



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

Certified Mail

2/5/2016

Nathan Wheldon
 Yoder Compressor Station
 1515 Arapahoe St
 Tower 1, Suite 1600
 Denver, CO 80202

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0634005123
 Permit Number: P0119165
 Permit Type: Initial Installation
 County: Harrison

Dear Permit Holder:

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

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

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

Sincerely,



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

Cc: Ohio EPA-SEDO



FINAL

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

Facility ID:	0634005123
Permit Number:	P0119165
Permit Type:	Initial Installation
Issued:	2/5/2016
Effective:	2/5/2016
Expiration:	2/5/2026



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

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Final Permit-to-Install and Operate
Yoder Compressor Station
Permit Number: P0119165
Facility ID: 0634005123
Effective Date: 2/5/2016

Authorization

Facility ID: 0634005123
Application Number(s): A0053627, A0055344
Permit Number: P0119165
Permit Description: Initial PTIO for a natural gas compressor station consisting of 6 natural gas fired compressor engines, one flare, blow downs, and fugitive leaks.
Permit Type: Initial Installation
Permit Fee: \$2,300.00
Issue Date: 2/5/2016
Effective Date: 2/5/2016
Expiration Date: 2/5/2026
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Yoder Compressor Station
79300 Cassville Rd
Cadiz, OH 43907

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

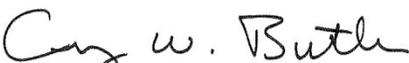
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0119165

Permit Description: Initial PTIO for a natural gas compressor station consisting of 6 natural gas fired compressor engines, one flare, blow downs, and fugitive leaks.

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

- | | |
|-----------------------------------|------------------------------|
| Emissions Unit ID: | P007 |
| Company Equipment ID: | Dehydrator Regenerator Flare |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P008 |
| Company Equipment ID: | Equipment Blowdowns |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P801 |
| Company Equipment ID: | Equipment Leaks |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |

Group Name: Compressor Engines

Emissions Unit ID:	P001
Company Equipment ID:	Compressor Engine #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Compressor Engine #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Compressor Engine #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	Compressor Engine #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	Compressor Engine #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Compressor Engine #6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
 Yoder Compressor Station
Permit Number: P0119165
Facility ID: 0634005123
Effective Date: 2/5/2016

Group Name: Storage Vessels

Emissions Unit ID:	T001
Company Equipment ID:	Storage Tank #1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T002
Company Equipment ID:	Storage Tank #2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T003
Company Equipment ID:	Storage Tank #3
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T004
Company Equipment ID:	Storage Tank #4
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T005
Company Equipment ID:	Storage Tank #5
Superseded Permit Number:	
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
Yoder Compressor Station
Permit Number: P0119165
Facility ID: 0634005123
Effective Date: 2/5/2016

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



Final Permit-to-Install and Operate
Yoder Compressor Station
Permit Number: P0119165
Facility ID: 0634005123
Effective Date: 2/5/2016

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
Yoder Compressor Station
Permit Number: P0119165
Facility ID: 0634005123
Effective Date: 2/5/2016

C. Emissions Unit Terms and Conditions

1. P007, Dehydrator Regenerator Flare

Operations, Property and/or Equipment Description:

One (1) flare that will be used to control emissions of off-gas from the glycol regeneration unit. The flare will be equipped with natural gas pilot burners, and a small amount of natural gas will be used to purge the flare header to avoid flash back and resulting over pressurization. Additional natural gas will be fired to supplement the heat content of gases sent to the flare, as necessary.

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

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

a. d)(2)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	Emissions shall not exceed: 0.87 pound per hour and 3.82 tons per year volatile organic compounds (VOC) 0.28 ton oxides of nitrogen (NO _x) per month averaged over a twelve month rolling period 0.009 ton sulfur dioxide (SO ₂) per month averaged over a twelve month rolling period 0.01 ton of particulate material less than 10 microns in diameter (PM ₁₀) per month



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		averaged over a twelve month rolling period 0.01 ton of particulate material less than 2.5 microns in diameter (PM _{2.5}) per month averaged over a twelve month rolling period See b)(2)a., b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	See b)(2)b.
c.	ORC 3704.03(T)	Emissions of carbon monoxide (CO) shall not exceed 1.10 ton per month averaged over a twelve month rolling period
d.	ORC 3704.03(F)	See d)(2)

(2) Additional Terms and Conditions

- a. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that Best Available Technology (BAT) is no longer required by state regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, paragraph (A)(3)(a)(ii) of OAC rule 3745-31-05 (the less than 10 tons per year BAT exemption) has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revisions to OAC rule 3745-31-05(A)(3)(a)(ii), the requirement to satisfy BAT for pollutant(s) less than 10 tons per year still exists as part of the federally-approved SIP.
- b. The following paragraphs will apply when U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the SIP:
 - i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of NO_x, SO₂, PM₁₀, PM_{2.5}, and VOC from this air contaminant source because the potential to emit for NO_x, SO₂, PM₁₀, PM_{2.5}, and VOC is less than 10 tons per year.
 - c. The VOC emission limit was established to reflect the potential to emit for this emission unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The flare or combustion device shall be operated with a flame present at all times when gases are vented to it.

