Ohio Environmental Protection Agency

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

10/2/2015

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	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

Kristine Akridge
Rockies Express Pipeline - Seneca Compressor Station
370 Van Gordon Street
Lakewood, CO 80228

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0661005020
Permit Number: P0119601
Permit Type: Administrative Modification
County: Noble

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

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Rockies Express Pipeline - Seneca Compressor Station

Facility ID:	0661005020
Permit Number:	P0119601
Permit Type:	Administrative Modification
Issued:	10/2/2015
Effective:	10/2/2015

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Rockies Express Pipeline - Seneca Compressor Station

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Authorization

Facility ID:	0661005020
Facility Description:	
Application Number(s):	M0003616
Permit Number:	P0119601
Permit Description:	Administrative modification for the four (4) compressors which are over 2,000 hp (P002, P003, P004, and P005) to incorporate the applicable rule reference OAC 3745-110-03.
Permit Type:	Administrative Modification
Permit Fee:	$0.00
Issue Date:	10/2/2015
Effective Date:	10/2/2015

This document constitutes issuance to:

Rockies Express Pipeline - Seneca Compressor Station
Seneca Lake Rd
Quaker City, OH 43773

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: P0119601
Permit Description: Administrative modification for the four (4) compressors which are over 2,000 hp (P002, P003, P004, and P005) to incorporate the applicable rule reference OAC 3745-110-03.

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

Emissions Unit ID:	**P002**
Company Equipment ID:	Compressor Engine 2
Superseded Permit Number:	P0119316
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	Compressor Engine 3
Superseded Permit Number:	P0119316
General Permit Category and Type:	Not Applicable

Group Name: Compressor Engines with Control

Emissions Unit ID:	**P004**
Company Equipment ID:	Compressor Engine 4
Superseded Permit Number:	P0119316
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	Compressor Engine 5
Superseded Permit Number:	P0119316
General Permit Category andType:	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.2.

2. Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), for this project was not necessary because for the emissions units not exempted from modeling per OEPA Engineering Guide #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 PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

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

4. Specific emissions units contained in this permit are subject to 40 CFR Part 60, Subpart JJJJ (P002, P003, P004, and P005). The complete NSPS requirements, including the NSPS General Provisions, may be accessed via the internet from the e-CFR website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

5. The Compressor Station must comply with the Used Oil Management Standards of OAC Chapter 3745-279.

6. Abbreviations throughout are as follows:

   Pollutants

NO_x	nitrogen oxides
CO	carbon monoxide
VOC	volatile organic carbon
PE	particulate emissions

   Units

TPY	tons per year
lb	pound
g	gram
MM	million
Btu	British thermal units
hp	horsepower

bhp	brake horsepower
hr	hour
m	month
yr	year

Regulations

OAC	Ohio Administrative Code
ORC	Ohio Revised Code
CFR	Code of Federal Regulations
e-CFR	Electronic Code of Federal Regulation
BAT	Best Available Technology
NSPS	New Source Performance Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
GACT	Generally Available Control Technology

General

PTE	Potential-to-Emit
PTI	Permit-to-Install

C. Emissions Unit Terms and Conditions

1. P002, Compressor Engine 2

Operations, Property and/or Equipment Description:

2,250 hp natural gas fired, 4-stroke rich burn, stationary spark-ignited reciprocating internal combustion engine (RICE) compressor engine; model Waukesha P9394GSI; equipped with air/fuel ratio and nonselective catalytic reduction (NSCR) for the control of NO_x, CO, VOC, and HAPs.

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) b)(1)c., c)(2), c)(3), and f)(1)a.

