Ohio Environmental Protection Agency

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

8/11/2015

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Nathan Wheldon, PE
Hopedale Fractionation Facility
1515 Arapahoe Street
Suite 1600 - Tower 1
Denver, CO 80202-2137

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0634005042
Permit Number: P0118897
Permit Type: Initial Installation
County: Harrison

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

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

Sincerely,

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

Cc: U.S. EPA
Ohio EPA-SEDO; Pennsylvania; West Virginia

Response to Comments

Facility ID:	0634005042
Facility Name:	Hopedale Fractionation Facility
Facility Description:	60,000 bpd (2.52 MMgpd) Fractionation Facility
Facility Address:	West of Hwy 151, North of Giacobbi Rd Green Twp., OH 43986 Harrison County
Permit:	P0118897, Permit-To-Install - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Harrison News Herald on 07/11/2015. The comment period ended on 08/10/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

1. Topic: None

a. Comment: None

b. Response: None

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Hopedale Fractionation Facility

Facility ID:	0634005042
Permit Number:	P0118897
Permit Type:	Initial Installation
Issued:	8/11/2015
Effective:	8/11/2015

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Hopedale Fractionation Facility

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Authorization

Facility ID:	0634005042
Facility Description:	60,000 bpd (2.52 MMgpd) Fractionation Facility
Application Number(s):	A0053221
Permit Number:	P0118897
Permit Description:	Initial installation/modification permit other to allow for expanded operations.
Permit Type:	Initial Installation
Permit Fee:	$2,800.00
Issue Date:	8/11/2015
Effective Date:	8/11/2015

This document constitutes issuance to:

Hopedale Fractionation Facility
West of Hwy 151, North of Giacobbi Rd
Green Twp., OH 43986

of a Permit-to-Install 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 a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0118897
Permit Description: Initial installation/modification permit other to allow for expanded operations.

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

Emissions Unit ID:	**B004**
Company Equipment ID:	B004
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F001**
Company Equipment ID:	F001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**J001**
Company Equipment ID:	J001
Superseded Permit Number:	P0116897
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**J003**
Company Equipment ID:	J003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	P002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	P003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	P004
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P801**
Company Equipment ID:	P801
Superseded Permit Number:	P0116897
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

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

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

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

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

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to theOhio EPA DAPC, Southeast District Officein accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

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

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

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

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

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.

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

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s)not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted,no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d)must be obtained beforeoperating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services"facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed.The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

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

   a) 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) B.4.

   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. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.5 tons per year (TPY) for any individual HAP and 24.5 TPY for the combination of all HAPs, based upon rolling, 12-month summations.

3. The permittee shall collect and record the following information each month for this facility:

   a) the company identification for each HAP-emitting material (i.e., all HAP-containing coatings, clean-up materials, resins, adhesives, potting compounds, plating chemicals, etc.);

   b) the individual HAP content of each HAP emitting material;

   c) the total combined HAP content of each HAP emitting material (i.e. sum of individual HAP contents from b);

   d) the amount of each HAP emitting material employed during the previous calendar month;

   e) the hours of operation, or other emissions determining rationale, of all HAP-generating sources (e.g., fuel combustion, sanding/grinding operations, plating);

   f) the total individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in pounds or tons per month;

   g) the total combined HAP emissions from all HAP emitting materials employed and all HAP-generating sources, in pounds or tons per month;

   h) the rolling, 12-month summation of individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons; and

   i) the rolling, 12-month summation of total combined HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons.

   The permittee shall have the option of using the potential to emit in place of the recordkeeping described in B.3. for any “de minimis” or exempt emissions unit for purposes of complying with the facility-wide HAP(s) limitations. Furthermore, the permittee shall have the flexibility to use purchasing records in lieu of recordkeeping requirement as stated in B.3.d) for purposes of complying with the facility-wide HAP(s) limitations.

4. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:

   a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

      (1) The rolling 12 individual HAP emissions is equal to or greater than 9.5 tons from this facility; and

      (2) The rolling 12 month combined HAP's emissions are equal to or greater than 24.5 tons from this facility.

   b) the probable cause of each deviation (excursion);

   c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

   d) the magnitude and duration of each deviation (excursion).

   If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

   The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

5. Specific emissions units contained in this permit are subject to 40 CFR Part 60, Subparts VVa (P002, P003, and P004) and 40 CFR Part 60, OOOO (P001, P002 and P801). 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.

