 98% control efficiency for VOC. CO emissions shall not exceed 0.07 ton/m as a rolling, 12-month average. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 06/30/2008	See b)(2)b. below.
c.	40 CFR Part 63, Subpart HH (40 CFR 63.760-63.779) [In accordance with 40 CFR 63.760(a)(2)-(3), this emissions unit processes, upgrades, or stores	See b)(2)c. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	natural gas or hydrocarbon liquids prior to the point of custody transfer from the facility.]	
d.	40 CFR 63.1-15 (40 CFR 63.764)	Table 2 of Subpart HH of 40 CFR Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. This BAT emission limit applies until US EPA approves OAC paragraph 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.
- b. These requirements apply once US EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 TPY BAT exemption) as part of the Ohio SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO emissions from this air contaminant source since the PTE is less than 10 TPY.

- c. The dehydration unit controlled by the low pressure flare and located at this facility is subject to 40 CFR Part 63, Subpart HH, National Emission Standards for Hazardous Air Pollutants (NESHAP) From Oil and Natural Gas Production Facilities. The dehydration unit at this facility are exempt per 63.764(e)(ii) from the requirements of 63.764(d)(2) due to the actual average emission of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram per year, as determined by the procedures specified in 63.772(b)(2) of 40 CFR Part 63, Subpart HH.

c) Operational Restrictions

- (1) The permittee shall operate the low pressure flare at all times the dehydrator glycol regeneration unit is in operation for the control of VOC emissions from the still vent via the BTEX unit and shall maintain the flare in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modification deemed necessary by the permittee.
- (2) In the event the low pressure flare is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the low pressure flare, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.



- (2) The permittee shall conduct periodic inspections of the low pressure flare to determine whether it is operating in accordance with the manufacturer’s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer’s recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the low pressure flare while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer’s recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the low pressure flare and shall maintain the following information:
 - a. The date of the inspection;
 - b. A description of each/any problem identified and the date it was corrected;
 - c. A description of any maintenance and repairs performed; and
 - d. The name of the person who performed the inspection.

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

- (5) The permittee shall maintain records that document any time periods when the low pressure flare was not in service when the emissions unit(s) was/were in operation, as well as a record of all operations during which the flare was not operated according to the manufacturer’s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The permittee shall comply with the applicable recordkeeping requirements required under 40 CFR Part 63, Subpart HH, including the following sections:

63.774(d)	Record the actual annual benzene emissions calculated as provided by rule.
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e) Reporting Requirements

- (1) See Section B. 8-9.

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

This permit takes into account the following voluntary restriction as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):

i. The low pressure flare shall operate when EU is in operation with control efficiency for VOC emissions of 98% reduction from the still vent via the BTEX unit, and

ii. VOC emissions shall not exceed 0.06 tons/yr from the emissions unit as a whole.

b. Design Efficiency:

Install a low pressure flare with 100% capture and 98% control efficiency for VOC.

Applicable Compliance Method:

Compliance is demonstrated by the manufacturer's guaranteed specifications for the low pressure flare control efficiency of at least 98% with 100% capture.

c. Emissions Limitation:

CO emissions shall not exceed 0.07 ton/m as a rolling, 12-month average.

g) Miscellaneous Requirements

(1) None.



9. **Emissions Unit Group -compressor engines: P001-P009**

EU ID	Operations, Property and/or Equipment Description
P001	Nine Waukesha 7044GSI 1,680 hp natural gas compressor engines fitted with a five element non-selective catalytic reduction catalysts with control efficiencies of 98% for NO _x , 98% CO, and 50% for VOC, manufactured in 2014
P002	Nine Waukesha 7044GSI 1,680 hp natural gas compressor engines fitted with a five element non-selective catalytic reduction catalysts with control efficiencies of 98% for NO _x , 98% CO, and 50% for VOC, manufactured in 2014
P003	Nine Waukesha 7044GSI 1,680 hp natural gas compressor engines fitted with a five element non-selective catalytic reduction catalysts with control efficiencies of 98% for NO _x , 98% CO, and 50% for VOC, manufactured in 2014
P004	Nine Waukesha 7044GSI 1,680 hp natural gas compressor engines fitted with a five element non-selective catalytic reduction catalysts with control efficiencies of 98% for NO _x , 98% CO, and 50% for VOC, manufactured in 2014
P005	Nine Waukesha 7044GSI 1,680 hp natural gas compressor engines fitted with a five element non-selective catalytic reduction catalysts with control efficiencies of 98% for NO _x , 98% CO, and 50% for VOC, manufactured in 2014
P006	Nine Waukesha 7044GSI 1,680 hp natural gas compressor engines fitted with a five element non-selective catalytic reduction catalysts with control efficiencies of 98% for NO _x , 98% CO, and 50% for VOC, manufactured in 2014
P007	Nine Waukesha 7044GSI 1,680 hp natural gas compressor engines fitted with a five element non-selective catalytic reduction catalysts with control efficiencies of 98% for NO _x , 98% CO, and 50% for VOC, manufactured in 2014
P008	Nine Waukesha 7044GSI 1,680 hp natural gas compressor engines fitted with a five element non-selective catalytic reduction catalysts with control efficiencies of 98% for NO _x , 98% CO, and 50% for VOC, manufactured in 2014
P009	Nine Waukesha 7044GSI 1,680 hp natural gas compressor engines fitted with a five element non-selective catalytic reduction catalysts with control efficiencies of 98% for NO _x , 98% CO, and 50% for VOC, manufactured in 2014

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. 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 06/30/2008	Install an engine with guaranteed manufacturer's specifications of 0.14 g NO _x /bhp, 0.21 g VOC/bhp, and 0.26 g CO/bhp. Install an engine capable of meeting 0.11 tons PE/m as a rolling, 12-month average. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 06/30/2008	See b)(2)b.
c.	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 ≥ 500 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. CO emissions shall not exceed 2.0 g/hp-hr. VOC emissions shall not exceed 0.7 g/hp-hr. [40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1] See b)(2)c. below.
d.	40 CFR Part 60.1-19 (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 60.1-19 apply.
e.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/MMBtu actual heat input.
f.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.



