Ohio Environmental Protection Agency

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

2/2/2016

Certified Mail

Facility ID: 0370000164
Permit Number: P0120221
County: Ashland

Susan Brown
LUCAS COMPRESSOR STATION
7815 Walton Parkway
New Albany, OH 43054

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Administrative Permit Modification

Dear Permit Holder:

Enclosed is a finalOhio Environmental Protection Agency (EPA) Air Pollution Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it 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**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

The issuance of this Title V permit 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.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office as indicated on page one of your permit.

Sincerely,

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

Cc: U.S. EPA Region 5*Via E-Mail Notification*
Ohio EPA DAPC, Northwest District Office

FINAL

Division of Air Pollution Control
Title V Permit
for
LUCAS COMPRESSOR STATION

Facility ID:	0370000164
Permit Number:	P0120221
Permit Type:	Administrative Permit Modification
Issued:	2/2/2016
Effective:	2/2/2016
Expiration:	10/10/2019

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
LUCAS COMPRESSOR STATION

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance 6
4. Risk Management Plans 7
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 9
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 11
17. Off-Permit Changes 12
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 12
20. Permit to Install Requirement 13
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Records Retention Requirements Under State Law Only 14
26. Inspections and Information Requests 14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements 15
28. Permit Transfers 15

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 15
30. Submitting Documents Required by this Permit 15
B. Facility-Wide Terms and Conditions 17
C. Emissions Unit Terms and Conditions 19
1. B006, RECIP ENGINE/GENERATOR #095G1 20
2. Emissions Unit Group -Group A - Line Heaters: B008 and B009 27
3. Emissions Unit Group -Group B - Prime Mover IC Engines: P003, P004, P005, P006, and P007 32
4. Emissions Unit Group -Group C - TEG Dehydration: P001 and P002 35

Authorization

Facility ID:	0370000164
Facility Description:	Natural Gas Transmission
Application Number(s):	M0003796
Permit Number:	P0120221
Permit Description:	Administrative Title V permit modification to correct the mailing address for the facility.
Permit Type:	Administrative Permit Modification
Issue Date:	2/2/2016
Effective Date:	2/2/2016
Expiration Date:	10/10/2019
Superseded Permit Number:	P0115552

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

LUCAS COMPRESSOR STATION
4307 State Route 39
Perrysville, OH 44843

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 reissuance, or modification, or for denial of a permit renewal application.

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 permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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, reopening 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, 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 paragraph (E) of OAC rule 3745-77-03.

(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, Northwest 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible 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 Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Northwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention RequirementsUnder State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

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 ofan 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 Ohio EPA DAPC,

Northwest District Office, 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

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.

2. The following insignificant emission units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emission unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21 and/or 40 CFR Part 60 or 63.

   B007 –Heating System Process Heater – 3.36 mmBtu/hr (input) – natural gas ("Heating System Boiler")

   (Authority for term: OAC rule 3745-77-07(A)(13))

3. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DDDDD. The final rules found in 40 CFR Part 63, Subpart DDDDD establish national emission standards for hazardous air pollutants (NESHAP), operational limits, work practice standards, and compliance requirements for industrial, commercial, and institutional boilers and process heaters located at a major source of hazardous air pollutants (HAP).

   The following emissions unit is designed to only burn gas 1 fuels (subcategory) and therefore is not subject to the emission limits in Tables 1 and 2, or 11 through 13 of the subpart or the operating limits in Table 4 to the subpart. However, it is subject to tune-up requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart; and a one-time energy assessment, performed in accordance with Table 3 #4 of the subpart. The permittee shall comply with the requirements of this NESHAP for emissions unit B007 no later than January 31, 2016.

C. Emissions Unit Terms and Conditions

1. B006, RECIP ENGINE/GENERATOR #095G1

Operations, Property and/or Equipment Description:

Emergency Generator (Waukesha-F18GL) – 2.95 mmBtu/hr input - 369 HP output – natural gas (4-stroke lean-burn)

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) (PTI 03-7588 issued December 22, 1993)	3.55 lbs nitrogen oxides (NO_X) /hr, 15.6 tons NOx/yr 0.06 lb particulate emissions (PE) /hr, 0.26 ton PE/yr 1.45 lbs carbon monoxide (CO) /hr, 6.35 tons CO/yr 0.74 lb organic compounds (OC) /hr, 3.24 tons OC/yr The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(5)(b) and 3745-17-07(A).
b.	OAC rule 3745-17-11(B)(5)(a)	0.310 lb particulate emissions (PE) /mmBtu of actual heat input
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-18-06(G)	See b)(2)a.
e.	40 CFR 63.6580 et seq. (MACT Subpart ZZZZ) In accordance with 40 CFR 63.6585 and 63.6590(a)(1)(ii), this emissions unit is an existing emergency 4-	See b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	stroke lean-burn <500 HP natural gas stationary reciprocating internal combustion engine (RICE) subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary RICE.	

