



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

Certified Mail

9/25/2015

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

Jim Alexander
Summerfield Compressor Station
801 E. 86th Ave
Merrillville, IN 46410

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0661005062
Permit Number: P0119124
Permit Type: Initial Installation
County: Noble

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

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: Ohio EPA-SEDO



FINAL

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

Facility ID:	0661005062
Permit Number:	P0119124
Permit Type:	Initial Installation
Issued:	9/25/2015
Effective:	9/25/2015
Expiration:	9/25/2025



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

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Final Permit-to-Install and Operate
Summerfield Compressor Station
Permit Number: P0119124
Facility ID: 0661005062
Effective Date: 9/25/2015

Authorization

Facility ID: 0661005062
Application Number(s): A0053741, A0054090
Permit Number: P0119124
Permit Description: Natural gas transmission facility consisting of the following emissions units: two (2) turbines rated at 7431 hp, an emergency engine, fugitive VOC leaks and blowdown maintenance operations.
Permit Type: Initial Installation
Permit Fee: \$950.00
Issue Date: 9/25/2015
Effective Date: 9/25/2015
Expiration Date: 9/25/2025
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Summerfield Compressor Station
Town Hwy 209
Summerfield, OH 43779

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0119124

Permit Description: Natural gas transmission facility consisting of the following emissions units: two (2) turbines rated at 7431 hp, an emergency engine, fugitive VOC leaks and blowdown maintenance operations.

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

- Emissions Unit ID: P003**
 Company Equipment ID: B001
 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: P100
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Group Name: Turbines #1,#2

Emissions Unit ID:	P001
Company Equipment ID:	P001
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



Final Permit-to-Install and Operate
Summerfield Compressor Station
Permit Number: P0119124
Facility ID: 0661005062
Effective Date: 9/25/2015

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



Final Permit-to-Install and Operate
Summerfield Compressor Station
Permit Number: P0119124
Facility ID: 0661005062
Effective Date: 9/25/2015

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subpart KKKK, Standards of Performance for Stationary Combustion Turbines: P001 and P002. The complete New Source Performance Standards (NSPS) requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northwest District Office.
3. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines:P003. The complete New Source Performance Standards (NSPS) requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northwest District Office.
4. The permittee is advised that this facility may be subject to the "Generally Available Control Technology" (GACT) requirements under Title 40 of the Code of Regulations, Part 63, Subpart ZZZZ, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines. At this time the Ohio EPA is not accepting the delegating authority to enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this Subpart (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.



Final Permit-to-Install and Operate
Summerfield Compressor Station
Permit Number: P0119124
Facility ID: 0661005062
Effective Date: 9/25/2015

C. Emissions Unit Terms and Conditions

1. P003

Operations, Property and/or Equipment Description:

1175 hp NG Waukesha Emergency Generator

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

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

a. b)(1)i. and d)(3).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	1.30 ton nitrogen oxides (NOx)/yr; 0.84 ton carbon monoxide (CO)/yr; 0.02 ton particulate matter less than 10 micron in diameter (PM10)/yr; 0.03 ton volatile organic compounds (VOC)/yr; 0.13 ton sulfur dioxide (SO2)/yr See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 6/30/08	PM10 emissions shall not exceed 0.01 lb/MMBtu NOx emissions shall not exceed 2.00 g/hp-hr or 160 ppmvd at 15% O ₂ .

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		CO emissions shall not exceed 4.0 g/hp-hr or 540 ppmvd at 15% O ₂ . VOC emissions shall not exceed 1.0 g/hp-hr or 86 ppmvd at 15% O ₂ . SO ₂ emissions shall not exceed 0.0571 lb SO ₂ /mmBtu See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/08	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO _x , SO ₂ , PM ₁₀ , CO and VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)c.
c.	40 CFR, Part 60, Subpart JJJJ	NO _x emissions shall not exceed 2.00 g/hp-hr or 160 ppmvd at 15% O ₂ . CO emissions shall not exceed 4.0 g/hp-hr or 540 ppmvd at 15% O ₂ . VOC emissions shall not exceed 1.0 g/hp-hr or 86 ppmvd at 15% O ₂ . See b)(2)d.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule
e.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 pound/MMBtu actual heat input.
f.	OAC rule 3745-18-06(G)	See b)(2)e.
g.	OAC rule 3745-110-03(F)	See b)(2)f.
h.	40 CFR, Part 63, Subpart ZZZZ 40 CFR 63.6590(c)(1)	See b)(2)g.
i.	OAC rule 3745-114 ORC 3704.03(F)	See d)(3)

(2) Additional Terms and Conditions

- a. This permit establishes legally and practically enforceable emission limitations in b)(1)a.for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established

under OAC rule 3745-31-05(F) and are based on the operational restriction in c)(1).

