



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

9/9/2016

Certified Mail

Reagan Mayces
Salineville Compressor Station
P.O. Box 1642
Houston, TX 77251-1642

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
Yes	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: 0215102003
Permit Number: P0119333
Permit Type: Initial Installation
County: Columbiana

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



Response to Comments
Salineville Compressor Station
Permit Number: P0119333
Facility ID: 0215102003

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, Northeast District Office at (330)963-1200 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

A handwritten signature in cursive script that reads "Michael E. Hopkins".

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

Cc: Ohio EPA-NEDO



Response to Comments

Facility ID:	0215102003
Facility Name:	Salineville Compressor Station
Facility Description:	Natural Gas Compressor Station
Facility Address:	Yellow Creek Road (Twsp. Highway 846) Salineville, OH 43945 Columbiana County
Permit:	P0119333, Permit-To-Install and Operate - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Morning Journal on 01/15/2016. The comment period ended on 02/14/2016.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Public Hearing Request (Jensen Silvis)

- a. Comment: I would like to request a public hearing for the proposed Hanoverton and Salineville compressor stations. I believe that the local residents deserve a face to face meeting where they can ask questions and express concerns. Please schedule a public hearing as soon as possible.
- b. Response: Ohio EPA has decided there was not enough public interest to warrant a public hearing for Hanoverton and Salineville compressor stations.

2. Topic: Public Hearing and Emissions (Sally and John Saliga)

- a. Comment: Why is this compressor station (Wadsworth) getting a public hearing when those near my home did not? There are two compressor stations in close proximity to my home. What are the health implications for those of us receiving a double dose of emissions? Is the CDC or any other agency collecting health data of people residing near compressor stations? How many compressor stations are planned for Ohio and what impact would their combined emissions have on the environment? Is there any technology that could "scrub" their emissions?
- b. Response: Each question contained in the comment is answered separately:

Why is this compressor station getting a public hearing when those near my home did not?

Ohio EPA has decided there was not enough public interest to warrant a public hearing for Hanoverton and Salineville compressor stations, while the Wadsworth and Waterville compressor stations did have significant public interest.

There are two compressor stations in close proximity to my home. What are the health implications for those of us receiving a double dose of emissions? Is the CDC or any other agency collecting health data of people residing near compressor stations?

The emissions are minor (non-Title V levels) as outlined in the Permit Strategy Write-Up (PSWU). The proposed facilities are roughly 12 miles apart and modeling for each facility found no exceedances for nitrogen oxides (NOx) and particulate matter with a diameter equal to or less than 2.5 microns (PM2.5) pertaining to Ohio Acceptable Increment Impact Modeling, NOx and PM2.5 were the only two pollutants that triggered Ohio modeling. The limits Ohio EPA uses to protect public health are over-protective and are designed to protect the very young and very old, those most susceptible. Because of this over protection, we would not expect any adverse cumulative health and welfare effects. Ohio EPA is not aware of any agency collecting health data of people in the surrounding areas.

How many compressor stations are planned for Ohio and what impact would their combined emissions have on the environment?

There are currently dozens of compressor stations throughout eastern Ohio. Ohio EPA does not know how many are planned for the future. For this project, there will be a total of five stations throughout Ohio (Hanoverton, Salineville, Wadsworth, Clyde and Waterville) and two in Columbiana County (Hanoverton and Salineville).

Is there any technology that could “scrub” their emissions?

All of the combustion turbines will be equipped with oxidation catalysts that will control carbon monoxide, volatile organic compounds and hazardous air pollutants.

3. Topic: Total Number of Compressor Stations for the Project (Jensen Silvis)

- a. Comment: I am writing with a quick question about the Hanoverton and Salineville proposed compressor stations. In my review of the initial plan report (link attached below), Spectra stated they would only have 4 stations and the one in Columbiana County would be 52,000 horsepower as opposed to 26,000. I would like to know if, in lieu of one 52,000 horsepower station, the proposal was changed to having two smaller stations (bringing the total to 5 instead of 4 in Ohio)? Any help with this is appreciated. Thank you.

http://www.spectraenergy.com/content/documents/Projects/NEW_NEXUS_RR1_Pre-filing_01-23-15_FINAL.pdf

- b. Response: The document Spectra Energy submitted to the Federal Energy Regulatory Commission's (FERC) was a draft report and provided an introduction of the project in its early stages of development. There will be a total of five stations throughout Ohio (Hanoverton, Salineville, Wadsworth, Clyde and Waterville) and two in Columbiana County (Hanoverton and Salineville). Hanoverton compressor station will have a total of 59,034 hp (each 29,517 hp) for the two combustion turbines on site. Salineville compressor station will have a total of 21,604 hp (each 10,802 hp) for the two combustion turbines on site.



