John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

5/19/2015

Certified Mail

Kijun Hong
Kilgore Compressor Station-Utica Gas Services, LLC
P.O. Box 54342
Oklahoma City, OK 73154

Facility ID: 0210002039
Permit Number: P0118053
County: Carroll

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Initial

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 4/6/2015. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

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

and

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

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

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

Cc: Ohio EPA DAPC, Northeast District Office

Response to Comments

Facility ID:	0210002039
Facility Name:	Kilgore Compressor Station-Utica Gas Services, LLC
Facility Description:	3335 Amsterdam Rd. SE Scio, OH 43988
Facility Address:	Pontiff Rd Kilgore, OH 43988 Carroll County
Permit:	P0118053, Title V Permit - Initial
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Free Press Standard on 04/16/2015. The comment period ended on 05/16/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Flares 1 & 2 (P014-P015-standard flares)

a. Facility Comment: For Flare 1 (P014) and Flare 2 (P015), section d) (1), there is a flame detection device and monitoring requirement.We believe that this requirement does not apply to flares that have a continuous pilot system, which these two flares have.

b. Response: Sections c)(2) and d)(1), (2) were updated with language that reflects site specific flare monitoring to ensure continuous operation and control

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Kilgore Compressor Station-Utica Gas Services, LLC

Facility ID:	0210002039
Permit Number:	P0118053
Permit Type:	Initial
Issued:	5/19/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Kilgore Compressor Station-Utica Gas Services, LLC

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Authorization

Facility ID:	0210002039
Facility Description:	3335 Amsterdam Rd. SE Scio, OH 43988
Application Number(s):	A0052206
Permit Number:	P0118053
Permit Description:	Initial Title V permit for compressor station
Permit Type:	Initial
Issue Date:	5/19/2015
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	

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

Kilgore Compressor Station-Utica Gas Services, LLC
Pontiff Rd
Kilgore, OH 43988

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

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

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

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

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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

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

federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

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

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

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

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

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

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

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

4. Risk Management Plans

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

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

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

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

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

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

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

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

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

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

17. Off-Permit Changes

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

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

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

23. Title VI Provisions

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

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Northeast District Office.

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

25. Records Retention RequirementsUnder State Law Only

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

26. Inspections and Information Requests

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

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

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

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

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

28. Permit Transfers

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

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

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

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

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

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart HH, National Emission Standards for Hazardous Air Pollutants (NESHAP) From Oil and Natural Gas Production Facilities: P024-P027. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Ohio EPA Northeast District Office.

3. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines at Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

4. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines: P001 – P010, and P011-P013. The complete NSPS requirements may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoacess.gov or by contacting the Ohio EPA Northeast District Office.

5. The reciprocating compressors, storage vessels, and pneumatic controllers (as defined in 60.5365 and 60.5430) located at this facility are subject to 40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution. The complete New Source Performance Standards (NSPS) requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Ohio EPA Northeast District Office.

C. Emissions Unit Terms and Conditions

1. J001, Truck Loading

Operations, Property and/or Equipment Description:

Condensate and slop water outbound loading into tanker trucks from storage tanks, emissions controlled by Flare 1 (P014).

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from the flare stack for this emissions unit shall not exceed 2.3 lbs/hr and 0.64 ton/year (tpy). See b)(2)a through b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)d.
c.	ORC 3704.03(T)	Fugitive VOC emissions shall not exceed 13.68 tpy, as a rolling, 12-month summation. See b)(2)e through b)(2)g.

(2) Additional Terms and Conditions

a. The hourly emission limitation for VOC is based on the potential to emit (PTE) for this emissions unit, therefore, no monitoring or record keeping is required to document compliance with the emission limitation.

b. The emissions from this unit shall be vented to the flare during all loading operations. The flare shall have a minimum destruction efficiency of 98%. See emissions unit P014 for flare requirements.

c. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

d. These requirements apply once U.S. EPA approves OAC rule 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 VOC emissions from this air contaminant source since the controlled potential to emit for VOC is less than 10 tpy.

e. All condensate loading lines shall be equipped with fittings which are vapor tight.

f. The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.

g. The permittee shall not permit condensate to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following each month:

a. the amount of throughput of condensate, in gallons; and

b. the monthly VOC emissions as calculated in section f)(1)a, in tons.

[Authority for term:OAC rule 3745-77-07(C)(1) & PTI P0114925]

e) Reporting Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0114925]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation from the work practice standards in b)(2).

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0114925]

f) Testing Requirements

(1) Compliance with the emissions limitations and/or control requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
VOC emissions from the flare stack for this emissions unit shall not exceed 2.3 lbs/hr and 0.64 tpy.

Applicable Compliance Method:
These emission limitations reflect the unit's PTE and were derived by the following equations:

lbs/hr = T x H x CE x (1-DE)
tpy = A x AT x (1 ton/2000 lbs) x CE x (1-DE)

where:

T = maximum hourly throughput, 21,000 gallons;
H = hourly emission factor, 7.82 lbs/1000 gallons;
A = annual emission factor, 5.95 lbs/1000 gallons;
AT = annual throughput, 15,330,000 gallons;
CE = Capture efficiency, 70%; and
DE = Destruction efficiency, 98%.

b. Emission Limitation:
The flare shall have a minimum destruction efficiency of 98%.

Applicable Compliance Method:
Compliance shall be demonstrated by the design and operation specifications detailed in emissions units P014.

c. Emission Limitation:
Fugitive VOC emissions shall not exceed 13.68 tons/year, as a rolling, 12-month summation.

Applicable Compliance Method:
VOC emissions shall be based on multiplying a loading loss factor (L) by the rolling, 12-month summation of the condensate throughput, in tons, by the capture efficiency (70%) divided by 2000. The loading loss factor was derived using Equation (1) from AP-42, Section 5.2-4 (6/08).

L = 12.46 SPM/T

where:

L = loading loss, lb/10^3 gal of liquid loaded;
S = saturation factor, 0.6 for submerged fill;
P = true vapor pressure of liquid loaded, 6.7413 average psia;
M = molecular weight of vapor, 60 lb/lb-mole; and
T = temperature of bulk liquid, = 508.3 ^{o}R.(average 48.3°F).

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0114925]

g) Miscellaneous Requirements

(1) None.