6. Risk Management Plans:

   If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

7. Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), for this project was not necessary because the emissions units not exempted from modeling per OEPA Engineering Guides #69 and #70, maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year when controlled. OAC Chapter 3745 31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in

the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

C. Emissions Unit Terms and Conditions

1. B004, B004

Operations, Property and/or Equipment Description:

Hot Oil Heater #4 - One (1) natural gas-fired process heater rated at a heat input capacity of 249.76 MMBtu/hr supporting the equipment used in the fractionation process.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(A)(3)	Install a process heater that is designed to meet the emissions limitation of 0.04 lb. /MMBtu of nitrogen oxides (NOx). Install a process heater that is designed to meet the emissions limitation of 0.041 lb./MMBtu of carbon monoxide (
	OAC rule 3745-31-05(A)(3) June 30, 2008	Use of natural gas as fuel. See section b)(2)a. and b., below.
	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See section b)(2)c., below.
	OAC rule 3745-17-10(B)(1)	0.02 lbs. of particulate emissions (PE) per mmBtu of actual heat input.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	40 CFR Part, 60, Subpart Dc	See Section b)(2)d., below.

(2) Additional Terms and Conditions

a. Best available technology (BAT) for this emissions unit has been determined to be the use of natural gas a fuel.

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)(ii) (the

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

[OAC rule 3745-31-05(A)(3)]

c. 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.

[OAC rule 3745-31-05(A)(3)(a)(ii)]

d. There are no specific additional requirements under 40 CFR Part 60 Subpart Dc since this emissions unit employs only natural gas as fuel.

c) Operational Restrictions

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

(2) This emissions unit shall be equipped with a low NOx burner.

(3) The permittee shall maintain this process heater in accordance with the manufacturer's specifications and maintenance guidance in order to assure compliance with the required above listed design emission rates of nitrogen oxides and carbon monoxide.

d) Monitoring and/or Recordkeeping Requirements

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

(2) The permittee shall maintain all manufacturer's specifications and maintenance guidance, along with, records on all maintenance performed on the process heater in accordance with the manufacturer's specifications and maintenance guidance in order to assure compliance with the required above listed design emission rates of nitrogen oxides and carbon monoxide.

(3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

The permittee may, upon receipt of written approval from the Ohio EPA Southeast District Office, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

[OAC rule 3745-17-07(A)] or [OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. that identify each day when a fuel other than natural gas was burned in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. Testing Requirements

(2) The permittee shall submit the following information in the quarterly deviation reports in accordance monitoring requirements for visible emissions in term number d) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;

b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;

c. any corrective actions taken to minimize or eliminate the visible particulate emissions and/or visible fugitive dust emissions;

d. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

e. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

[OAC rule 3745-77-07(A)(3)(c)].

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:

Install a process heater that is designed to meet the emissions limitation of 0.04 lb. /MMBtu of NO_x.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the manufacturer's guaranteed 0.004 lb. /MMBtu emission factor.

If required, NO_x emissions shall be demonstrated by an emission test performed in accordance with the methods and procedures specified in Methods 1 through 4 and Method 7 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, Southeast District Office.

b. Emission Limitation:

Install a process heater that is designed to meet the emissions limitation of 0.041 lb. /MMBtu of CO.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the manufacturer's guaranteed 0.041 lb. /MMBtu emission factor.

If required, CO emissions shall be demonstrated by an emission test performed in accordance with the methods and procedures specified in Methods 1 through 4 and Method 10 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, Southeast District Office.

c. Emission Limitation:

0.020 pound PE/mmBtu of actual heat input

The above limit is based on the required limitations in Ohio Administrative Code (OAC) rule 3745-17-10(B)(1).

Applicable Compliance Method:

Compliance is assumed based on the use of natural gas.

If required, the permittee shall conduct or have conducted a compliance stack test in order to verify with the PE limitation. The compliance stack test shall be determined in accordance with the Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

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

Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

[OAC rule 3745-17-03(B)(1)(a)] and [OAC rule 3745-17-07(A)(1)]

g) Miscellaneous Requirements

(1) None.

2. F001, F001

Operations, Property and/or Equipment Description:

Paved and Unpaved Plant Roadways and Parking Areas

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions.
b.	OAC rule 3745-17-07(B)(5) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	Exempt
c.	OAC rule 3745-17-08(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	Exempt.

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on all paved and unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the paved and unpaved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. Facility is not located in Appendix A of OAC rule 3745-17-08, therefore the fugitive emission are not required to meet emission and/or control standards of OAC rule 3745-17-08.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Work Practice Plan

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

a. An identification of each segment of roadway or parking area for which the plan applies.

b. A determination of the frequency that each roadway or parking area will be inspected to determine if additional control measures are needed.

c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways. This form/record should include, at a minimum, the following elements:

i. Roadway or parking area segment inspected;

ii. Date inspected;

iii. Name of employee who either did the inspection or who can verify that the inspection was completed;

iv. Result of the inspection (needs treated or does not need treated);

v. A description of why no treatment was needed;

vi. Date treated;

vii. Name of employee who either treated the segment or who can verify that the segment was treated; and

viii. Method used to treat the segment.

d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the appropriate District Office or local air agency (DO/Laa) for review and approval. The permittee can begin using the revised Work Practice Plan once the Ohio EPA Southeast District Office has approved its use.

Prior to the approval of the "Work Practice Plan", the permittee shall take steps to assure that this emissions unit is maintained in accordance with the permittee's application, including all control and frequencies listed in the application and supporting documents to ensure that the air pollution is minimized and/or eliminated.