FINAL

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

Facility ID:	0215102003
Permit Number:	P0119333
Permit Type:	Initial Installation
Issued:	9/9/2016
Effective:	9/9/2016
Expiration:	9/9/2026



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

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Final Permit-to-Install and Operate
Salineville Compressor Station
Permit Number: P0119333
Facility ID: 0215102003
Effective Date: 9/9/2016

Authorization

Facility ID: 0215102003
Application Number(s): A0053969, A0054910
Permit Number: P0119333
Permit Description: Initial installation PTIO for a natural gas compressor station.
Permit Type: Initial Installation
Permit Fee: \$2,850.00
Issue Date: 9/9/2016
Effective Date: 9/9/2016
Expiration Date: 9/9/2026
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Salineville Compressor Station
Yellow Creek Road (Twsp. Highway 846)
Salineville, OH 43945

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

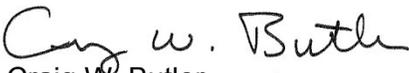
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

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: P0119333

Permit Description: Initial installation PTIO for a natural gas compressor station.

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

Emissions Unit ID: J001
 Company Equipment ID: Loading Operation
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P004
 Company Equipment ID: Gas Releases
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P009
 Company Equipment ID: Separator Vessel #5
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P010
 Company Equipment ID: Separator Vessel #6
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P011
 Company Equipment ID: Pigging Activities
 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: Combustion Turbines

Emissions Unit ID:	P001
Company Equipment ID:	Combustion Turbine #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Combustion Turbine #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Separator Vessel Group #1

Emissions Unit ID:	P005
Company Equipment ID:	Separator Vessel #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Salineville Compressor Station
Permit Number: P0119333
Facility ID: 0215102003
Effective Date: 9/9/2016

Emissions Unit ID:	P006
Company Equipment ID:	Separator Vessel #2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: Separator Vessel Group #2

Emissions Unit ID:	P007
Company Equipment ID:	Separator Vessel #3
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	Separator Vessel #4
Superseded Permit Number:	
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
Salineville Compressor Station
Permit Number: P0119333
Facility ID: 0215102003
Effective Date: 9/9/2016

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
Salineville Compressor Station
Permit Number: P0119333
Facility ID: 0215102003
Effective Date: 9/9/2016

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) B.4.
 - 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.
2. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subpart KKKK, Standards of Performance for Stationary Combustion Turbines: P001 and P002. The complete New Source Performance Standards (NSPS) requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the Ohio EPA Northeast District Office.
3. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subpart OOOOa, Standards of Performance for Crude Oil and Natural Gas Facilities: P801. The complete New Source Performance Standards (NSPS) requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the Ohio EPA Northeast District Office.
4. Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the 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 for those emissions units subject to this rule. 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.
5. Air contaminant sources that qualify as de minimis under OAC rule 3745-15-05, or are exempt under OAC rules 3745-31-03(B)(1) or 3745-31-03 (C) are not subject to emission standards established within this permit. Although this permit does not apply to de minimis or exempt sources, emissions from de minimis or exempt sources must be included in the total potential to emit (PTE) calculations for this permit.



Final Permit-to-Install and Operate
Salineville Compressor Station
Permit Number: P0119333
Facility ID: 0215102003
Effective Date: 9/9/2016

C. Emissions Unit Terms and Conditions

1. J001, Loading Operation

Operations, Property and/or Equipment Description:

Condensate and oily water/used oil truck loading.

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. None.

(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) June 30, 2008	Fugitive volatile organic compound (VOC) emissions shall not exceed 0.001 ton per month averaged over a 12-month rolling period. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year. See b)(2)b. below.

- (2) Additional Terms and Conditions
 - a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
 - b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c) Operational Restrictions
 - (1) Tank Truck Unloading Operations
 - a. Prior to connecting the condensate transfer line(s) from the condensate tank to the condensate tank truck, the permittee shall inspect all fittings, valves, gaskets and fasteners that will be used during the transfer to ensure they are in proper condition (i.e., not corroded, torn, worn, stripped or otherwise damaged) and will result in vapor tight connections.
 - b. During the loading of condensate from the condensate to the condensate tank truck, the permittee shall continually monitor the transfer equipment, the condensate tank and the tank truck for any leaks through visual, olfactory, or other observations. If any leak is detected, loading of the condensate shall cease until the leaking component has been repaired.
 - c. The permittee shall not permit condensate and used oil to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
 - (2) All condensate loading lines shall be equipped with fittings which are vapor tight.
 - (3) The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- 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 the Appropriate District Office or Local Air Agency.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER 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:

