



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

6/10/2015

Certified Mail

David Nickel
Harrison Compressor Station
P.O. Box 8288
Longview, TX 75603

Yes	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: 1431004600
Permit Number: P0118861
Permit Type: Initial Installation
County: Hamilton

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 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: SWOQA



FINAL

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

Facility ID:	1431004600
Permit Number:	P0118861
Permit Type:	Initial Installation
Issued:	6/10/2015
Effective:	6/10/2015
Expiration:	6/10/2025



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

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Final Permit-to-Install and Operate
Harrison Compressor Station
Permit Number: P0118861
Facility ID: 1431004600
Effective Date: 6/10/2015

Authorization

Facility ID: 1431004600
Application Number(s): A0053412
Permit Number: P0118861
Permit Description: Installation of a natural gas compressor station in Harrison, Ohio
Permit Type: Initial Installation
Permit Fee: \$375.00
Issue Date: 6/10/2015
Effective Date: 6/10/2015
Expiration Date: 6/10/2025
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

Harrison Compressor Station
2.6 mile east of Harrison, Ohio off of Dry Fork Road
Harrison, OH 45030

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

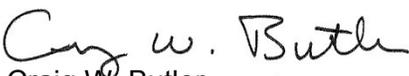
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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
Harrison Compressor Station
Permit Number: P0118861
Facility ID: 1431004600
Effective Date: 6/10/2015

Authorization (continued)

Permit Number: P0118861
Permit Description: Installation of a natural gas compressor station in Harrison, Ohio

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

Emissions Unit ID:	P001
Company Equipment ID:	Compressor Turbine #1 (TB01)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Compressor Turbine #2 (TB02)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	NG Venting
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Harrison Compressor Station
Permit Number: P0118861
Facility ID: 1431004600
Effective Date: 6/10/2015

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
Harrison Compressor Station
Permit Number: P0118861
Facility ID: 1431004600
Effective Date: 6/10/2015

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) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
Harrison Compressor Station
Permit Number: P0118861
Facility ID: 1431004600
Effective Date: 6/10/2015

C. Emissions Unit Terms and Conditions

1. P001, Compressor Turbine #1 (TB01)

Operations, Property and/or Equipment Description:

117.61 MMBtu/hr Natural Gas Fired Combustion Turbine #1

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

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

a. b)(1)g., b)(2)c. and d)(3) through d)(6)

(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)	Install a burner that is designed to meet the following: 0.061 pound of carbon monoxide (CO) per MMBtu of heat input 15 parts per million (ppm) nitrogen oxides (NO _x) emissions at 15% O ₂ See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective June 30, 2008	Install a burner that is designed to meet the following: 0.007 pound of volatile organic compounds (VOC) per million Btu (MMBtu) of heat input 0.005 pound of sulfur dioxide (SO ₂) per MMBtu of heat input

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>0.0044 pound of particulate matter 10 microns and less in diameter (PM₁₀) per MMBtu of heat input</p> <p>0.0044 pound of particulate matter 2.5 microns and less in diameter (PM_{2.5}) per MMBtu of heat input</p> <p>See b)(2)b.</p>
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective June 30, 2008	See b)(2)c.
d.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.
e.	OAC rule 3745-17-11(B)(4)	PE from the turbine shall not exceed 0.040 pound per MMBtu of actual heat input.
f.	OAC rule 3745-18-06(A)	See b)(2)d.
g.	OAC rule 3745-114	See d)(3) through d)(6)
h.	<p>40 CFR 60, Subpart KKKK (40 CFR 60.4300 – 4420)</p> <p>[In accordance with 40 CFR 60.4305(a), 60.4320, and 60.4330 this emissions unit is a stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu/hr located in a continental area subject to the emissions limitations/control measures specified in this section.]</p>	<p>The NO_x limit established in accordance with this rule is less stringent than the NO_x limit established in accordance with OAC rule 3745-31-05(A)(3).</p> <p>SO₂ emissions shall not exceed 110 nanograms per Joule (ng/J), or the permittee shall burn fuel which restrains potential sulfur emissions to less than 0.06 lb SO₂/MMBtu (this SO₂ emissions limitation is less stringent than the SO₂ emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>See b)(2)c.ii</p> <p>See Table 1 of 40 CFR Part 60, Subpart KKKK</p>
i.	40 CFR 60.1 – 60.19 Subpart A	General Provisions of 40 CFR 60

(2) Additional Terms and Conditions

- a. BAT for NO_x emissions from this emission unit has been determined to be 15 ppm of NO_x at 15% O₂ (achievable as designed according to manufacturers’

certified emissions guarantee); therefore, the BAT requirements for NO_x emissions are more stringent than the NO_x emissions requirements established pursuant to 40 CFR Part 60, Subpart KKKK. This does not relieve the permittee of any applicable requirements established pursuant to 40 CFR Part 60, Subpart KKKK and instead the permittee shall demonstrate compliance with the more stringent BAT standard (15 ppm of NO_x at 15% O₂) in accordance with the applicable monitoring, recordkeeping, reporting, and testing requirements identified in 40 CFR Part 60, Subpart KKKK.

