



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

5/28/2015

Certified Mail

Nathan Wheldon, PE  
 Seneca Gas Plant  
 1515 Arapahoe Street  
 Suite 1600 - Tower 1  
 Denver, CO 80202-2137

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0661005008  
 Permit Number: P0118588  
 Permit Type: OAC Chapter 3745-31 Modification  
 County: Noble

Dear Permit Holder:

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

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

**How to appeal this permit**

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

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

## **How to save money, reduce pollution and reduce energy consumption**

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

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

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

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

Sincerely,



Michael E. Hopkins, P.E.  
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-SEDO



**FINAL**

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

Facility ID:	0661005008
Permit Number:	P0118588
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	5/28/2015
Effective:	5/28/2015
Expiration:	9/26/2023





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

for  
Seneca Gas Plant

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**Final Permit-to-Install and Operate**  
Seneca Gas Plant  
**Permit Number:** P0118588  
**Facility ID:** 0661005008  
**Effective Date:** 5/28/2015

## Authorization

Facility ID: 0661005008  
Application Number(s): A0051537, A0052993  
Permit Number: P0118588  
Permit Description: Chapter 31 modification to increase VOC emissions from equipment leaks (P801) for Seneca Gas Plant #4 and #5.  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$200.00  
Issue Date: 5/28/2015  
Effective Date: 5/28/2015  
Expiration Date: 9/26/2023  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Seneca Gas Plant  
Zep Road  
Summerfield, OH 43788

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

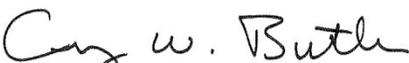
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



**Final Permit-to-Install and Operate**  
Seneca Gas Plant  
**Permit Number:** P0118588  
**Facility ID:** 0661005008  
**Effective Date:** 5/28/2015

## Authorization (continued)

Permit Number: P0118588  
Permit Description: Chapter 31 modification to increase VOC emissions from equipment leaks (P801) for Seneca Gas Plant #4 and #5.

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

<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	P004
Superseded Permit Number:	P0117209
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P801</b>
Company Equipment ID:	P801
Superseded Permit Number:	P0113977
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Seneca Gas Plant  
**Permit Number:** P0118588  
**Facility ID:** 0661005008  
**Effective Date:** 5/28/2015

## **A. Standard Terms and Conditions**

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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

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

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

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



**Final Permit-to-Install and Operate**  
Seneca Gas Plant  
**Permit Number:** P0118588  
**Facility ID:** 0661005008  
**Effective Date:** 5/28/2015

## **B. Facility-Wide Terms and Conditions**

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) 3.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.
2. Emissions unit P801 contained in this permit is subject to 40 CFR Part 60, Subparts OOOO and VVa. The complete NSPS requirements, including the NSPS General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulation (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.
3. Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions units' (P004 and P801) maximum annual emissions for each toxic air contaminant, taking into account Engineering Guide 69 and 70, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.



**Final Permit-to-Install and Operate**  
Seneca Gas Plant  
**Permit Number:** P0118588  
**Facility ID:** 0661005008  
**Effective Date:** 5/28/2015

## **C. Emissions Unit Terms and Conditions**

**1. P004**

**Operations, Property and/or Equipment Description:**

Equipment Maintenance Blowdown emissions where it is not feasible to vent to a flare for control; based on a maximum of 0.17 tons per month averaged over a twelve month rolling period. Chapter 31 modification to PTIO P0117209, issued July 22, 2014.

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

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

a. b)(1)b., b)(2)b. andg)(1).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective June 30, 2008	Fugitive volatile organic compound (VOC) emissions shall not exceed 0.17 ton per month averaged over a 12-month, rolling period.  See b)(2)a. and c)(1) below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year.  See b)(2)b. below.