- (2) An automatic flame ignition system shall be installed to meet one of the following requirements:
 - a. If using a pilot flame ignition system, the presence of a pilot flame shall be monitored using a thermocouple or other equivalent device to detect the presence of a flame. A pilot flame shall be maintained at all times in the flare's pilot light burner. If the pilot flame goes out and does not relight, then an alarm shall sound; or
 - b. If using an electric arc ignition system, the arcing of the electric arc ignition system shall pulse continually and a device shall be installed and used to continuously monitor the electric arc ignition system.
 - (3) The flare, its auto ignition system, and its recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall:
 - a. continuously monitor the presence of the flame;
 - b. record all periods of time when the automatic flare ignition system or thermocouple was not working and gas was being vented to the flare;
 - c. record all periods of time when gas was being vented to the flare and there was no flame present; and
 - d. record all periods of time when the enclosed combustor/flare was not operated in accordance with the manufacturer's recommendations.
 - (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.
 - (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the enclosed combustor/flare, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and made available to Ohio EPA, Southeast District Office upon request.
 - (4) The permittee shall conduct periodic inspections of the enclosed combustor/flare to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed

necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspections frequency. These records shall be made available to Ohio EPA, Southeast District Office upon request.

- (5) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the enclosed combustor/flare while the emissions unit is shut down and perform any needed maintenance and repairs to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the enclosed combustor/flare and maintain the following:
 - a. inspection date;
 - b. description of necessary maintenance, repairs performed and date completed; and
 - c. name of person performing the inspection.

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

- (7) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustor/flare outlet temperature when the organic vapors are being routed to the combustor/flare, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. These records shall be maintained for a period of no less than five year. These records shall be made available to Ohio EPA, Southeast District Office upon request.
- e) Reporting Requirements
- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to Ohio EPA, Southeast District Office.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA Southeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - (3) The permittee shall identify in the PER all periods of time when the pilot flame was not present and gas was being vented to it, including the time, date and duration of each event.

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: 0.87 pound per hour and 3.82 tons per year VOC

Applicable Compliance Method: The short term emission limitation is derived from the pilot light and purge gas rates multiplied by AP-42 Section 1.4, Table 1.4-2 emission factors while the long term emission limitation is the short term * 8760 hrs/yr / 2,000 lbs/ton.

If required, VOC emissions shall be determined according to test Methods 1-4 and 25 or 25A, as set forth in the "Appendix on Test Methods: in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA approved methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Emission Limitation: 0.28 ton NO_x per month averaged over a twelve month rolling period

Applicable Compliance Method: The NO_x emission limitation is derived from the pilot light and purge gas rates multiplied by TNRCC RG-109, Table 4 emission rates / 2,000 lbs/ton / 12 months/year.

If required, the permittee shall demonstrate compliance with the maximum outlet concentration limitation by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 7E or 20 of CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

c. Emission Limitation: 0.009 ton SO₂ per month averaged over a twelve month rolling period

Applicable Compliance Method: The SO₂ emission limitation is derived from the sulfur content (gr/mmscf) / 7,000 (gr/lb) * SO₂ MW (lb/lbmol) / Sulfur MW (lb/lbmol) / avg NG HHV (Btu/scf) * the combination of pilot late and purge gas rates (mmscf) / 2,000 lbs/ton / 12 month/year.

If required, compliance shall be determined according to test Methods 1-4 and 6, 6A, 6B, or 6C, as set forth in the "Appendix on Test Methods: in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA approved methods may be used with prior approval from Ohio EPA, Central District Office.

d. Emission Limitation: 0.01 ton of particulate material less than 10 microns in diameter (PM₁₀) per month averaged over a twelve month rolling period and 0.01 ton of particulate material less than 2.5 microns in diameter (PM_{2.5}) per month averaged over a twelve month rolling period



Applicable Compliance Method: The short term emission limitation is derived from the pilot light and purge gas rates multiplied by AP-42 Section 1.4, Table 1.4-2 emission factors while the long term emission limitation is the short term * 8760 hrs/yr / 2,000 lbs/ton / 12 months/year.