(2) Additional Terms and Conditions

a. Since the rated heat input capacity for this emissions unit is less than 10 mmBtu/hr, this emissions unit is exempt from the sulfur dioxide emission limitation in OAC rule 3745-18-06(G), pursuant to OAC rule 3745-18-06(B). Also, natural gas is the only fuel fired in this emissions unit and, therefore, this emissions unit is exempt from the sulfur dioxide emission limitation in OAC rule 3745-18-06(G), pursuant to OAC rule 3745-18-06(A).

b. The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR 63.6595(a)(1)	The compliance date for Part 63 Subpart ZZZZ for existing SI RICE is 10/19/13.
Applicable Tables from Part 63, Subpart ZZZZ	Compliance requirements in Table 2c #6; continuous compliance in Table 6 #9; general provision from Subpart A in Table 8.
40 CFR 63.6602	Maintain compliance with operational limitations in Table 2c #6 (inspection and maintenance requirements) to Part 63 Subpart ZZZZ.
40 CFR 63.6665	Meet all of the general provisions of Subpart A, from Sections 63.1 through 63.15, that apply to the SI RICE, as identified in Table 8 to Subpart ZZZZ.

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI 03-7588]

(2) Unless meeting the requirements of 40 CFR 63.6625(j), the permittee shall change the oil and filter every 500 hours of operation or annually, whichever comes first; shall inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace them as necessary; and shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace them as necessary.

A log shall be maintained for the hours of operation between each oil, filter, and spark plug change and the date of each required inspection.

[OAC rule 3745-77-07(A)(1), and 40 CFR 63.6602, 40 CFR 63.6625(j), and Subpart ZZZZ Table 2c #6 and Table 6 #9]

(3) The permittee shall install a non-resettable hour meter in order to record the hours of operation during emergency and non-emergency conditions.

[OAC rule 3745-77-07(A)(1) and 40 CFR 63.6625(f) and 40 CFR 63.6655(f)]

(4) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR 63.6605	General duty to minimize emissions, with good air pollution control practices for minimizing emissions; and compliance required at all times.
40 CFR 63.6625(e)	Operate & maintain RICE according to mfg. instructions and develop a facility maintenance plan for the RICE that meets the requirements of Subpart ZZZZ Table 2c #6.
40 CFR 63.6625(f)	Install a non-resettable hour meter by compliance date.
40 CFR 63.6625(h)	Minimize idle and startup time, not to exceed 30 minutes.
40 CFR 63.6625(j)	Oil analysis program, option to extend the oil change frequency.
40 CFR 63.6640(f)	Requirements /restrictions for engine to be considered an emergency stationary RICE.

[OAC rule 3745-77-07(A)(1), and 40 CFR Part 63, Subpart ZZZZ]

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.

[OAC rule 3745-77-07(C)(1) and PTI 03-7588]

(2) The permittee shall maintain records or a log for the operation of the engine in emergency and non-emergency service, as recorded through the non-resettable hour meter. The records shall include the number or hours spent in emergency operation, including what classified the operation as an emergency; the number or hours spent in maintenance checks and readiness testing; and the number or hours spent in non-emergency operations. If the RICE is operated as part of a demand response operation, the permittee shall keep records of the notification of the emergency situation and the time the engine was operated as part of the demand response.

[OAC rule 3745-77-07(C)(1), and 40 CFR 63.6655(f) for 40 CFR 63.6640(f)]

(3) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR 63.6655(f)	Maintain records of the hours of operation in emergency operations, non-emergency operations, and in maintenance checks and readiness testing, as recorded through the non-resettable hour meter. If the RICE is used for demand response, records of the notification of the emergency and the time of operation, as part of the demand response, is to be maintained.
40 CFR 63.6640(a) and 40 CFR 63.6655(d)	Keep the records required in #9 of Table 6 to Subpart ZZZZ to demonstrate continuous compliance.
40 CFR 63.6655(e)	Records of maintenance and inspections conducted in order to demonstrate compliance with Table 2c and to demonstrate that the RICE was operated and maintained according to the facility's maintenance plan.
40 CFR 63.6625(h)	Maintain a record of each idle and/or startup time that exceeded 30 minutes.
40 CFR 63.6660	Records readily available and retained for at least 5 years after the date of occurrence or date of report according to 63.10(b)(1).