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 NO_X and CO emissions limitations specified by this rule are equivalent to the NO_X and CO emissions limitations established pursuant to 40 CFR Part 60, Subpart JJJJ. Install an engine designed to meet 0.07 g VOC/hp-hr. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to VOC from this air contaminant source since the calculated annual emission rate is less than 10 tons/yr taking into account the voluntary restriction from OAC rule 3745-31-05(E). The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx, CO, PM_{10} and SO_2 emissions from this air contaminant source since the uncontrolled potential to emit for NOX, CO, PM_{10} andSO_2 is each less than 10 tons/year. See b)(2)b. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(E) June 30, 2008	Install and operate the NSCR with at least 76.7% control efficiency for VOC emissions. Emissions shall not exceed 1.521 tons of VOC per year. See c)(2) and (3) below.
d.	OAC rule 3745-17-07(A)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)(5)(b)	PE from the engine exhaust shall not exceed 0.062 lb/mmBtu of actual heat input for a stationary large internal combustion engine.
f.	OAC rule 3745-18-06	Exempt pursuant to OAC rule 3745-18-06(A).
g.	OAC rule 3745-110-03(F)(1) via OAC rule 3745-110-02(A)(2)(b)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart JJJJ.
h.	40 CFR Part 60, Subpart JJJJ (40 CFR 60.4230-60.4248) [In accordance with 40 CFR 60.4230, this emissions unit is a non-emergency stationary spark ignition (SI) natural gas fired internal combustion engine (ICE) with a maximum engine power greater than 500 HP that commenced construction after July 1, 2010.]	NO_x emissions shall not exceed 1.0 g/hp-hr or 82 ppmvd at 15% O_2. CO emissions shall not exceed 2.0 g/hp-hr or 270 ppmvd at 15% O_2. VOC emissions shall not exceed 0.7 g/hp-hr or 60 ppmvd at 15% O_2. [40 CFR 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1]
i.	40 CFR Part 60.1-19 (40 CFR 60.4246)	Table 3 to Subpart JJJJ of 40 CFR Part 60 – Applicability of General Provisions to Subpart JJJJ shows which part of the General Provisions in 40 CFR Part 60.1-19 apply.

(2) Additional Terms and Conditions

(i) The Best Available Technology (BAT) emission limit for VOC only 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).

(ii) These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

(1) The permittee shall only burn natural gas in this emissions unit except as provided by 40 CFR 60.4243(e).

(2) The permittee shall install and operate this engine with NSCR for control of VOC emissions whenever this emissions unit is in operation and shall maintain the engine and NSCR in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(3) In the event the engine or NSCR is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the engine shall be expeditiously repaired or otherwise returned to these documented operating conditions.

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

60.4234	operation and maintenance
60.4243(b)	(b)(2)(ii) air pollution control practices and maintenance practices
60.4243(e)	Alternative fuel and emergency operations
60.4243(g)	Maintain and operate at all times an air-to-fuel ratio controller with the operation of three-way catalysts/non-selective catalytic reduction (NSCR) to minimize emissions.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, except as provided in 40 CFR 60.4243(e), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

60.4243(b)(2)(ii)	Maintenance plan and recordkeeping
60.4243(e)	recordkeeping for propane use in emergency situations

60.4245(a)(1)	recordkeeping – notifications
60.4245(a)(2)	recordkeeping – maintenance
60.4245(a)(4)	recordkeeping – emissions standards for uncertified engines

e) Reporting Requirements

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

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit except as provided by 40 CFR 60.4243(e). Each report shall be submitted within 30 day after the deviation occurs.

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

60.4245(a)	Maintain records of notifications and supporting documentation
60.4245(c)	Must submit an initial notification
60.4245(d)	performance testing reporting

f) Testing Requirements

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

a. <u>Emissions Limitation</u>:

Emissions shall not exceed 1.521 tons of VOC per year.

<u>Applicable Compliance Method</u>:

The annual emissions limitation was established based on the emissions factor provided by the engine manufacturer for VOC emissions multiplied by the maximum hp/hr and divided by 453.6 g/lb, multiplied by 8,760 hrs/yr and divided by 2,000 lbs/ton.

b. <u>Emissions Limitation</u>:

Visible PE from the stack serving this emission unit shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

c. Emissions Limitation:

PE from the engine exhaust shall not exceed 0.062 lb/mmBtu of actual heat input for a stationary large internal combustion engine.

Applicable Compliance Method:

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745 17 03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

d. Emissions Limitation:

NO_x emissions shall not exceed 1.0 g/HP-hr or 82 ppmvd at 15% O_2.

CO emissions shall not exceed 2.0 g/hp-hr or 270 ppmvd at 15% O_2.

VOC emissions shall not exceed 0.7 g/HP-hr or 60 ppmvd at 15% O_2.

Applicable Compliance Method:

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

(2) When purchasing a non-certified engine, the permittee shall demonstrate compliance with the emission standards specified in 40 CFR 60.4233(e) and according to the requirements specified in 40 CFR 60.4244, as applicable. The permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practices for minimizing emissions.

(3) The permittee has chosen to demonstrate compliance with the emission standards specified in §60.4233(e) and OAC rule 3745-31-05(A)(3) by performing a stack test, and therefore the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the procedures specified in 40 CFR 60.4244; 40 CFR Part 60, Subpart JJJJ Table 2; and the following requirements:

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

i. The initial performance test for P002 was completed on March 3, 2015.

b. Subsequent performance tests shall be conducted every 8760 hours or 3 years whichever comes first [40 CFR 60.4243(b)(2)(ii)].