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(3) Work Practice Plan Record Keeping

The permittee shall maintain records of the following information:

a. The records required to be collected under the Work Practice Plan, and

b. The date and reason any element of the Work Practice Plan was not implemented.

The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part I of this permit.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. that identify each day when element of the Work Practice Plan was not implemented or when the emissions unit was not in accordance with the permittee's application and supporting documents.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. Testing Requirements

(1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the Ohio EPA, Southeast District Office.

f) Testing Requirements

(1) Compliance with the emission limitations in Term b)(1) shall be determined in accordance with the following methods:

Emission Limitation:

None.

g) Miscellaneous Requirements

(1) None.

3. J001, J001

Operations, Property and/or Equipment Description:

Truck Loading Rack vented to a flare.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Use of a capture and control system in order to reduce VOC emissions See section b)(2)a.
b.	OAC rule 3745-31-05(F) (voluntary limitation on fugitive emission in order to assure emissions are minimized and/ eliminated).	The fugitive VOC emissions from this emissions unit shall not exceed 13.2 tons per rolling 12 month period.

(2) Additional Terms and Conditions

a. Best available technology (BAT) for this emissions unit has been determined to be use of a flare to minimize and/or eliminate VOC emissions while this emissions unit is processing material.

c) Operational Restrictions

(1) The system that captures and vents the VOC emissions from this emissions unit shall be maintained in accordance with good engineering practice and in a manner that assures maximum VOC emissions are reduced by the associated flare prior to being emitted to the ambient air.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records demonstrating any occurrence when emissions from this emissions unit was not vented to an operating flare prior being emitted to the ambient air. These records shall include the following:

a. The date and time of the occurrence;

b. The duration of the occurrence, in hours;

c. The cause of the occurrence; and

d. The proactive and corrective steps taken to minimize the occurrence and to prevent future occurrences.

(2) The permittee shall maintain records demonstrating any maintenance that is done to this emissions unit and/or associated capture and venting equipment that is to assure that they are maintained in accordance with good engineering practice and in a manner minimizes and/eliminates fugitive emissions to the ambient air.`

(3) While natural gas liquids are being loaded, the permittee shall monitor the vapor recovery system for leaks. If vapor leaks are detected, the permittee shall maintain a record of the following information:

a. the date the leak was detected;

b. the findings of the inspection for the leak, which shall indicate the location, nature, and severity of the leak;

c. the leak detection method;

d. the corrective action(s) taken to repair each leak and the date of final repair;

e. the reasons for any repair interval exceeding 15 calendar days (from the time of detection to the date of final repair) for each leak equal to or greater than one hundred per cent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10; and

f. the inspector's name and signature.

These records shall be retained and accessible for a period of 5 years.

(4) The permittee shall collect and record the following information each month for this emissions unit:

a. The number of pressurized trucks loaded;

b. The estimated fugitive VOC emitted from the pressurized truck loading, in tons, as based on the following equation: Monthly Emissions = [("a" x 0.112 lbs. /truck*) / 2000]

c. The number of gasoline trucks loaded;

d. The estimated fugitive VOC emitted from the gasoline truck loading, in tons, as based on the following equation: Monthly Emissions = [("c" x 0.153 lbs. /truck*) / 2000]

e. The total amount of gasoline processed through this unit, in gallons;

f. Gasoline loading loss in VOC emitted, in tons, as based on the following equation: Monthly Emissions = [("e" / 1,000) x 9.57 lbs. / Mgal*] x (1-98.7% captured);

g. the total fugitive VOC emitted, in tons, based on the following equation: Monthly Total Emissions = "b" + "d" + "f";

h. the rolling, 12-month total combined fugitive VOC emitted from this emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("g") plus the total amount of VOC emissions for the 11 previous calendar months).

* Emissions factors provided by permittee in their application and supporting documents.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each day that natural gas liquid is transferred via the loading rack and the flare was not in operation;

b. any month the fugitive VOC emissions from this emissions unit exceed 13.2 tons per rolling 12 month period; and

c. any leaks in vapor or liquid lines that are not repaired within 15 days after identification (in accordance with d)(2)).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. Testing Requirements

f) 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:

(1) Emissions Limitation:

The fugitive VOC emissions from this emissions unit shall not exceed 13.2 tons per rolling 12 month period

The above emission limitation is based on the following equation:

$AER = \{(Pt \times Ef_1) + (Gt \times Ef_2) + [(Gp \times Ef_3) \times (1-Ce)]\} /2000)$

Where:

AER = Annual emissions rate, in tons per year;

Pt = Pressurized trucks loaded per year, ((75,000), from permittee's application and calculation sheet);

Gt = Gasoline trucks loaded per year, ((15,938),from permittee's application and calculation sheet).