2. J002, Methanol Loading

Operations, Property and/or Equipment Description:

Methanol to be used as a hydrate inhibitor will be loaded into on-site storage tanks from incoming tanker trucks.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Methanol emissions shall not exceed 0.57 tpy, as a rolling 12-month summation. See b)(2)a through b)(2)c.

(2) Additional Terms and Conditions

a. All methanol loading lines shall be equipped with fittings which are vapor tight.

b. The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.

c. The permittee shall not permit methanol to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following each month:

a. the amount of throughput of methanol, in gallons; and

b. the monthly methanol emissions as calculated in section f)(1)a, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0114925]

e) Reporting Requirements

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

[Authority for term:OAC rule 3745-77-07(C)(1) & PTI P0114925]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation from the work practice standards in b)(2).

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0114925]

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:
Methanol emissions shall not exceed 0.57 tpy, as a rolling, 12-month summation.

Applicable Compliance Method:
Methanol emissions shall be based on multiplying a loading loss factor (L) by the monthly throughput, in tons, divided by 2000. The loading loss factor was derived using Equation (1) from AP-42, Section 5.2-4 (6/08).

$L = 12.46\ SPM/T$

where:
L = loading loss, lb/10^3 gal of liquid loaded;
S = saturation factor, 1.45 for splash fill;
P = true vapor pressure of liquid loaded, 1.796 psia;
M = molecular weight of vapor, 32.04 lb/lb-mole; and
T = temperature of bulk liquid, = 526.58 ^{o}R.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0114925]

g) Miscellaneous Requirements

(1) None.

3. P014, Flare 1

Operations, Property and/or Equipment Description:

Standard flare to control condensate tanks (T001-T005), slop water tanks (T006-T008), and truck loading operations (J001). Assist gas is also routed to this flare.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Nitrogen oxides (NO_x) emissions shall not exceed 2.50 lbs/hr and 3.76 tpy. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)b.
c.	ORC 3704.03(T)	Carbon monoxide (CO) emissions shall not exceed 14.83 tons/rolling, 12-month period. See c)(1) and c)(2).
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC rule 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 NO_x emissions from this air contaminant source since the uncontrolled potential to emit for NO_x is less than 10 tpy.

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

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

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) & PTI P0118129]

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

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

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

c. The temperature value shall be continuously monitored to determine operational status of the flare.

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

[Authority for term: OAC rule 3745-77-07(A)(1) & PTI P0118129]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain a monitoring device to monitor the temperature values when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118129]

(2) The permittee shall record the following information each day for the flare and process operations:

a. all periods during which the temperature monitor was not functioning properly; and

b. the operating times for the flare and monitoring equipment.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118129]

(3) Each day a fuel other than natural gas is burned in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118129]

e) Reporting Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118129]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118129]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation from the operational restrictions in section c).

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term:OAC rule 3745-77-07(C)(1) & PTI P0118129]

f) Testing Requirements

(1) Compliance with the emissions limitations and/or control requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
NO_x emissions shall not exceed 2.50 lbs/hr and 3.76 tpy

Applicable Compliance Method:
The **hourly** emission rate specified above was established by the following equation:

$ER_h = (EF_{flare\ stream} \times BV_{flare\ stream}) + (EF_{assist} \times FR_{assist}) + (EF_{pilot} \times FR_{pilot})$

where:
ER_h = hourly emission rate (lbs/hr);
$EF_{flare\ stream}$ = emission factor from AP-42, Table 13.5-1 (revised 1/95) for the flare stream portion (0.068 lb/mmBtu);
$BV_{flare\ stream}$ = maximum Btu value of flare stream gas (20.69 mmBtu/hr);
EF_{assist}= emission factor from AP-42, Table 1.4-1 (7/98) for the assist gas portion (100 lbs/10^6scf);
FR_{assist}= maximum hourly flow rate of assist gas (10,830 scf/hr);
EF_{pilot} = emission factor from AP-42, Table 1.4-1 (7/98) for the pilot gas portion (100 lbs/10^6scf); and
FR_{pilot} = maximum hourly flow rate of pilot gas (0.000070 mmscf/hr).

The **annual** emission rate specified above was established by the following equation:

$ER_a = [(EF_{flare\ stream} \times BV_{flare\ stream}) + (EF_{assist} \times FR_{assist}) + (EF_{pilot} \times FR_{pilot})] / 2{,}000$ lbs/ton

where:
ER_a = annual emission rate (tpy);
$EF_{flare\ stream}$ = emission factor from AP-42, Table 13.5-1 (revised 1/95) for the flare stream portion (0.068 lb/mmBtu);
$BV_{flare\ stream}$ = maximum Btu value of flare stream gas (74,651 mmBtu/yr);
EF_{assist}= emission factor from AP-42, Table 1.4-1 (7/98) for the assist gas portion (100 lbs/10^6scf);
FR_{assist}= maximum annual flow rate of assist gas (23.725 mmscf/yr);
EF_{pilot} = emission factor from AP-42, Table 1.4-1 (7/98) for the pilot gas portion (100 lbs/10^6scf); and
FR_{pilot} = maximum annual flow rate of pilot gas (0.6132 mmscf/yr).

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

b. Emission Limitation:
CO emissions shall not exceed 14.83 tons per rolling, 12-month period.

Applicable Compliance Method:
The **annual** emission rate specified above was established by the following equation:

$ER_a = [(EF_{flare\ stream} \times BV_{flare\ stream}) + (EF_{assist} \times FR_{assist}) + (EF_{pilot} \times FR_{pilot})] / 2{,}000$ lbs/ton

where:
ER_a = annual emission rate (tpy);
$EF_{flare\ stream}$ = emission factor from AP-42, Table 13.5-1 (revised 1/95) for the flare stream portion (0.37 lb/mmBtu);
$BV_{flare\ stream}$ = maximum Btu value of flare stream gas (74,651 mmBtu/yr);
EF_{assist}= emission factor from AP-42, Table 1.4-1 (7/98) for the assist gas portion (84 lbs/10^6scf);
FR_{assist}= maximum annual flow rate of assist gas (23.725 mmscf/yr);
EF_{pilot} = emission factor from AP-42, Table 1.4-1 (7/98) for the pilot gas portion (84 lbs/10^6scf); and
FR_{pilot} = maximum annual flow rate of pilot gas (0.6132 mmscf/yr).