Fugitive VOC emissions shall not exceed 0.001 ton per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

The permittee has demonstrated compliance with this emissions limitation with the calculations submitted as part of the permit application associated with this permit (#A0053969, dated 7/31/2015). The emissions limitation was derived by multiplying the loading loss factor for each material loaded by the annual throughput of each material loaded to determine the annual emissions of each material loaded in pounds per year. Divide the sum of the annual emissions from all liquids loaded by 2,000 pounds per ton, and divide by 12 months per year to determine the monthly emissions averaged over a twelve-month rolling period. The loading loss factors were derived using AP-42, Section 5.2, "Transportation and Marketing of Petroleum Liquids", Equation 1 (6/08).

$$LL = 12.46 \text{ SPM/T}$$

Where:

LL = loading loss, pounds per 1000 gallons loaded;

S = saturation factor, 0.6 for submerged fill and 1.45 for splash;

P = vapor pressure of liquid loaded, in psia;

M = molecular weight of vapor, in lb/mole; and

T = temperature of bulk liquid, in °R.

g) Miscellaneous Requirements

- (1) None.

2. P004, Gas Releases

Operations, Property and/or Equipment Description:

Gas releases due to periodic maintenance, compressor blowdowns, routine operations (startup and shutdown and reduced pressure demand events) and other miscellaneous releases.

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. None.

(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.	ORC 3704.03(T)	Fugitive volatile organic compound (VOC) emissions shall not exceed 2.05 tons per month averaged over a 12-month rolling period.

(2) Additional Terms and Conditions

None.

c) Operational Restrictions

(1) The permittee shall minimize the frequency and size of gas releases by conducting routine operation and maintenance activities in a manner consistent with safety and good air pollution control practices.

(2) The permittee shall implement the following operational best management work practices where feasible for purposes of minimizing emissions from each gas release:

- a. Annual emergency shutdown (ESD) system tests required by existing DOT regulations shall be conducted to the extent practical as “capped” tests (i.e. with a minimal discharge of natural gas to the atmosphere.);
 - b. Manage station equipment during periods of system maintenance to minimize the quantity of natural gas vented to the extent practical;
 - c. Develop and follow a standby pressurized hold plan for gas compressor shutdowns in order to minimize standby gas releases and maintain safe operation; and
 - d. Schedule multiple maintenance activities concurrently to the extent possible to minimize blowdowns.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall record the following information for each year:
 - a. the number of gas releases;
 - b. concentration of total VOC in the gas stream using the most recent representative analysis;
 - c. the volume of gas emitted from all gas releases for each month, in scf;
 - d. the gas density, using the most recent representative analysis;
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the volume of gas emitted from all gas releases, in scf; and
 - f. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of VOC emissions, in tons, and the monthly VOC emissions, in tons, averaged over each rolling, 12-month period.
- 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 the Appropriate District Office or Local Air Agency.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER 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:



Final Permit-to-Install and Operate
Salineville Compressor Station
Permit Number: P0119333
Facility ID: 0215102003
Effective Date: 9/9/2016

a. Emission Limitation:

VOC emissions shall not exceed 2.05 tons per month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the monthly VOC emissions limitation above shall be based on the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.

3. P801, Equipment Leaks

Operations, Property and/or Equipment Description:

Fugitive emissions from components

- 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. None.
 - (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.	ORC 3704.03(T)	Fugitive volatile organic compound (VOC) emissions shall not exceed 0.876 ton per month averaged over a 12-month rolling period.
b.	40 CFR Part 60, Subpart OOOOa (40 CFR 60.5360a – 60.5432a) [In accordance with 40 CFR 60.5365a this emissions unit is the collection of fugitive emissions components at a compressor station constructed after September 18, 2015 and subject to the applicable provisions of this subpart.]	See b)(2)a. below.
c.	40 CFR Part 60, Subpart A (40 CFR Part 60.1 – 60.19)	General Provisions See b(2)a. below.