If required, the permittee shall demonstrate compliance with the maximum outlet concentration limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

- e. Emission Limitation: Emissions of carbon monoxide (CO) shall not exceed 1.10 ton per month averaged over a twelve month rolling period

Applicable Compliance Method: The CO emission limitation is derived from the pilot light and purge gas rates multiplied by TNRCC RG-109, Table 4 emission rates / 2,000 lbs/ton / 12 months/year.

If required, the permittee shall demonstrate compliance with the maximum outlet concentration limitation by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 7E or 20 of CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

g) Miscellaneous Requirements

- (1) None.

2. P008, Equipment Blowdowns

Operations, Property and/or Equipment Description:

Process releases associated with periodic maintenance blowdown activities that will not pose a safety issue to plant personnel. This includes light gas releases and relatively small volume releases from equipment that are impractical to route to a flare.

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

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

a. d)(2)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	Emissions shall not exceed: 0.10 tons volatile organic compounds (VOC) per month averaged over a twelve month rolling period See b)(2)a., b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	See b)(2)b.
c.	ORC 3704.03(F)	See d)(2)

(2) Additional Terms and Conditions

a. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that Best Available Technology (BAT) is no

longer required by state regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, paragraph (A)(3)(a)(ii) of OAC rule 3745-31-05 (the less than 10 tons per year BAT exemption) has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revisions to OAC rule 3745-31-05(A)(3)(a)(ii), the requirement to satisfy BAT for pollutant(s) less than 10 tons per year still exists as part of the federally-approved SIP.

- b. The following paragraphs will apply when U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the SIP:
 - i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the potential to emit for VOC emissions is less than 10 tons per year; and
 - c. The VOC emission limit was established to reflect the potential to emit for this emission unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following records on a monthly basis:
 - a. the date of each event;
 - b. percent VOC fraction in the gas stream obtained from gas sampling/monitoring;
 - c. total volume of gas (ft³) emitted from each event specified in d)(1)a.;
 - d. total volume of gas emitted from all events specified in d)(1)a.;
 - e. gas density (lb/scf) obtained from gas sampling/monitoring; and
 - f. total VOC emissions per month, averaged over a twelve month rolling period [as established in f)(1)].
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

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

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: 0.10 tons volatile organic compounds (VOC) per month averaged over a twelve month rolling period

Applicable Compliance Method: The VOC emission limitation was developed using information provided in application A0053627 (7/6/15), and the following equation:

$$\text{VOC} = \text{weight fraction (\%VOC)} * \text{release volume (ft}^3\text{)} * \text{gas density (lb VOC/ft}^3\text{)} / 2,000 \text{ lbs/ton} / 12 \text{ months/year}$$

Ongoing compliance is demonstrated through the use of the provided equation combined with the recordkeeping established in d)(1).

g) Miscellaneous Requirements

- (1) None.

3. P801, Equipment Leaks

Operations, Property and/or Equipment Description:

Various equipment components, including valves, pumps, flanges, and connectors will be located throughout the plant that may result in fugitive emissions due to equipment leaks.

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

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

a. d)(1)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	The permittee shall develop and implement a site-specific leak detection and repair program for ancillary equipment as described in c), below. See b)(2)a., c)(1), c)(2), c)(3), d)(2), d)(3), d)(4) and e)(3)
b.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	See b)(2)b.
c.	ORC rule 3704.03(F)	See d)(1)
d.	40 CFR Part 60, Subpart OOOO	See b)(2)c.

(2) Additional Terms and Conditions

a. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that Best Available Technology (BAT) is no

longer required by state regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, paragraph (A)(3)(a)(ii) of OAC rule 3745-31-05 (the less than 10 tons per year BAT exemption) has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revisions to OAC rule 3745-31-05(A)(3)(a)(ii), the requirement to satisfy BAT for pollutant(s) less than 10 tons per year still exists as part of the federally-approved SIP.

- b. The following rule paragraph will apply when U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:
 - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the uncontrolled potential to emit for VOC is less than 10 tons/year.
 - c. The equipment leak standards specified in 40 CFR Part 60, Subpart OOOO do not apply to this emission unit because the facility does not actively extract natural gas liquids (it happens incidentally within the cyclonic separators of the compressor engines through centrifugal separation), thereby not meeting the definition of a "natural gas processing plant".

c) Operational Restrictions

- (1) The permittee shall minimize the emissions of VOC from the maintenance venting activities to the extent practicable.
- (2) Ancillary Equipment Leak Detection and Repair Program

The permittee shall develop and implement a leak detection and repair program designed to monitor and repair leaks from ancillary equipment covered by this permit, including each pump, compressor, pressure relief device, connector, valve, flange, vent, cover, any bypass in the closed vent system, and each storage vessel. This program shall meet the following requirements:

- a. Leaks shall be detected by the use of either a "Forward Looking Infra-Red" (FLIR) camera or an analyzer meeting U.S. EPA Method 21 of 40 CFR Part 60, Appendix A.
- b. An initial monitoring shall be completed within 30 days of startup and quarterly thereafter for a period of four consecutive quarters (1 year).
- c. If following the initial four consecutive quarters, less than or equal to 2.0% of the ancillary equipment are determined to be leaking during the most recent quarterly monitoring event, then the frequency of monitoring can be reduced to semi-annual.