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

d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

(1) None.

2. P003, Compressor Engine 3

Operations, Property and/or Equipment Description:

2,250-hp Waukesha, natural gas-fired four-stroke rich burn internal combustion engine equipped with nonselective catalytic reduction controlling CO, VOC, and NO_x, non-emergency

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) b)(1)c., c)(3), c)(4) and f)(1)a.

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 for NO_x and CO emissions are equivalent to the requirements of 40 CFR Part 60, Subpart JJJJ. Install an engine designed to meet 0.07 g VOC/hp-hr. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to VOC from this air contaminant source since the calculated annual emission rate is less than 10 tons/yr taking into account the voluntary restriction from OAC rule 3745-31-05(E). The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx, CO, PM_{10} and SO_2 emissions from this air contaminant source since the uncontrolled potential to emit for NOX, CO, PM_{10} andSO_2 is each less than 10 tons/year. See b)(2)b. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(E) June 30, 2008	Install and operate the NSCR with at least 76.7% control efficiency for VOC emissions. Emissions shall not exceed 1.521 tons of VOC per year. See c)(3) and (4) below.
d.	40 CFR Part 60, Subpart JJJJ (40 CFR 60. 4230 – 60.4248) [In accordance with 40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1, this emissions unit is a natural gas-fired, stationary spark internal combustion engine manufactured after July 1, 2010 that is located at a new natural gas compressor station and is subject to the emission limitations and control measures specified in this section.]	NO_x emissions shall not exceed 1.0 g/hp-hr or 82 ppmvd at 15% O_2. CO emissions shall not exceed 2.0 g/hp-hr or 270 ppmvd at 15% O_2. VOC emissions shall not exceed 0.7 g/hp-hr or 60 ppmvd at 15% O_2. [40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1] See b)(2)c. below.
e.	40 CFR Part 60.1-19 (40 CFR 60.4246)	Table 3 to Subpart JJJJ of 40 CFR Part 60 – Applicability of General Provisions to Subpart JJJJ shows which part of the General Provisions in 40 CFR Part 60.1 – 19 apply.
f.	40 CFR 60, Subpart A (60.1-60.19)	General provisions may apply.
g.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 pound/MMBtu actual heat input.
h.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.
i.	OAC rule 3745-18-06	Exempt pursuant to OAC rule 3745-18-06(A).
j.	OAC rule 3745-110-03(F)(1) via OAC rule 3745-110-02(A)(2)(b)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart JJJJ.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) emission limit for VOC only 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. The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4233(e)	Standards
60.4236(a)	Installation deadlines
60.4243(b)(2)(ii)	Compliance demonstration

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit except as provided by 40 CFR 60.4243(e).

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

60.4234	Duration of compliance with emission standards
60.4243(b)(2)(ii)	Maintenance requirements
60.4243(e)	Alternative fuel and emergency operations
60.4243(g)	Maintain and operate at all times an air-to-fuel ratio controller with the operation of three-way catalysts/non-selective catalytic reduction (NSCR) to minimize emissions.

(3) The permittee shall install and operate the engines with nonselective catalytic reduction for the control of VOC emissions whenever this emissions unit is in operation and shall maintain the engines in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(4) In the event the engine is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the engine shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, except as provided by 40 CFR 60.4243(e), 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 JJJJ, including the following sections:

60.4243(b)(2)(ii) and 60.4245	Maintain records of maintenance plan and records of maintenance conducted on the engine

(3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, operating manuals for the engines, and emissions guarantees along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(4) The permittee shall conduct periodic inspections of the engine to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.

(5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the engine while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(6) The permittee shall document each inspection (periodic and annual) of the engine and shall maintain the following information:

a. The date of the inspection;

b. A description of each/any problem identified and the date it was corrected;

c. A description of any maintenance and repairs performed; and

d. The name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(7) The permittee shall maintain records that document any time periods when the nonselective catalytic reduction was not in service when the emissions unit(s) was/were in operation, as well as a record of all operations during which the engine was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

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

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit except as provided by 40 CFR 60.4243(e). Each report shall be submitted within 30 days after the deviation occurs.

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

60.4245(a)	Maintain records of notifications and supporting documentation
60.4245(c)	Must submit an initial notification
60.4245(d)	Performance testing

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:

Emissions shall not exceed 1.521 tons of VOC per year.

Applicable Compliance Method:

The annual emissions limitation was established based on the emissions factor provided by the engine manufacturer for VOC emissions (g/hp-hr) multiplied by the maximum hp and divided by 453.6 g/lb, multiplied by 8,760 hrs/yr and divided by 2,000 lbs/ton.

b. Emissions Limitation:

NO_x emissions shall not exceed 1.0 g/hp-hr or 82 ppmvd at 15% O_2.

