



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

12/24/2015

Ms. Luz Slauter
Long Compressor Station
1615 Wynkoop Street
Denver, CO 80202

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0661005052
Permit Number: P0119132
Permit Type: Initial Installation
County: Noble

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

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
Long Compressor Station**

Facility ID:	0661005052
Permit Number:	P0119132
Permit Type:	Initial Installation
Issued:	12/24/2015
Effective:	12/24/2015



Division of Air Pollution Control
Permit-to-Install
for
Long Compressor Station

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Final Permit-to-Install
Long Compressor Station
Permit Number: P0119132
Facility ID: 0661005052
Effective Date: 12/24/2015

Authorization

Facility ID: 0661005052
Facility Description:
Application Number(s): A0053676, A0054659
Permit Number: P0119132
Permit Description: Permit to Install for the Antero Midstream LLC Long Compressor Station. This PTI is for Long Phase II. Long Phase II will add nine natural gas reciprocating compressors (18 total for Phase I and II), two natural gas dehydrators (4 total for Phase I and II), an additional Enclosed Combustor (2 total for Phase I and Phase II), and roadways and parking areas (no longer de minimis after Phase II is completed). These emission units and the associated equipment yield compressed natural gas for transmission to market and marketable condensate gases and liquids.
Permit Type: Initial Installation
Permit Fee: \$4,400.00
Issue Date: 12/24/2015
Effective Date: 12/24/2015

This document constitutes issuance to:

Long Compressor Station
55135 Batesville Rd
Quaker City, OH 43773

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

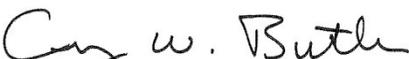
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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: P0119132

Permit Description: Permit to Install for the Antero Midstream LLC Long Compressor Station. This PTI is for Long Phase II. Long Phase II will add nine natural gas reciprocating compressors(18 total for Phase I and II), two natural gas dehydrators (4 total for Phase I and II), an additional Enclosed Combustor (2 total for Phase I and Phase II), and roadways and parking areas (no longer de minimis after Phase II is completed). These emission units and the associated equipment yield compressed natural gas for transmission to market and marketable condensate gases and liquids.

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

Emissions Unit ID: F001
 Company Equipment ID: FUG-02
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P026
 Company Equipment ID: FL-9002
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Group Name: Dehydration Units Phase II

Emissions Unit ID:	P024
Company Equipment ID:	DEHY-003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P025
Company Equipment ID:	DEHY-004
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: NG Compressor Engines Phase II

Emissions Unit ID:	P016
Company Equipment ID:	C-2002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P017
Company Equipment ID:	C-2102
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	C-2202
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P019
Company Equipment ID:	C-2302
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
 Long Compressor Station
Permit Number: P0119132
Facility ID: 0661005052
Effective Date: 12/24/2015

Emissions Unit ID:	P020
Company Equipment ID:	C-2402
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P021
Company Equipment ID:	C-2502
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P022
Company Equipment ID:	C-2602
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	C-2702
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P027
Company Equipment ID:	C-2802
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Long Compressor Station
Permit Number: P0119132
Facility ID: 0661005052
Effective Date: 12/24/2015

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 emission limitations, operational restrictions, and control device operating parameter limitations, 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, and reporting requirements 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 the Ohio EPA DAPC, Southeast District Office in 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 before operating 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 entered upon 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.



Final Permit-to-Install
Long Compressor Station
Permit Number: P0119132
Facility ID: 0661005052
Effective Date: 12/24/2015

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) None.
 - b) 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.
 - c) Deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
 - d) This facility is subject to 40 CFR Part 60, Subpart OOOO and/or OOOOa. 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.
 - e) This facility is subject to 40 CFR Part 60, Subpart JJJJ. 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.
 - f) This facility is subject to 40 CFR Part 63, Subpart HH. The complete MACT requirements, including the MACT 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 of local air agency.
 - g) This facility is subject to 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>.
 - h) Abbreviations throughout are as follows:

Pollutants

NO _x	nitrogen oxides
CO	carbon monoxide
VOC	volatile organic compound
PE	particulate emissions

Units

TPY	tons per year
lb	pound
g	gram
Mg	megagram
gal	gallon
bbl.	barrel
M	thousand

MM	million
scf	standard cubic foot
Btu	British thermal units
hp	horsepower
bhp	brake horsepower
hr	hour
min	minute
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
MACT	Maximum Achievable Control Technology
NSPS	New Source Performance Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
GACT	Generally Available Control Technology

