



S.E.D.

State of Ohio Environmental Protection Agency

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Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

05/13/99

CERTIFIED MAIL

06-84-02-0223
East Ohio Gas Company
Roger Walters
17045 Galehouse Road
Doylestown, OH 44230

RE: Final Chapter 3745-35 Permit To Operate

Dear Roger Walters:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Southeast District Office at (740) 385-8501.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Southeast District Office

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 05/13/99

Facility ID: 06-84-02-0223

Expiration Date: 05/13/04

FINAL ISSUE

This document constitutes issuance for:

East Ohio Gas Company
State Route 26
Marietta, OH 45750

of a permit to operate for:

P001 (Engine No. 7301)
Compress Natural Gas for Storage

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. 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.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

4. Records Retention Requirements

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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

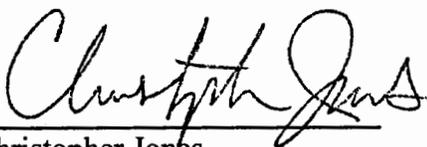
10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

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

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Southeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Christopher Jones
Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
500 Hp Natural Gas Compressor Engine - ID# 7301	OAC rule 3745-31-05 (A)(3) PTI # 06-5387	CO: 15.5 pounds/hr 54.25 tons/yr NOx: 11.04 pounds/hr 38.64 tons/yr VOC: 2.2 pound/hr 7.7 tons/yr PM: 0.39 pound/hr 1.38 tons/yr
	OAC rule 3745-17-11(B)(5)(b)	0.310 pound of particulate matter per million Btu of actual heat input
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

None

B. Operational Restrictions

- Operation of the 500 hp Natural Gas Compressor shall not exceed 7,000 hours per year as a 12-month rolling summation.

C. Monitoring and/or Record Keeping Requirements

- The permittee shall maintain monthly records of the hours of operation and the rolling 12-month summations of the hours of operation.

D. Reporting Requirements

- The permittee shall submit deviation (excursion) reports of any monthly record which shows that the hours of operation exceed 7,000 hours as a 12-month rolling summation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southeast District Office within 45 days after the end of the month during which the exceedance occurs.

E. Testing Requirements

- Emission Limitation:
PM
0.31 lb/MMBtu, 0.39 lb/hr, and 1.38 ton/yr

Applicable Compliance Method

Compliance with the particulate matter emission limit of 0.31 pound per million Btu of actual heat input is demonstrated by use of the AP-42, 5th Edition emission factor, table 3.2-4, for Heavy Duty Natural Gas Fired Pipeline Compressor Engines (0.029 lb of particulate matter/million Btu of actual heat input). Compliance with the particulate matter emission limits 0.39 pound per hour and 1.38 ton per year shall be determined by using the emission factor 0.029 lb of particulate matter/million Btu of actual heat X 1.27 million Btu heat input per hour = 0.039 pounds per hour X 7,000 hours of operation per year = 1.28 ton per year. Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03. No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

E. Testing Requirements (continued)

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

Applicable Compliance Method

Compliance with the visible emission limit shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

3. Emission Limitation:
CO
15.5 lb/hr, and 54.25 ton/yr

Applicable Compliance Method

Compliance shall be based upon the following calculation - $15.5 \text{ lb./hr.} \times 7,000 \text{ hr/yr} = 54.25 \text{ ton/yr}$ (emission factor of 15.5 lb./hr. supplied by engine manufacturer).

4. Emission Limitation:
NOx
11.04 lb/hr, and 38.64 ton/yr

Applicable Compliance Method

Compliance shall be based upon the following calculation - $11.04 \text{ lb./hr.} \times 7,000 \text{ hr/yr} = 38.64 \text{ ton/yr}$ (emission factor of 11.04 lb./hr. supplied by engine manufacturer)

5. Emission Limitation:
VOC
2.2 lb/hr, and 7.7 ton/yr

Applicable Compliance Method

Compliance shall be based upon the following calculation - $2.2 \text{ lb./hr.} \times 7,000 \text{ hr/yr} = 7.7 \text{ ton/yr}$ (emission factor of 2.2 lb./hr. supplied by engine manufacturer).

6. Operational Limitation:
Twelve-month rolling operating limit of 7,000 hours

Applicable Compliance Method

Compliance shall be based upon the record keeping and reporting requirements in sections C.1 and D.1.

F. Miscellaneous Requirements

None