[OAC rule 3745-77-07(A)(1), and 40 CFR Part 63, Subpart ZZZZ]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas is in use in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI 03-7588]

(2) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR 63.6640(b); and OAC rule 3745-15-03(B)(2) and (D)	Submit in the PER each instance in which the operational requirements in Table 2c of the NESHAP Subpart ZZZZ were not met.
40 CFR 63.6640(e) and OAC rule 3745-15-03(B)(2) and (D)	Submit in the PER each instance in which the applicable requirements in Table 8 to Subpart ZZZZ, the general provisions from Subpart A, were not met.

[OAC rule 3745-77-07(A)(1), and 40 CFR Part 63, Subpart ZZZZ]

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 Limitations:
0.310 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
The permittee may determine compliance with the PE limitation above based on an emission factor from AP-42, Table 3.2-2 (revised 7/00) of 0.0000771 lb PE (filterable)/mmBtu of actual heat input.
If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with Methods in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1) and PTI 03-7588]

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

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI 03-7588]

c. Emission Limitations:
3.55 lbs NOx/hr, 15.6 tons NO_X/yr

Applicable Compliance Method:
The permittee may determine compliance with the hourly allowable NO_X emission limitation by multiplying the appropriate emission factor from AP-42, Table 3.2-2 (revised 7/00) by the maximum hourly heat input rate (3.2 mmBtu/hr).

If required, compliance with the hourly allowable NO_X emission limitation shall be determined in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly allowable NO_X emission limitation, compliance with the annual limitation shall be demonstrated (the annual allowable limitation was developed by multiplying the hourly allowable limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI 03-7588]

d. Emission Limitations:
1.45 lbs CO/hr and 6.35 tons CO/yr

Applicable Compliance Method:
The permittee may determine compliance with the hourly allowable CO emission limitation by multiplying the appropriate emission factor from AP-42, Table 3.2-2 (revised 7/00) by the maximum hourly heat input rate (3.2 mmBtu/hr).

If required, compliance with the hourly allowable CO emission limitation shall be determined in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly allowable CO emission limitation, compliance with the annual limitation shall be demonstrated (the annual allowable limitation was developed by multiplying the hourly allowable limitation by 8760, and then dividing by 2000).
[OAC rule 3745-77-07(C)(1) and PTI 03-7588]

e. Emission Limitations:
0.06 lb PE/hr and 0.26 ton PE/yr

Applicable Compliance Method:
The permittee may determine compliance with the hourly PE limitation by multiplying the emission factor from AP-42, Table 3.2-2 (revised 7/00) of 0.0000771 lb PE (filterable)/mmBtu of actual heat input by the maximum heat input rate of the emissions unit (3.2 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the hourly PE limitation above in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly allowable PE limitation, compliance with the annual limitation shall be demonstrated (the annual allowable limitation was developed by multiplying the hourly allowable limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI 03-7588]

f. Emission Limitations:
0.74 lbs OC/hr and 3.24 tons OC/yr

Applicable Compliance Method:
The permittee may also determine compliance with the hourly allowable OC emission limitation by multiplying the appropriate emission factor from AP-42, Table 3.2-2 (revised 7/00) by the maximum hourly heat input rate (3.2 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the hourly OC limitation above in accordance with Methods 18 and 25 or 25A of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly allowable OC emission limitation, compliance with the annual limitation shall be demonstrated (the annual allowable limitation was developed by multiplying the hourly allowable limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI 03-7588]

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -Group A - Line Heaters: B008 and B009

EU ID	Operations, Property and/or Equipment Description
B008	Line Heater 2 - Total Energy Resource Inc. natural gas (indirect-fired) 12.0 mmBtu/hr
B009	Line Heater 3 - Total Energy Resource Inc. natural gas (indirect-fired) 12.0 mmBtu/hr