Gp = Gasoline processed in thousands of gallons per year, Mgals.,

Gp = (Gt x 8,000 gallons per truck)/1000 = 127,504 Mgal/yr

Ef = Emission factor in pounds of VOC emitted per truck:

Ef_1= Pressurized trucks, ((0.112), from permittee application and calculation sheet); and

Ef_2 = Gasoline trucks, ((0.153), from permittee application and calculation sheet); and

Ef_3 = Loading loss, ((9.57), worst case from permittee application and calculation sheet);

Ce = Loading collection efficiency, (98.7%, (0.987), from permittee application and calculation sheet).

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in section d) of this permit

g) Miscellaneous Requirements

(1) None.

4. J003, J003

Operations, Property and/or Equipment Description:

Railcar Loading #2 vented to a flare

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Use of a capture and control system in order to reduce VOC emissions See section b)(2)a.
b.	OAC rule 3745-31-05(F) (voluntary limitation on fugitive emission in order to assure emissions are minimized and/ eliminated).	The fugitive VOC emissions from this emissions unit shall not exceed 27.0 tons per rolling 12 month period.

(2) Additional Terms and Conditions

a. Best available technology (BAT) for this emissions unit has been determined to be use of a flare to minimize and/or eliminate VOC emissions while this emissions unit is processing material.

c) Operational Restrictions

(1) The system that captures and vents the VOC emissions from this emissions unit shall be maintained in accordance with good engineering practice and in a manner that assures maximum VOC emissions are reduced by the associated flare prior to being emitted to the ambient air.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records demonstrating any occurrence when emissions from this emissions unit was not vented to an operating flare prior being emitted to the ambient air. These records shall include the following:

a. The date and time of the occurrence;

b. The duration of the occurrence, in hours;

c. The cause of the occurrence; and

d. The proactive and corrective steps taken to minimize the occurrence and to prevent future occurrences.

(2) The permittee shall maintain records demonstrating any maintenance that is done to this emissions unit and/or associated capture and venting equipment that is to assure that they are maintained in accordance with good engineering practice and in a manner minimizes and/eliminates fugitive emissions to the ambient air.`

(3) While natural gas liquids are being loaded, the permittee shall monitor the vapor recovery system for leaks. If vapor leaks are detected, the permittee shall maintain a record of the following information:

a. the date the leak was detected;

b. the findings of the inspection for the leak, which shall indicate the location, nature, and severity of the leak;

c. the leak detection method;

d. the corrective action(s) taken to repair each leak and the date of final repair;

e. the reasons for any repair interval exceeding 15 calendar days (from the time of detection to the date of final repair) for each leak equal to or greater than one hundred per cent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10; and

f. the inspector's name and signature.

These records shall be retained and accessible for a period of 5 years.

(4) The permittee shall collect and record the following information each month for this emissions unit:

a. The number of pressurized railcars loaded;

b. The estimated fugitive VOC emitted from the pressurized railcar loading, in tons, as based on the following equation: Monthly Emissions = [("a" x 0.057 lbs. /railcar*) / 2000]

c. The number of gasoline trucks loaded;

d. The estimated fugitive VOC emitted from the gasoline railcar loading, in tons, as based on the following equation: Monthly Emissions = [("c" x 0.083 lbs. /truck*) / 2000]

e. The total amount of gasoline processed through this unit, in gallons;

f. Gasoline loading loss in VOC emitted, in tons, as based on the following equation: Monthly Emissions = [("e" / 1,000) x 9.57 lbs. / Mgal*] x (1-98.7% captured);

g. the total fugitive VOC emitted, in tons, based on the following equation: Monthly Total Emissions = "b" + "d" + "f";

h. the rolling, 12-month total combined fugitive VOC emitted from this emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("g") plus the total amount of VOC emissions for the 11 previous calendar months).

* Emissions factors provided by permittee in their application and supporting documents.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each day that natural gas liquid is transferred via the loading rack and the flare was not in operation;

b. any month the fugitive VOC emissions from this emissions unit exceed 27.0 tons per rolling 12 month period; and

c. any leaks in vapor or liquid lines that are not repaired within 15 days after identification (in accordance with d)(2)).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. Testing Requirements

f) 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:

The fugitive VOC emissions from this emissions unit shall not exceed 27.0 tons per rolling 12 month period

The above emission limitation is based on the following equation:

$AER = \{(Pr \times Ef_1) + (Gr \times Ef_2) + [(Gp \times Ef_3) \times (1-Ce)]\} /2000)$

Where:

AER = Annual emissions rate, in tons per year;

Pr= Pressurized rail cars loaded per year, ((53,333), from permittee's application and calculation sheet);

Gr = Gasoline rail cars loaded per year, ((13,333),from permittee's application and calculation sheet).

Gp = Gasoline processed in thousands of gallons per year, Mgals.,

Gp = (Gt x 30,000 gallons per railcar)/1000 = 399,990 Mgal/yr

Ef = Emission factor in pounds of VOC emitted per railcars:

Ef_1= Pressurized railcar, ((0.057), from permittee application and calculation sheet); and

Ef_2 = Gasoline railcars, ((0.083), from permittee application and calculation sheet); and

Ef_3 = Loading loss, ((9.57), worst case from permittee application and calculation sheet);

Ce = Loading collection efficiency, (98.7%, (0.987), from permittee application and calculation sheet).