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

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

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

d. Emission Limitation:
The flare shall be operated with a minimum destruction efficiency of 98%.

Applicable Compliance Method:
If the flare complies with the control requirements specified in c)(2), compliance with the 98% control efficiency requirement shall be assumed.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118129]

g) Miscellaneous Requirements

(1) None.

4. P015, Flare 2

Operations, Property and/or Equipment Description:

Standard flare to control dehydration unit flash tanks, condensate stabilizer stream whenever the flash gas compressors are down, and residual flash gas from glycol reboilers (B001-B004).

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	NO_x emissions shall not exceed 0.28 ton per month averaged over a 12-month rolling period. See b)(2)a
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)b.
c.	ORC 3704.03(T)	CO emissions shall not exceed 1.51 tons per month averaged over a 12-month rolling period. See c(1) and c)(2).
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC rule 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 NOx emissions from this air contaminant source since the uncontrolled potential to emit for NOx is less than 10 tpy.

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

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

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) & PTI P0118052]

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

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

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

c. The temperature value shall be continuously monitored to determine operational status of the flare.

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

[Authority for term: OAC rule 3745-77-07(A)(1) & PTI P0118129]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain a monitoring device to monitor the temperature values when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118129]

(2) The permittee shall record the following information each day for the flare and process operations:

a. all periods during which the temperature monitor was not functioning properly; and

b. the operating times for the flare and monitoring equipment.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

(3) Each day a fuel other than natural gas is burned in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

e) Reporting Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation from the operational restrictions in c)(2).

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

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. <u>Emission Limitation</u>:
NO_x emissions shall not exceed 0.28 ton/month averaged over a 12-month rolling period.

<u>Applicable Compliance Method</u>:
The monthly emission rate specified above was established by the following equation:

ER_m={ [($EF_{flare\ stream}$ x $BV_{flare\ stream}$) + (EF_{pilot} x FR_{pilot})] / 2,000 lbs/ton}/12 months/year

where:
ER_m = monthly emission rate (ton/month);
$EF_{flare\ stream}$ = emission factor from AP-42, Table 13.5-1 (revised 1/95) for the flare stream portion (0.068 lb/mmBtu);
$BV_{flare\ stream}$ = maximum Btu value of flare stream gas (97,523 mmBtu/yr);
EF_{pilot} = emission factor from AP-42, Table 1.4-1 (7/98) for the pilot gas portion (100 lbs/10^6scf); and
FR_{pilot} = maximum annual flow rate of pilot gas (0.6132 mmscf/yr).

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

b. Emission Limitation:
CO emissions shall not exceed 1.51 tons/month averaged over a 12-month rolling period.

Applicable Compliance Method:
The monthly emission rate specified above was established by the following equation:

$ER_m = \{[(EF_{flare\ stream} \times BV_{flare\ stream}) + (EF_{pilot} \times FR_{pilot})] / 2{,}000\ lbs/ton\} / 12\ months/year$

where:
ER_a = monthly emission rate (ton/mon);
$EF_{flare\ stream}$ = emission factor from AP-42, Table 13.5-1 (revised 1/95) for the flare stream portion (0.37 lb/mmBtu);
$BV_{flare\ stream}$ = maximum Btu value of flare stream gas (97,523 mmBtu/yr);
EF_{pilot} = emission factor from AP-42, Table 1.4-1 (7/98) for the pilot gas portion (84 lbs/10^6scf); and
FR_{pilot} = maximum annual flow rate of pilot gas (0.6132 mmscf/yr).

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

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

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

d. Emission Limitation:
The flare shall be operated with a minimum destruction efficiency of 98%.

Applicable Compliance Method:
If the flare complies with the control requirements specified in c)(2), compliance with the 98% control efficiency requirement shall be assumed.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

g) Miscellaneous Requirements

(1) None.

5. P016, Flare 3

Operations, Property and/or Equipment Description:

Enclosed flare to control emissions from dehydration unit (P024-P027) condenser vent streams.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	NO_x emissions shall not exceed 0.09 ton/month averaged over a 12-month rolling period. CO emissions shall not exceed 0.50 ton/month averaged over a 12-month rolling period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(ii)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC rule 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 NO_x and CO emissions from this air contaminant source since the uncontrolled potential to emit for each is less than 10 tpy.

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

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

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) & PTI P0118052]

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

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

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

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

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

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

[Authority for term: OAC rule 3745-77-07(A)(1) & PTI P0118052]

d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term:OAC rule 3745-77-07(C)(1) & PTI P0118052]

(2) The permittee shall record the following information each day for the flare and process operations:

a. all periods during which the flame detection device was not functioning properly; and

b. the operating times for the flare and monitoring equipment.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

(3) Each day a fuel other than natural gas is burned in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

e) Reporting Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

(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.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation from the operational restrictions in c)(2).

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

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. <u>Emission Limitation:</u>
NO_x emissions shall not exceed 0.09 ton/month averaged over a 12-month rolling period.

<u>Applicable Compliance Method</u>:
The monthlyemission rate specified above was established by the following equation:

ER_m={ [($EF_{flare\ stream}$ x $BV_{flare\ stream}$) + (EF_{pilot} x FR_{pilot})] / 2,000 lbs/ton}/12 months/year

where:
ER_m = monthly emission rate (tons/month);
$EF_{flare\ stream}$ = emission factor from AP-42, Table 13.5-1 (revised 1/95) for the flare stream portion (0.068 lb/mmBtu);
$BV_{flare\ stream}$ = maximum Btu value of flare stream gas (32,495 mmBtu/yr);
EF_{pilot} = emission factor from AP-42, Table 1.4-1 (7/98) for the pilot gas portion (84 lbs/10^6scf); and
FR_{pilot} = maximum annual flow rate of pilot gas (0.6132 mmscf/yr).

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

b. Emission Limitation:
CO emissions shall not exceed 0.50 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:
The monthlyemission rate specified above was established by the following equation:

ER_m={ [($EF_{flare\ stream}$ x $BV_{flare\ stream}$) + (EF_{pilot} x FR_{pilot})] / 2,000 lbs/ton}/12 months/year

where:
ER_m = monthly emission rate (ton/month);
$EF_{flare\ stream}$ = emission factor from AP-42, Table 13.5-1 (revised 1/95) for the flare stream portion (0.37 lb/mmBtu);
$BV_{flare\ stream}$ = maximum Btu value of flare stream gas (32,495 mmBtu/yr);
EF_{pilot} = emission factor from AP-42, Table 1.4-1 (7/98) for the pilot gas portion (84 lbs/10^6scf); and
FR_{pilot} = maximum annual flow rate of pilot gas (0.6132 mmscf/yr).