General

PTE	Potential to Emit
EF	Emissions factor
PTI	Permit-to-Install
EU	Emissions Unit
SIP	State Implementation Plan
SEDO	Southeast District Office



Final Permit-to-Install
Long Compressor Station
Permit Number: P0119132
Facility ID: 0661005052
Effective Date: 12/24/2015

C. Emissions Unit Terms and Conditions

1. F001, FUG-02

Operations, Property and/or Equipment Description:

Roadways and Parking Areas

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective June 30, 2008	Develop and implement a site-specific work practice plan designed as described in c)(1) below to minimize or eliminate fugitive dust emissions. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective June 30, 2008	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source since the calculated annual emissions are < 10 TPY 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 PM ₁₀ emissions from this air contaminant source since the calculated annual emissions are < 10 TPY. See b)(2)b. below.
c.	OAC rule 3745-31-05(E)	PE shall not exceed 2.71 TPY. PM ₁₀ shall not exceed 0.69 TPY
d.	OAC rule 3745-17-07(B)(5)	No visible PE from any unpaved roadway or parking area except for a period of time not to exceed 13 minutes during any 60-minute observation period.

- (2) Additional Terms and Conditions
 - a. This BAT emissions limit applies until US EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the < 10 TPY BAT exemption as part of the Ohio SIP).
 - b. These requirements apply once US EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the < 10 TPY BAT exemption) as part of the Ohio SIP.
- c) Operational Restrictions
 - (1) The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittees paved and unpaved roadways and parking areas. This work practice plan shall include, at a minimum, the following elements:
 - a. An identification of each segment of unpaved roadway or parking area for which the plan applies.
 - b. A determination of the frequency that each roadway or parking area will be inspected to determine if additional control measures are needed.
 - c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways. This form/record should include, at a minimum, the following elements:
 - i. Roadway or parking area segment inspected;
 - ii. Date inspected;
 - iii. Name of employee doing the inspection;
 - iv. Result of the inspection (needs treated or does not need treated);
 - v. A description of why no treatment was needed;
 - vi. Date treated;
 - vii. Name of employee treating the segment; and
 - viii. Method used to treat the segment.
 - d. A description of how and where the records shall be maintained.
 - (2) The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee cannot begin using any modified Work Practice Plan until such time as the Southeast District Office approves the revised plan.

d) **Monitoring and/or Recordkeeping Requirements**

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

e) **Reporting Requirements**

- (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the Southeast District Office.
- (2) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. Each instance when a control measure that was to be implemented as a result of an inspection was not implemented.

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:

PE shall not exceed 2.71 TPY.

Applicable Compliance Method:

Compliance with annual emissions limitations shall be determined based on the emission factor calculations for unpaved roadways and parking areas in AP-42 Section 13.2.2 (11/06) and a maximum of 4,245 annual vehicle miles traveled as demonstrated by the following equation:



$$k(s/12)^a(W/3)^b * (365-p/365)(1-CE_{speed}) = EF$$

$$EF * VMT \leq 2.71 \text{ TPY}$$

Where:

- k = particle size multiplier (lb/VMT)
- s = surface material silt content (%)
- W = mean vehicle weight (tons)
- p = number of rain days per year >0.01 inches
- CE = control efficiency
- EF = particulate emission factor (lb/VMT)
- VMT = vehicle miles traveled

b. Emissions Limitation:

PM₁₀ shall not exceed 0.69 TPY.

Applicable Compliance Method:

Compliance with annual emissions limitations shall be determined based on the emission factor calculations for unpaved roadways and parking areas in AP-42 Section 13.2.2 (11/06) and a maximum of 4,245 annual vehicle miles traveled as demonstrated by the following equation:

$$k(s/12)^a(W/3)^b * (365-p/365)(1-CE_{speed}) = EF$$

$$EF * VMT \leq 0.69 \text{ TPY}$$

Where:

- k = particle size multiplier (lb/VMT)
- s = surface material silt content (%)
- W = mean vehicle weight (tons)
- p = number of rain days per year >0.01 inches
- CE = control efficiency
- EF = particulate emission factor (lb/VMT)
- VMT = vehicle miles traveled

c. Emission Limitation:

No visible PE from any unpaved roadway or parking area except for a period of time not to exceed three minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.



d. Emission Limitation:

No visible PE from any unpaved roadway or parking area except for a period of time not to exceed 13 minutes during any 60-minute observation period

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.

g) Miscellaneous Requirements

(1) None.