(2) Additional Terms and Conditions

- a. The permittee shall comply with the following requirements identified in 40 CFR Part 60, Subpart OOOOa:

60.5365a(j)	Affected facility and modifications to a compressor station.
60.5370a(a)	Subpart OOOOa of Part 60 compliance date is no later than August 2, 2016 or upon startup, whichever is later. In accordance with 40 CFR 60.5397a(f)(2), the permittee must conduct the initial monitoring survey within 60 days of startup or by June 3, 2017, whichever is later.
60.5370a(c)	Permit exempt from 40 CFR Parts 70 and 71.
60.5397a(a) through (j)	Fugitive emissions GHG and VOC standards.
60.5398a(a) through (g)	Alternative means of emission limitations for GHG and VOC.
60.5425a	Applicable General Provisions in Table 3 to Subpart OOOOa of Part 60.

c) Operational Restrictions

- (1) The permittee shall comply with the following requirements identified in 40 CFR Part 60, Subpart OOOOa:

60.5370a(b)	General duty to minimize emissions with good air pollution control practices, and compliance required at all times.
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d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the following requirements identified in 40 CFR Part 60, Subpart OOOOa:

60.5410a(j)	Initial compliance demonstration.
60.5415a(h)	Continuous compliance demonstration.
60.5420a(c) and (c)(15)	Recordkeeping requirements.

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 the appropriate Ohio EPA District Office or Local Air Agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.



- (3) The permittee shall comply with the following requirements identified in 40 CFR Part 60, Subpart OOOOa:

60.5420a(a)(1)	Notifications in 60.7(a)(1), (3) and (4) are not required.
60.5420a(b), (b)(1), (b)(7) and (b)(11)	Annual reporting requirements.

f) Testing Requirements

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

- a. Emissions Limitation:

Fugitive VOC emissions shall not exceed 0.876 ton per month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation identified above shall be demonstrated by multiplying the number of each component type in gas, light oil and heavy oil service by the applicable total organic compound (TOC) emission factor from U.S. EPA's "Protocol for Equipment Leak Emission Estimates", Table 2-4, for Oil and Gas Production Operations (EPA-453/R-95-017, November 1995). The resulting TOC hourly mass emission rate for each component type is multiplied by the VOC concentration of the applicable service stream as provided in the permittee's application, then added together for a facility-wide component emission total and multiplied by the maximum annual hours of operation (8,760 hrs/year) and conversion factors of 2.205 lb/1 kg, 1 ton/2,000 lbs and 1 yr/12 months.

*Table 2-4 does not contain an emission factor for pump seals in heavy oil service. U.S. EPA's "Protocol for Equipment Leak Emission Estimates", Table 2-1, for Synthetic Organic Chemical Manufacturing Industry (SOCMI) (EPA-453/R-95-017, November 1995) shall be applied for pump seals in heavy liquid service.

g) Miscellaneous Requirements

- (1) None.

4. Emissions Unit Group - Combustion Turbines: P001 & P002

EU ID	Operations, Property and/or Equipment Description
P001	10,802 HP (78.45 MMBtu/hr) natural gas-fired Solar Turbines Taurus-070-10802S3 Compressor Turbine equipped with SoLoNOx technology and an oxidation catalyst.
P002	10,802 HP (78.45 MMBtu/hr) natural gas-fired Solar Turbines Taurus-070-10802S3 Compressor Turbine equipped with SoLoNOx technology and 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. None.

