



3/27/2015

Certified Mail

Kristine Akridge
Rockies Express Pipeline - Washington CH Compressor Sta
370 Van Gordon Street
Lakewood, CO 80228

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	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: 0124000404
Permit Number: P0118168
Permit Type: Initial Installation
County: Fayette

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, Central District Office at (614)728-3778 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-CDO



FINAL

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

Rockies Express Pipeline - Washington CH Compressor Sta

Facility ID:	0124000404
Permit Number:	P0118168
Permit Type:	Initial Installation
Issued:	3/27/2015
Effective:	3/27/2015
Expiration:	3/27/2025



Division of Air Pollution Control
Permit-to-Install and Operate
for
Rockies Express Pipeline - Washington CH Compressor Sta

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?	5
7. What reports must I submit under this permit?	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	7
15. What happens if a portion of this permit is determined to be invalid?	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions	10
1. F001, Unpaved Roadways	11
2. P002, Equipment Blowdowns.....	15
3. Emissions Unit Group -Turbines: B001,B002,B003,.....	18



Authorization

Facility ID: 0124000404
Application Number(s): A0052377
Permit Number: P0118168
Permit Description: Initial installation permit for unpaved roadways and parking areas, equipment blowdowns and three (3) natural gas-fired combustion turbines with low-NOx system.
Permit Type: Initial Installation
Permit Fee: \$1,000.00
Issue Date: 3/27/2015
Effective Date: 3/27/2015
Expiration Date: 3/27/2025
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Rockies Express Pipeline - Washington CH Compressor Sta
U S 35 NW
5.13 miles northwest of Washington CH city limits
Jefferson Twp., OH 43160

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0118168
 Permit Description: Initial installation permit for unpaved roadways and parking areas, equipment blowdowns and three (3) natural gas-fired combustion turbines with low-NOx system.

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: Unpaved Roadways
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P002
 Company Equipment ID: Equipment Blowdowns
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Group Name: Turbines

Emissions Unit ID:	B001
Company Equipment ID:	Combustion Turbine #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B002
Company Equipment ID:	Combustion Turbine #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B003
Company Equipment ID:	Combustion Turbine #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Rockies Express Pipeline - Washington CH Compressor Sta
Permit Number: P0118168
Facility ID: 0124000404
Effective Date: 3/27/2015

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.



B. Facility-Wide Terms and Conditions



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



Final Permit-to-Install and Operate
Rockies Express Pipeline - Washington CH Compressor Sta
Permit Number: P0118168
Facility ID: 0124000404
Effective Date: 3/27/2015

C. Emissions Unit Terms and Conditions



1. F001, Unpaved Roadways

Operations, Property and/or Equipment Description:

Unpaved roadways and parking areas

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) <i>June 30, 2008</i>	No visible emissions from roadways except for 3 minutes during a 60 minute period, as requested by the permittee. See b)(2)a. through b)(2)f.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	See b)(2)g.
c.	OAC rule 3745-17-07(B)	Not applicable pursuant to OAC rule 3745-17-07(B)(11)(e) because the facility is not located in an Appendix A area.
d.	OAC rule 3745-17-08(B)	Not applicable pursuant to OAC rule 3745-17-08(A)(1) because the facility is not located in an Appendix A area.

(2) Additional Terms and Conditions

a. 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 Best Available Technology (BAT) is no longer required by state regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, paragraph (A)(3)(a)(ii) of OAC rule 3745-31-05 (the less than 10 tons per year BAT exemption) has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revisions to OAC rule 3745-31-05(A)(3)(a)(ii), the requirement to satisfy BAT for pollutant(s) less than 10 tons per year still exists as part of the federally-approved SIP.