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 11/30/01 (PTI P0117072 issued June 17, 2014)	1.18 lbs nitrogen oxides (NO_X) per hour; 5.15 tons NO_X per year (each emissions unit) 0.99 lbs carbon monoxide (CO) per hour; 4.33 tons CO per year (each emissions unit) See b)(2)a and b)(2)f.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06
c.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input
e.	40 CFR 63.7480 et seq. (MACT Subpart DDDDD) [In accordance with 63.7575, this emissions unit is in the 'unit designed to fire Gas 1 fuels' subcategory existing process heater located at a major source of HAP emissions.]	See b)(2)c, c)(2), d)(3) and e)(2).
f.	40 CFR 60.40c et seq. (NSPS Subpart Dc)	See b)(2)d and d)(2).
g.	OAC rule 3745-18-06(A)	See b)(2)e.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_X and CO emissions from this air contaminant source(s) since the uncontrolled potentials to emit for NO_X and CO is less than ten tons per year for each pollutant.

c. This emissions unit(s) is subject to the initial notification requirements of 40 CFR, Part 63, Subpart DDDDD (Boiler MACT) as outlined in 63.9(b) and the work practice standards located in Table 3 as outlined in 63.7500 (i.e., it is not subject to the emission limits, performance testing, monitoring, or site-specific monitoring plan requirements of Subpart DDDDD or any other requirements in 40 CFR, Part 63, Subpart A).

d. This regulation does not specify emission limitations for units that only fire natural gas.

e. These emissions units are exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).

f. The PM_{10}, SO_2, and VOC emissions from the combustion of natural gas are negligible, therefore no emissions limitations for these pollutants were established.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in these emissions units.

[OAC rule 3745-77-07(A)(1) and PTI P0117072]

(2) The permittee shall comply with the applicable operating requirements pursuant to 40 CFR, Part 63, Subpart DDDDD, including the following sections:

63.7495(b)	compliance date
63.7510(e)	initial compliance demonstration
63.7500(e)	conduct annual tune-up
63.7500(a)(1) - Table 3	one-time energy assessment
63.7545(e) 63.7530(d), 63.7530(e)	notification of compliance

[OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart DDDDD]

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 each emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI P0117072]

(2) The permittee shall collect and record the amount of fuel (natural gas) combusted during each calendar month for each emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI P0117072]

(3) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR, Part 63, Subpart DDDDD, including the following sections:

63.7555(i)	maintain records of startup and shutdown events
63.7555(j)	fuel records for startup and shutdown
63.7560	general recordkeeping requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in either emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI P0117072]

(2) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR, Part 63, Subpart DDDDD, including the following sections:

63.7550(b), (c) and (h)(3)	annual reporting requirements

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

f) Testing Requirements

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

a. Emission Limitation:
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
The permittee may demonstrate compliance with the lb PE/mmBtu allowable limitation above by multiplying the emission factor of 1.9 lbs PE (filterable)/mm cu.ft. of natural gas [from AP-42, Table 1.4-2 (revised 7/98)] by the 1020 mmBtu /cu ft heat content of natural gas.

If required, the permittee shall demonstrate compliance with the PE limitation above pursuant to OAC rule 3745-17-03(B)(9).

[OAC rule 3745-77-07(C)(1) and PTI P0117072]

b. Emission Limitations: (each emissions unit)
1.18 lb NO_X per hour and 5.15 tons NO_X per year

Applicable Compliance Method:
The permittee may demonstrate compliance with the hourly allowable NOx emission limitation by multiplying the emission factor of 100 lbs NOx/mm cu. ft. of natural gas [from AP-42, Table 1.4-1 (revised 7/98)] by the heat input of 12.0 mmBtu/hr, and then divided by the 1020 mmBtu /cu ft heat content of natural gas.

If required, the permittee shall demonstrate compliance with the hourly NO_X limitation pursuant to Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable NO_X limitation shall be demonstrated as long as compliance with the hourly allowable NO_X emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI P0117072]

c. Emission Limitations: (each emissions unit)
0.99 lbs CO per hour and 4.33 tons CO per year

Applicable Compliance Method:
The permittee may demonstrate compliance with the hourly allowable CO emission limitation by multiplying the emission factor of 84 lbs CO/mm cu. ft. of natural gas [from AP-42, Table 1.4-1 (revised 7/98)] by the by the heat input of 12.0 mmBtu/hr, and then divided by the 1020 mmBtu /cu ft heat content of natural gas.