(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) June 30, 2008	<p><u>Emissions from each emissions unit:</u></p> <p>Particulate matter 10 microns or less in size (PM₁₀) shall not exceed 0.21 ton/month averaged over a 12-month rolling period.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 0.11 ton/month averaged over a 12-month rolling period.</p> <p>The hourly volatile organic compound (VOC) BAT emission limitation established pursuant to this rule is equivalent to the hourly VOC emission limitation established pursuant to OAC rule 3745-31-05(E).</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The VOC emissions shall not exceed 1.53 tpy. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM ₁₀ , SO ₂ and VOC emissions from these air contaminant sources since the potential to emit is less than 10 tons/year. See b)(2)b. below.
c.	ORC 3704.03(T)	NO _x emissions shall not exceed 1.73 tons per month averaged over a twelve month rolling period. The hourly carbon monoxide (CO) BAT emission limitation established pursuant to this rule is equivalent to the hourly CO limitation established pursuant to OAC rule 3745-31-05(E). The annual CO emissions shall not exceed 13.34 tpy.
d.	OAC rule 3745-31-05(E) June 30, 2008	CO emissions shall not exceed 0.25 lb/hr during normal operations and 1.11 tons per month averaged over a 12-month rolling period. VOC emissions shall not exceed 0.32 lb/hr during normal operations and 0.13 ton per month averaged over a 12-month rolling period. See b)(2)c.
e.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stacks serving these emissions units shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
f.	OAC rule 3745-17-11(B)(4)	PE shall not exceed 0.040 pound per million Btu of actual heat input.
g.	OAC rule 3745-18-06(F)	This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).
h.	OAC rule 3745-110-03(E)	This emission limitation is less stringent than the limitation listed pursuant to 40 CFR 60, Subpart KKKK.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
i.	<p>40 CFR Part 60, Subpart KKKK (40 CFR Part 60.4300 – 60.4420)</p> <p>[In accordance with 40 CFR 60.4305(a), this emissions unit has a stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the higher heating value of the fuel.]</p>	<p>NO_x emissions shall not exceed 25 ppm at 15% O₂ or 150 ng/J of useful output (1.2 lb/MWh) when operating at least 75% of peak load.</p> <p>NO_x emissions shall not exceed 96 ppm at 15% O₂ or 590 ng/J of useful output (4.7 lb/MWh) when operating at less than 75% of peak load or when operating at temperatures less than 0 degrees Fahrenheit (°F).</p> <p>SO₂ emissions shall not exceed 110 nanograms per Joule (0.90 pounds per mega-Watt hour) or 26 ng SO₂/J (0.060 lb SO₂/mmBtu).</p> <p>[Table 1 to 40 CFR Part 60 Subpart KKKK and 60.4330(a)(1) and (a)(2)]</p> <p>See b)(2)d. below.</p>
j.	<p>40 CFR Part 60, Subpart GG (40 CFR Part 60.330 – 60.335)</p> <p>[In accordance with 40 CFR 60.330 (a), this emissions unit has a stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the higher heating value of the fuel.]</p>	<p>Stationary combustion turbines regulated pursuant to 40 CFR Part 60, Subpart KKKK are exempt from the requirements of 40 CFR Part 60, Subpart GG.</p>
k.	<p>40 CFR Part 60, Subpart OOOOa (40 CFR 60.5360a-60.5432a)</p>	<p>The compressor associated with this emissions unit does not employ wet seals and; therefore, is exempt from the requirements of 40 CFR Part 60, Subpart OOOOa.</p>
l.	<p>40 CFR Part 60, Subpart A (40 CFR Part 60.1 – 60.19)</p> <p>[General Provisions]</p>	<p>General Provisions.</p> <p>See b)(2)d. below.</p>

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP. It should be noted that the emission limitations established pursuant to OAC rule 3745-31-05(E) will remain applicable after the above SIP revisions are approved by U.S. EPA.
- c. The permit to Install and Operate for these air contaminant sources takes into account the following voluntary emission limitations associated with the use of an oxidation catalyst to minimize emissions, [see c)(3)], as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3).
 - i. CO emissions shall not exceed 0.25 lbs/hr (at temperatures above 0°F during normal operations) and 1.11 tons per month averaged over a twelve month rolling period.
 - ii. VOC emissions shall not exceed 0.32 lb/hr (at temperatures above 0°F during normal operations) and 0.13 ton per month averaged over a twelve month rolling period.
 - iii. “Normal operations” includes all periods of operation, except for startup, shutdown, and operation at temperatures below 0 °F.
- d. The permittee shall demonstrate compliance with the applicable provisions of 40 CFR Part 60, Subpart KKKK in accordance with 40 CFR Part 60, Subpart A. Proposed amendments to 40 CFR Part 60, Subpart KKKK were published in the Federal Register on August 29, 2012. If final amendments to 40 CFR Part 60, Subpart KKKK become effective during the term of this PTIO, then the permittee shall comply with the effective version of 40 CFR Part 60, Subpart KKKK on the date that the new requirements go into effect, rather than the 40 CFR Part 60 Subpart KKKK requirements specified in this PTIO.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.
- (2) The permittee shall comply with the applicable restrictions of 40 CFR Part 60, Subpart KKKK, including the following sections:

60.4333(a)	Utilize good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction
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- (3) The permittee shall install and operate the turbine with an oxidation catalyst for the partial control of VOC and CO emissions whenever this emissions unit is in operation excluding startup and shutdown and shall maintain the turbine in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the total hours of operation, including a breakdown of the following different temperature operating scenarios;
 - i. Ambient temperatures greater than 0°F;
 - ii. Ambient temperatures less than or equal to 0°F but greater than -20°F, and
 - iii. Ambient temperatures less than or equal to -20°.
 - b. the number of startups and shutdowns;
 - c. the monthly emissions of CO, VOC and NO_x, in tons per month;
 - d. the annual emissions of CO and VOC, in tons per year; and
 - e. beginning after the first 12 months of operation, the emissions of CO, VOC and NO_x, in tons per month averaged over a 12-month rolling period.
- (3) The permittee shall comply with the applicable restrictions of 40 CFR Part 60, Subpart KKKK, including the following sections:

60.4340	Option to conduct performance testing for NO _x in lieu of installing a continuous emissions monitor.
60.4360	Exemption from determining the total sulfur content of the fuel being fired in the turbine as provided in §60.4365
60.4365(a)	Maintain current, valid purchase contract, tariff sheet or transportation contract that specifies the maximum total sulfur content for natural gas in continental areas is 20 grains of sulfur or less per 100 standard cubic feet

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 the Appropriate District Office or Local Air Agency.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall comply with the applicable restrictions of 40 CFR Part 60, Subpart KKKK, including the following sections:

60.4375(a)	Excess emissions reporting
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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. Emissions Limitation:

PM₁₀ from each emissions unit shall not exceed 0.21 ton per month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

Compliance shall be determined by using the following equation:

$$\frac{0.5753 \text{ lb}}{\text{hr}} * \frac{8,760 \text{ hr}}{\text{yr}} * \frac{\text{ton}}{2,000} * \frac{\text{yr}}{12 \text{ m rolling}} = 0.21 \frac{\text{ton}}{\text{m rolling 12}}$$

Where:

0.5753 lb/hr = PM emission factor for combined operations (i.e., normal, startup, shutdown, and low temperatures) derived from AP-42, Section 3.1, Table 3.1-2a, revised 4/2000.

If required, compliance shall be demonstrated based upon emission tests performed in accordance with Methods 1 through 4 of 40 CFR Part 60, Appendix A, and Methods 201 and 202 of 40 CFR Part 51, Appendix M to determine a site-specific emission factor

b. Emissions Limitation:

SO₂ from each emissions unit emissions shall not exceed 0.11 ton per month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

Compliance shall be determined by using the following equation:

$$\frac{0.2964 \text{ lb}}{\text{hr}} * \frac{8,760 \text{ hr}}{\text{yr}} * \frac{\text{ton}}{2,000} * \frac{\text{yr}}{12 \text{ m rolling}} = 0.11 \frac{\text{ton}}{\text{m rolling 12}}$$

Where:

0.2964 lb/hr = SO₂ emission factor for combined operations (i.e., normal, startup, shutdown, and low temperatures) derived from AP-42, Section 3.1, Table 3.1-2a, revised 4/2000.

If required, compliance shall be demonstrated based upon emission tests performed in accordance with, Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A to determine a site-specific emission factor.

c. Emission Limitation:

CO emissions from each emissions unit shall not exceed 13.34 tpy, 0.25 lb/hr during normal operations and 1.11 ton per month averaged over a 12-month rolling period

Applicable Compliance Method:

Compliance with the hourly limitation above shall be based upon the emissions testing requirements specified in f)(2). Compliance with the annual and average monthly emission limitations shall be based on the record keeping requirements specified in d)(2).

If required, subsequent testing to demonstrate compliance with the hourly CO emission limitation shall be conducted in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

VOC emissions from each emissions unit shall not exceed 1.53 tpy, 0.32 lb/hr during normal operations and 0.13 ton per month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the hourly limitation shall be based upon the emissions testing requirements specified in f)(2). Compliance with annual and average monthly emission limitation shall be based on the record keeping requirements specified in d)(2).

If required, subsequent testing to demonstrate compliance with the hourly VOC emission limitation shall be conducted in accordance with Methods 1-4 and 18, 25, or 25a, as appropriate, of 40 CFR Part 60, Appendix A.

e. Emission Limitation:

NO_x emissions shall not exceed 1.73 tons per month averaged over a twelve month rolling period.

Applicable Compliance Method:

Compliance with the average monthly emission limitation shall be based on the record keeping requirements specified in d)(2).

f. Opacity Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be determined in accordance with OAC rule 3745-17-03(B)(1).

g. Emission Limitation:

PE shall not exceed 0.040 pound per MMBTU of actual heat input.

Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated based on the particulate emissions factor of 0.0066 lb/MMBtu for natural gas-fired turbines (AP-42, Section 3.1, Table 3.1-2a, revised 4/2000).

If required, compliance with the above emission limitation shall be determined in accordance with the methods and procedures as outlined in Methods 1 through 5 of 40 CFR Part 60, Appendix A.

h. Emission Limitations:

NO_x emissions shall not exceed 25 ppm at 15% O₂ or 150 ng/J of useful output (1.2 lb/MWh) when operating at least 75% of peak load.

NO_x emissions shall not exceed 96 ppm at 15% O₂ or 590 ng/J of useful output (4.7 lb/MWh) when operating at less than 75% of peak load or when operating at temperatures less than 0 °F.