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in section d) of this permit

g) Miscellaneous Requirements

(1) None.

5. P002, P002

Operations, Property and/or Equipment Description:

Railroad Loading Flare

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	The requirements of this rule include compliance with 40 CFR Part 60, Subpart OOO and Wa. See section b)(2)a. and b., below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See section b)(2)c., below.
c.	40 CFR Part 60, Subparts A, OOOO and VVa. (40 CFR 60.18, 60.5360-5430 and 60.480a – 60.489a) [In accordance with 40 CFR 60.5365(f)(3), this emissions unit consists of a flare used to control emissions from pressure relief devices in a process unit in onshore natural gas located at an processing plant constructed after August 23,2011.]	The flare shall be designed and operated with no visible particulate emissions, except for periods not to exceed a total of five minutes during any two consecutive hours. The pressure relief devices in a process unit located at an onshore natural gas processing plant are exempt from the requirements of NSPS Subpart OOOO if they are subject to and controlled according to NSPS Subpart VVa. See sections b)(2)d.-g and c)(2), below. See sections c)(1), d(1) and e(3), below.

(2) Additional Terms and Conditions

a. Best available technology (BAT) for this emissions unit has been determined to be compliance with 40 CFR Part 60, Subpart OOO and Wa.

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

[OAC rule 3745-31-05(A)(3)]

c. 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.

[OAC rule 3745-31-05(A)(3)(a)(ii)]

d. No later than 180 days after issuance of this permit, the permittee shall demonstrate compliance with the applicable requirements of 40 CFR 60.60.482-4 and 60.482-10.

e. 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.

f. Any pressure relief device that is routed to a process or fuel gas system or equipped with a closed vent system capable of capturing and transporting leakage through the pressure relief device to a control device as described in 40 CFR 60.482–10 is exempted from the requirements of paragraphs (a) and (b) of 40 CFR 60.482-4.

g. Pursuant to 40 CFR 60.482-10(d), flares used to comply with 40 CFR 60.482 shall comply with the requirements of 40 CFR 60.18.

c) Operational Restrictions

(1) The permittee shall burn only natural gas as pilot gas in this emissions unit, except during an emergency.

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

60.5365(f)(3), 60.482-10(m), 60.482-10a(b) and 60.18(e)	Operate closed vent systems and control devices used to comply with the provisions of 60.482 at all times when emissions may be vented to them.
60.5365(f)(3) and 60.482-10(g)	Repair all leaks detected for the closed vent system within 15 days with a first attempt at repair occurring within 5 days of detection except as provided by rule (e.g., delay of repair, unsafe to inspect, difficult to inspect).
60.5365(f)(3) and 60.482-10a(d) and 60.18(c)(2)	Operate the flare with a flame present at all times.

60.5365(f)(3), 60.482-10a(d), 60.18(c)(3), 60.18(c)(3)(ii), 60.18(c)(5), 60.18(e), 60.485a(g)(3), (g)(4) , and 60.18(f)(3) and (6)	Adhere to the minimum net heating value of gas specified in 60.18(c)(3)(ii) and maximum tip velocity specifications in 60.18(c)(4). Calculate heat content as specified in 60.485a(g)(4) and 60.18(f)(3). Calculate exit velocities as specified in 60.485a(g)(3) and 60.18(f)(6).

d) Monitoring and/or Recordkeeping Requirements

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

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

60.5365(f)(3), 60.485a(g)(2) and 60.18(f)(2).	Monitor presence of flare pilot flame using a thermocouple or equivalent device.
60.5365(f)(3), 60.18(d)	Owners or operators of flares used to comply with the provisions of this subpart shall monitor these control devices to ensure that they are operated and maintained in conformance with their designs. Applicable subparts will provide provisions stating how owners or operators of flares shall monitor these control devices.
60.482-10a(e), and 60.5365(f)(3)	Monitor and operate control equipment in conformance with design.
60.482-10a(f),and 60.5365(f)(3)	Closed vent system inspection procedures and schedule.
60.486a(d)	Closed vent system and control device design requirements recordkeeping (design specifications, parametric monitoring, operating records)
60.486a(e)	Subject equipment recordkeeping requirements (equipment identification, visual inspections, instrument calibrations, connector monitoring, pressure relief device releases)

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. Each day when a fuel other than natural gas was burned as pilot gas in this emissions unit; and

b. Each day that this emissions unit was no operated in compliance with 40 CFR Part 60, Subparts A, OOOO and VVa and/or not accordance with the permit application and supporting documents.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. Testing Requirements

(2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subparts A,OOOO and VVa, including the following sections:

60.7(a)	Initial notification of the date construction the affected facility commenced and the actual date of the initial startup of the affected facility.
60.5365(f)(3) and 60.487(a)	Submit semiannual reports beginning six months after the initial startup date.
60.5365(f)(3) and 60.487(b) and (c)	Initial and subsequent semiannual report requirements.

f) Testing Requirements

(1) Performance testing shall be conducted as required in 40 CFR Part 60, Subparts A and OOOO pursuant to 40 CFR 60.18(f)(1), 60.5365(f)(3) and 60.485. 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 6 months of the issuance of this permit and within 6 months prior to the expiration of future permits, unless an alternative schedule is submitted and approved by Ohio EPA, Southeast District Office.

b. The emissions testing shall be conducted to demonstrate compliance with the visible particulate emission limitation for the flare in accordance with the requirements of 40 CFR 60.485.

c. The following test method shall be employed to demonstrate compliance with the allowable emission rate for visible particulate emissions - Method 22 of 40 CFR Part 60, Appendix A.

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 Ohio EPA, Southeast District Office. 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.

No later than thirty (30) days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emissions test(s).

Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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 Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

g) Miscellaneous Requirements

(1) None.

6. P003, P003

Operations, Property and/or Equipment Description:

Plant Emergency Flare #2 - One (1) air-assisted flare that will be used to control emergency process releases from the fractionation facility. The flare will be equipped with natural gas pilot burners, and natural gas will be used to purge the flare header to avoid flash back and resulting over-pressurization.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	The requirements of this rule include compliance with 40 CFR Part 60, Subpart OOO and Wa. See section b)(2)a. and b., below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See section b)(2)c., below.
c.	40 CFR Part 60, Subparts A, OOOO and VVa. (40 CFR 60.18, 60.5360-5430 and 60.480a – 60.489a) [In accordance with 40 CFR 60.5365(f)(3), this emissions unit consists of a flare used to control emissions from pressure relief devices in a process unit in onshore natural gas located at an processing plant constructed after August 23,2011.]	The flare shall be designed and operated with no visible particulate emissions, except for periods not to exceed a total of five minutes during any two consecutive hours. The pressure relief devices in a process unit located at an onshore natural gas processing plant are exempt from the requirements of NSPS Subpart OOOO if they are subject to and controlled according to NSPS Subpart VVa. See sections b)(2)d.-g and c)(2), below. See sections c)(1), d(1) and e(3), below.

(2) Additional Terms and Conditions

a. Best available technology (BAT) for this emissions unit has been determined to be compliance with 40 CFR Part 60, Subpart OOO and Wa..

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

[OAC rule 3745-31-05(A)(3)]

c. 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.

[OAC rule 3745-31-05(A)(3)(a)(ii)]

d. No later than 180 days after issuance of this permit, the permittee shall demonstrate compliance with the applicable requirements of 40 CFR 60.60.482-4 and 60.482-10.

e. 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.

f. Any pressure relief device that is routed to a process or fuel gas system or equipped with a closed vent system capable of capturing and transporting leakage through the pressure relief device to a control device as described in 40 CFR 60.482–10 is exempted from the requirements of paragraphs (a) and (b) of 40 CFR 60.482-4.

g. Pursuant to 40 CFR 60.482-10(d), flares used to comply with 40 CFR 60.482 shall comply with the requirements of 40 CFR 60.18.

c) Operational Restrictions

(1) The permittee shall burn only natural gas as pilot gas in this emissions unit, except during an emergency.

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

60.5365(f)(3), 60.482-10(m), 60.482-10a(b) and 60.18(e)	Operate closed vent systems and control devices used to comply with the provisions of 60.482 at all times when emissions may be vented to them.
60.5365(f)(3) and 60.482-10(g)	Repair all leaks detected for the closed vent system within 15 days with a first attempt at repair occurring within 5 days of detection except as provided by rule (e.g., delay of repair, unsafe to

	inspect, difficult to inspect).
60.5365(f)(3) and 60.482-10a(d) and 60.18(c)(2)	Operate the flare with a flame present at all times.
60.5365(f)(3), 60.482-10a(d), 60.18(c)(3), 60.18(c)(3)(ii), 60.18(c)(5), 60.18(e), 60.485a(g)(3), (g)(4) , and 60.18(f)(3) and (6)	Adhere to the minimum net heating value of gas specified in 60.18(c)(3)(ii) and maximum tip velocity specifications in 60.18(c)(4). Calculate heat content as specified in 60.485a(g)(4) and 60.18(f)(3). Calculate exit velocities as specified in 60.485a(g)(3) and 60.18(f)(6).