- b. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the unpaved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for unpaved roadways and parking areas that are 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. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- d. The permittee shall promptly remove, in such a manner as to minimize or prevent re-suspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- e. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
- g. The following paragraphs will apply when U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the SIP:
 - i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of particulate matter less than 10 microns in diameter (PM₁₀), or the emissions of particulate matter less than 2.5 microns in diameter (PM_{2.5}) from this air contaminant source because the potential to emit for each pollutant is less than 10 tons per year; and



- ii. The monitoring and recordkeeping requirements identified in d)(1) through d)(4) do not apply.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all roads and parking areas	weekly
 - (2) The purpose of the inspections is to determine the need for implementing the above-mentioned 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 date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.
 - (4) The information required in d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
- e) Reporting Requirements
 - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA Central District Office 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.



f) Testing Requirements

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

a. Emission Limitation:

No visible emissions from unpaved roadways except for 3 minutes during a 60 minute period (as applicable prior to U.S. EPA approving OAC rule 3745-31-05(A)(3)(a)(ii) as part of the SIP)

Applicable Compliance Method:

If required, compliance with the visible emissions limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) None.



2. P002, Equipment Blowdowns

Operations, Property and/or Equipment Description:

Blowdowns from maintenance, operations and pigging activities vented to atmosphere

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. d)(2)

(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) <i>June 30, 2008</i>	Emissions shall not exceed: 0.044 tons volatile organic compounds (VOC) per month averaged over a twelve month rolling period See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	See b)(2)b.
c.	ORC 3704.03(F)	See d)(2)

(2) Additional Terms and Conditions

a. 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 Best Available Technology (BAT) is no longer required by state regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, paragraph



(A)(3)(a)(ii) of OAC rule 3745-31-05 (the less than 10 tons per year BAT exemption) has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revisions to OAC rule 3745-31-05(A)(3)(a)(ii), the requirement to satisfy BAT for pollutant(s) less than 10 tons per year still exists as part of the federally-approved SIP.

b. The following paragraphs will apply when U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the SIP:

- i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the potential to emit for VOC emissions is less than 10 tons per year; and
- ii. The monitoring and recordkeeping requirements identified in d)(1) do not apply, except that the permittee shall maintain the records necessary to satisfy the applicable fee emissions reporting requirements identified in the Standard Terms and Conditions.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following records on a monthly basis:

- a. the date of each event;
- b. percent VOC fraction in the gas stream obtained from historic sampling;
- c. total volume of gas (ft³) emitted from each event specified in d)(1)a.;
- d. total volume of gas emitted from all events specified in d)(1)a.;
- e. gas density (lb / scf) attained from historic gas sampling; and
- f. total VOC emissions per month, averaged over a twelve month rolling period (as established in f)(1)a.).

(2) 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 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.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA Central District Office 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.

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:

0.044 tons VOC per month averaged over a twelve month rolling period (as applicable prior to U.S. EPA approving OAC rule 3745-31-05(A)(3)(a)(ii) as part of the SIP)

Applicable Compliance Method:

The VOC emission limitation was developed using information provided in application A0052377 (12/11/14), and the following equation:

$$\text{VOC (TPY)} = \text{Weight fraction (\%VOC)} * \text{Release volume (ft}^3\text{)} * \text{Gas density (lb/ft}^3\text{)} / 2000 \text{ (lbs/ton)}$$

Ongoing compliance is demonstrated through the use of the provided equation combined with the recordkeeping requirements established in d)(1).

g) Miscellaneous Requirements

- (1) None.



3. Emissions Unit Group -Turbines: B001,B002,B003,

EU ID	Operations, Property and/or Equipment Description
B001	124.85 MMBtu/hr (lower heating value) Solar Mars 100 natural gas fired combustion turbine with low-NOx system
B002	109.1 MMBtu/hr (lower heating value) Solar Mars 90 natural gas fired combustion turbine with low-NOx system
B003	109.1 MMBtu/hr (lower heating value) Solar Mars 90 natural gas fired combustion turbine with low-NOx system

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. b)(1)g., and d)(3)

(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) <i>June 30, 2008</i>	Install a burner that is designed to meet the following: 0.007 pound of volatile organic compounds (VOC) per million Btu (MMBtu) of heat input 0.004 pound of sulfur dioxide (SO ₂) per MMBtu of heat input 0.013 pound of particulate matter less than 10 microns in diameter (PM ₁₀) per MMBtu of heat input