- d. If following two consecutive semi-annual periods, less than 2.0% of the ancillary equipment are determined to be leaking during the most recent semi-annual monitoring event, then the frequency of the monitoring can be reduced to annual.
 - e. If more than or equal to 2.0% of the ancillary equipment are determined to be leaking during any one of the semi-annual or annual monitoring events, then the frequency of monitoring shall be returned to quarterly.
 - f. The program shall require the first attempt at repair within five (5) calendar days of determining a leak.
 - g. The program shall require that the leaking component is repaired within 30 calendar days after the leak is detected.
 - h. The program shall allow for the delayed repair of a leaking component following the language found in 40 CFR 60.5416(c)(5).
 - i. The program shall following the Monitoring and Record Keeping requirements described in paragraph 5.d) of this permit.
- (3) In the event that a leak or defect is detected in the cover, closed vent system, process equipment, or control device, the permittee shall make a first attempt at repair no later than 5 calendar days after the leak is detected. Repair shall be completed no later than 30 calendar days after the leak is detected as allowed in 40 CFR 60.5416(c)(4). Any delay of repair of a leak or defect shall meet the requirements of 40 CFR 60.5416(c)(5).
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.
 - (2) **Ancillary Equipment Leak Detection and Repair Program Monitoring and Record Keeping for Programs Utilizing FLIR Cameras**
 - a. Leaks shall be determined by visually observing each ancillary component through the FLIR camera to determine if leaks are visible.
 - b. The following information shall be recorded during each leak inspection:
 - i. the date the inspection was conducted;
 - ii. the name of the employee conducting the leak check;
 - iii. the identification of any component that was determined to be leaking;

- iv. the date the first attempt to repair the component was made;
 - v. the reason the repair was delayed following the language found in 40 CFR 60.5416(c)(5);
 - vi. the date the component was repaired and determined to no longer be leaking;
 - vii. the total number of components that are leaking; and
 - viii. the percentage of components leaking, determined as the sum of the number of components for which a leak was detected, divided by the total number of ancillary components capable of developing a leak, and multiplied by 100.
- c. The permittee shall maintain records that demonstrate the FLIR camera is operated and maintained in accordance with the manufacturer's operation and maintenance instructions.
 - d. The records from each inspection and the dates each leak is detected and repaired shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.
- (3) Ancillary Equipment Leak Detection and Repair Program Monitoring and Record Keeping for Programs Utilizing a Method 21 Analyzer:
- a. Leaks shall be measured by utilizing U.S. EPA Method 21 (40 CFR Part 60, Appendix A). All potential leak interfaces shall be traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm or 10,000 ppm (as applicable) for determining compliance.
 - b. A component is considered to be leaking if the instrument reading is equal to or greater than:

pressure relief device in gas/vapor service	10,000 ppm
pressure relief device in light liquid service	10,000 ppm
pumps in light liquid service	10,000 ppm
compressor	500 ppm
sampling connection system*	*
open ended valves or lines**	**
valves in gas/vapor and light liquid service	10,000 ppm
closed vent system	500 ppm

connectors 10,000 ppm

all other ancillary and associated equipment in VOC service 10,000 ppm

* must be equipped with a closed-purge, closed-loop, or closed-vent system

** must be equipped with a cap, blind flange, plug, or a second valve

- c. The following information shall be recorded during each leak inspection:
- i. the date the inspection was conducted;
 - ii. the name of the employee conducting the leak check;
 - iii. the identification of any component that was determined to be leaking (company ID and component type (flange, pump, etc.);
 - iv. the date the first attempt to repair the component was made;
 - v. the reason the repair was delayed following the language found in 40 CFR 60.5416(c)(5);
 - vi. the date the component was repaired and determined to no longer be leaking;
 - vii. the total number of components that are leaking; and
 - viii. the percentage of components leaking, determined as the sum of the number of components for which a leak was detected, divided by the total number of ancillary components capable of developing a leak, and multiplied by 100.
- d. The permittee shall maintain records that demonstrate the Method 21 analyzer is operated and maintained in accordance with the manufacturer's operation and maintenance instructions.
- e. In order to calibrate the analyzer, the following calibration gases shall be used:
- i. zero air, which consists of less than 10 ppm of hydrocarbon in air; and
 - ii. a mixture of air and methane or n-hexane at a concentration of approximately, but less than, 10,000 ppm of methane or n-hexane.
- f. The records from each inspection and the dates each leak is detected and repaired shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.
- (4) The permittee shall perform daily inspections, each day that an operator is at the facility and when the facility is in operation, for indications of releases from the pressure relief valves, and any olfactory, visual, or auditory indications of equipment leaks. The

positive indication of a release or a leak shall be noted in an operations log, along with the following information:

- a. the name of the inspector;
 - b. the date and time inspected;
 - c. the identification of the pressure relief valve that released and/or piece of equipment that leaked;
 - d. the estimated or calculated duration of the pressure relief valve release and/or equipment leak and the estimated emission totals; and
 - e. any corrective actions taken to minimize or eliminate the release or leak.
- (5) The permittee shall maintain records of the amount of gas released (scf/m) for scheduled maintenance venting.
- e) Reporting Requirements
- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to Ohio EPA, Southeast District Office.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA Southeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - (3) Supplement to the PER for the Ancillary Equipment Leak Detection and Repair Program
- For each inspection that occurred during the year, the permittee shall submit the following information with the annual PER from data collected by the ancillary equipment leak detection and repair program:
- a. the date of the inspection;
 - b. the number of components determined to be leaking;
 - c. the company ID and component type (flange, pump, etc.) of each leaking component;
 - d. the total number of components at the site;
 - e. the percent of components determined to be leaking;
 - f. a list of all components that have not been repaired due to a delay of repair and the reason for the delay; and
 - g. a notification indicating if the permittee has changed future inspection frequencies based on the percent of components leaking.

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. None.

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -Compressor Engines: P001,P002,P003,P004,P005,P006,

EU ID	Operations, Property and/or Equipment Description
P001	Natural gas-fired four-stroke lean burn (4SLB) internal combustion engine rated at an operating capacity of 2,370 horsepower (hp) and equipped with an oxidation catalyst.
P002	Natural gas-fired four-stroke lean burn (4SLB) internal combustion engine rated at an operating capacity of 2,370 horsepower (hp) and equipped with an oxidation catalyst.
P003	Natural gas-fired four-stroke lean burn (4SLB) internal combustion engine rated at an operating capacity of 2,370 horsepower (hp) and equipped with an oxidation catalyst.
P004	Natural gas-fired four-stroke lean burn (4SLB) internal combustion engine rated at an operating capacity of 2,370 horsepower (hp) and equipped with an oxidation catalyst.
P005	Natural gas-fired four-stroke lean burn (4SLB) internal combustion engine rated at an operating capacity of 2,370 horsepower (hp) and equipped with an oxidation catalyst.
P006	Natural gas-fired four-stroke lean burn (4SLB) internal combustion engine rated at an operating capacity of 2,370 horsepower (hp) and equipped with an oxidation catalyst.

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

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

a. d)(2)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	Emissions shall not exceed: 0.73 lb/hr and 3.2 tons per year carbon monoxide (CO) 1.46 lbs/hr and 6.41 tons per year volatile organic compounds (VOC)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>0.004 ton of sulfur dioxide (SO₂) per month averaged over a twelve month rolling period</p> <p>0.07 ton of particulate material less than 10 microns in diameter (PM₁₀) per month averaged over a twelve month rolling period</p> <p>0.07 ton of particulate material less than 2.5 microns in diameter (PM_{2.5}) per month averaged over a twelve month rolling period</p> <p>See b)(2)a., b)(2)f.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	See b)(2)b.
c.	OAC rule 3745-17-11(B)(5)(b)	Particulate emissions shall not exceed 0.062 lb/MMBtu
d.	40 CFR Part 60, Subpart JJJJ (stationary, spark ignition, internal combustion engine manufactured in 2013 subject to and operated in compliance with requirements established pursuant to 40 CFR Part 60, Subpart JJJJ including 60.4246 (General Provisions) identified in Table 3 of Subpart JJJJ)	<p>Emissions shall not exceed:</p> <p>1.0 gram per horse power hour (g/hp-hr) NO_x or 82 ppmvd at 15% O₂</p> <p>2.0 g/hp-hr CO or 270 ppmvd at 15% O₂</p> <p>0.7 g/hp-hr VOC or 60 ppmvd at 15% O₂</p> <p>See b)(2)c., c)(2), d)(3), e)(4), f)(3)</p>
e.	40 CFR Part 60, Subpart OOOO	See b)(2)d., d)(4), and e)(5)
f.	ORC 3704.03(F)	See d)(2).
g.	ORC 3704.03(T)	<p>Emissions shall not exceed:</p> <p>2.61 lbs/hr and 11.44 tons per year oxides of nitrogen (NO_x)</p> <p>See b)(2)f.</p>
h.	40 CFR Part 63, Subpart ZZZZ	See b)(2)e.