- b. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. The following paragraphs will apply when U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the SIP:
 - i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC, SO₂, PM₁₀, and PM_{2.5} emissions from this air contaminant source since the potential to emit for each pollutant is less than 10 tons per year.
 - ii. BAT for SO₂ is more stringent than the SO₂ emission requirements established pursuant to 40 CFR Part 60, Subpart KKKK. However, when the U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption), the more stringent BAT requirements will no longer apply. This does not relieve the permittee of any applicable requirements established pursuant to 40 CFR Part 60, Subpart KKKK and instead the permittee shall demonstrate compliance with the more stringent BAT standard (0.004 pound SO₂ per MMBtu) in accordance with the applicable monitoring, recordkeeping, reporting, and testing requirements identified in 40 CFR Part 60, Subpart KKKK.
- d. This emissions unit is exempt from the requirements of this rule, since only natural gas is burned.
- e. In accordance with 40 CFR 60.4333(a), the permittee shall operate and maintain your stationary combustion turbine, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.
- f. This emissions unit is subject to the applicable provisions of Subpart KKKK of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

c) Operational Restrictions

- (1) The permittee shall only burn pipeline quality natural gas as fuel in this emissions unit.
- (2) The permittee shall comply with the applicable operational restrictions of 40 CFR Part 60, Subpart KKKK, including the following:

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

d) Monitoring and/or Recordkeeping Requirements

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

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

- (3) The Permit to Install application for this facility was evaluated based on the actual materials and the design parameters of the emissions units' exhaust systems, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X = 24" hours per day and "Y = 7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- d. The following summarizes the results of dispersion modeling for the "worst case" toxic contaminant(s):

Toxic Contaminant: formaldehyde

STEL (mg/m³): 0.30

Maximum Hourly Emission Rate (Lbs/hr): 0.78, Facility-wide

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1.96

MAGLC (ug/m³): 5.26

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

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

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 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 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (4) The permittee shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart KKKK, including the following sections:

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

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

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

Applicable Compliance Method:

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

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

0.0005 pound of SO₂ per MMBtu of heat input (as applicable prior to U.S. EPA approving OAC rule 3745-31-05(A)(3)(a)(ii) as part of the SIP)



Applicable Compliance Method:

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

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

c. Emission Limitation:

0.0044 pound of PM₁₀ per MMBtu of heat input (as applicable prior to U.S. EPA approving OAC rule 3745-31-05(A)(3)(a)(ii) as part of the SIP)

Applicable Compliance Method:

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

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

d. Emission Limitation:

0.0044 pound of PM_{2.5} per MMBtu of heat input (as applicable prior to U.S. EPA approving OAC rule 3745-31-05(A)(3)(a)(ii) as part of the SIP)

Applicable Compliance Method:

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

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

e. Emission Limitation:

PE shall not exceed 0.040lb/MMBtu

Applicable Compliance Method:

Compliance is demonstrated by the turbine manufacturer's certified emissions guarantee of 0.0044 lb PE/MMBtu.

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

f. Emission Limitation:

0.061 pound of CO per MMBtu of heat input

Applicable Compliance Method:

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

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

g. Emission Limitation:

NO_x emissions shall not exceed 15 ppm at 15% O₂

Applicable Compliance Method:

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

h. Emission Limitation:

NO_x emissions shall not exceed 25 ppm at 15% O₂

Applicable Compliance Method:

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

i. Emission Limitation:

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

Applicable Compliance Method:

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

j. Emission Limitation:

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

Applicable Compliance Method:

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

(2) In accordance with 40 CFR 60.4340(a), 40 CFR 60.4400, OAC rule 3745-31-05(A)(3), and ORC 3704.03(T), the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and on annual bases (no more than 14 calendar months following the previous performance test.

b. The emissions testing shall be conducted to demonstrate compliance with the NO_x and CO emissions limits.

c. Pursuant to Table 1 of 40 CFR Part 60, Subpart KKKK and OAC rule 3745-31-05(A)(3) the following test methods shall be employed to demonstrate compliance with the allowable NO_x and CO emissions rates:

Methods 7, 7a, 7c, 7d, or 7e of 40 CFR Part 60, Appendix A for NO_x

Methods 1 thru 4 and 10 of 40 CFR Part 60, Appendix A for CO

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency or as required by 40 CFR 60.4400(b). Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).