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

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

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

d. Emission Limitation:
The flare shall be operated with a minimum destruction efficiency of 98%.

Applicable Compliance Method:
If the flare complies with the control requirements specified in c)(2), compliance with the 98% control efficiency requirement shall be assumed.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

g) Miscellaneous Requirements

(1) None.

6. P017, Compressor Blowdowns

Operations, Property and/or Equipment Description:

Process releases associated with periodic blowdown activities

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	VOC emissions shall not exceed 2.32 tons/month averaged over a 12-month rolling period.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) & PTI P0118052]

d) Monitoring and/or Recordkeeping Requirements

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

a. number of compressor blowdown events;

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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

e) Reporting Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

(2) The permittee shall submit annual reports that identify:

a. the rolling, 12-month summation of VOC emissions, as calculated in f)(1)a; and

b. the annual volume of natural gas released from this emissions unit.

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

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. <u>Emission Limitation</u>:
VOC emissions shall not exceed 2.32 tons/month averaged over a 12-month rolling period.

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

VOC (tons/month) = sum of the following for each VOC component:
= [MW x (V x M%) / C] x (1 ton/2,000 pounds)
where:

MW = molecular weight constant, in lb/lb-mole;
V = volume of gas emitted/month from records specified in d)(1)c, in scf;
M% = mole % of each VOC component/month from analysis in d)(1)b, in %; and
C = molar volume conversion, 379.4 scf/lb-mole, at 60° F and 1 atm.

[Authority for term:OAC rule 3745-77-07(C)(1) & PTI P0118052]

g) Miscellaneous Requirements

(1) None.

7. P023, Pigging Activities

Operations, Property and/or Equipment Description:

Pigging Emissions

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Fugitive VOC emissions shall not exceed 3.23 tpy. See b)(2)a and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(ii)	See b)(2)b.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC rule 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 VOC from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tpy.

c. The permittee shall maintain a written operating manual for pig launching and recovery. The manual shall include, at a minimum, procedures for minimizing the duration and frequency of the pigging activities, and a training program for the operators performing the activities.

c) Operational Restrictions

(1) The permittee shall minimize the emissions of VOC from the pigging activities to the extent practicable.

[Authority for term: OAC rule 3745-77-07(A)(1) & PTI P0118129]

(2) Access openings to the receivers shall be kept closed at all times, except when a pig is being placed into or removed from the receiver, or during active maintenance operations.

[Authority for term: OAC rule 3745-77-07(A)(1) & PTI P0118129]

d) Monitoring and/or Recordkeeping Requirements

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

a. number of pigging events;

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

c. the volume of gas emitted from all pigging events for each month, in scf; and

d. the rolling, 12-month summation of the volume of gas emitted from all pigging events, in scf.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

e) Reporting Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118129]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation from the operational restrictions in section c).

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

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. <u>Emission Limitation</u>:
Fugitive VOC emissions shall not exceed 3.23 tpy.

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

VOC (tons/month) = sum of the following for each VOC component:

= [molecular weight x ((volume of gas emitted/month) x (mole % of each VOC component/month)) / molar volume conversion] x (1 ton/2,000 pounds)

where:
molecular weight = constant, in lb/lb-mole;
volume of gas emitted/month = from records specified in d)(1)c, in scf;
mole % of each VOC component/month = from analysis required in d)(1)b, in %; and
molar volume conversion = 379.4 scf/lb-mole, at 60° F and 1 atm.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

g) Miscellaneous Requirements

(1) None.

8. P801, Equipment Leaks

Operations, Property and/or Equipment Description:

Various equipment components, including valves, pumps, flanges, and connectors located throughout facility

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Fugitive VOC emissions shall not exceed 2.16 tons/month averaged over a 12-month rolling period.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) Ancillary Equipment Leak Detection and Repair Program

The permittee shall develop and implement a leak detection and repair program designed to monitor and repair leaks from ancillary equipment covered by this permit, including each pump, compressor, pressure relief device, connector, valve, flange, vent, cover, any bypass in the closed vent system, and each storage vessel. This program shall meet the following requirements:

a. Leaks shall be detected by the use of either a “Forward Looking Infra-Red” (FLIR) camera or an analyzer meeting U.S. EPA Method 21 of 40 CFR Part 60, Appendix A.

b. An initial monitoring shall be completed within 90 days of startup and quarterly thereafter for a period of four consecutive quarters (1 year).

c. If following the initial four consecutive quarters, less than or equal to 2.0% of the ancillary equipment are determined to be leaking during the most recent quarterly monitoring event, then the frequency of monitoring can be reduced to semi-annual.

d. If following two consecutive semi-annual periods, less than 2.0% of the ancillary equipment are determined to be leaking during the most recent semi-annual monitoring event, then the frequency of the monitoring can be reduced to annual.

e. If more than or equal to 2.0% of the ancillary equipment are determined to be leaking during any one of the semi-annual or annual monitoring events, then the frequency of monitoring shall be returned to quarterly.

f. The program shall require the first attempt at repair within five (5) calendar days of determining a leak.

g. The program shall require that the leaking component is repaired within 30 calendar days after the leak is detected.

h. The program shall allow for the delayed repair of a leaking component following the language found in 40 CFR 60.5416(c)(5).

i. The program shall follow the Monitoring and Record Keeping requirements described in paragraph 5.d) of this permit.

[Authority for term: OAC rule 3745-77-07(A)(1) & PTI P0118052]

(2) In the event that a leak or defect is detected in the cover, closed vent system, process equipment, or control device, the permittee shall make a first attempt at repair no later than 5 calendar days after the leak is detected. Repair shall be completed no later than 30 calendar days after the leak is detected as allowed in 40 CFR 60.5416(c)(4). Any delay of repair of a leak or defect shall meet the requirements of 40 CFR 60.5416(c)(5).