(2) Additional Terms and Conditions

- a. This BAT emissions limit applies until US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.
- b. These rule paragraphs apply once US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM emissions from this air contaminant source since the PTE for PM is less than 10 TPY.

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

60.4233(e)	Emission standards
60.4234	Duration of emission standards
60.4243(b)	Demonstrating compliance
60.4243(b)(2)	Purchasing a non-certified engine
60.4243(b)(2)(ii)	Maintenance plan and records
60.4243(e)	Use of propane
60.4243(g)	Air-to-fuel ratio controllers
60.4246	General Provisions

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.
- (2) The permittee shall install and operate the engine with a catalyst for the control of NO_x and CO emissions whenever this emissions unit is in operation and shall maintain the engine in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (3) In the event the engine is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the generator shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

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



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

60.4243(b)(2)	Purchasing a non-certified engine
60.4243(b)(2)(ii)	Maintenance plan and records
60.4243(e)	Use of propane
60.4243(g)	Air-to-fuel ratio controllers
60.4244(a)	Performance testing
60.4244(b)	Startup, shutdown, or malfunction
60.4244(c)	Performance testing runs
60.4244(d)	NO _x mass per unit output emission limitation
60.4244(e)	CO mass per unit output emission limitation
60.4244(f)	Emissions of formaldehyde
60.4245(a)(1)	Notifications
60.4245(a)(2)	Engine maintenance
60.4245(a)(4)	Documentation of non-certified engines
60.4246	General Provisions

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



- d. The name of the person who performed the inspection.

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

- (7) The permittee shall maintain records that document any time periods when the oxidation catalyst was not in service when the emissions unit(s) was/were in operation, as well as a record of all operations during which the engine was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) See B. 3.-4.
- (2) 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.
- (3) The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4245(c)	Initial notification
60.4245(d)	Performance testing reporting

f) Testing Requirements

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

a. Design Efficiency:

Install an engine with guaranteed manufacturer's specifications of 0.14 g NO_x/bhp.

Applicable Compliance Method:

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

b. Design Efficiency:

Install an engine with guaranteed manufacturer's specifications of 0.26 g CO/bhp.



Applicable Compliance Method:

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

c. Design Efficiency:

Install an engine with guaranteed manufacturer's specifications of 0.21 g VOC/bhp.

Applicable Compliance Method:

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

d. Emissions Limitation:

NO_x emissions shall not exceed 1.0 g/hp-hr.

Applicable Compliance Method:

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

e. Emissions Limitation:

CO emissions shall not exceed 2.0 g/hp-hr.

Applicable Compliance Method:

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

f. Emissions Limitation:

VOC emissions shall not exceed 0.7 g/hp-hr.

Applicable Compliance Method:

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

g. Emissions Limitation:

PE shall not exceed 0.062 lb/MMBtu actual heat input.

Applicable Compliance Method:



If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources." Alternative US EPA-approved test methods may be used with prior approval from Ohio EPA, SEDO.

h. Design Efficiency:

Install an engine capable of meeting 0.11 tons PE/m as a rolling, 12-month average.

Applicable Compliance Method:

The PE emissions limitation for engine was derived by the calculation below using the inputs provided in the permittee's application including the emissions factor from AP-42 Section 1.4 (7/98).

$$\frac{0.30 \text{ lb}}{\text{hr}} * \frac{8,760 \text{ hr}}{\text{yr}} * \frac{\text{ton}}{2,000 \text{ lb}} * \frac{\text{yr}}{12 \text{ m}} = \frac{0.11 \text{ tons}}{\text{m rolling 12}}$$

i. Emissions Limitation:

Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

- (2) When purchasing a non-certified engine, the permittee shall demonstrate compliance with the emission standards specified in 40 CFR 60.4233(e) and according to the requirements specified in 40 CFR 60.4244, as applicable. The permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practices for minimizing emissions. In addition, the permittee must conduct an initial performance test.

The permittee has chosen to demonstrate compliance with the emission standards specified in §60.4233(e) and OAC rule 3745-31-05(A)(3) by performing a stack test, and therefore 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 1; and the following requirements:

- a. An initial performance test shall be performed to demonstrate compliance with the mass emissions limitations in 40 CFR 60.4233(e) and OAC rule 3745-31-05(A)(3) 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.



Final Permit-to-Install and Operate

Crum Compressor Station

Permit Number: P0117011

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Effective Date: 1/6/2015

- b. If the stationary internal combustion engine is rebuilt, or undergoes major repair or maintenance the permittee shall conduct 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 1 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, Southeast 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, Southeast District Office's refusal to accept the results of the emission test(s).
 - e. Personnel from the Ohio EPA, Southeast 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, Southeast 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, Southeast District Office.
- g) **Miscellaneous Requirements**
- (1) None.