- f. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.
- (3) The permittee shall comply with the applicable testing requirements of 40 CFR Part 60, Subpart KKKK, including the following sections:

60.4400	Initial and subsequent performance tests for NO _x
60.4415	Initial and subsequent performance tests for SO ₂ (These requirements will not apply if the permittee qualifies for the 40 CFR 60.4365 exemption).

g) Miscellaneous Requirements

- (1) None.

2. P002, Compressor Turbine #2 (TB02)

Operations, Property and/or Equipment Description:

80.03 MMBtu/hr Natural Gas Fired Combustion Turbine #2

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

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

a. b)(1)g., b)(2)c. and d)(3) through d)(6)

(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)	Install a burner that is designed to meet the following: 0.061 pound of carbon monoxide (CO) per MMBtu of heat input 15 parts per million (ppm) nitrogen oxides (NO _x) emissions at 15% O ₂ See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective June 30, 2008	Install a burner that is designed to meet the following: 0.007 pound of volatile organic compounds (VOC) per million Btu (MMBtu) of heat input 0.005 pound of sulfur dioxide (SO ₂) per MMBtu of heat input

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>0.0044 pound of particulate matter 10 microns and less in diameter (PM₁₀) per MMBtu of heat input</p> <p>0.0044 pound of particulate matter 2.5 microns and less in diameter (PM_{2.5}) per MMBtu of heat input</p> <p>See b)(2)b.</p>
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective June 30, 2008	See b)(2)c.
d.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.
e.	OAC rule 3745-17-11(B)(4)	PE from the turbine shall not exceed 0.040 pound per MMBtu of actual heat input.
f.	OAC rule 3745-18-06(A)	See b)(2)d.
g.	OAC rule 3745-114	See d)(3) through d)(6)
h.	<p>40 CFR 60, Subpart KKKK (40 CFR 60.4300 – 4420)</p> <p>[In accordance with 40 CFR 60.4305(a), 60.4320, and 60.4330 this emissions unit is a stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu/hr located in a continental area subject to the emissions limitations/control measures specified in this section.]</p>	<p>The NO_x limit established in accordance with this rule is less stringent than the NO_x limit established in accordance with OAC rule 3745-31-05(A)(3).</p> <p>SO₂ emissions shall not exceed 110 nanograms per Joule (ng/J), or the permittee shall burn fuel which restrains potential sulfur emissions to less than 0.06 lb SO₂/MMBtu (this SO₂ emissions limitation is less stringent than the SO₂ emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>See b)(2)c.ii</p> <p>See Table 1 of 40 CFR Part 60, Subpart KKKK</p>
i.	40 CFR 60.1 – 60.19 Subpart A	General Provisions of 40 CFR 60

(2) Additional Terms and Conditions

- a. BAT for NO_x emissions from this emission unit has been determined to be 15 ppm of NO_x at 15% O₂ (achievable as designed according to manufacturers’

certified emissions guarantee); therefore, the BAT requirements for NO_x emissions are more stringent than the NO_x emissions requirements established pursuant to 40 CFR Part 60, Subpart KKKK. This does not relieve the permittee of any applicable requirements established pursuant to 40 CFR Part 60, Subpart KKKK and instead the permittee shall demonstrate compliance with the more stringent BAT standard (15 ppm of NO_x at 15% O₂) in accordance with the applicable monitoring, recordkeeping, reporting, and testing requirements identified in 40 CFR Part 60, Subpart KKKK.

- b. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. The following paragraphs will apply when U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the SIP:
 - i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC, SO₂, PM₁₀, and PM_{2.5} emissions from this air contaminant source since the potential to emit for each pollutant is less than 10 tons per year.
 - ii. BAT for SO₂ is more stringent than the SO₂ emission requirements established pursuant to 40 CFR Part 60, Subpart KKKK. However, when the U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption), the more stringent BAT requirements will no longer apply. This does not relieve the permittee of any applicable requirements established pursuant to 40 CFR Part 60, Subpart KKKK and instead the permittee shall demonstrate compliance with the more stringent BAT standard (0.004 pound SO₂ per MMBtu) in accordance with the applicable monitoring, recordkeeping, reporting, and testing requirements identified in 40 CFR Part 60, Subpart KKKK.
- d. This emissions unit is exempt from the requirements of this rule, since only natural gas is burned.
- e. In accordance with 40 CFR 60.4333(a), the permittee shall operate and maintain your stationary combustion turbine, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.
- f. This emissions unit is subject to the applicable provisions of Subpart KKKK of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

c) Operational Restrictions

- (1) The permittee shall only burn pipeline quality natural gas as fuel in this emissions unit.
- (2) The permittee shall comply with the applicable operational restrictions of 40 CFR Part 60, Subpart KKKK, including the following:

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

d) Monitoring and/or Recordkeeping Requirements

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

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

- (3) The Permit to Install application for this facility was evaluated based on the actual materials and the design parameters of all of the fuel burning emissions units' exhaust systems, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X = 24" hours per day and "Y = 7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- d. The following summarizes the results of dispersion modeling for the "worst case" toxic contaminant(s):

Toxic Contaminant: formaldehyde

TLV (mg/m³): 0.30

Maximum Hourly Emission Rate (Lbs/hr): 0.78, Facility-wide

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1.96

MAGLC (ug/m³): 5.26

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

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

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.
- (2) The permittee shall submit an annual 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 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (4) The permittee shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart KKKK, including the following sections:

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

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

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

Applicable Compliance Method:

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

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

0.0005 pound of SO₂ per MMBtu of heat input (as applicable prior to U.S. EPA approving OAC rule 3745-31-05(A)(3)(a)(ii) as part of the SIP)



Applicable Compliance Method:

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

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

c. Emission Limitation:

0.0044 pound of PM₁₀ per MMBtu of heat input (as applicable prior to U.S. EPA approving OAC rule 3745-31-05(A)(3)(a)(ii) as part of the SIP)

Applicable Compliance Method:

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

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

d. Emission Limitation:

0.0044 pound of PM_{2.5} per MMBtu of heat input (as applicable prior to U.S. EPA approving OAC rule 3745-31-05(A)(3)(a)(ii) as part of the SIP)

Applicable Compliance Method:

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

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

e. Emission Limitation:

PE shall not exceed 0.040lb/MMBtu

Applicable Compliance Method:

Compliance is demonstrated by the turbine manufacturer's certified emissions guarantee of 0.0044 lb PE/MMBtu.

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

f. Emission Limitation:

0.061 pound of CO per MMBtu of heat input

Applicable Compliance Method:

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

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

g. Emission Limitation:

NO_x emissions shall not exceed 15 ppm at 15% O₂

Applicable Compliance Method:

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

h. Emission Limitation:

NO_x emissions shall not exceed 25 ppm at 15% O₂

Applicable Compliance Method:

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

i. Emission Limitation:

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

Applicable Compliance Method:

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

j. Emission Limitation:

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

Applicable Compliance Method:

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

(2) In accordance with 40 CFR 60.4340(a), 40 CFR 60.4400, OAC rule 3745-31-05(A)(3), and ORC 3704.03(T), the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and on annual bases (no more than 14 calendar months following the previous performance test.

b. The emissions testing shall be conducted to demonstrate compliance with the NO_x and CO emissions limits.

c. Pursuant to Table 1 of 40 CFR Part 60, Subpart KKKK and OAC rule 3745-31-05(A)(3) the following test methods shall be employed to demonstrate compliance with the allowable NO_x and CO emissions rates:

Methods 7, 7a, 7c, 7d, or 7e of 40 CFR Part 60, Appendix A for NO_x

Methods 1 thru 4 and 10 of 40 CFR Part 60, Appendix A for CO

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency or as required by 40 CFR 60.4400(b). Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).



- f. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.
- (3) The permittee shall comply with the applicable testing requirements of 40 CFR Part 60, Subpart KKKK, including the following sections:

60.4400	Initial and subsequent performance tests for NO _x
60.4415	Initial and subsequent performance tests for SO ₂ (These requirements will not apply if the permittee qualifies for the 40 CFR 60.4365 exemption).

- g) Miscellaneous Requirements
 - (1) None.

3. P003, NG Venting

Operations, Property and/or Equipment Description:

Natural Gas Venting

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)c., and d)(2)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	Emissions shall not exceed: 0.41 tons volatile organic compounds (VOC) per month averaged over a twelve month rolling period See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	See b)(2)b.
c.	OAC rule 3745-114	See d)(2)

(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) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

- b. The following paragraphs will apply when U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the SIP:
 - i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the potential to emit for VOC emissions is less than 10 tons per year; and
 - ii. The monitoring and recordkeeping requirements identified in d)(1) do not apply.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain the following records on a monthly basis:
 - a. the date of each event;
 - b. percent VOC fraction in the gas stream obtained from historic sampling;
 - c. total volume of gas (ft³) emitted from each event specified in d)(1)a.;
 - d. total volume of gas emitted from all events specified in d)(1)a.;
 - e. gas density (lb / scf) attained from historic gas sampling; and
 - f. total VOC emissions per month, averaged over a twelve month rolling period (as established in f)(1)a.).
 - (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.
- 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 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 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

The VOC emission limitation was developed using information provided in application A0053412(04/24/15), and the following equation:

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

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

g) Miscellaneous Requirements

- (1) None.