d) Monitoring and/or Recordkeeping Requirements

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

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

60.5365(f)(3), 60.485a(g)(2) and 60.18(f)(2).	Monitor presence of flare pilot flame using a thermocouple or equivalent device.
60.5365(f)(3), 60.18(d)	Owners or operators of flares used to comply with the provisions of this subpart shall monitor these control devices to ensure that they are operated and maintained in conformance with their designs. Applicable subparts will provide provisions stating how owners or operators of flares shall monitor these control devices.
60.482-10a(e), and 60.5365(f)(3)	Monitor and operate control equipment in conformance with design.
60.482-10a(f),and 60.5365(f)(3)	Closed vent system inspection procedures and schedule.
60.486a(d)	Closed vent system and control device design requirements recordkeeping (design specifications, parametric monitoring, operating records)
60.486a(e)	Subject equipment recordkeeping requirements (equipment identification, visual

	inspections, instrument calibrations, connector monitoring, pressure relief device releases)

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. Each day when a fuel other than natural gas was burned as pilot gas in this emissions unit; and

b. Each day that this emissions unit was no operated in compliance with 40 CFR Part 60, Subparts A, OOOO and VVa and/or not accordance with the permit application and supporting documents.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. Testing Requirements

(2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subparts A,OOOO and VVa, including the following sections:

60.7(a)	Initial notification of the date construction the affected facility commenced and the actual date of the initial startup of the affected facility.
60.5365(f)(3) and 60.487(a)	Submit semiannual reports beginning six months after the initial startup date.
60.5365(f)(3) and 60.487(b) and (c)	Initial and subsequent semiannual report requirements.

f) Testing Requirements

(1) Performance testing shall be conducted as required in 40 CFR Part 60, Subparts A and OOOO pursuant to 40 CFR 60.18(f)(1), 60.5365(f)(3) and 60.485. 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 6 months of the issuance of this permit and within 6 months prior to the expiration of future permits, unless an alternative schedule is submitted and approved by Ohio EPA, Southeast District Office.

b. The emissions testing shall be conducted to demonstrate compliance with the visible particulate emission limitation for the flare in accordance with the requirements of 40 CFR 60.485.

c. The following test method shall be employed to demonstrate compliance with the allowable emission rate for visible particulate emissions - Method 22 of 40 CFR Part 60, Appendix A.

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 Ohio EPA, Southeast District Office. 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.

No later than thirty (30) days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emissions test(s).

Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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 Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

g) Miscellaneous Requirements

(1) None.

7. P004, P004

Operations, Property and/or Equipment Description:

Railyard Flare #2 - One (1) air-assisted flare that will be used to control vapors displaced from Railcar Loading #2 (J003). The flare will be equipped with a natural gas pilot burner, and air will be used to purge the flare header to avoid flash back and resulting over-pressurization. MarkWest will also introduce methane, as needed, to supplement the combustion of the vapors displaced from J003.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	The requirements of this rule include compliance with 40 CFR Part 60, Subpart OOO and Wa. See section b)(2)a. and b., below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See section b)(2)c., below.
c.	40 CFR Part 60, Subparts A, OOOO and VVa. (40 CFR 60.18, 60.5360-5430 and 60.480a – 60.489a) [In accordance with 40 CFR 60.5365(f)(3), this emissions unit consists of a flare used to control emissions from pressure relief devices in a process unit in onshore natural gas located at an processing plant constructed after August 23,2011.]	The flare shall be designed and operated with no visible particulate emissions, except for periods not to exceed a total of five minutes during any two consecutive hours. The pressure relief devices in a process unit located at an onshore natural gas processing plant are exempt from the requirements of NSPS Subpart OOOO if they are subject to and controlled according to NSPS Subpart VVa. See sections b)(2)d.-g and c)(2), below. See sections c)(1), d(1) and e(3), below.

(2) Additional Terms and Conditions

a. Best available technology (BAT) for this emissions unit has been determined to be compliance with 40 CFR Part 60, Subpart OOO and Wa..

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

[OAC rule 3745-31-05(A)(3)]

c. 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.

[OAC rule 3745-31-05(A)(3)(a)(ii)]

d. No later than 180 days after issuance of this permit, the permittee shall demonstrate compliance with the applicable requirements of 40 CFR 60.60.482-4 and 60.482-10.

e. 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.

f. Any pressure relief device that is routed to a process or fuel gas system or equipped with a closed vent system capable of capturing and transporting leakage through the pressure relief device to a control device as described in 40 CFR 60.482–10 is exempted from the requirements of paragraphs (a) and (b) of 40 CFR 60.482-4.

g. Pursuant to 40 CFR 60.482-10(d), flares used to comply with 40 CFR 60.482 shall comply with the requirements of 40 CFR 60.18.

c) Operational Restrictions

(1) The permittee shall burn only natural gas as pilot gas in this emissions unit, except during an emergency.