Applicable Compliance Method:

Compliance shall be based upon the results of emissions testing as required in f)(2).

i. Emission Limitation:

SO₂ emissions shall not exceed 110 nanograms per Joule (0.90 pounds per mega-Watt hour) or 26 ng SO₂/J (0.060 lb SO₂/mmBtu)

Applicable Compliance Method:

Compliance shall be demonstrated by record keeping required in d)(3).

- (2) Pursuant to 40 CFR 60.8, 60.4340(a), 60.4375(b) and 60.4400, OAC rules 3745-31-05(A)(3) and ORC 3704.03(T), the permittee shall conduct, or have conducted, emission testing for each emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which this emissions unit will be operated, but not later than 180 days after initial startup of this unit. Any subsequent performance tests for NO_x shall be conducted in accordance with the frequencies specified in 40 CFR Part 60, Subpart KKKK and Ohio EPA Engineering Guide #16.
 - b. The initial emissions testing shall be conducted to demonstrate compliance with the NO_x, CO, and VOC emissions limitations identified in b)(1)d. and b)(1)i. Subsequent testing shall be conducted to measure NO_x and to demonstrate compliance with 40 CFR 60, Subpart KKKK.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable limits:

CO: Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A.

VOC: Methods 1 through 4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A.

NO_x: Methodology specified in 40 CFR Part 60 Subpart KKKK, and Appendix A.
 - 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 emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency, or as required by 40 CFR 60.4400(b). Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test 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 the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
 - f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire



data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

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

60.4375(b)	Written report submittal of the performance testing results
60.4400(a)	Initial and subsequent performance tests for NO _x
60.4400(b)	Performance test loading conditions, number of test runs and minimum duration of test runs.
60.4400(b)(4)	Emission limit compliance requirements
60.4400(b)(6)	Performance test minimum ambient temperature requirement
60.4415	Initial and subsequent performance tests for SO ₂ (These requirements will not apply if the permittee qualifies for the 40 CFR 60.4365 exemption).

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group - Separator Vessel Group #1: P005 & P006

EU ID	Operations, Property and/or Equipment Description
P005	750-gallon separator vessel
P006	750-gallon separator vessel

- 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. None.
- (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) June 30, 2008	Volatile organic compound (VOC) emissions from each emissions unit shall not exceed 0.03 ton/month averaged over a 12-month rolling period. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the potential to emit is less than 10 tons/year. See b)(2)b. below.
c.	40 CFR Part 60, Subpart Kb	See b)(2)c. below.
d.	OAC Rule 3745-21-09(L)(1)	This emissions unit is exempt from the requirements of OAC rule 3745-21-09(L)pursuant to OAC rule 3745-21-09(L)(2)(b).

- (2) Additional Terms and Conditions
- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
 - b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
 - c. This emissions unit is exempt from the control requirements of 40 CFR 60, Subpart Kb because it is a vessel with a design capacity less than or equal to 75 m³ used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) None.
- 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 the Appropriate District Office or Local Air Agency.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER 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:

VOC emissions from each emissions unit shall not exceed 0.03 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined using a current version of the U.S. EPA's TANKS software program for storage tank working/breathing losses; data from the application, the TANKS software



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program, or other process simulation programs such as, but not limited to, TankESP or other proprietary tanks tools, to calculate flash losses.

- g) Miscellaneous Requirements
 - (1) None.

6. Emissions Unit Group - Separator Vessel Group #2: P007 & P008

EU ID	Operations, Property and/or Equipment Description
P007	168-gallon separator vessel
P008	168-gallon separator vessel

- 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. None.
- (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) June 30, 2008	Volatile organic compound (VOC) emissions from each emissions unit shall not exceed 0.006 ton/month averaged over a 12-month rolling period. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the potential to emit is less than 10 tons/year. See b)(2)b. below.
c.	40 CFR Part 60, Subpart Kb	See b)(2)c. below.
d.	OAC Rule 3745-21-09(L)(1)	This emissions unit is exempt from the requirements of OAC rule 3745-21-09(L)pursuant to OAC rule 3745-21-09(L)(2)(b).

- (2) Additional Terms and Conditions
- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
 - b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
 - c. This emissions unit is exempt from the control requirements of 40 CFR 60, Subpart Kb because it is a vessel with a design capacity less than or equal to 75 m³ used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) None.
- 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 the Appropriate District Office or Local Air Agency.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER 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:

VOC emissions from each emissions unit shall not exceed 0.006 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined using a current version of the U.S. EPA's TANKS software program for storage tank working/breathing losses; data from the application, the TANKS software



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program, or other process simulation programs such as, but not limited to, TankESP or other proprietary tanks tools, to calculate flash losses.