(2) Additional Terms and Conditions

- a. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that Best Available Technology (BAT) is no longer required by state regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, paragraph



(A)(3)(a)(ii) of OAC rule 3745-31-05 (the less than 10 tons per year BAT exemption) has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revisions to OAC rule 3745-31-05(A)(3)(a)(ii), the requirement to satisfy BAT for pollutant(s) less than 10 tons per year still exists as part of the federally-approved SIP.

b. The following paragraphs will apply when U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the SIP:

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, PM₁₀, PM_{2.5}, SO₂, and VOC emissions from these air contaminant sources because the potential to emit for CO, PM₁₀, PM_{2.5}, SO₂, and VOC is less than 10 tons per year.

c. The permittee shall comply with the applicable additional terms and conditions of 40 CFR Part 60, Subpart JJJJ including the following:

4233	ission Standards
4246	eneral Provisions

d. The permittee shall comply with the applicable additional terms and conditions of 40 CFR Part 60, Subpart OOOO including the following:

5410	ial Compliance Demonstration
5415	ntinuous Compliance
5411	ditional Requirements
5385	iprocating Compressor Standards

e. This new, stationary RICE, located at an area source of HAPs, will comply with the requirements of 40 CFR, Part 63, Subpart ZZZZ by meeting the requirements of 40 CFR, Part 60, Subpart JJJJ.

f. The CO, VOC, NO_x, SO₂, PM₁₀, and PM_{2.5} emission limits were established to reflect the potential to emit for these emission units while combusting natural gas. Therefore, so long as only natural gas is combusted, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emission limitations.

c) Operational Restrictions

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

60.4243	Compliance Requirements
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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 these emission units.
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.
- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements of 40 CFR Part 60, Subpart JJJJ, including the following:

60.4245	Notification, Reports, Records
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- (4) The permittee shall comply with the applicable monitoring and recordkeeping requirements of 40 CFR Part 60, Subpart OOOO, including the following:

60.5416	Monitoring
60.5421	Recordkeeping

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to Ohio EPA, Southeast District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA Southeast District Office by the due date identified in the Authorization section of this



permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

- (3) 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.
- (4) The permittee shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart JJJJ, including the following:

60.4245	Notification, Reports, Records
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- (5) The permittee shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart OOOO, including the following:

60.5420	Notification, Reporting, Monitoring
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f) **Testing Requirements**

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

a. Emission Limitation: Particulate emissions shall not exceed 0.062 lb/MMBtu

Applicable Compliance Method: Compliance is demonstrated by the manufacturer’s emission guarantee.

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

b. Emission Limitation: 0.73 lb/hr and 3.2 tons per year carbon monoxide (CO)

Applicable Compliance Method: The short term emission limitation is taken from the manufacturer’s emission guarantee while the long term emission limitation is the short term * 8760 hrs/yr / 2,000 lbs/ton.

If required, CO emissions shall be determined according to test Methods 1-4 and 10 or 10B, as set forth in the “Appendix on Test Methods” in 40 CFR, Part 60 “Standards of Performance for New Stationary Sources”. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

- c. Emission Limitation: 1.46 lbs/hr and 6.41 tons per year volatile organic compounds (VOC)

Applicable Compliance Method: The short term emission limitation is taken from the manufacturer's emission guarantee while the long term emission limitation is the short term * 8760 hrs/yr / 2,000 lbs/ton.

If required, VOC emissions shall be determined according to test Methods 1-4 and 25 or 25A, as set forth in the "Appendix on Test Methods: in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA approved methods may be used with prior approval from Ohio EPA, Southeast District Office.

- d. Emission Limitation: 0.004 ton of sulfur dioxide (SO₂) per month averaged over a twelve month rolling period

Applicable Compliance Method: This emission limitation was derived from AP-42 emission factors (Section 3.2, Table 3.2-2 for 4-stroke lean burn) * the MMBtu/hr value of the unit / 2,000 lbs/ton / 12 month/year.

If required, compliance shall be determined according to test Methods 1-4 and 6, 6A, 6B, or 6C, as set forth in the "Appendix on Test Methods: in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA approved methods may be used with prior approval from Ohio EPA, Central District Office.

- e. Emission Limitation: 0.07 ton of particulate material less than 10 microns in diameter (PM₁₀) per month averaged over a twelve month rolling period and 0.07 ton of particulate material less than 2.5 microns in diameter (PM_{2.5}) per month averaged over a twelve month rolling period

Applicable Compliance Method: These emission limitations were derived from AP-42 emission factors (Section 3.2, Table 3.2-2 for 4-stroke lean burn) * the MMBtu/hr value of the unit / 2,000 lbs/ton / 12 month/year.