Applicable Compliance Method:

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

c. Emissions Limitation:

CO emissions shall not exceed 2.0 g/hp-hr or 270 ppmvd at 15% O_2.

Applicable Compliance Method:

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

d. Emissions Limitation:

VOC emissions shall not exceed 0.7 g/hp-hr or 60 ppmvd at 15% O_2.

Applicable Compliance Method:

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

e. Emissions Limitation:

PE shall not exceed 0.062 pound/MMBtu actual heat input.

Applicable Compliance Method:

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

f. Emissions Limitation:

Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

(2) When purchasing a non-certified engine, the permittee shall demonstrate compliance with the emission standards specified in 40 CFR 60.4233(e) and according to the requirements specified in 40 CFR 60.4244, as applicable. The permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practices for minimizing emissions.

The permittee has chosen to demonstrate compliance with the emission standards specified in §60.4233(e) and OAC rule 3745-31-05(A)(3) by performing a stack test, and therefore the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the procedures specified in 40 CFR 60.4244; 40 CFR Part 60, Subpart JJJJ Table 2; and the following requirements:

a. An initial performance test shall be performed to demonstrate compliance with the mass emissions limitations and design efficiencies in f)(1)b.-d. of this permit within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

i. The initial performance test for P003 was completed on May 19, 2015.

b. Subsequent performance tests shall be conducted every 8760 hours or 3 years whichever comes first [40 CFR 60.4243(b)(2)(ii)].

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

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

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

e. 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.

f. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, 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.

3. Emissions Unit Group -Compressor Engines with Control: Compressor Engines P004 and P005

EU ID	Operations, Property and/or Equipment Description
P004	5,000 bhp Caterpillar G3616B, natural gas-fired four-stroke lean burn internal combustion engine equipped with catalytic oxidation controlling CO and VOC, non-emergency
P005	5,000 bhp Caterpillar G3616B, natural gas-fired four-stroke lean burn internal combustion engine equipped with catalytic oxidation controlling CO and VOC, non-emergency

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) b)(1)c., c)(3), c)(4), f)(1)a. and f)(1)b.

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	Install an engine designed to meet 0.50 g NO_x/hp-hr. Install an engine designed to meet 0.05 g VOC/hp-hr. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to VOC or CO from this air contaminant source since the calculated annual emission rate is less than 10 tons/yr taking into account the voluntary restriction from OAC rule 3745-31-05(E). The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx, PM_{10} and SO_2 emissions from this air contaminant source since the uncontrolled potential to emit for NOx, PM_{10} andSO_2 is each less than 10 tons/year. See b)(2)b. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(E) June 30, 2008	Install and operate the oxidation catalyst with at least 93.0% control efficiency for CO emissions. Carbon monoxide (CO) emissions shall not exceed 1.70 lbs//hr and 7.45 tons/yr. Install and operate the oxidation catalyst with at least 80% control efficiency for VOC emissions. VOC emissions shall not exceed 2.41 tons/year. See c)(3) and (4) below.
d.	40 CFR Part 60, Subpart JJJJ (40 CFR 60. 4230 – 60.4248) [In accordance with 40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1, this emissions unit is a natural gas-fired, stationary spark internal combustion engine manufactured after July 1, 2010 that is located at a new natural gas compressor station and is subject to the emission limitations and control measures specified in this section.]	NO_x emissions shall not exceed 1.00 g/hp-hr or 82 ppmvd at 15% O_2. CO emissions shall not exceed 2.0 g/hp-hr or 270 ppmvd at 15% O_2. VOC emissions shall not exceed 0.7 g/hp-hr or 60 ppmvd at 15% O_2. [40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1] See b)(2)c. below.
e.	40 CFR Part 60.1-19 (40 CFR 60.4246)	Table 3 to Subpart JJJJ of 40 CFR Part 60 – Applicability of General Provisions to Subpart JJJJ shows which part of the General Provisions in 40 CFR Part 60.1 – 19 apply.
f.	40 CFR 60, Subpart A (60.1-60.19)	General provisions may apply.
g.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 pound/MMBtu actual heat input.
h.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.
i.	OAC rule 3745-18-06	Exempt pursuant to OAC rule 3745-18-06(A).
j.	OAC rule 3745-110-03(F)(2) via OAC rule 3745-110-02(A)(2)(b)	The emission limitation required by this applicable rule is less stringent than the

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emission limitation established pursuant to 40 CFR Part 60, Subpart JJJJ.