- (2) Additional Terms and Conditions
  - a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
  - b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c) Operational Restrictions
  - (1) The permittee shall minimize the frequency and size of blowdown events by conducting routine operation and maintenance activities in a manner consistent with safety and good air pollution control practices.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall maintain the following records on a monthly basis:
    - a. The date, number and type of each maintenance blowdown event;
    - b. Mole % of each VOC constituent in the gas stream obtained by representative sampling and analysis;
    - c. Total volume of gas emitted from each maintenance blowdown event; and
    - d. Total volume of gas emitted from all maintenance blowdown events as a rolling, 12-month total.
    - e. Total monthly VOC emissions averaged over a 12-month rolling period.
- e) Reporting Requirements
  - (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
  - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- f) Testing Requirements
  - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emissions Limitation:

Fugitive VOC emissions shall not exceed 0.17 ton per month averaged over a rolling, 12-month period.

Applicable Compliance Method:

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

$$\text{VOC} = (\text{percentage of VOC in gas X annual blowdown mass in lb/yr X } 1\text{ton}/2,000 \text{ lb}) / 12 \text{ months / yr}$$

$$\text{VOC} = (18.52^1 \% \times 21,883 \text{ lb/yr}^2 \times 1 \text{ ton}/2,000 \text{ lb}) / 12 \text{ months / yr}$$

$$\text{VOC} = 0.17 \text{ month averaged over a rolling, 12 – month period}$$

g) Miscellaneous Requirements

(1) None.

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<sup>1</sup> 18.52% of gas is VOC: from permittee's application

<sup>2</sup> Annual blowdown mass of 21,883 lb/yr: from permittee's application

**2. P801, Equipment Leaks**

**Operations, Property and/or Equipment Description:**

Equipment Leaks including equipment leaks from valves, flanges, seals, and connectors in VOC or wet gas service. Chapter 31 modification to PTIO P0113977, issued September 26, 2013.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05-(A)(3) and ORC 3704.03(T)	Volatile organic compound (VOC) emissions shall not exceed 1.42 tons per month averaged over a twelve-month, rolling period.
b.	40 CFR Part 60, Subparts OOOO and VVa (40 CFR 60.5360–60.5430, 40 CFR 60.482-2a, 60.482-4a–60.482-11a)  [In accordance with 40 CFR 60.5365 (f)(2), this emissions unit includes fugitive leaks from equipment associated with a compressor station and a field gas gathering system in an onshore natural gas processing plant constructed after August 23, 2011.]	See b)(2)a.-c. and c)(1) below.

(2) Additional Terms and Conditions

- a. In accordance with 40 CFR Part 60 Subparts OOOO and VV, the following pieces of equipment are affected facilities in a process unit in an onshore natural gas processing plant constructed after August 23, 2011. Fugitive leaks from the following equipment are covered by this permit and subject to the NSPS requirements: valves, pump seals, connectors, flanges, open-ended lines, and pressure relief devices.
- b. No later than 180 days after initial startup, the permittee shall demonstrate compliance with the applicable requirements of 40 CFR 60.482-1(a), (b) and (d) and 60.482-2 through 60.482-10, except as provided in 40 CFR 60.633.
- c. Compliance with 40 CFR 60.482-1 to 60.482-10 will be determined by review of records and reports, review of performance test results, and inspection using the methods and procedures specified in 40 CFR 60.485.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subparts OOOO and VVa, including the following sections:

60.5400(a) and 60.482-2(b)(2)(ii)	Designate visual indications of liquids dripping from a pump seal as a leak, and repair the leak within 15 days of detection by eliminating visual indications of liquids dripping.
60.5400(a), 60.482-2(c)(1) and 60.5401(a)(3)(ii)	Repair detected leaks from pumps in light liquid service not later than 15 calendar days after detection, except as provided in 60.482-9a.
60.5400(a) and 60.482-2(c)(2)	Attempt first repair of detected leaks from pumps in light liquid service within 5 days after each leak is detected.
60.5400(a) and 60.482-2(d)	Meet the requirements of 60.482-2(d) for pumps equipped with a dual mechanical seal system.
60.5400(a), 60.482-2(e) and 60.486(e)	Meet the requirements of 60.482-2(e) for pumps designated for no detectable emissions (less than 500 ppm above background) in lieu of 60.482-2(a), (c) and (d).
60.5400(a), 60.482-2(g) 1) and 60.486(f)	Meet the requirements of 60.482-2(g) for