If required, the permittee shall demonstrate compliance with the maximum outlet concentration limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

- f. Emission Limitation: 2.61 lbs/hr and 11.44 tons per year oxides of nitrogen (NO_x)

Applicable Compliance Method: The short term emission limitation is taken from the manufacturer's emission guarantee while the long term emission limitation is the short term * 8760 hrs/yr / 2,000 lbs/ton.

If required, the permittee shall demonstrate compliance with the maximum outlet concentration limitation by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 7E or 20 of CFR Part 60 Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

- g. Emission Limitation: 1.0 gram per horse power hour (g/hp-hr) NO_x or 82 ppmvd at 15% O₂

Applicable Compliance Method: This emission limitation is taken from Table 1 of 40 CFR Part 60, Subpart JJJJ and the required initial and ongoing compliance demonstrations specified in 60.4244 and 60.4243 shall serve as the compliance method. See f)(2), below.

- h. Emission Limitation: 2.0 g/hp-hr CO or 270 ppmvd at 15% O₂

Applicable Compliance Method: This emission limitation is taken from Table 1 of 40 CFR Part 60, Subpart JJJJ and the required initial and ongoing compliance demonstrations specified in 60.4244 and 60.4243 shall serve as the compliance method. See f)(2), below.

- i. Emission Limitation: 0.7 g/hp-hr VOC or 60 ppmvd at 15% O₂

Applicable Compliance Method: This emission limitation is taken from Table 1 of 40 CFR Part 60, Subpart JJJJ and the required initial and ongoing compliance demonstrations specified in 60.4244 and 60.4243 shall serve as the compliance method. See f)(2), below.

- (2) Pursuant to 40 CFR 60.4243 and 40 CFR 60.4244 the permittee shall conduct or have conducted, emission testing for these emission units in accordance with the following requirements:

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected engines will be operated, but not later than 1 year after initial engine startup;
- b. The emissions testing shall be conducted to demonstrate compliance with the NO_x, CO and VOC emission limitations identified in 40 CFR 60.4233 and Table 1 of 40 CFR Part 60, Subpart JJJJ;
- c. Pursuant to 40 CFR 60.4243 and 40 CFR 60.4344, the following test methods shall be employed to demonstrate compliance with the allowable NO_x, CO and VOC emission rates:

Methods 7E or 20 of 40 CFR Part 60, Appendix A for NO_x, Method 19 of 40 CFR Part 60, Appendix A, and Methods 1 and 2 of 40 CFR Part 60, Appendix A, if applicable. Alternate U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Methods 10 or 10B, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" for CO. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.



Methods 1-4 and 25 or 25A, as set forth in the “Appendix on Test Methods: in 40 CFR, Part 60 “Standards of Performance for New Stationary Sources” for VOC. Alternative U.S. EPA approved methods may be used with prior approval from Ohio EPA, Southeast District Office.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility’s ability to meet the applicable emission limits and/or control requirements, unless otherwise specified or approved by Ohio EPA, Southeast District Office as required by 40 CFR 60.4243 and 60.4244. Although this generally consists of operating the emission units at their maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emission loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the results as a demonstration of compliance.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an “Intent to Test” notification to Ohio EPA, Southeast District Office. The ITT notification shall describe in detail the proposed test methods and procedures, the emission units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southeast District Office’s refusal to accept the results of the emission test(s).
 - f. Personnel from Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emission units and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emission test(s) shall be signed by the person(s) responsible for the test(s) and submitted to Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal for the written report, where warranted, with prior approval from Ohio EPA, Southeast District Office.
- (3) The permittee shall comply with the applicable testing requirements of 40 CFR Part 60, Subpart JJJJ, including the following:

60.4244	Testing Requirements
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- g) Miscellaneous Requirements
 - (1) None.

5. Emissions Unit Group -Storage Vessels: T001,T002,T003,T004,T005,

EU ID	Operations, Property and/or Equipment Description
T001	400 barrel (bbl) (16,800 gallon) liquid storage tank equipped with submerged filling mechanisms. Vapors from the storage tank battery are routed to a closed vent system that is equipped with a mechanical vapor recovery unit (VRU).
T002	400 barrel (bbl) (16,800 gallon) liquid storage tank equipped with submerged filling mechanisms. Vapors from the storage tank battery are routed to a closed vent system that is equipped with a mechanical vapor recovery unit (VRU).
T003	400 barrel (bbl) (16,800 gallon) liquid storage tank equipped with submerged filling mechanisms. Vapors from the storage tank battery are routed to a closed vent system that is equipped with a mechanical vapor recovery unit (VRU).
T004	400 barrel (bbl) (16,800 gallon) liquid storage tank equipped with submerged filling mechanisms. Vapors from the storage tank battery are routed to a closed vent system that is equipped with a mechanical vapor recovery unit (VRU).
T005	400 barrel (bbl) (16,800 gallon) liquid storage tank equipped with submerged filling mechanisms. Vapors from the storage tank battery are routed to a closed vent system that is equipped with a mechanical vapor recovery unit (VRU).