[Authority for term: OAC rule 3745-77-07(A)(1) & PTI P0118052]

d) Monitoring and/or Recordkeeping Requirements

(1) Ancillary Equipment Leak Detection and Repair Program Monitoring and Record Keeping for Programs Utilizing FLIR Camera's

a. Leaks shall be determined by visually observing each ancillary component through the FLIR camera to determine if leaks are visible.

b. The following information shall be recorded during each leak inspection:

i. the date the inspection was conducted;

ii. the name of the employee conducting the leak check;

iii. the identification of any component that was determined to be leaking;

iv. the date the first attempt to repair the component was made;

v. the reason the repair was delayed following the language found in 40 CFR 60.5416(c)(5);

vi. the date the component was repaired and determined to no longer be leaking;

vii. the total number of components that are leaking; and

viii. the percentage of components leaking, determined as the sum of the number of components for which a leak was detected, divided by the total number of ancillary components capable of developing a leak, and multiplied by 100.

c. The permittee shall maintain records that demonstrate the FLIR camera is operated and maintained in accordance with the manufacturer's operation and maintenance instructions.

d. The records from each inspection and the dates each leak is detected and repaired shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

(2) Ancillary Equipment Leak Detection and Repair Program Monitoring and Record Keeping for Programs Utilizing a Method 21 Analyzer

a. Leaks shall be measured by utilizing U.S. EPA Method 21 (40 CFR Part 60, Appendix A). All potential leak interfaces shall be traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm or 10,000 ppm (as applicable) for determining compliance.

b. A component is considered to be leaking if the instrument reading is equal to or greater than:

pressure relief device in gas/vapor service	10,000 ppm
pressure relief device in light liquid service	10,000 ppm
pumps in light liquid service	10,000 ppm
compressor seals	500 ppm
sampling connection system*	*
open ended valves or lines**	**
valves in gas/vapor and light liquid service	10,000 ppm
closed vent system	500 ppm
connectors	10,000 ppm
all other ancillary and associated equipment in VOC service	10,000 ppm
* must be equipped with a closed-purge, closed-loop, or closed-vent system	
** must be equipped with a cap, blind flange, plug, or a second valve	

c. The following information shall be recorded during each leak inspection:

i. the date the inspection was conducted;

ii. the name of the employee conducting the leak check;

iii. the identification of any component that was determined to be leaking (company ID and component type (flange, pump, etc.);

iv. the date the first attempt to repair the component was made;

v. the reason the repair was delayed following the language found in 40 CFR 60.5416(c)(5);

vi. the date the component was repaired and determined to no longer be leaking;

vii. the total number of components that are leaking; and

viii. the percentage of components leaking, determined as the sum of the number of components for which a leak was detected, divided by the total number of ancillary components capable of developing a leak, and multiplied by 100.

d. The permittee shall maintain records that demonstrate the Method 21 analyzer is operated and maintained in accordance with the manufacturer's operation and maintenance instructions.

e. In order to calibrate the analyzer, the following calibration gases shall be used:

i. zero air, which consists of less than 10 ppm of hydrocarbon in air; and

ii. a mixture of air and methane or n-hexane at a concentration of approximately, but less than, 10,000 ppm of methane or n-hexane.

f. The records from each inspection and the dates each leak is detected and repaired shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

e) Reporting Requirements

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

[Authority for term:OAC rule 3745-77-07(C)(1) & PTI P0118052]

(2) For each inspection that occurred during the year, the permittee shall submit the following information annually from data collected by the ancillary equipment leak detection and repair program:

a. the date of the inspection;

b. the number of components determined to be leaking;

c. the company ID and component type (flange, pump, etc.) of each leaking component;

d. the total number of components at the site;

e. the percent of components determined to be leaking;

f. a list of all components that have not been repaired due to a delay of repair and the reason for the delay; and

g. a notification indicating if the permittee has changed future inspection frequencies based on the percent of components leaking.

[Authority for term:OAC rule 3745-77-07(C)(1) & PTI P0118052]

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. <u>Emission Limitations</u>:
Fugitive VOC emissions shall not exceed 2.16 tons/month averaged over a 12-month rolling period.

<u>Applicable Compliance Method</u>:
This emission limitation is based on the potential to emit. Emission factors from U.S. EPA's "Protocol for Equipment Leak Emission Estimates", Table 2-4, for Oil and Gas production Operations (a conservative estimate), shall be used to demonstrate compliance with the limit. The monthly emissions from ancillary and associated equipment shall be documented from the summation of the calculations listed below, multiplied by (8,760 hours/year), the conversion factor (1 ton/2,000 pounds) and divided by (12 months/year).

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

In Gas/Vapor Service
Number of connectors (1,444) x 0.000441 lb/hr x % VOC = lb/hr
Number of valves (831) x 0.00992 lb/hr x %VOC = lb/hr
Number of flanges (741) x 0.00086 lb/hr x % VOC = lb/hr
Number of compressor seals (66) x 0.0194 lb/hr x % VOC = lb/hr
Number of relief valves (18) x 0.0194 lb/hr x % VOC = lb/hr
Number of pump seals (64) x 0.0194 lb/hr x % VOC = lb/hr

*where: % VOC = 15.8909 per company's analysis

In Light Oil Service
Number of connectors (1,083) x 0.000463 lb/hr x % VOC = lb/hr
Number of valves (406) x 0.00551 lb/hr x % VOC = lb/hr
Number of pump seals (31) x 0.0287 lb/hr x % VOC = lb/hr
Number of flanges (221) x 0.00086 lb/hr x % VOC = lb/hr
Number of other components (5) x 0.0165 lb/hr x % VOC = lb/hr
*where: % VOC = 100 per company's analysis

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

g) Miscellaneous Requirements

(1) None.