- g) Miscellaneous Requirements
 - (1) None.

7. P009, Separator Vessel #5

Operations, Property and/or Equipment Description:

587-gallon separator vessel

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. None.

(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) June 30, 2008	<p>Volatile organic compound (VOC) emissions shall not exceed 0.06 ton/month averaged over a 12-month rolling period.</p> <p>See b)(2)a. below.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	<p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the potential to emit is less than 10 tons/year.</p> <p>See b)(2)b. below.</p>
c.	40 CFR Part 60, Subpart Kb	See b)(2)c. below.
d.	OAC Rule 3745-21-09(L)(1)	This emissions unit is exempt from the requirements of OAC rule 3745-21-09(L) pursuant to OAC rule 3745-21-09(L)(2)(b).

- (2) Additional Terms and Conditions
- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
 - b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
 - c. This emissions unit is exempt from the control requirements of 40 CFR 60, Subpart Kb because it is a vessel with a design capacity less than or equal to 75 m³ used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) None.
- 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 the Appropriate District Office or Local Air Agency.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER 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:

VOC emissions from each emissions unit shall not exceed 0.06 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined using a current version of the U.S. EPA's TANKS software program for storage tank working/breathing losses; data from the application, the TANKS software



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program, or other process simulation programs such as, but not limited to, TankESP or other proprietary tanks tools, to calculate flash losses.

- g) Miscellaneous Requirements
 - (1) None.

8. P010, Separator Vessel #6

Operations, Property and/or Equipment Description:

587-gallon separator vessel

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. None.

(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) June 30, 2008	<p>Volatile organic compound (VOC) emissions shall not exceed 0.01 ton/month averaged over a 12-month rolling period.</p> <p>See b)(2)a. below.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	<p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the potential to emit is less than 10 tons/year.</p> <p>See b)(2)b. below.</p>
c.	40 CFR Part 60, Subpart Kb	See b)(2)c. below.
d.	OAC Rule 3745-21-09(L)(1)	This emissions unit is exempt from the requirements of OAC rule 3745-21-09(L) pursuant to OAC rule 3745-21-09(L)(2)(b).

- (2) Additional Terms and Conditions
- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
 - b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
 - c. This emissions unit is exempt from the control requirements of 40 CFR 60, Subpart Kb because it is a vessel with a design capacity less than or equal to 75 m³ used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) None.
- 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 the Appropriate District Office or Local Air Agency.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER 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:
VOC emissions from each emissions unit shall not exceed 0.01 ton/month averaged over a 12-month rolling period.
 - Applicable Compliance Method:
Compliance with the above emission limitations shall be determined using a current version of the U.S. EPA's TANKS software program for storage tank working/breathing losses; data from the application, the TANKS software



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program, or other process simulation programs such as, but not limited to, TankESP or other proprietary tanks tools, to calculate flash losses.

- g) Miscellaneous Requirements
 - (1) None.

9. P011, Pipeline Pigging

Operations, Property and/or Equipment Description:

Pigging operations

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. None.

(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) June 30, 2008	Fugitive volatile organic compounds (VOC) emissions shall not exceed 0.018 ton per month averaged over a 12-month, rolling period. See b)(2)a. below.
b.	OAC Rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A) do not apply to the VOC emissions from this source since the potential to emit is less than 10 tons/year. See b)(2)b. below.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the

less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

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

c) Operational Restrictions

- (1) The permittee shall minimize the emissions of VOC from the pigging activities to the extent practicable.
- (2) Access openings to the receivers shall be kept closed at all times, except when a pig is being placed into or removed from the receiver, or during active maintenance operations.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following records on a monthly basis:
 - a. the date and number of each pigging event;
 - b. the concentration of total VOC in the gas stream using the most recent representative analysis;
 - c. the gas density, in lb/scf, using the most recent representative analysis;
 - d. the total volume of gas emitted from each pigging event, in scf;
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, the total volume of gas emitted per month, from all pigging events, in scf, as a 12-month rolling average; and
 - f. beginning after the first 12 calendar months of operation following the issuance of this permit, the monthly VOC emissions, in tons, averaged over each 12-month rolling period, from all pigging events.

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 the appropriate district office or local air agency.
- (2) The permittee shall submit an annual PER to the Ohio EPA District Office or Local Air Agency 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:

VOC emissions shall not exceed 0.018 ton per month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the monthly VOC emissions limitation above shall be based on the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.