- b. This 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).
- 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.
- d. The stationary emergency spark ignition (SI) internal combustion engine (ICE) is subject to and shall be operated in compliance with the requirements of 40 CFR, Part 60, Subpart JJJJ, standards of performance for stationary SI ICE. The permittee shall also comply with all applicable requirements of 40 CFR Part 60.4246 (General Provisions) as identified in Table 3 of 40 CFR Part 60, Subpart JJJJ.
- e. This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) in accordance with OAC rule 3745-18-06(A).
- f. This emissions unit is not subject to this rule pursuant to OAC rule 3745-110-03(K)(3).
- g. A new or reconstructed stationary RICE located at an area source will be compliant with 40 CFR, Part 63, Subpart ZZZZ by meeting the requirements of 40 CFR, Part 60, Subpart JJJJ.

c) Operational Restrictions

- (1) The maximum annual hours of operation for this emissions unit shall not exceed 500 hours.
- (2) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the hours of operation of the emergency generator (in hours per month and total hours, to date for the calendar year).
- (3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air

contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

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:
2.0 g NOx/hp-hr
4.0 g CO/hp-hr
1.0 g VOC/hp-hr
0.01 lb PM10/MMBtu
0.0571 lb SO2/mmBtu

Applicable Compliance Method:

Compliance with the emission limitations above shall be based on the manufacturer's certification and by maintaining the engine according to the manufacturer's specifications. The g/hp-hr limits are the emission limitations from Table 1 of 40 CFR, Part 60, Subpart JJJJ, the emission standards for emergency engines greater than 130 horsepower. The lb/mmBtu re emission limitations are from AP-42, Table 3.2-2 (7/00).

- b. Emission Limitation:
1.3 ton NOx/yr
0.84 ton CO/yr
0.02 ton PM10/yr
0.03 ton VOC/yr
0.13 ton SO2/yr

Applicable Compliance Method:

The NOx, CO and VOC emission limitations were determined by multiplying the g/hp-hr limitation by 1175 hp, a conversion factor of lb/453.59 g and 500 hours/yr of operation, then dividing by 2000 lbs/ton. The PM10 and SO2 emission limitations were determined by multiplying the lb/mmBtu limitation by 9.09 mmBtu/hr and 500 hours/yr of operation, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hours of operation restriction, compliance with the annual emission limitations shall also be demonstrated.



- c. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).

- d. Emission Limitation:
PE shall not exceed 0.062 pound/MMBtu actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

- (1) None.

2. P004

Operations, Property and/or Equipment Description:

Maintenance Activities including Blowdown

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/08	<p>Volatile Organic Compound (VOC) emissions shall not exceed 0.54ton/month as a rolling, 12-month average.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/08	<p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year.</p> <p>See b)(2)b.</p>
c.	OAC rule 3745-114 ORC 3704.03(F)	See d)(2)

- (2) Additional Terms and Conditions
 - a. This BAT emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
 - b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall record the following information each month:
 - a. the date and number of each equipment blowdown event;
 - b. percent VOC fraction in the gas stream obtained by representative sampling and analysis (e.g., chromatography);
 - c. the volume of gas emitted from all release events from each type of equipment, in scf;
 - d. the rolling, 12-month summation of the volume of gas emitted from all release events from each type of equipment, in scf; and
 - e. the rolling, 12-month summation of VOC emissions and the average calculated over each rolling 12-month period.
 - (2) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.
- e) Reporting Requirements
 - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

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

- a. Emission Limitation:

VOC emissions shall not exceed 0.54 ton per month averaged over a 12-month rolling period.