9. Emissions Unit Group -Compressors: P001, P002,P003, P004, P005, P006, P007, P008, P009, P010: 1,775 hp NG-fired 4SLB Stationary Internal Combustion Engines equipped w/catalyst

EU ID	Operations, Property and/or Equipment Description
P001	Caterpillar G3606: Serial Number: 4ZS01713
P002	Caterpillar G3606: Serial Number: 4ZS01796
P003	Caterpillar G3606: Serial Number: 4ZS01797
P004	Caterpillar G3606: Serial Number: 4ZS01800
P005	Caterpillar G3606: Serial Number: 4ZS01804
P006	Caterpillar G3606: Serial Number: 4ZS01805
P007	Caterpillar G3606: Serial Number: 4ZS01807
P008	Caterpillar G3606: Serial Number: 4ZS01808
P009	Caterpillar G3606: Serial Number: 4ZS01776
P010	Caterpillar G3606: Serial Number: 4ZS01814

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	CO emissions from the stack serving each emissions unit shall not exceed 1.18 lbs/hr and 5.18 tpy. NO_x emissions from the stack serving each emissions unit shall not exceed 1.96 lbs/hr and 8.57 tpy. VOC emissions from the stack serving each emissions unit shall not exceed 0.71 lb/hr and 3.11 tpy. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11 and 40 CFR Part 60, Subpart JJJJ. See b)(2)a and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the exhaust stack serving each emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-11(B)	PE shall not exceed 0.062 lb/mmBtu of actual heat input.
e.	OAC rule 3745-18-06	These emissions units are exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).
f.	40 CFR Part 60, Subpart JJJJ In accordance with 40 CFR 60.4230, these emissions units are subject to the NSPS for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE). 40 CFR 60.4233(e) 40 CFR 60.4231(e)-mfg. Table 1 to Part 60, Subpart JJJJ	NO_x emissions shall not exceed 2.0 g/hp-hr and 160 ppmvd at 15% oxygen (O_2). CO emissions shall not exceed 4.0 g/hp-hr and 540 ppmvd at 15% O_2. VOC emissions shall not exceed 1.0 g/hp-hr and 86 ppmvd at 15% O_2. [40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1] See b)(2)d, c)(2), d)(2), e)(2) and f)(2).
g.	40 CFR Part 60, Subpart OOOO	In accordance with 40 CFR 63.5365(c), these emissions units are subject to the NSPS for Crude Oil and Natural Gas Production, Transmission, and Distribution. See c)(3), d)(3) and e)(3).
h.	40 CFR Part 63, Subpart ZZZZ 40 CFR 63.6590(c)(1)	A new or reconstructed area source operating in compliance with 40 CFR Subpart JJJJ is the demonstration of compliance for 40 CFR Subpart ZZZZ.

(2) Additional Terms and Conditions

a. The hourly emission limitations for CO, NO_x and VOC are based on the potential to emit (PTE) for these emissions units, therefore, no monitoring or record keeping is required to document compliance with the emission limitations.

b. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

c. These requirements apply once U.S. EPA approves OAC rule 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 NO_x, CO and VOC emissions from this air contaminant source since the controlled potentials to emit for NO_x, CO and VOC are less than 10 tpy.

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

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

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) & PTI P0114925]

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

60.4234	Duration of compliance with emission standards
60.4243(b)	Maintenance requirements
60.4243(e)	Alternative fuel
60.4243(g)	AFR controllers

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 60, Subpart JJJJ & PTI P0114925]

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

60.5385(a)-(d)	Standards for reciprocating compressor facilities
60.5410(c)(1)-(4)	Initial compliance demonstration
60.5415(c) & (h)	Continuous compliance demonstration

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 60, Subpart OOOO & PTI P0114925]

d) Monitoring and/or Recordkeeping Requirements

(1) Each day a fuel other than natural gas is burned in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0114925]

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

60.4245(a)(1)	Keeping records of notifications and supporting documentation
60.4243(b)(2)(ii) and 60.4245(a)(2)	Keeping records of maintenance plan and records of maintenance conducted on the engine

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart JJJJ & PTI P0114925]

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

60.5420(c)(3)	Record keeping requirements

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart OOOO & PTI P0114925]

e) Reporting Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0114925]

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

60.4245(c)	Must submit an initial notification
60.4245(d)	Must submit performance test copies within 60 days after the test has been completed

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart JJJJ & PTI P0114925]

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

60.5420(a)&(b)(1)&(4)	Notifications and reports

[Authority for term:OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart OOOO & PTI P0114925]

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. <u>Emission Limitations</u>:
CO emissions from the stack serving each emissions unit shall not exceed 1.18 lbs/hr and 5.18 tpy.

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

The annual emission limitation was developed by multiplying the short-term allowable CO emission limitation (1.18 lbs/hr) by the maximum annual hours of operation (8,760 hours) by (1 ton/2,000 lbs). Therefore, if compliance is shown

with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

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

b. Emission Limitations:
NO_x emissions from the stack serving each emissions unit shall not exceed 1.96 lbs/hr and 8.57 tpy.

Applicable Compliance Method:
Compliance with the hourly emission limitation above shall be determined by dividing 0.50 g/bhp-hr (the manufacturer supplied emission factor) by 454 g/lb, and then multiplying by 1,775 bhp.

The annual emission limitation was developed by multiplying the short-term allowable NO_x emission limitation (1.96 lbs/hr) by (8,760 hours) by (1 ton/2,000 lbs). Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

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

c. Emission Limitations:
VOC emissions from the stack serving each emissions unit shall not exceed 0.71 lb/hr and 3.11 tpy.

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

The annual emission limitation was developed by multiplying the short-term allowable VOC emission limitation (0.71 lb/hr) by (8,760 hours)by (1 ton/2,000 lbs. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

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

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0114925]

d. Emission Limitation:
Visible PE from the exhaust stack serving each emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)& PTI P0114925]

e. Emission Limitation:
PE shall not exceed 0.062 lb/mmBtu of actual heat input.

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

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(B)& PTI P0114925]

f. Emission Limitations:
NO_x emissions shall not exceed 2.0 g/HP-hr and 160 ppmvd at 15% O2.
CO emissions shall not exceed 4.0 g/HP-hr and 540 ppmvd at 15% O2.
VOC emissions shall not exceed 1.0 g/HP-hr and 86 ppmvd at 15% O2.

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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart JJJJ& PTI P0114925]

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

a. Conduct performance testing in the following manner:

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

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

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

d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office (NEDO). 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 NEDO's refusal to accept the results of the emission test(s).

e. Personnel from the Ohio EPA NEDO 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 NEDO 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 NEDO.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart JJJJ & PTI P0114925]

g) Miscellaneous Requirements

(1) None.