2. P026, FL-9002

Operations, Property and/or Equipment Description:

Enclosed Combustor (Flare) to control emissions from the dehydration units (DEHY-003 and DEHY-004)

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) d)(7).

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	NO _x emissions shall not exceed 0.23 tons/m as a rolling, 12-month average. CO emissions shall not exceed 1.04 tons/m as a rolling, 12-month average. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective June 30, 2008	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO _x emissions from this air contaminant source since the PTE is < 10 TPY. See b)(2)b. below.

(2) Additional Terms and Conditions

a. This BAT emissions limit applies until US EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the < 10 TPY BAT exemption as part of the Ohio SIP).

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

c) Operational Restrictions

- (1) The permittee shall operate the enclosed combustor at all times emission units P024, or P025 are in operation for the control of VOC emissions and shall maintain the enclosed combustor in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modification deemed necessary by the permittee.
- (2) In the event the enclosed combustor is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the enclosed combustor, 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.
- (2) The permittee shall conduct periodic inspections of the enclosed combustor 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.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the enclosed combustor 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.
- (4) The permittee shall document each inspection (periodic and annual) of the enclosed combustor 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.

- (5) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measure and record the combustor outlet temperature when the organic vapors are being routed to the combustor, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. These records shall be maintained for a period of no less than five years. These records can be kept electronically, provided they can be made available to the appropriate Ohio EPA District Office or local air agency.
- (6) The permittee shall maintain records that document any time periods when the enclosed combustor was not in service when emissions units P024 or P025 were in operation, as well as a record of all operations during which the enclosed combustor 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.
- (7) 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 quarterly deviation (excursion) reports that identify deviations from the operational restrictions specified in c)(1) and c)(2) or the monitoring and recordkeeping requirements specified in d)(1)-d)(6).

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

f) Testing Requirements

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

a. Emissions Limitation:

NO_x emissions shall not exceed 0.23 tons/m as a rolling, 12-month average.

Applicable Compliance Method:

Compliance may be demonstrated using the following equation.



$$\frac{EF \text{ lb}}{MMBtu} * \frac{X \text{ MMBtu}}{hr} * \frac{ton}{2,000 \text{ lb}} * \frac{8,760 \text{ hr}}{yr} * \frac{yr}{12 \text{ m rolling}} \leq \frac{0.23 \text{ ton NOx}}{\text{rolling } 12 \text{ m}}$$

NOx emission factor of .068 lb./MMBtu*

*AP 42 Table 13.5-1 Industrial Flare Emissions

Heat input to flare is 9.22 MMBtu/hr

b. Emissions Limitation:

CO emissions shall not exceed 1.04 tons/m as a rolling, 12-month average.

Applicable Compliance Method:

Compliance may be demonstrated using the following equation.

$$\frac{EF \text{ lb}}{MMBtu} * \frac{X \text{ MMBtu}}{hr} * \frac{ton}{2,000 \text{ lb}} * \frac{8,760 \text{ hr}}{yr} * \frac{yr}{12 \text{ m rolling}} \leq \frac{1.04 \text{ tons CO}}{\text{rolling } 12 \text{ m}}$$

CO emission factor of .31 lb./MMBtu*

*AP 42 Table 13.5-1 Industrial Flare Emissions

Heat input to flare is 9.22 MMBtu/hr

g) Miscellaneous Requirements

- (1) None.

3. Emissions Unit Group -Dehydration Units Phase II: P024,P025,

EU ID	Operations, Property and/or Equipment Description
P024	60 MMscf/day TEG dehydration unit fitted with a flash tank and condenser. Unit consists of equipment IDs V-3102 (dehy contactor), SK-3702 (reboiler), and SK-3712 (BTEX skid).
P025	60 MMscf/day TEG dehydration unit fitted with a flash tank and condenser. Unit consists of equipment IDs V-3102 (dehy contactor), SK-3702 (reboiler), and SK-3712 (BTEX skid).

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) d)(8).