Applicable Compliance Method:

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

(1) Released Volume (scf) event	(2) 0.9325	(3) 0.0422 lb scf	(4) 0.039	100 events year	1 ton 2000 lbs	1 year 12 months
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Where:

- (1) Maximum volume of gas vented for Blowdowns (84856 scf/event)
- (2) Volume % of methane in Natural Gas
- (3) Gas density in lbs/scf for methane
- (4) Ratio of VOC to methane as calculated from gas composition

g) Miscellaneous Requirements

- (1) None.

3. P801

Operations, Property and/or Equipment Description:

Fugitive VOC Leaks

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective June 30, 2008	Fugitive volatile organic compound (VOC) emissions shall not exceed 0.15 ton per month averaged over a 12-month rolling period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate taking into account the voluntary restriction of 3745-31-05(E) is less than 10 tons/year. See b)(2)b.
c.	OAC rule 3745-114 ORC 3704.03(F)	See d)(2)

- (2) Additional Terms and Conditions
 - a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
 - b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform weekly inspections, each day that an operator is at the facility and when the facility is in operation, for indications of releases from the pressure relief valves, and any olfactory, visual or auditory indications of equipment leaks. The positive indication of a release or a leak shall be noted in an operations log, along with the following information:
 - a. the name of the inspector;
 - b. the date and time inspected;
 - c. the identification of the pressure relief valve that released and/or piece of equipment that leaked;
 - d. the estimated or calculated duration of the pressure relief valve release and/or equipment leak and the estimated emission totals; and
 - e. any corrective actions taken to minimize or eliminate the release or leak.
 - (2) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.
- e) Reporting Requirements
 - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

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:

VOC emissions shall not exceed 0.23 ton/month as a rolling, 12-month average.

Applicable Compliance Method:

Compliance with the fugitive VOC emissions limitation shall be demonstrated by the following calculation based on the emissions factors provided in Table 2-4 of US EPA's Protocol for Equipment Leak Emission Estimates (11/95) for components in gas, light oil, and water/oil service and the information provided in the permittee's application:

$$\sum \left(\text{component count} * \text{max leak rates} * \text{VOC fraction} * \frac{8,760 \text{ hr}}{\text{yr}} * \frac{1 \text{ ton}}{2,000 \text{ lb}} * \frac{\text{yr}}{12 \text{ m rolling}} \right) \leq 0.15 \frac{\text{ton}}{12 \text{ m rolling}}$$

Where component counts, max leak rates, and VOC fractions are based on the data provided in the permittee's application.

g) Miscellaneous Requirements

- (1) None.

4. Emissions Unit Group -Turbines #1,#2: P001,P002,

EU ID	Operations, Property and/or Equipment Description
P001	Turbine #1 -60.87 mmBtu/hr Solar Taurus 60
P002	Turbine #2 -60.87 mmBtu/hr Solar Taurus 60

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

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

a. b)(1)i. and d)(3)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	0.1 lb nitrogen oxides (NOx)/MMBtu of actual heat input 0.122 lb carbon monoxide (CO)/MMBtu of actual heat input
b.	OAC rule 3745-31-05(A)(3), as effective 6/30/08	0.0066 lb particulate matter less than 10 micron in diameter (PM ₁₀)/MMBtu of actual heat input 0.007 lb volatile organic compounds (VOC)/MMBtu of actual heat input 0.000714 lb sulfur dioxide (SO ₂)/MMBtu of actual heat input See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/08	e Best Available Technology (BAT) requirements under OAC rule 3745-31-



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		05(A)(3) do not apply to the PM10, SO2 and VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)b.
d.	40 CFR, Part 60, Subpart KKKK	Nitrogen oxides (NOx) emissions shall not exceed 25 ppmvd at 15% oxygen. SO ₂ emissions shall not exceed 110 nanograms per Joule (ng/J), or the permittee shall burn fuel which restrains potential sulfur emissions to less than 0.06 lb SO ₂ /MMBtu See Table 1 of 40 CFR, Part 60, Subpart KKKK See b)(2)c., c)(2), d)(2), e)(3) and f)(3)
e.	OAC rule 3745-18-06(F)	See b)(2)d.
f.	OAC rule 3745-17-11(B)(4)	Particulate emissions (PE) shall not exceed 0.040 lb/MMBtu See b)(2)e.
g.	OAC rule 3745-17-07(A)	Visible PE from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
h.	OAC rule 3745-110-03(E)	This emission limitation established pursuant to this rule is less stringent than the limitation established under 40 CFR, 60, Subpart KKKK.
i.	OAC rule 3745-114 ORC 3704.03(F)	See d)(3)

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.