	pumps designated as unsafe to monitor in lieu of 60.482-2(a) and (d)(4) – (6).
60.5400(a), 60.482-4 and 60.5401(b)(3)	Repair detected leaks from pressure relief devices in gas/vapor service as soon as practicable, but not later than 15 calendar days after detection, except as provided in 60.482-9a, and attempt first repair within 5 days after each leak is detected.*
60.5400(a) and 60.482-4(d)	Meet the requirements of 60.482-4(d)(2) for any pressure relief device equipped with a rupture disk upstream of the pressure relief device in lieu of 60.482-4(a) and (b).
60.5400(a), 60.482-5 and 60.5401(c)	Sampling connection systems are exempt from the requirements of 60.482-5.
60.5400(a) and 60.482-6(a)(1)	Equip each open-ended valve or line with a cap, blind flange, plug or a second valve, except as provided in 60.482-1(c),(d) and (e).
60.5400(a), 60.482-6(a)(2) and (b) through (e)	Operate each open-ended valve or line in compliance with the requirements of 60.482-5(a)(2) and (b) through (e).
60.5400(a), 60.482-7(d)(1) and (2)	Repair detected leaks from valves in gas/vapor or light liquid service as soon as practicable, but not later than 15 calendar days after detection, except as provided in 60.482-9, and attempt first repair within 5 days after each leak is detected.
60.5400(a) and 60.482-7(e)	Use best practices in the first attempt at repair of leaks from valves in gas/vapor or light liquid service.
60.5400(a) and 60.482-7(f)	Meet the requirements of 60.482-7(f) for valves in gas/vapor or light liquid service designated for no detectable emissions (less than 500 ppm above background) in lieu of 60.482-7(a).
60.5400(a) and 60.482-7(h)	Meet the requirements of 60.482-7(h) for valves in gas/vapor or light liquid service designated as difficult to monitor in lieu of 60.482-7(a).

60.5400(a) and 60.482-8(c)	Repair detected leaks from pumps and valves in heavy liquid service, pressure relief devices in light or heavy liquid service, and connectors as soon as practicable, but not later than 15 calendar days after detection, except as provided in 60.482-9, and attempt first repair within 5 days after each leak is detected.
60.5400(a) and 60.482-8(d)	Use best practices in the first attempt at repair of leaks from pumps and valves in heavy liquid service, pressure relief devices in light or heavy liquid service, and connectors.
60.5400(a) and 60.482-9	Comply with the requirements in 60.482-9 for delays of repair.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subparts OOOO and VVa, including the following sections:

60.5400(a), 60.482-2(a)(1) and 60.485(b)	Monitor each pump in light liquid service within 30 days after the end of the startup period and monthly thereafter to detect leaks, except as provided in 60.482-1(f) and 60.482-2(d), (e) and (f).
60.5400(a) and 60.482-2(a)(2)	Visually inspect each pump in light liquid service each week for indications of liquids dripping from the pump seal, except as provided in 60.482-1(f).
60.5400(a) and (d), 60.482-2(b)(1) and 60.485(b)(1)	Detect leaks from pumps in light liquid service at an instrument rating of 500 ppm.
60.5400(a) and 60.482-2(b)(2)(i)	Monitor each pump in light liquid service in accordance with 60.485(b) within 5 days of discovery of liquids dripping from the pump seal.*
60.5400(a) and 60.482-2(h)	Alternate inspection requirements for pumps located at unmanned plant sites.