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	<p>The VOC emissions from the DEHY-003 and DEHY-004 still vents shall be vented to an enclosed combustor with a design destruction efficiency of 98% by weight or greater.</p> <p>The VOC emissions from the DEY-003 and DEY-004 flash tanks shall be vented to through a closed vent system to the reboiler at all times when there is potential VOC emissions generated from the flash tanks. The VOC emissions from the flash tank shall be introduced into the flame zone of the reboiler.</p> <p>See b)(2)a. below.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective June 30, 2008	<p>The 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 is < 10 TPY due to the voluntary restriction from OAC rule 3745-31-05(E).</p> <p>See b)(2)b. below.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(E), as effective June 30, 2008	<p>The VOC emissions from the DEHY-003 and DEHY-004 still vents shall be vented to an enclosed combustor with a design destruction efficiency of 98% by weight or greater.</p> <p>The VOC emissions from the DEY-003 and DEY-004 flash tanks shall be vented to through a closed vent system to the reboiler at all times when there is potential VOC emissions generated from the flash tanks. The VOC emissions from the flash tank shall be introduced into the flame zone of the reboiler.</p> <p>(The potential VOC emissions with this restriction is 7.13 TPY for each emission unit).</p>
d.	<p>40 CFR Part 63, Subpart HH (40 CFR 63.760-63.779)</p> <p>[In accordance with 40 CFR 63.760(a)(2)-(3), this emissions unit processes, upgrades, or stores natural gas or hydrocarbon liquids prior to the point of custody transfer from the facility.]</p>	See b)(2)c. and b)(2)d. below.
e.	40 CFR 63.1-15 (40 CFR 63.764)	Table 2 of Subpart HH of 40 CFR Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. This BAT emissions limit applies until US EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the < 10 TPY BAT exemption as part of the Ohio SIP).
- b. These requirements apply once US EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the < 10 TPY BAT exemption) as part of the Ohio SIP.
- c. The dehydration unit located at this facility is subject to 40 CFR Part 63, Subpart HH, NESHAP from Oil and Natural Gas Production Facilities. The dehydration units at this facility are exempt per 63.764(e)(1)(ii) from the requirements of 63.764(d) because actual average emissions of benzene from the glycol dehydration unit process venting to the atmosphere are less than 0.90 Mg/yr, as determined by the procedures specified in 63.772(b)(2) of 40 CFR 63, Subpart HH.

- d. The permittee shall comply with applicable requirements of 40 CFR Part 63, Subpart HH, including the following sections:

63.764(j)	Control equipment
63.775(c)(8)	Exemption

c) Operational Restrictions

- (1) The permittee shall operate the enclosed combustor at all times DEHY-003 and DEHY004 are in operation for the control of VOC emissions and shall maintain the enclosed combustor in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modification deemed necessary by the permittee.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the enclosed combustor, 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.
- (2) The permittee shall conduct periodic inspections the enclosed combustors 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 Ohio EPA upon request.
- (3) The permittee shall document each inspection of the enclosed combustor 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, and any necessary maintenance or repairs that were completed, shall be maintained at the facility for not less than five years from the date the inspection and shall be made available to the appropriate Ohio EPA District Office or local air upon request.

- (4) The permittee shall maintain records that document any time periods when the enclosed combustor was not in service when the emissions unit(s) was/were in operation, as well as a record of all operations during which the combustors were 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 Ohio EPA upon request.

- (5) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measure and record the combustor outlet temperature of the combustors when the organic vapors are being routed to the combustors, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. These records shall be maintained for a period of no less than five years. These records can be kept electronically, provided they can be made available to the appropriate Ohio EPA District Office or local air agency.
- (6) The composition of the gas being processed may vary due to the nature of the industry. The company will sample the gas semiannually to perform a detailed gas analysis in order to determine if the composition has changed such that it will result in an increase in emissions of any toxic air contaminant. 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. After one year, the permittee may petition the Agency to adjust the frequency of sampling.
- (7) The permittee shall comply with applicable requirements of 40 CFR Part 63, Subpart HH, including the following sections:

63.760(a)(2)	Applicability
63.772(b)(2)	Actual average BTEX emissions
63.774(b)(1)	File maintenance
63.774(d)(1)	Exemption recordkeeping
63.774(d)(1)(ii)	Actual average annual benzene emissions

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify deviations from the operational restrictions specified in c)(1) or the monitoring and recordkeeping requirements specified in d)(1)-d)(7).

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

f) Testing Requirements

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



a. Emissions Limitation:

The VOC emissions from the DEHY-003 and DEHY-004 still vents shall be vented to an enclosed combustor with a design destruction efficiency of 98% by weight or greater.

Applicable Compliance Method:

The enclosed combustor utilized by the permittee, ABUTEC 100, demonstrated compliance with the requirements specified in 40 CFR 60.543. This enclosed combustor is 40 CFR Part 60, Subpart OOOO compliant. During this testing the ABUTEC 100 achieved an average destruction efficiency of 99+%.

g) Miscellaneous Requirements

(1) None.