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

60.5365(f)(3), 60.482-10(m), 60.482-10a(b) and 60.18(e)	Operate closed vent systems and control devices used to comply with the provisions of 60.482 at all times when emissions may be vented to them.
60.5365(f)(3) and 60.482-10(g)	Repair all leaks detected for the closed vent system within 15 days with a first attempt at repair occurring within 5 days of detection except as provided by rule (e.g., delay of repair, unsafe to

	inspect, difficult to inspect).
60.5365(f)(3) and 60.482-10a(d) and 60.18(c)(2)	Operate the flare with a flame present at all times.
60.5365(f)(3), 60.482-10a(d), 60.18(c)(3), 60.18(c)(3)(ii), 60.18(c)(5), 60.18(e), 60.485a(g)(3), (g)(4) , and 60.18(f)(3) and (6)	Adhere to the minimum net heating value of gas specified in 60.18(c)(3)(ii) and maximum tip velocity specifications in 60.18(c)(4). Calculate heat content as specified in 60.485a(g)(4) and 60.18(f)(3). Calculate exit velocities as specified in 60.485a(g)(3) and 60.18(f)(6).

d) Monitoring and/or Recordkeeping Requirements

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

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

60.5365(f)(3), 60.485a(g)(2) and 60.18(f)(2).	Monitor presence of flare pilot flame using a thermocouple or equivalent device.
60.5365(f)(3), 60.18(d)	Owners or operators of flares used to comply with the provisions of this subpart shall monitor these control devices to ensure that they are operated and maintained in conformance with their designs. Applicable subparts will provide provisions stating how owners or operators of flares shall monitor these control devices.
60.482-10a(e), and 60.5365(f)(3)	Monitor and operate control equipment in conformance with design.
60.482-10a(f),and 60.5365(f)(3)	Closed vent system inspection procedures and schedule.
60.486a(d)	Closed vent system and control device design requirements recordkeeping (design specifications, parametric monitoring, operating records)
60.486a(e)	Subject equipment recordkeeping requirements (equipment identification, visual

	inspections, instrument calibrations, connector monitoring, pressure relief device releases)

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. Each day when a fuel other than natural gas as pilot gas was burned in this emissions unit; and

b. Each day that this emissions unit was no operated in compliance with 40 CFR Part 60, Subparts A, OOOO and VVa and/or not accordance with the permit application and supporting documents.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. Testing Requirements

(2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subparts A,OOOO and VVa, including the following sections:

60.7(a)	Initial notification of the date construction the affected facility commenced and the actual date of the initial startup of the affected facility.
60.5365(f)(3) and 60.487(a)	Submit semiannual reports beginning six months after the initial startup date.
60.5365(f)(3) and 60.487(b) and (c)	Initial and subsequent semiannual report requirements.

f) Testing Requirements

(1) Performance testing shall be conducted as required in 40 CFR Part 60, Subparts A and OOOO pursuant to 40 CFR 60.18(f)(1), 60.5365(f)(3) and 60.485. 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 6 months of the issuance of this permit and within 6 months prior to the expiration of future permits, unless an alternative schedule is submitted and approved by Ohio EPA, Southeast District Office.

b. The emissions testing shall be conducted to demonstrate compliance with the visible particulate emission limitation for the flare in accordance with the requirements of 40 CFR 60.485.

c. The following test method shall be employed to demonstrate compliance with the allowable emission rate for visible particulate emissions - Method 22 of 40 CFR Part 60, Appendix A.

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 Ohio EPA, Southeast District Office. 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.

No later than thirty (30) days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emissions test(s).

Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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 Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

g) Miscellaneous Requirements

(1) None.

8. P801, P801

Operations, Property and/or Equipment Description:

Fugitive Equipment Leaks

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	The requirements of this rule include compliance with 40 CFR Part 60, Subpart OOO and Wa. See section b)(2)a. and b., below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See section b)(2)c., below.
c.	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), this emissions unit consists of equipment within a process unit at an onshore natural gas processing plant constructed after August 23,2011.]	See sections b)(2)c-f. below.

(2) Additional Terms and Conditions

a. Best available technology (BAT) for this emissions unit has been determined to be compliance with 40 CFR Part 60, Subpart OOO and Wa.

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)(ii) (the

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

[OAC rule 3745-31-05(A)(3)]

c. 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.

[OAC rule 3745-31-05(A)(3)(a)(ii)]

d. In accordance with 40 CFR Part 60 Subparts OOOO and VVa, 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, compressors and pressure relief devices.

e. No later than 180 days after issuance of this permit, 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.

f. 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) and 60.482-3(a)	Equip each compressor with a seal system that includes a barrier fluid system that prevents leakage of VOC to the atmosphere, except as provided in 60.482–1(c) and 60.482-3(h), (i), and (j).
60.5400(a) and 60.482-3(b) through (g)	Operate each compressor seal system and barrier fluid system in accordance with 40.482-3(b) through (g).
60.5400(a), 60.482-3(i) and 60.486(e)	Meet the requirements of 60.482-3(i) for compressors designated for no detectable emissions (less than 500 ppm above background) in lieu of 60.482-3(a) through (h).
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.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. Each day that this emissions unit was no operated in compliance with 40 CFR Part 60, Subparts A, OOOO and VVa and/or not accordance with the permit application and supporting documents.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. Testing Requirements

(2) 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 section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

None.

g) Miscellaneous Requirements

(1) None.