If required, the permittee shall demonstrate compliance with the hourly CO limitation pursuant to Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable CO limitation shall be demonstrated as long as compliance with the hourly allowable CO emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI P0117072]

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

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)]

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Group B - Prime Mover IC Engines: P003, P004, P005, P006, and P007

EU ID	Operations, Property and/or Equipment Description
P003	PRIME MOVER: A NATURAL GAS-FIRED RECIPROCATING ENGINE COMPRESSING NATURAL GAS. (13.6 mmBtu/hr)
P004	PRIME MOVER: A NATURAL GAS-FIRED RECIPROCATING ENGINE COMPRESSING NATURAL GAS. (13.6 mmBtu/hr)
P005	PRIME MOVER: A NATURAL GAS-FIRED RECIPROCATING ENGINE COMPRESSING NATURAL GAS. (13.6 mmBtu/hr)
P006	PRIME MOVER: A NATURAL GAS-FIRED RECIPROCATING ENGINE COMPRESSING NATURAL GAS. (32.4 mmBtu/hr)
P007	PRIME MOVER: A NATURAL GAS-FIRED RECIPROCATING ENGINE COMPRESSING NATURAL GAS. (32.4 mmBtu/hr)

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 3745-17-11(B)(5)(b)	0.062 lb particulate emissions (PE) /mmBtu of actual heat input
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-18-06(G)	See b)(2)a.
d.	40 CFR, Part 63, Subpart ZZZZ (40 CFR 63.6580-6675) [In accordance with 40 CFR 63.6590 (a)(1)(i), these emissions units are all existing stationary reciprocating internal combustion engines with a site rating of more than 500 brake HP.]	See b)(2)b.

(2) Additional Terms and Conditions

a. Since natural gas is the only fuel fired in this emissions unit, it is exempt from the sulfur dioxide emission limitation in OAC rule 3745-18-06(G), pursuant to OAC rule 3745-18-06(A).

b. These emission units do not have to meet the requirement of this subpart and of subpart A in accordance with 40 CFR 63.6590(b)(3) because it is an existing spark ignition 2 stroke lean burn (2SLB) stationary reciprocating internal combustion engine (RICE) with a site rating of more than 500 brake horsepower at a major source. In addition, no initial notification is required.

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1)]

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.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

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>Emission Limitations:</u>
0.062 lb PE/mmBtu of actual heat input

<u>Applicable Compliance Method:</u>
The permittee may determine compliance with the PE limitation above based on an emission factor from AP-42, Table 3.2-1 (revised 7/00) of 0.0384 lb PE (filterable)/mmBtu of actual heat input.

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

[OAC rule 3745-77-07(C)(1)]

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

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -Group C - TEG Dehydration: P001 and P002

EU ID	Operations, Property and/or Equipment Description
P001	TEG dehydration Unit 1 (gas flow rate capacity 200 mmscf/day) with reboiler (2.9 mmBtu/hrn.g.), with exhaust outlet flare (4.4 mmBtu/hr with n.g. supplement)
P002	TEG dehydration Unit 2 (gas flow rate capacity 200 mmscf/day) with reboiler (2.9 mmBtu/hrn.g.), with exhaust outlet flare (4.4 mmBtu/hr with n.g. supplement)

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)(2), d)(3), d)(4), d)(5), and e)(2).

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 11/30/01 (PTI P0115969 issued April 29, 2014)	See b)(2)a and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-17-10(B)	0.020 lbs of particulate emissions (PE) per MMBtu of actual heat input from natural gas combustion in reboiler /regenerator
d.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the reboiler /regenerator combustion exhaust stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
e.	40 CFR 63.1270 et seq. (MACT Subpart HHH) [In accordance with 40 CFR 63.1270(b)(2) and 63.1271, these emissions units are 'existing small glycol dehydration units' at a natural gas transmission and storage facility.]	See b)(2)d, b)(2)l, c)(1), d)(6), d)(7), e)(3), and f)(2).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR 63. 1-15 (40 CFR 63.1274)	Table 2 to Subpart HHH of 40 CFR, Part 63 - Applicability of General Provisions to Subpart HHH shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
g.	ORC 3704.03(F) OAC rule 3745-114-01	See d)(2), d)(3), d)(4), d)(5), and e)(2).
h.	OAC rule 3745-17-11(B)	See b)(2)e. (for flare)
i.	OAC rule 3745-17-07(A)	See b)(2)f. (for flare)
j.	OAC rule 3745-18-06	See b)(2)g. (for flare)
k.	OAC rule 3745-18-06(E)	See b)(2)h. (for reboiler /regenerator)

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements for VOC emissions from the flare for this emissions unit have been determined to be equivalent to 40 CFR Part 63 Subpart HHH.