**4. Emissions Unit Group -NG Compressor Engines Phase II:
 P016,P017,P018,P019,P020,P021,P022,P023,P027,**

EU ID	Operations, Property and/or Equipment Description
P016	1,680 hp Waukesha 7044GSI NG Fired-rich burn-4 Stroke compressor engine
P017	1,680 hp Waukesha 7044GSI NG Fired-rich burn-4 Stroke compressor engine
P018	1,680 hp Waukesha 7044GSI NG Fired-rich burn-4 Stroke compressor engine
P019	1,680 hp Waukesha 7044GSI NG Fired-rich burn-4 Stroke compressor engine
P020	1,680 hp Waukesha 7044GSI NG Fired-rich burn-4 Stroke compressor engine
P021	1,680 hp Waukesha 7044GSI NG Fired-rich burn-4 Stroke compressor engine
P022	1,680 hp Waukesha 7044GSI NG Fired-rich burn-4 Stroke compressor engine
P023	1,680 hp Waukesha 7044GSI NG Fired-rich burn-4 Stroke compressor engine
P027	1,680 hp Waukesha 7044GSI NG fired-rich burn-4stroke compressor engine

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) d)(8).

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 06/30/2008	NO _x emissions shall not exceed 1.0 g/hp-hr. CO emissions shall not exceed 2.0 g/hp-hr. VOC emissions shall not exceed 0.7 g/hp-hr. PE shall not exceed 0.062 lb./MMBtu actual heat input. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 06/30/2008	See b)(2)b. below.
c.	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,	NO _x emissions shall not exceed 1.0 g/hp-hr. CO emissions shall not exceed 2.0 g/hp-hr.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Subpart JJJJ, Table 1, this emissions unit is a \geq 500 hp, 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.]	VOC emissions shall not exceed 0.7 g/hp-hr. [40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1] See b)(2)c. below.
d.	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.
e.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb./MMBtu actual heat input.
f.	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.

(2) Additional Terms and Conditions

- a. This BAT emissions limit applies until US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.
- b. These rule paragraphs apply once US EPA approves OAC rule 3745-31-05(A)(3)(a) (the less than 10 TPY BAT exemption) into the Ohio SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x, CO, VOC, and PM emissions from this air contaminant source since the PTE for PM 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)	Emission standards
60.4234	Duration of emission standards
60.4243(b)	Demonstrating compliance
60.4243(b)(2)	Purchasing a non-certified engine
60.4243(b)(2)(ii)	Maintenance plan and records
60.4243(e)	Use of propane
60.4243(g)	Air-to-fuel ratio controllers
60.4246	General Provisions

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.
- (2) The permittee shall install and operate the engine with a catalyst for the control of NO_x, CO, and VOC emissions whenever this emissions unit is in operation and shall maintain the engine 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 is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the generator 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.
- (2) The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4243(b)(2)	Purchasing a non-certified engine
60.4243(b)(2)(ii)	Maintenance plan and records
60.4243(e)	Use of propane
60.4243(g)	Air-to-fuel ratio controllers
60.4244(a)	Performance testing
60.4244(b)	Startup, shutdown, or malfunction
60.4244(c)	Performance testing runs
60.4244(d)	NO _x mass per unit output emission limitation
60.4244(e)	CO mass per unit output emission limitation
60.4244(f)	Emissions of formaldehyde
60.4245(a)(1)	Notifications
60.4245(a)(2)	Engine maintenance
60.4245(a)(4)	Documentation of non-certified engines
60.4246	General Provisions

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, operating manuals for the engine, 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.
- (8) 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 quarterly deviation (excursion) reports that identify deviations from the operational restrictions specified in c)(1) through c)(3) or the monitoring and recordkeeping requirements specified in d)(1)-d)(7).

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

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

60.4245(c)	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) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

NO_x emissions shall not exceed 1.0 g/hp-hr.

Applicable Compliance Method:

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

- b. Emissions Limitation:

CO emissions shall not exceed 2.0 g/hp-hr.

Applicable Compliance Method:

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

- c. Emissions Limitation:

VOC emissions shall not exceed 0.7 g/hp-hr.

Applicable Compliance Method:

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

d. Emissions Limitation:

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

Applicable Compliance Method:

Compliance may be demonstrated by the emission factor found in AP 42 Section 3.2, Table 3.2-2 of .0099 lb.PE/MMBtu for Natural Gas fired reciprocating Engines.

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 the Ohio EPA, SEDO.

e. 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. In addition, the permittee must conduct an initial performance test.

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 1; 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) and OAC rule 3745-31-05(A)(3) 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.
- 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 1 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.