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.013 pound of particulate matter less than 2.5 microns in diameter (PM _{2.5}) per MMBtu of heat input 0.061 pound of carbon monoxide (CO) per MMBtu of heat input 15 parts per million (ppm) nitrogen oxides (NO _x) emissions at 15% O ₂ See b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(4)	Particulate emissions (PE) shall not exceed 0.040 lb/MMBtu
e.	40 CFR Part 60, Subpart KKKK (New, natural gas fired turbines with heat input capacity greater than 50 MMBtu/hr but less than 850 MMBtu/hr)	NO _x emissions shall not exceed 25 ppm at 15% O ₂ SO ₂ emissions shall not exceed 110 nanograms per Joule (ng/J) or the permittee shall burn fuel which restrains potential sulfur emissions to less than 0.06 lb SO ₂ /MMBtu (this SO ₂ emissions limitation is less stringent than the SO ₂ emissions limitation established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)b.ii. and b)(2)c. See Table 1 of 40 CFR Part 60, Subpart KKKK
f.	40 CFR 60.1 – 60.19 Subpart A	General Provisions of 40 CFR 60
g.	ORC 3704.03(F)	See d)(3)

(2) Additional Terms and Conditions

- a. 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 Best Available Technology (BAT) is no longer required by state regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, paragraph



(A)(3)(a)(ii) of OAC rule 3745-31-05 (the less than 10 tons per year BAT exemption) has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revisions to OAC rule 3745-31-05(A)(3)(a)(ii), the requirement to satisfy BAT for pollutant(s) less than 10 tons per year still exists as part of the federally-approved SIP.

b. The following paragraphs will apply when U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the SIP:

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC, SO₂, PM₁₀, and PM_{2.5} emissions from this air contaminant source since the potential to emit for each pollutant is less than 10 tons per year.

ii. BAT for SO₂ is more stringent than the SO₂ emission requirements established pursuant to 40 CFR Part 60, Subpart KKKK. However, when the U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption), the more stringent BAT requirements will no longer apply. This does not relieve the permittee of any applicable requirements established pursuant to 40 CFR Part 60, Subpart KKKK and instead the permittee shall demonstrate compliance with the more stringent BAT standard (0.004 pound SO₂ per MMBtu) in accordance with the applicable monitoring, recordkeeping, reporting, and testing requirements identified in 40 CFR Part 60, Subpart KKKK.

c. BAT for NO_x emissions from this emission unit has been determined to be 15 ppm of NO_x at 15% O₂ (achievable as designed according to manufacturers' certified emissions guarantee); therefore, the BAT requirements for NO_x emissions are more stringent than the NO_x emissions requirements established pursuant to 40 CFR Part 60, Subpart KKKK. This does not relieve the permittee of any applicable requirements established pursuant to 40 CFR Part 60, Subpart KKKK and instead the permittee shall demonstrate compliance with the more stringent BAT standard (15 ppm of NO_x at 15% O₂) in accordance with the applicable monitoring, recordkeeping, reporting, and testing requirements identified in 40 CFR Part 60, Subpart KKKK.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in these emission units.
- (2) The permittee shall comply with the applicable operational restrictions of 40 CFR Part 60, Subpart KKKK, including the following:

60.4320(a)	Emission limitations for NO _x
60.4330(a)(2)	Emission limitations for SO ₂
60.4333(a)	General compliance requirements



d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in these emission units.
- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements of 40 CFR Part 60, Subpart KKKK, including the following sections:

60.4340	Continuous compliance demonstration for NO _x
60.4360 60.4365	Determining the SO ₂ content of fuel and exemption from monitoring the total sulfur content of fuel

- (3) 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 (that is not the product of the combustion of fossil fuels, per Engineering Guide #69, Item 4.2), 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 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.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) 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 reporting requirements of 40 CFR Part 60, Subpart KKKK, including the following sections:

60.4375(b)	Written report submittal of the performance testing results
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f) Testing Requirements

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

a. Emission Limitation:

0.007 pound of VOC per MMBtu of heat input (as applicable prior to U.S. EPA approving OAC rule 3745-31-05(A)(3)(a)(ii) as part of the SIP)

Applicable Compliance Method:

This emissions limitation is derived from the turbine manufacturer's certified emissions guarantee.

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

b. Emission Limitation:

0.004 pound of SO₂ per MMBtu of heat input (as applicable prior to U.S. EPA approving OAC rule 3745-31-05(A)(3)(a)(ii) as part of the SIP)

Applicable Compliance Method:

This emissions limitation is derived from AP-42 emission factors (Table 3.1-2a, Emission Factors for Criteria Pollutants and Greenhouse Gases From Stationary Gas Turbines, 4/00).