60.5400(a), 60.482-4 and 60.5401(b)(1)	Monitor each pressure relief device in gas/vapor service quarterly and within 5 days after each pressure release to detect leaks in accordance with 60.485(c).*
60.5400(a) and (d), 60.5401(b)(2), 60.482-4 and 60.485(c)	Detect leaks from pressure relief devices in gas/vapor service at an instrument rating of 500 ppm.*
60.5400(a) and 60.482-7(a)	Monitor each valve in gas/vapor and light liquid service within 30 days after the end of the startup period and monthly thereafter to detect leaks, except as provided in 60.482-1(c) and (f), 60.483-1 and 60.483-2 and 60.482-7(f), (g) and (h).*
60.5400(a), 60.5421	Perform recordkeeping requirements with respect to VOC requirements

(2) The permittee shall perform daily inspections, each day that an operator is at the facility and when the facility is in operation, for indications of releases from the pressure relief valves, and any olfactory, visual or auditory indications of equipment leaks. The positive indication of a release or a leak shall be noted in an operations log, along with the following information:

- a. the name of the inspector;
- b. the date and time inspected;
- c. the identification of the pressure relief valve that released and/or piece of equipment that leaked;
- d. the estimated or calculated duration of the pressure relief valve release and/or equipment leak and the estimated emission totals; and
- e. any corrective actions taken to minimize or eliminate the release or leak.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section

of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

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

60.7(a)	Initial notification of the date construction of the affected facility commenced and the actual date of initial startup of the affected facility
60.5400(e), and 60.487(a)	Submit semiannual reports beginning six months after the initial startup date
60.5400(e), and 60.487(b) and (c)	Initial and subsequent semiannual report requirements
60.5400(a), 60.5420	Report as required by 60.5420
60.5400(a),60.5422	Perform reporting with respect to VOC requirements

f) Testing Requirements

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

a. Emissions Limitation:

VOC emissions shall not exceed 1.42 tons per month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

Compliance with the monthly, rolling VOC emissions limitation shall be demonstrated by the following calculation based on the emissions factors (lb/hr/source) in service<sup>3</sup>, the number and type of source in gas and light liquid service<sup>4</sup>, the percentage of VOC in the gas<sup>5</sup>, and a 15% safety factor.

$$\text{VOC} = [\# \text{ of connectors in gas service} \times \text{gas service connectors EF}$$

<sup>3</sup>Table 2-4:Oil& Gas Production Operations Average Emission Factors, Protocol for Equipment Leak Emission Estimates, EPA 453/R-95-017, November 1995.

<sup>4</sup>Based on information in permittee's application.

<sup>5</sup> Percentage of VOC in gas is 18.52%, per permittee's application.



+# of valves in gas service X gas service valve EF

+# of flanges in gas service X gas service flanges EF

+# of low-bleed pneumatic valves in gas service X gas service low-bleed pneumatic valves EF

+# of other points in gas service X other points in gas service EF

+# of connectors in light liquid service X light liquid service connectors EF

+# of valves in light liquid service X light liquid service valve EF

+# of flanges in light liquid service X light liquid service flanges EF

+# of low-bleed pneumatic valves in light liquid service X light liquid service low-bleed pneumatic valves EF

+# of pump seals in light liquid service X light liquid service pump seal EF

+# of other points in light liquid service X other points in light liquid service EF]

X safety factor X percentage of gas and light liquid that is VOC X 8,760 hrs/yr X 1 ton / 2,000 lb/ton

Where emission factors are:

4.41E-04 lb/hr/component for connectors in gas service

9.92E-03 lb/hr/component for valves in gas service

8.60E-04 lb/hr/component for flanges in gas service

9.92E-03 lb/hr/component for low-bleed pneumatic valves in gas service

1.94E-02 lb/hr/component for other points in gas service

4.63E-04 lb/hr/component for connectors in light liquid service

5.51E-03 lb/hr/component for valves in light liquid service

2.43E-04 lb/hr/component for flanges in light liquid service

5.51E-03 lb/hr/component for low-bleed pneumatic valves in light liquid service

2.87E-02 lb/hr/component for pump seals in light liquid service

1.65E-02 lb/hr/component for other points in light liquid service

g) Miscellaneous Requirements

(1) None.