The combustion emissions from the flare (NO_X, CO, SO_2, and PM_{10}) are negligible; therefore, no emission limitations will be established pursuant to OAC rule 3745-31-05(A)(3) as effective 11/30/01.

The combustion emissions from the reboiler /regenerator (VOC, NO_X, CO, SO_2, and PM_{10}) are negligible; therefore, no emission limitations will be established pursuant to OAC rule 3745-31-05(A)(3) as effective 11/30/01.

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the 40 CFR Part 63 Subpart HHH requirements will remain applicable (under 40 CFR Part 63 authority) after the above SIP revisions are approved by U.S. EPA and OAC rule 3745-31-05(A)(3) authority expires.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_X, CO, SO_2, and PM_{10} emissions from the flare and the reboiler /regenerator for this air contaminant source since the uncontrolled potentials to emit for NO_X, CO, SO_2, and PM_{10} are each less than ten tons per year.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled VOC emissions from the reboiler /regenerator since the potential to emit for VOC for this air contaminant source is less than ten tons per year.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC from the flare, since the potential to emit for VOC, taking into account federally enforceable control requirements from 40 CFR 63 Subpart HHH (for the flare), for this air contaminant source is less than ten tons per year.

The potential to emit (PTE) for VOC emissions from the flares for each unit is 9.2 tons per year and was determined by adding natural gas /organics combustion emissions (off-gas from the re-boiler and the flash tank), and the 2% 'pass-through' uncontrolled emissions, from the flares. Combustion emissions were determined by multiplying the AP-42 emission factor from Table 13.5-1 (Jan 1995) of 0.14 lb VOC /MMBtu by the maximum firing capacity (two at 4.4 mmBtu/hr each). Flare emissions from pass-through were determined by employing the Geotechnical Resources Inc (GRI) GLYCalc, Version 4.0 computer program (for the dehydrator contribution to the emissions), and flare control efficiency of 98 percent by weight. The resulting hourly emission rate of combustion and uncontrolled emissions (4.20 lbs/hr) was multiplied by a maximum operating schedule of 8760 hours per year.

d. The potential to emit for benzene emissions [as per 40 CFR 63.1282(a)] from the flares for each unit is 0.9 tons per year and was determined by adding natural gas /organics benzene emissions (off-gas from the re-boiler and the flash tank), and the 2% 'pass-through' uncontrolled emissions, from the flares. All benzene emissions were determined by employing the Geotechnical Resources Inc (GRI) GLYCalc, Version 4.0 computer program (GLYCalc includes flare control efficiency of 98 percent by weight). The resulting hourly emission rate of emissions (0.165 lbs/hr per unit) was multiplied by a maximum operating schedule of 8760 hours per year.

Benzene emissions from natural gas combustion from the re-boiler /regenerator make negligible contribution to PTE for benzene.

e. The uncontrolled mass rate of particulate emissions from the flare is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule

3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(17).

f. The emissions from the flare are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

g. There are no sulfur dioxide emission limitations established by OAC rule 3745-18 for equipment associated with these emissions units that are not considered "fuel burning equipment" because the process weight rate is less than 1000 pounds per hour and is therefore exempt pursuant to OAC rule 3745-18-06(C).

h. The combustion emissions from the regenerator are exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).

i. This emission unit(s) must achieve compliance with the 40 CFR Part 63 Subpart HHH requirements under this permit by October 15, 2015, except as provided in 40 CFR 63.6(i).
[40 CFR 63.1270(d)(3)]

c) Operational Restrictions

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

[OAC rule 3745-77-07(C)(1) and PTI P0115969]

(2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart HHH, including the following sections:

63.1275(b)(1)(iii)	must meet annual BTEX emission limit according to Equation 1 (of this Title 40 CFR section)
63.1275(b)(1)(iii)(A)	must connect each dehydrator process vent to a control device (i.e. flare) through a closed-vent system
63.1275(b)(2)	safety devices that vent directly to the atmosphere may be used on the air emission control equipment
63.1281(c)(1)	closed-vent system shall route all gases, vapors, and fumes emitted from the material in an emissions unit to a control device
63.1281(c)(2)	closed-vent system shall be designed and operated with no detectable emissions
63.1281(c)(3)	requirements for closed-vent system bypass devices
63.1281(f)(1)(iii)	use of a flare that is designed and operated in accordance with the requirements of 40 CFR 63.11(b)

63.1281(f)(2)(i)	flare shall be operating at all times (may vent more than one unit to a control device)
63.1281(f)(2)(ii)	flare shall demonstrate compliance according to the requirements of 63.1282(h) [where flare manufacturer has tested in accordance with 63.1282(g)].

[OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart HHH]

d) Monitoring and/or Recordkeeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI P0115969]

(2) The permit to install for emissions units P001 and P002 was evaluated based on the actual materials and the design materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statue", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year (in addition to benzene that emits less than one ton per year) using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxics Emissions, Option A", as follows:

a. the exposure limit, expressed as time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emission units, (as determined from the raw materials processed has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the ACGIH "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions units, i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the MAGLC:

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Benzene TLV (mg/m3): 1.5973
Maximum Hourly Emission Rate (lbs/hr): 0.3306
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 8.317
MAGLC (µg/m3): 38.03

Toxic Contaminant: Toluene TLV (mg/m3): 188.405
Maximum Hourly Emission Rate (lbs/hr): 0.4810
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 12.10
MAGLC (µg/m3): 4485.8

Toxic Contaminant: Xylene TLV (mg/m3): 434.192
Maximum Hourly Emission Rate (lbs/hr): 0.6678
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 16.81
MAGLC (µg/m3): 10337.9

The permittee, has demonstrated that emissions of benzene, toluene and xylene, from emissions units P001 and P002, is calculated to be less than eighty per cent of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statue", ORC 3704.03(F).

[PTI P0115969]

(3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

[PTI P0115969]

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statue", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statue", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statue", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statue", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[PTI P0115969]

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statue", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[PTI P0115969]

(6) The permittee shall comply with the applicable inspection /monitoring requirements required under 40 CFR Part 63 Subpart HHH, including the following sections:

63.1283(b)	[where flare manufacturer has tested in accordance with 63.1282(g)] shall develop an inspection and maintenance plan for the flare - shall conduct semi-annual inspections, with maintenance and replacement of flare components made in accordance with the plan
63.1283(c)(2)(i)	procedures for initial and annual inspections, for closed-vent system joints, seams, or other connections that are permanently or semi-permanently sealed (e.g., a welded joint between two sections of hard piping or a bolted or gasketed ducting flange)
63.1283(c)(2)(ii)	procedures for initial and annual leak detection inspections and annual visual inspections, for closed-vent system components other than those specified in paragraph (c)(2)(i)
63.1283(c)(2)(iii)	bypass devices - inspection, monitoring, and other requirements
63.1283(c)(3), (4)	leak detections - timeframes for repair, provision for delay of repair
63.1283(c)(5), (6)	provisions for 'unsafe' and 'difficult' inspection and repair for closed-vent system
63.1283(d)(1)(i)	each parametric monitoring data reading required every hour (if applicable)
63.1283(d)(1)(ii)	requirements to prepare a site-specific monitoring plan
63.1283(d)(1)(iii), (iv)	QA /QC requirements for monitoring equipment
63.1283(d)(3)(i)(C)	heat sensing monitoring device for flare
63.1283(d)(3)(i)(H)(1)	determine actual average inlet waste gas flow rate using the model GRI- GLYCalcTM, Version 3.0 or higher, ProMax, or AspenTech HYSYS

63.1283(d)(3)(i)(H)(2)	use a heat sensing monitoring device equipped with a continuous recorder that indicates the continuous ignition of the pilot flame
63.1283(d)(6), (7)	definitions /determinations for control device /closed-vent system excursion /noncompliance
63.1283(d)(9)	Nothing in paragraphs 40 CFR 63.1283 (d)(1) through (d)(8) shall be construed to allow or excuse a monitoring parameter excursion caused by any activity that violates other applicable provisions of Subpart HHH.
63.1282(a)(1)	determination of natural gas actual flowrate - instrumental direct measurement, or other method documented to the Director's satisfaction

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart HHH]

(7) The permittee shall comply with the applicable recordkeeping requirements required under 40 CFR Part 63 Subpart HHH, including the following sections:

63.1284(a)	recordkeeping requirements according to Subpart A are in Table 2 to Subpart HHH
63.1284(b)(1)	records requirements, retention - general
63.1284(b)(2)	records requirement from certain part of Subpart A
63.1284(b)(3)	records for monitoring systems - general
63.1284(b)(5)	records for unsafe-to-inspect parts of closed-vent system
63.1284(b)(6)	records for difficult-to-inspect parts of closed-vent system
63.1284(b)(7), (8)	records for leak inspection for closed-vent system (detailed)
63.1284(f)	malfunction records
63.1284(g)	records for control device tests under 63.1282(g), to comply with 63.1281(f)(1)(iii)
.1284(h)	cords of the semi-annual flare maintenance inspections

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart HHH]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a supplemental fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI P0115969]

(2) The permittee shall submit annual reports to the appropriate Ohio EPA District Office of local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statue", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[OAC rule 3745-77-07(C)(1) and PTI P0115969]

(3) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63 Subpart HHH, including the following sections:

63.1285(a)	reporting requirements according to Subpart A are in Table 2 to Subpart HHH
63.1285(b)(1)	initial notification requirement for existing sources
63.1285(b)(2)	monitor performance evaluation report (if applicable)
63.1285(b)(3)	notification of planned date for flare performance test
63.1285(b)(6)	malfunction reporting
63.1285(d)	Notification of Compliance Status reporting requirement
63.1285(d)(5)	results of continuous monitoring system performance evaluations (if applicable)
63.1285(d)(6)	deference to Title V compliance reporting
63.1285(d)(9)	affirmative statement of compliance
63.1285(d)(11)	reporting for flares tested under 1282(g) (i.e. tested by manufacturer) must include data under 1282(g)(8)
63.1285(d)(12)	further reporting for flares tested under 1282(g)
63.1285(e)	Periodic Reports
63.1285(e)(1)	reporting frequency

63.1285(e)(2)(ii)(E)	visible emissions excursion reporting (performance test)
63.1285(e)(2)(iii)	reporting for leak inspection for closed-vent system
63.1285(e)(2)(iv)	reporting for closed-vent system bypass (if applicable)
63.1285(e)(2)(vi)	'negative declaration' reporting
63.1285(e)(2)(xii)	reporting for semi-annual inspections for flare under 1284(h)
63.1285(e)(2)(xiii)	responsible official certification
63.1285(f)	notification of process change (if applicable)
63.1285(g)	electronic reporting of performance test results to US EPA (if applicable)

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart HHH]

f) Testing Requirements

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

a. Emission Limitation:
0.020 lbs of PE per MMBtu of actual heat input from natural gas combustion in regenerator

Applicable Compliance Method:
The permittee shall demonstrate compliance by multiplying the AP-42 emission factor from Table 1.4-2 (revised 7/1998), of 7.6 lbs PE/MMscf by the heat content of scf/1020 Btu.

If required, the permittee shall demonstrate compliance with the PE limitation above pursuant to OAC rule 3745-17-03(B)(9).

[OAC rule 3745-77-07(C)(1) and PTI P0115969]

b. Emission Limitation:
Visible PE emissions from the regenerator combustion exhaust stack shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI P0115969]

(2) The permittee shall comply with the applicable compliance requirements as required under 40 CFR Part 63 Subpart HHH, including the following sections:

63.1282(a)(2)(i)	determine actual average benzene or BTEX emissions using the model GRI-GLYCalcTM, Version 3.0 or higher
63.1282(b)	procedures for determining 'no detectable emissions' [Method 21, 40 CFR 60, Appendix A]
63.1282(h)(1)	inlet gas flow rate shall meet the range specified by the manufacturer - flow rate shall be calculated as specified in 40 CFR 63.1283(d)(3)(i)(H)(1)
63.1282(h)(2)	a pilot flame shall be present at all times of operation - the pilot flame shall be monitored in accordance with 40 CFR 63.1283(d)(3)(i)(H)(2).
63.1282(h)(3)	flare shall be operated with no visible emissions, except for periods not to exceed a total of 2 minutes during any hour. A visible emissions test using Method 22, 40 CFR part 60, Appendix A, shall be performed each calendar quarter. The observation period shall be 1 hour and shall be conducted according to EPA Method 22, 40 CFR part 60, Appendix A.
63.1282(h)(4)	compliance determination for 63.1282(h), including provisions /instructions when failing the visible emissions test from (h)(3)

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart HHH]

g) Miscellaneous Requirements

(1) None.