- c. BAT for SO₂ is more stringent than the SO₂ emission requirements limitation pursuant to 40 CFR, Part 60, Subpart KKKK. However, when the U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption), the more stringent BAT requirements will no longer apply. This does not relieve the permittee of any applicable requirement established pursuant to 40 CFR Part 60, Subpart KKKK and instead the permittee shall demonstrate compliance with the more stringent BAT standard (0.000714 pound SO₂ per MMBtu) in accordance with the applicable monitoring, recordkeeping, reporting, and testing requirements identified in 40 CFR, Part 60, Subpart KKKK.
- d. The emissions unit is exempt from the requirements of OAC rule 3745-18-06(F) in accordance with OAC rule 3745-18-06(A).
- e. BAT for PM₁₀ is more stringent than the PE emission limitation pursuant to OAC rule 3745-17-11(B)(4). However, when the U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption), the more stringent BAT requirements will no longer apply. This does not relieve the permittee of any applicable requirement established pursuant to OAC rule 3745-17-11(B)(4) and instead the permittee shall demonstrate compliance with the more stringent BAT standard (0.0066 lb PM₁₀/MMBtu) in accordance with the applicable monitoring, recordkeeping, reporting, and testing requirements identified in OAC rule 3745-17-11(B)(4).

c) Operational Restrictions

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

60.4320(a)	Emission limits for NO _x
60.4333(a)	Good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction
60.4330(a)(1) and (2)	Emission limitations for SO ₂ and sulfur fuel requirements

d) Monitoring and/or Recordkeeping Requirements

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



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

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

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (3) The permittee shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart KKKK, including the following sections:

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

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



Applicable Compliance Method:

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

If required, NO_x emissions shall be determined according to Methods 1-4 and 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, Central District Office.

b. Emission Limitation:

0.122 pound of CO per MMBtu of heat input

Applicable Compliance Method:

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

If required, CO emissions shall be determined according to Methods 1-4 and 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, Central District Office.

c. Emission Limitation:

0.0066 lb PM₁₀/MMBtu of heat input
0.007 lb VOC/MMBtu of heat input
0.000714 lb SO₂/MMBtu of heat input

Applicable Compliance Method:

The emission limitations were established based on the emission factors provided by the permittee in permit application # A0053947.

d. Emission Limitation:

NO_x emissions shall not exceed 25 ppm at 15% O₂

Applicable Compliance Method:

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

e. Emission Limitation:

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



Applicable Compliance Method:

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

f. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.040 lb/MMBtu

Applicable Compliance Method:

If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(10).

g. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined in accordance with OAC rule 3745-17-03(B)(1).

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

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility.
- b. The emissions testing shall be conducted to demonstrate compliance with the NO_x emission limitation identified in 40 CFR 60.4320.
- c. Pursuant to 40 CFR 60.4400, the following test methods shall be employed to demonstrate compliance with the allowable NO_x emission rate (2.00 g NO_x/hp-hr or 160 ppmvd at 15% O₂):

Methods 7E or 20 of 40 CFR Part 60, Appendix A for NO_x; Method 19 of 40 CFR Part 60, Appendix A to calculate the NO_x emission rate in lb/MMBtu; and Methods 1 through 4 of 40 CFR Part 60, Appendix A. Alternate U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emission limits and/or control requirements, unless otherwise specified or approved by Ohio EPA Central District Office as required by 40 CFR 60.4400(b). Although this generally consists of operating the emission units at their maximum



material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emission loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the results as a demonstration of compliance.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA Central District Office. The ITT notification shall describe in detail the proposed test methods and procedures, the emission units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA Central District Office's refusal to accept the results of the emission test(s).
 - f. Personnel from Ohio EPA Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emission units and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emission test(s) shall be signed by the person(s) responsible for the test(s) and submitted Ohio EPA Central District
- (3) The permittee shall comply with the applicable testing requirements of 40 CFR Part 60, Subpart KKKK, including the following sections:

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

- g) Miscellaneous Requirements
None.