10. Emissions Unit Group -Dehydration Units: P024, P025, P026, P027: 110 MMSCFD, residual flash gas emissions controlled by flare 2; condenser vent stream emissions controlled by flare 3

EU ID	Operations, Property and/or Equipment Description
P024	Glycol dehydration unit 1: reboiler (B001), condenser and flares 2 and 3
P025	Glycol dehydration unit 2: reboiler (B002), condenser and flares 2 and 3
P026	Glycol dehydration unit 3: reboiler (B003), condenser and flares 2 and 3
P027	Glycol dehydration unit 4: reboiler (B004), condenser and flares 2 and 3

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

(1) d)(4)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	VOC emissions from the flare stack(s) for each emissions unit shall not exceed 0.41 ton/month averaged over a 12-month rolling period. See b)(2)a, b)(2)c through b)(2)e, c)(1) and c)(2).
b.	OAC rule 3745-31-05(A)(3)(ii)	See b)(2)b.
c.	40 CFR Part 63, Subpart HH, NESHAP from Oil and Natural Gas Production Facilities, 40 CFR 63.764(e)(1)(ii)	Exempt. Less than 0.90 Megagram benzene/year. See d)(2) and d)(3).
d.	ORC 3704.03(F)(4)(d)	See d)(4).

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC rule 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 VOC from this air contaminant source since the controlled potential to emit for VOC is less than 10 tpy.

c. Dehydrator flash tank off-gases that are not used as fuel in the reboiler shall be recompressed and routed to the inlet separator. During flash gas compressor downtime, flash tank off-gases will be routed to Flare-2 (P015).

d. Maintenance of the temperature of the exhaust gases from the condenser and maintenance of the flare used to control VOC and HAPs will assure compliance with the annual limit. Additional monthly record keeping is not required since the annual limits are based on each emissions unit's potential to emit (at a throughput of 110mmscf of natural gas/day and 98% destruction efficiency). See emissions units P015 and P016 for flare requirements.

e. The emissions from the dehydration unit's condenser shall be vented to the flare at all times the emissions unit is in operation. The flare shall have a minimum destruction efficiency of 98**%**. See emissions units P015 and P016 for flare requirements.

c) Operational Restrictions

(1) All emissions from the dehydrator still vent shall be vented to a condenser that shall meet the monitoring and record keeping requirements of this permit, when the emissions unit is in operation, including the following:

a. The condenser shall be operated at all times when gases are vented to it.

b. The condenser must be equipped with a temperature monitoring device that monitors and records the dehydration still vent temperature.

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

[Authority for term: OAC rule 3745-77-07(A)(1) & PTI P0118052]

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

[Authority for term: OAC rule 3745-77-07(A)(1) & PTI P0118052]

d) Monitoring and/or Recordkeeping Requirements

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

a. monitor and record the temperature of the exit of the condenser on a daily basis (Monday through Friday, excluding major holidays); and

b. record all periods of time when the condenser is not operating correctly to control the emissions from the dehydration still vent.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart HH & PTI P0118052]

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

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

b. The permittee shall determine an average mass rate of benzene emissions in kilograms/hour through direct measurement using the methods in 63.772(a)(1)(i) or (ii), or an alternative method according to 63.7(f). Annual emissions in kilograms/year shall be determined by multiplying the mass rate by the number of hours the unit is operated per year. This result shall be converted to megagrams/year.

[Authority for term:OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart HH & PTI P0118052]

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

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

[Authority for term: ORC 3704.03(F)(4), OAC rule 3745-77-07(C)(1) & PTI P0118052]

e) Reporting Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation from the operational restrictions in section c).

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

f) Testing Requirements

(1) Compliance with the emissions limitations and/or control requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:
VOC emissions from the flare stack(s) for each emissions unit shall not exceed 0.41 ton/month averaged over a 12-month rolling period.

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

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

See emissions units P015 and P016 for testing requirements.

The annual emission limitation was developed by multiplying the short-term allowable limitation (0.76 lb/hr) by (8,760 hours) by (1 ton/2,000 lbs). Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

b. Emission Limitation:
The flare shall have a minimum destruction efficiency of 98%.

Applicable Compliance Method:
Compliance shall be demonstrated by the design and operation specifications detailed in emissions units P015 and P016.

[Authority for term:OAC rule 3745-77-07(C)(1) & PTI P0118052]

g) Miscellaneous Requirements

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

11. Emissions Unit Group -Generators: P011, P012, P013

EU ID	Operations, Property and/or Equipment Description
P011	605 hp NG-fired generator equipped w/3-way catalyst Baldor IGLC420-2N
P012	605 hp NG-fired generator equipped w/3-way catalyst Baldor IGLC420-2N
P013	605 hp NG-fired generator equipped w/3-way catalyst Baldor IGLC420-2N

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	The requirements of this rule for CO are equivalent to the requirements established pursuant to 40 CFR Part 60, Subpart JJJJ
b.	OAC rule 3745-31-05(A)(3)	NO_x emissions from the stack serving each emissions unit shall not exceed 1.33 lbs/hr and 5.84 tpy. VOC emissions from the stack serving each emissions unit shall not exceed 0.93 lb/hr and 4.09 tpy. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11 and 40 CFR Part 60, Subpart JJJJ. See b)(2)a and b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)c.
d.	OAC rule 3745-17-07(A)	Visible PE from the exhaust stack serving each emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-11(B)	PE shall not exceed 0.062 lb/mmBtu of actual heat input.
f.	OAC rule 3745-18-06	These emissions units are exempt from the

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).
g.	40 CFR Part 60, Subpart JJJJ	NO_x emissions shall not exceed 2.0 g/hp-hr and 160 ppmvd at 15% oxygen (O_2). CO emissions shall not exceed 4.0 g/hp-hr and 540 ppmvd at 15% O_2. VOC emissions shall not exceed 1.0 g/hp-hr and 86 ppmvd at 15% O_2. [40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1] See b)(2)d, c)(2), d)(2), e)(2) and f)(2).
h.	40 CFR Part 63, Subpart ZZZZ 40 CFR 63.6590(c)(1)	A new or reconstructed area source operating in compliance with 40 CFR JJJJ is the demonstration of compliance for 40 CFR Subpart ZZZZ.

(2) Additional Terms and Conditions

a. The hourly emission limitations for NO_x and VOC are based on the uncontrolled potential to emit (PTE) for these emissions units, therefore, no monitoring or record keeping is required to document compliance with the emission limitations.

b. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

c. These requirements apply once U.S. EPA approves OAC rule 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 NO_x and VOC emissions from this air contaminant source since the controlled potentials to emit for NO_x and VOC are less than 10 tpy.

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

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

c) Operational Restrictions

(1) The permittee shall burn only natural gas in these emissions units.