(2) Additional Terms and Conditions

a. These BAT emission limits applies until US EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 TPY BAT exemption) into the Ohio SIP.

b. These requirements apply once US EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 TPY BAT exemption) as part of the Ohio SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, VOC, and CO emissions from this air contaminant source since the PTE is less than 10 TPY.

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

60.4233(e)	Standards
60.4236(a)	Installation deadlines
60.4243(b)(2)(ii)	Compliance demonstration

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit except as provided by 40 CFR 60.4243(e).

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

60.4234	Duration of compliance with emission standards
60.4243(b)(2)(ii)	Maintenance requirements
60.4243(e)	Alternative fuel and emergency operations

(3) The permittee shall install and operate the engines with an oxidation catalyst for the control of CO and VOC emissions whenever this emissions unit is in operation and shall maintain the engines in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(4) In the event the engine is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the engine shall be expeditiously repaired or otherwise returned to these documented operating conditions.

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, except as provided by 40 CFR 60.4243(e).

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

60.4245(a), (c) and (d)	Notification, record keeping, and reporting requirements

(3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, operating manuals for the engines, and emissions guarantees along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(4) The permittee shall conduct periodic inspections of the engine to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.

(5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the engine while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(6) The permittee shall document each inspection (periodic and annual) of the engine and shall maintain the following information:

a. The date of the inspection;

b. A description of each/any problem identified and the date it was corrected;

c. A description of any maintenance and repairs performed; and

d. The name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(7) The permittee shall maintain records that document any time periods when the oxidation catalyst was not in service when the emissions unit(s) was/were in operation, as well as a record of all operations during which the engine was not operated according to the

manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

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

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit, except as provided by 40 CFR 60.4243(e). Each report shall be submitted within 30 days after the deviation occurs.

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

60.4243(b)(2)(ii) and 60.4245	Maintain records of maintenance plan and records of maintenance conducted on the engine
60.4245(a)	Maintain records of notifications and supporting documentation
60.4245(c)	Must submit an initial notification
60.4245(d)	Performance testing

f) Testing Requirements

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

a. <u>Emissions Limitation</u>:

Carbon monoxide (CO) emissions shall not exceed 1.70 lbs//hr and 7.45 tons/year.

<u>Applicable Compliance Method</u>:

Compliance with the short-term emission limitation shall be demonstrated based upon the emissions testing requirements specified in f)(2).

Compliance with the annual emission limitation is demonstrated by achieving compliance with the short-term emission limitation.

b. <u>Emissions Limitation</u>:

VOC emissions shall not exceed 2.41 tpy.

Applicable Compliance Method:

The annual emissions limitation was established based on the emissions factor provided by the engine manufacturer for VOC emissions (g/hp-hr) multiplied by the maximum hp and divided by 453.6 g/lb, multiplied by 8,760 hrs/yr and divided by 2,000 lbs/ton.

c. Emissions Limitation:

NO_x emissions shall not exceed 1.0 g/hp-hr or 82 ppmvd at 15% O_2.

Applicable Compliance Method:

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

d. Emissions Limitation:

CO emissions shall not exceed 2.0 g/hp-hr or 270 ppmvd at 15% O_2.

Applicable Compliance Method:

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

e. Emissions Limitation:

VOC emissions shall not exceed 0.7 g/hp-hr or 60 ppmvd at 15% O_2.

Applicable Compliance Method:

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

f. Emissions Limitation:

PE shall not exceed 0.062 pound/MMBtu actual heat input.

Applicable Compliance Method:

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

g. Emissions Limitation:

Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

(2) When purchasing a non-certified engine, the permittee shall demonstrate compliance with the emission standards specified in 40 CFR 60.4233(e) and according to the requirements specified in 40 CFR 60.4244, as applicable. The permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practices for minimizing emissions.

The permittee has chosen to demonstrate compliance with the emission standards specified in §60.4233(e) and OAC rule 3745-31-05(A)(3) by performing a stack test, and therefore the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the procedures specified in 40 CFR 60.4244; 40 CFR Part 60, Subpart JJJJ Table 2; and the following requirements:

a. An initial performance test shall be performed to demonstrate compliance with the mass emissions limitations and design efficiencies in f)(1)a.-c. and e.-g. of this permit within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

i. The initial performance tests for P004 and P005 were completed on May 18, 2015 and May 19, 2015.

ii. Subsequent performance tests shall be conducted every 8760 hours or 3 years whichever comes first [40 CFR 60.4243(b)(2)(ii)].

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

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

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

e. 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.

f. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office within 30 day s 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

a. None.