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

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

a. See d)(7)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	Install a vapor recovery unit (VRU) with a design control efficiency of 98% for volatile organic compounds (VOC) for overhead vapor venting from storage vessels.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	See b)(2)b.
c.	OAC rule 3745-21-09	See b)(2)c.
d.	40 CFR Part 60, Subpart OOOO	See b)(2)d.
e.	ORC rule 3704.03(F)	See d)(7)

(2) Additional Terms and Conditions

- a. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that Best Available Technology (BAT) is no longer required by state regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, paragraph (A)(3)(a)(ii) of OAC rule 3745-31-05 (the less than 10 tons per year BAT exemption) has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revisions to OAC rule 3745-31-05(A)(3)(a)(ii), the requirement to satisfy BAT for pollutant(s) less than 10 tons per year still exists as part of the federally-approved SIP.
- b. The following rule paragraph will apply when U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:
 - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the uncontrolled potential to emit for VOC is less than 10 tons/year.
 - c. Emission units T001, T002, T003, T004, and T005 are not subject to the requirements established pursuant to OAC rule 3745-21-09 as they do not meet the size requirements established under OAC rule 3745-21-09(L)(2)(a).
 - d. Emission units T001, T002, T003, T004, and T005 are not subject to the requirements established pursuant to 40 CFR Part 60, Subpart OOOO as the emissions from these storage vessels will be vented to a VRU and the facility shall maintain documentation demonstrating compliance with the cover and closed vent system requirements specified in 40 CFR 60.5411(b) – (c). In addition, tanks T001 – T005 do not exhibit VOC emission rates exceeding six (6.0 TPY) tons per year with the use of the VRU as specified in 40 CFR 60.5365(e).

c) Operational Restrictions

- (1) The collection and control system shall be operated at all times when gases, vapors, and fumes are vented from the storage vessels to the VRU.

- (2) In the event that a leak or defect is detected in the cover or closed vent system that is used to demonstrate compliance, the permittee shall make a first attempt at repair no later than 5 calendar days after the leak is detected. Repair shall be completed no later than 30 calendar days after the leak is detected in accordance with 40 CFR 60.5416(c)(4) and (5). A record of the leak detected and repairs must be maintained for a period of five years.
 - (3) Where the closed vent system (used to demonstrate compliance) contains one or more bypass devices that could be used to divert all or a portion of the gases, vapors, or fumes from entering the control device or a process, the requirements identified in 40 CFR 60.5416(c)(3) shall be met.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) Where using vapor recovery unit(s) (VRU) for compliance, the permittee shall maintain records that document the VRU system is operated in compliance with the cover and closed vent system requirements of 40 CFR 60.5411(b) and 40 CFR 60.5411(c).
 - (2) The following records shall be maintained for each storage vessel that has been determined to have potential VOC emissions less than 6 tons/year and not subject to the requirements of Part 60 Subpart OOOO:
 - a. records for the identification of each storage vessel and their location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of 5 decimals of a degree using the North American Datum of 1983; and
 - b. records of the VOC emissions determination for each storage vessel made under 40 CFR 60.5365(e), including identification of the simulation model(s) and calculation methodology used to calculate the VOC emission rate.
 - (3) The permittee shall properly install, operate and maintain the VRU in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).
 - (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, and/or operating manual(s) for the VRU. These documents shall be maintained at the facility and made available to Ohio EPA, Southeast District Office upon request.
 - (5) The permittee shall maintain the following information for maintenance and repairs performed on the VRU:
 - a. the date of the maintenance and/or repair;
 - b. a description of the maintenance and/or repairs performed; and
 - c. the name of the person(s) who performed the maintenance and/or repair.
 - (6) The permittee shall maintain records that document any periods of time when the VRU was not in service and the storage vessels were in operation, as well as a record of all times when the VRU was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These

records shall be maintained for a period of not less than five (5) years and shall be made available to Ohio EPA, Southeast District Office upon request.

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

e) Reporting Requirements

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

f) Testing Requirements

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

- a. Emission Limitation: Install a VRU with a design control efficiency of 98% for volatile organic compounds (VOC) for overhead vapor venting from storage vessels

Applicable Compliance Method: Compliance is based on the company supplied design estimate of the VRU and maintaining the VRU in accordance with the monitoring and recordkeeping requirements found in Section d) above.

g) Miscellaneous Requirements

- (1) None.