[Authority for term: OAC rule 3745-77-07(A)(1)& P0114925]

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

60.4234	Duration of compliance with emission standards
60.4243(b)	Maintenance requirements
60.4243(e)	Alternative fuel
60.4243(g)	AFR controllers

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Subpart JJJJ& P0114925]

d) Monitoring and/or Recordkeeping Requirements

(1) Each day a fuel other than natural gas is burned in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0118052]

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

60.4245(a)(1)	Keeping records of notifications and supporting documentation
60.4243(b)(2)(ii) and 60.4245(a)(2)	Keeping records of maintenance plan and records of maintenance conducted on the engine

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Subpart JJJJ& PTI P0114925]

e) Reporting Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0114925]

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

60.4245(c)	Must submit an initial notification
60.4245(d)	Must submit performance test copies within 60 days after the test has been completed

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Subpart JJJJ& PTI P0114925]

f) Testing Requirements

(1) Compliance with the emissions limitations and/or control requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:
NO_x emissions from the stack serving each emissions unit shall not exceed 1.33 lbs/hr and 5.84 tpy.

Applicable Compliance Method:
Compliance with the hourly emission limitation above shall be determined by dividing 1.0 g/bhp-hr (the manufacturer supplied emission factor) by 454 g/lb, and then multiplying by 605 bhp (the maximum power output rating of this unit).

The annual emission limitation was developed by multiplying the short-term allowable limitation (1.33 lbs/hr) by (8,760 hours) by (1 ton/2,000 lbs). Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

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

b. Emission Limitations:
VOC emissions from the stack serving each emissions unit shall not exceed 0.93 lb/hr and 4.09 tpy.

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

The annual emission limitation was developed by multiplying the short-term allowable limitation (0.93 lb/hr) by (8,760 hours) by (1 ton/2,000 lbs). Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

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

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0114925]

c. Emission Limitation:
Visible PE from the exhaust stack serving each emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)& PTI P0114925]

d. Emission Limitation:
PE shall not exceed 0.062 lb/mmBtu of actual heat input.

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

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

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(B)& PTI P0114925]

e. Emission Limitations:
NO_x emissions shall not exceed 2.0 g/HP-hr and 160 ppmvd at 15% O2.
CO emissions shall not exceed 4.0 g/HP-hr and 540 ppmvd at 15% O2.
VOC emissions shall not exceed 1.0 g/HP-hr and 86 ppmvd at 15% O2.

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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Subpart JJJJ & PTI P0114925]

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

a. Conduct performance testing in the following manner:

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

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

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

d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA NEDO. 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 NEDO's refusal to accept the results of the emission test(s).

e. Personnel from the Ohio EPANEDO 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 EPANEDO 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 NEDO.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Subpart JJJJ& PTI P0114925]

g) Miscellaneous Requirements

(1) None.

12. Emissions Unit Group -Tanks: T001, T002, T003, T004, T005, T006, T007, T008: 400 barrel vertical fixed roof tanks with mechanical vapor recovery units; flash emissions controlled by Flare 1 during truck loading

EU ID	Operations, Property and/or Equipment Description
T001	Condensate storage tank expected to exhibit flashing emissions
T002	Condensate storage tank expected to exhibit flashing emissions
T003	Condensate storage tank expected to exhibit flashing emissions
T004	Condensate storage tank expected to exhibit flashing emissions
T005	Condensate storage tank expected to exhibit flashing emissions
T006	Slop water storage tank expected to exhibit flashing emissions
T007	Slop water storage tank expected to exhibit flashing emissions
T008	Slop water storage tank expected to exhibit flashing emissions

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	VOC emissions from the flare stack shall not exceed 4.02 tpy for each condensate tank and 0.22 tpyfor each slop water tank. The requirements of this rule include compliance with the applicable requirements of 40 CFR Part 60, Subpart OOOO. Use of submerged or bottom fill on tank. See b)(2)a and c)(1).
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)b.
c.	40 CFR Part 60, Subpart Kb	Exempt. See b)(2)c.
d.	OAC rule 3745-21-09(L)(2)	Exempt. See b)(2)d.
e.	40 CFR Part 60, Subpart OOOO, NSPS for Crude Oil and Natural Gas Production, Transmission, and Distribution. (60.5360-60.5430)	Group 2 storage vessels with the potential to emit VOC emissions greater than 6 tpy. See c)(1) and e)(3).

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC rule 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 VOC emissions from this air contaminant source since the controlled potential to emit for VOC is less than 10 tpy.

c. Storage vessels with a capacity of less than 75 m^3 (19,812.9 gallons) are not subject to the requirements of 40 CFR Part 60, Subpart Kb.

d. Fixed roof tanks with a capacity of less than 40,000 gallons are exempted from the requirements of OAC rule 3745-21-09(L)(1).

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

60.5395(a),(c),(d),(e),(f)	Group 2 storage vessel requirements
60.5410(h)	Initial compliance demonstration
60.5411(b),(c) and 60.5412(d)	Additional requirements for initial compliance
60.5415(e)	Continuous compliance requirements

c) Operational Restrictions

(1) All of the emissions from the storage tank shall be captured by a vapor recovery unit (VRU) or flare. The flare shall be designed and operated as required in emissions unit P014.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Subpart OOOO & PTI P0114925]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall record the annual throughput of each tank in gallons/year. The permittee shall keep records of U.S. EPA TANKS software program and/or other process simulation program calculations used to demonstrate annual storage tank and process vent emissions. These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0114925]

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

60.5416(c), 60.5417(h)	Monitoring requirements
60.5420(c)	Record keeping requirements

[Authority for term: OAC rule 3745-77-07(C)(1),40 CFR Subpart OOOO & PTI P0114925]

e) Reporting Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0114925]

(2) The permittee shall submit deviation (excursion) reports that identify any deviation from the operational restrictions in section c).

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0114925]

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

60.5420(a), (b)	Notifications and reports

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Subpart OOOO & PTI P0114925]

f) Testing Requirements

(1) Compliance with the emissions limitations and/or control requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:
VOC emissions from the flare stack shall not exceed 4.02 tons/year for each condensate tank and 0.22 tpyfor each slop water tank.

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

[Authority for term: OAC rule 3745-77-07(C)(1) & PTI P0114925]

g) Miscellaneous Requirements

(1) None.