If required, compliance shall be determined according to test Methods 1-4 and 6, 6A, 6B, or 6C, as set forth in the "Appendix on Test Methods: in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA approved methods may be used with prior approval from Ohio EPA, Central District Office.

c. Emission Limitation:

0.013 pound of PM₁₀ per MMBtu of heat input (as applicable prior to U.S. EPA approving OAC rule 3745-31-05(A)(3)(a)(ii) as part of the SIP)

Applicable Compliance Method:

This emissions limitation is derived from the turbine manufacturer's certified emissions guarantee.



If required, the permittee shall demonstrate compliance with the maximum outlet concentration limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

d. Emission Limitation:

0.013 pound of PM_{2.5} per MMBtu of heat input (as applicable prior to U.S. EPA approving OAC rule 3745-31-05(A)(3)(a)(ii) as part of the SIP)

Applicable Compliance Method:

This emissions limitation is derived from the turbine manufacturer's certified emissions guarantee.

If required, the permittee shall demonstrate compliance with the maximum outlet concentration limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

e. Emission Limitation:

PE shall not exceed 0.04 lb/MMBtu

Applicable Compliance Method:

Compliance is demonstrated by the turbine manufacturer's certified emissions guarantee of 0.012 lb PE/MMBtu.

If required, compliance 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 U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

f. Emission Limitation:

0.061 pound of CO per MMBtu of heat input

Applicable Compliance Method:

This emissions limitation is derived from the turbine manufacturer's certified emissions guarantee.

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



g. Emission Limitation:

NO_x emissions shall not exceed 25 ppm at 15% O₂

Applicable Compliance Method:

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

h. Emission Limitation:

NO_x emissions shall not exceed 15 ppm at 15% O₂

Applicable Compliance Method:

The required 40 CFR Part 60, Subpart KKKK NO_x initial compliance demonstration shall serve as the compliance method. See f)(2) below.

i. Emission Limitation:

SO₂ emissions shall not exceed 110 nanograms per Joule (ng/J) or the permittee shall burn fuel which restrains potential sulfur emissions to less than 0.06 lb SO₂/MMBtu

Applicable Compliance Method:

If required, compliance is demonstrated by burning only natural gas and through recordkeeping, monitoring, and reporting as required in 40 CFR 60.4360, 40 CFR 60.4365, and 40 CFR 60.4370.

j. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(2) Pursuant to 40 CFR 60.4340(A) and 40 CFR 60.4400, and OAC rule 3745-31-05(A)(3), the permittee shall conduct, or have conducted, emission testing for these emission units in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility.

b. The emissions testing shall be conducted to demonstrate compliance with the NO_x emission limitation identified in 40 CFR 60.4320.



- c. Pursuant to 40 CFR 60.4400 and OAC rule 3745-31-05(A)(3), the following test methods shall be employed to demonstrate compliance with the allowable NO_x emission rate:

Methods 7E or 20 of 40 CFR Part 60, Appendix A for NO_x; Method 19 of 40 CFR Part 60, Appendix A to calculate the NO_x emission rate in lb/MMBtu; and Methods 1 and 2 of 40 CFR Part 60, Appendix A, if applicable. Alternate U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emission limits and/or control requirements, unless otherwise specified or approved by Ohio EPA Central District Office as required by 40 CFR 60.4400(b). Although this generally consists of operating the emission units at their maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emission loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA Central District Office. The ITT notification shall describe in detail the proposed test methods and procedures, the emission units 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 Ohio EPA Central District Office's refusal to accept the results of the emission test(s).
- f. Personnel from Ohio EPA Central 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 emission units and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emission test(s) shall be signed by the person(s) responsible for the test(s) and submitted Ohio EPA Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal for the written report, where warranted, with prior approval from Ohio EPA Central District Office.

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

60.4400	Initial and subsequent performance tests for NO _x
60.4415	Initial and subsequent performance tests for SO ₂ (These requirements will not apply)



	if the permittee qualifies for the 40 CFR 60.4365 exemption).
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g) Miscellaneous Requirements

- (1) None.